# MID DEVON DISTRICT COUNCIL

**A MEETING** of the **MID DEVON DISTRICT COUNCIL** will be held in remotely on Wednesday, 26 August 2020 at 6.00 pm

**ALL MEMBERS** of the **COUNCIL** are summoned to attend for the purposes of transacting the business specified in the Agenda which is set out below:

**[The next meeting is scheduled to be held on Wednesday, 28 October 2020 at 6.00 pm]**

**STEPHEN WALFORD**
Chief Executive

18 August 2020

## Important - this meeting will be conducted and recorded by Zoom only. Please do not attend Phoenix House. The attached Protocol for Remote Meetings explains how this will work.

## To join this meeting, please click the following link:

https://zoom.us/j/91606187222?pwd=NjBwOHV0NE42aHBaWWR0YVBFd09yUT09

Meeting ID: 916 0618 7222
Passcode: 351560
One tap mobile
08002605801,,91606187222#,,,,,,0#,,351560# United Kingdom Toll-free
08003582817,,91606187222#,,,,,,0#,,351560# United Kingdom Toll-free

Dial by your location
0 800 260 5801 United Kingdom Toll-free
0 800 358 2817 United Kingdom Toll-free
0 800 031 5717 United Kingdom Toll-free Meeting ID: 916 0618 7222
Passcode: 351560
Find your local number: https://zoom.us/u/a0LgPN35R

Join by Skype for Business
https://zoom.us/skype/91606187222

**Members are reminded of the need to make declarations of interest prior to any discussion which may take place**

# AGENDA

1 **Apologies**
To receive any apologies for absence.

2 **Protocol for Remote Meetings** *(Pages 5 - 10)*
To note the protocol for remote meetings.

3 **Long Service Award - Emma Kingston**
To acknowledge that Emma Kingstone (Swimming Teacher) has achieved 25 years service to the District Council

4 **Long Service Award - Bev Saull-Hunt**
To acknowledge that Bev Saull-Hunt (Revenues and Benefits Team Leader)) has achieved 25 years service to the District Council

5 **Public Question Time**
To receive any questions relating to items on the agenda from members of the public and replies thereto.

6 **Declarations of Interest under the Code of Conduct**
Councillors are reminded of the requirement to declare any interest, including the type of interest, and the reason for that interest, either at this stage of the meeting or as soon as they become aware of that interest.

7 **Minutes** *(Pages 11 - 28)*
Members to consider whether to approve the minutes as a correct record of the meeting held on 1 July 2020.

Members to consider whether to approve the minutes as a correct record of the extraordinary meeting held on 29 July 2020.

The Council is reminded that only those Members present at the previous meeting should vote and, in doing so, should be influenced only by seeking to ensure that the minutes are an accurate record.

8 **Chairman's Announcements**
To receive any announcements which the Chairman of the Council may wish to make.

9 **Petitions**
To receive any petitions from members of the public.

10 **Notices of Motions**
There have been no Motions to Council received.

11 **Reports** *(Pages 29 - 1582)*
To receive and consider the reports, minutes and recommendations of the recent meetings as follows:

(1) Cabinet

- 9 July 2020
- 6 August 2020

2) Scrutiny Committee

- 20 July 2020
- 17 August 2020 (to follow)

(3) Audit Committee

- 11 August 2020

(4) Environment Policy Development Group

- 14 July 2020

(5) Homes Policy Development Group

- 21 July 2020

(6) Economy Policy Development Group

- 16 July 2020

(7) Community Policy Development Group

- 28 July 2020

(8) Planning Committee

- 15 July 2020
- 12 August 2020

12 **Questions in accordance with Procedure Rule 13**
To deal with any questions raised pursuant to Procedure Rule 13 not already dealt with during the relevant Committee reports.

13 **Special Urgency Decisions**
Decisions taken under Rule 16 (of the Constitution) Special Urgency – since the previous meeting.

There have been no such decisions in this period.

14 **Questions to Cabinet Members**
Cabinet Members will answer questions from Members on their Portfolios.

15 **Members Business**
To receive any statements made and notice of future questions by Members.

Note: the time allowed for this item is limited to 15 minutes.

## Covid-19 and meetings

The Council will be holding some meetings in the next few weeks, but these will not be in person at Phoenix House until the Covid-19 crisis eases. Instead, the meetings will be held remotely via Zoom and you will be able to join these meetings via the internet. Please see the instructions on each agenda and read the Protocol on Remote Meetings before you join.

If you want to ask a question or speak, email your full name to Committee@middevon.gov.uk by **no later than 4pm on the day before the meeting**. This will ensure that your name is on the list to speak and will help us ensure that you are not missed – as you can imagine, it is easier to see and manage public speaking when everyone is physically present in the same room. Notification in this way will ensure the meeting runs as smoothly as possible.

If you require any further information, or

If you would like a copy of the Agenda in another format (for example in large print) please contact Sally Gabriel on:
Tel: 01884 234229
E-Mail: sgabriel@middevon.gov.uk

**Mid Devon District Council - Remote Meetings Protocol**

## 1. Introduction

The Local Authorities and Police and Crime Panels (Coronavirus) (Flexibility of Local Authority and Police and Crime Panel Meetings) (England and Wales) Regulations permit remote attendance in Local Authority meetings.

Remote attendance is permitted as long as certain conditions are satisfied. These include that the Member is able to hear and be heard by the other Members in attendance. Also, being able to hear and be heard by any members of the public entitled to attend the meeting (in line with the public participation scheme). A visual solution is preferred, but audio is sufficient.

This also relates to members of the public attending the meeting also being heard. The regulations are clear that a meeting is not limited to those present in the same place, but includes electronic, digital or virtual locations (internet locations, web addresses or conference call telephone numbers).

## 2. Zoom

Zoom is the system the Council will be using for the time-being to host remote / virtual meetings. It has functionality for audio, video, and screen sharing and you do not need to be a member of the Council or have a Zoom account to join a Zoom meeting.

## 3. Access to documents

Member Services will publish the agenda and reports for committee meetings on the Council's website in line with usual practice. Paper copies of agendas will only be made available to those who have previously requested this and also the Chair of a virtual meeting.

If any other Member wishes to have a paper copy, they must notify the Member Services before the agenda is published, so they can arrange to post directly – it may take longer to organise printing, so as much notice as possible is appreciated. Printed copies will not be available for inspection at the Council's offices and this requirement was removed by the Regulations.

## 4. Setting up the Meeting

This will be done by Member Services. They will send a meeting request via Outlook which will appear in Members' Outlook calendar. Members will receive a URL link to click on to join the meeting.

## 5. Public Access

Members of the public will be able to use a weblink and standard internet browser. This will be displayed on the front of the agenda.

## 6. Joining the Meeting

Councillors must join the meeting early (i.e. at least five minutes before the scheduled start time) in order to avoid disrupting or delaying the meeting. Councillors should remember that they may be visible and heard by others, including the public, during this time.

## 7. Starting the Meeting

At the start of the meeting, the Member Services Officer will check all required attendees are present (viewing the participant list) and that there is a quorum. If there is no quorum, the meeting will be adjourned. This applies if, during the meeting, it becomes inquorate for whatever reason.

The Chair will remind all Members, Officers and the Public that **all microphones will be automatically muted,** unless and until they are speaking. This prevents background noise, coughing etc. which is intrusive and disruptive during the meeting. The Hosting Officer will enforce this and will be able to turn off participant mics when they are not in use. Members would then need to turn their microphones back on when they wish to speak.

## 8. Public Participation

Participation by members of the public will continue in line with the Council's current arrangements as far as is practicable. However, to ensure that the meeting runs smoothly and that no member of the public is missed, all those who wish to speak must register **by 4pm on the day before the meeting**. They should email their full name to Committee@middevon.gov.uk. If they wish to circulate their question in advance, that would be helpful.

At public question time, the Chair will invite the public by name to speak at the appropriate time. At that point, all public microphones will be enabled. This means that, to avoid private conversations being overheard, no member of the public should speak until it is their turn and they should then refrain from speaking until the end of public question time, when all microphones will be muted again. In the normal way, the public should state their full name, the agenda item they wish to speak to **before** they proceed with their question.

Unless they have registered, a member of the public will not be called to speak.

If a member of the public wishes to ask a question but cannot attend the meeting for whatever reason, there is nothing to prevent them from emailing members of the Committee with their question, views or concern in advance. However, if they do so, it would be helpful if a copy could be sent to Committee@middevon.gov.uk as well.

## 9. Declaration of Interests

Councillors should declare their interests in the usual way. A councillor with a disclosable pecuniary interest is required to the leave the room. For remote meetings, this means that they will be moved to a break-out room for the duration

of this item and will only be invited back into the meeting when discussion on the relevant item has finished.

## 10. The Meeting and Debate

The Council will not be using the Chat function.

The Chair will call each member of the Committee to speak - the Chair can choose to do this either by calling (i) each member in turn and continuing in this way until no member has anything more to add, or (ii) only those members who indicate a wish to speak using the 'raise hand' function within Zoom. This choice will be left entirely to the Chair's discretion depending on how they wish to manage the meeting and how comfortable they are using the one or the other approach.

Members are discouraged from physically raising their hand in the video to indicate a wish to speak – it can be distracting and easily missed/misinterpreted. No decision or outcome will be invalidated by a failure of the Chair to call a member to speak – the remote management of meetings is intensive and it is reasonable to expect that some requests will be inadvertently missed from time to time.

When referring to reports or making specific comments, Councillors should refer to the report and page number, so that all Members of the Committee have a clear understanding of what is being discussed at all times.

## 11. Voting

On a recommendation or motion being put to the vote, the Chair will go round the virtual room and ask each member entitled to vote to say whether they are for or against or whether they abstain. The Member Services Officer will announce the numerical result of the vote.

## 12. Meeting Etiquette Reminder

- Mute your microphone – you will still be able to hear what is being said.
- Only speak when invited to do so by the Chair.
- Speak clearly and please state your name each time you speak
- If you're referring to a specific page, mention the page number.

## 13. Part 2 Reports and Debate

There are times when council meetings are not open to the public, when confidential, or "exempt" issues – as defined in Schedule 12A of the Local Government Act 1972 – are under consideration. It is important to ensure that there are no members of the public at remote locations able to hear or see the proceedings during such meetings.

Any Councillor in remote attendance must ensure that there is no other person present – a failure to do so could be in breach of the Council's Code of Conduct.

If there are members of the public and press listening to the open part of the meeting, then the Member Services Officer will, at the appropriate time, remove them to a break-out room for the duration of that item. They can then be invited back in when the business returns to Part 1.

Please turn off smart speakers such as Amazon Echo (Alexa), Google Home or smart music devices. These could inadvertently record phone or video conversations, which would not be appropriate during the consideration of confidential items.

## 14. Interpretation of standing orders

Where the Chair is required to interpret the Council's Constitution and procedural rules in light of the requirements of remote participation, they may take advice from the Member Services Officer or Monitoring Officer prior to making a ruling. However, the Chair's decision shall be final.

## 15. Disorderly Conduct by Members

If a Member behaves in the manner as outlined in the Constitution (persistently ignoring or disobeying the ruling of the Chair or behaving irregularly, improperly or offensively or deliberately obstructs the business of the meeting), any other Member may move 'That the member named be not further heard' which, if seconded, must be put to the vote without discussion.

If the same behaviour persists and a Motion is approved 'that the member named do leave the meeting', then they will be removed as a participant by the Member Services Officer.

## 16. Disturbance from Members of the Public

If any member of the public interrupts a meeting the Chair will warn them accordingly. If that person continues to interrupt or disrupt proceedings the Chair will ask the Member Services Officer to remove them as a participant from the meeting.

## 17. After the meeting

Please ensure you leave the meeting promptly by clicking on the red phone button to hang up.

## 18. Technical issues – meeting management

If the Chair, the Hosting Officer or the Member Services Officer identifies a problem with the systems from the Council's side, the Chair should either declare a recess while the fault is addressed or, if the fault is minor (e.g. unable to bring up a presentation), it may be appropriate to move onto the next item of business in order to progress through the agenda. If it is not possible to address the fault and the meeting becomes inquorate through this fault, the meeting will be adjourned until such time as it can be reconvened.

If the meeting was due to determine an urgent matter or one which is time-limited and it has not been possible to continue because of technical difficulties, the Chief Executive, Leader and relevant Cabinet Member, in consultation with the Monitoring Officer, shall explore such other means of taking the decision as may be permitted by the Council's constitution.

For members of the public and press who experience problems during the course of a meeting e.g. through internet connectivity or otherwise, the meeting will not be suspended or adjourned.

**19. Technical issues – Individual Responsibility (Members and Officers)**

Many members and officers live in places where broadband speeds are poor, but technical issues can arise at any time for a number of reasons. The following guidelines, if followed, should help reduce disruption. Separate guidance will be issued on how to manage connectivity – this paragraph focusses on the procedural steps. Joining early will help identify problems – see paragraph 6.

- Join public Zoom meetings by telephone if there is a problem with the internet. Before all meetings, note down or take a photograph of the front page of the agenda which has the necessary telephone numbers. Annex 1 to this protocol contains a brief step-by-step guide to what to expect

- Consider an alternative location from which to join the meeting, but staying safe and keeping confidential information secure. For officers, this may mean considering whether to come into the office, subject to this being safe and practicable (childcare etc.)

- If hosting a meeting via Zoom (briefings etc.), consider creating an additional host when setting up the meeting. The additional host can step in if the main host has problems – remember that without a host, the meeting cannot close and any information on the screens will remain on view

- Have to hand the telephone number of another member or officer expected in the meeting – and contact them if necessary to explain the problem in connecting

- Officers should have an 'understudy' or deputy briefed and on standby to attend and present as needed (and their telephone numbers to hand)

- For informal meetings and as a last resort, members and officers may be able to call another member or officer in the meeting who can put the 'phone on loudspeaker for all to hear – not ideal, but it ensures some degree of participation and continuity

- Member Services will hold a list of contact details for all senior officers

**Annex 1**

**Phone only access to zoom meetings**

(Before you start **make sure you know the Meeting ID and the Meeting Password**) – Both of these are available on the agenda for the meeting

**Call the toll free number** either on the meeting agenda or on the Outlook appointment (this will start with 0800 --- ----)

(Ensure your phone is on 'speaker' if you can)

A message will sound saying *"Welcome to Zoom, enter your meeting ID followed by the hash button"*

- **Enter Meeting ID followed by #**

Wait for next message which will say *"If you are a participant, please press hash to continue"*

- **Press #**

Wait for next message which will say *"Enter Meeting Password followed by hash"*

- **Enter 6 digit Meeting Password followed by #**

Wait for the following two messages:

*"You are currently being held in a waiting room, the Host will release you from 'hold' in a minute*"

**Wait……**

*"You have now entered the meeting"*

Important notes for participating in meetings

Press ***6** to toggle between **'mute' and 'unmute'** (you should always ensure you are muted until you are called upon to speak)

If you wish to speak you can **'raise your hand'** by pressing ***9**. Wait for the Chairman to call you to speak. The Host will lower your hand after you have spoken. Make sure you mute yourself afterwards.

**MID DEVON DISTRICT COUNCIL**

**MINUTES** of a **MEETING** of the **COUNCIL** held on 1 July 2020 at 6.00 pm

**Present**
**Councillors** L J Cruwys (Chairman)
Mrs E M Andrews, G Barnell, E J Berry, W Burke, J Cairney, R J Chesterton, S J Clist, Mrs C Collis, Mrs F J Colthorpe, D R Coren, N V Davey, Mrs C P Daw, R M Deed, R J Dolley, J M Downes, C J Eginton, R Evans, Mrs S Griggs, B Holdman, T G Hughes, D J Knowles, F W Letch, B A Moore, Miss J Norton, S J Penny, D F Pugsley, R F Radford, C R Slade, Mrs M E Squires, R L Stanley, L D Taylor, Ms E J Wainwright, B G J Warren, A White, A Wilce, Mrs N Woollatt, J Wright and A Wyer

1 **Apologies**

There were no apologies, all Members were present.

2 **Protocol for Remote meetings (00-10-40)**

The protocol for remote meetings was noted.

3 **Public Question Time (00-10-54)**

The Chairman read a list of questions on behalf of Mr Davey referring to the 3 Rivers Governance Report:

1. Given that two large national developers- Russell Harrison & McCarthy & Stone - having spent thousands of pounds on surveys, plans etc.. and with all their schemes, no matter how poor, being rubber stamped by MDDCs planning committee - have abandoned their schemes as they could see no profit, was a proper cost profit analysis carried out by an independent consultancy i.e not the council or it's architects ?

2. Given that 3Rivers was set up by the council largely as a result of a report by a finance director in order to develop this and other sites and has not and is unlikely to make a profit. Is it not time to liquidate 3 Rivers , go back to the drawing board and consult with groups like the Angel Project of which I was a co-founder- to try to salvage from this disaster a better scheme which improves the area and enhances the riverside?

3. The accountants estimate a more than three quarters of a million pounds overspend on this project, I think this is a gross under estimate. I believe that a one and a quarter million pounds overspend is more realistic given the fact that despite nearly three years since start of work on this site, all of the ground works

are still not complete. What does the council intend to do as a matter of urgency, to staunch the haemorrhage of our -the council tax payers money ?

4. Given that most of the discussions around 3 Rivers and this scheme have been held in secret- to I believe save embarrassment of the council and some of top level management rather than any commercial considerations, when will the council hold a proper open meeting to discuss this fiasco and the implications for services in the future given the debt that will be incurred ?

The Deputy Chief Executive (S151) provided the following answers

1. After a national advert to find an architect capable to deliver an exemplar scheme to fit such a prominent site in Tiverton, the Council instructed Randall Simmonds LLP (professional construction consultants) to provide a budget cost sum analysis for the scheme. This value was very close to the final tendered price received by 3RDL after entering in to a negotiated contract with the current contractor. As many of you are aware this scheme (designed by Mikhail Riches - a London based architect) has already won a national design award (Housing Design).

2. This scheme was carefully selected by the Council in order to see the delivery of a project that would be of a very high design and build quality, maximising the sites location and vistas and would help to add increased footfall to that area of the Town centre. For clarification, 3RDL has already returned significant sums to the Council over the past 2 years and delivered its only completed scheme to date, on time and at its budgeted level of profit. I can confirm that the Council will continue to provide regular and diligent over sight on all current and future projects.

3. The Council is aware of a potential loss on this specific project and is currently working with its Development Company in order to be assured that the project is completed without further budgetary implications or time delay. Clearly, the whole commercial property market has been significantly impacted by Covid19, but it is encouraging to see a return to "business as normal" for most areas of the construction industry.

4. The Council continues to work with its Development Company and maintains an ongoing level of support for its operations. It has recently commissioned some external reports in to the ongoing governance and financial viability of the company and has made a number of recommendations that will be implemented at the earliest possibly opportunity. If lessons need to be learned from this one specific development, rest assured we will learn from them and then move forwards.

The Leader then made the following statement: There has been considerable mystery around the performance of 3 Rivers and the oversight of the company by the responsible officers at the Council. I do believe the time has come to lift the veil of secrecy and that we should have more transparency in our dealings not only with Members but with members of the public. You have heard in Mr Jarrett's response that 3 Rivers has already returned significant sums to the Council over the past 2 years and delivered its only completed scheme to date on time at its level of profit. This is opaque speak in that not one penny has been returned to the Council by 3

Rivers over the past 2 years, every penny of interest due from 3 Rivers to the Council has had to be lent by the Council to 3 Rivers and remains outstanding within its total loan figure due to the Council. With regard to the completed scheme, although 3 Rivers should have paid the profit on that scheme of around £100,000 to the Council, in fact that sum was not repaid as it should have been, but was retained by 3 Rivers effectively reducing their borrowing requirement by that amount. Also as part of the response it has been said that a number of recommendations emanate from recent commissioned reports on the ongoing governance and financial viability of 3 Rivers will be implemented at the earliest possible opportunity. Members it is the view of myself supported by the Cabinet that where practicable, all of the recommendations not just a number will be implemented. In terms of the ongoing performance of 3 Rivers, we would trust that these recommendations will be implemented at the earliest possible opportunity as until they are, the company will not be getting a green light to go forward.

4 **Declarations of Interest under the Code of Conduct (00-22-37)**

Members were reminded of the need to declare any interests when appropriate.

5 **Minutes ((00-23-01)**

The minutes of the meeting held on 26 February 2020 were agreed as a correct record.

6 **Chairman's Announcements (00-24-00)**

The Chairman had the following announcements to make:

- He had recently visited the widow of the late Cllr Gerald Luxton and had delivered the book of condolence, Mrs Luxton had been very appreciative and grateful for all the messages and cards that she had received.
- He informed the meeting of an Extraordinary Meeting of Council that would take place on 29 July 2020 to consider the adoption of the Local Plan.

7 **Petitions (00-25-34)**

There were no petitions presented.

8 **Notices of Motions (00-25-44)**

**(1) Motion 563 (Councillors: B Holdman and L D Taylor – 19 May 2020)**

The Council has before it a **MOTION** submitted for the first time:

That:

a) This Council resolves to hold all member briefings and working/advisory groups (where practicable) remotely in the future which will aid the reduction of carbon emissions and provide significant savings on Members travel expenses.

b) This Council agrees to lobby central Government requesting that Regulation 5 of the Local Authorities and Police and Crime Panels (Coronavirus) (Flexibility of Local

Authority and Police and Crime Panel meetings) (England and Wales) Regulations 2020 be extended past May 2021 and be formed into new legislation allowing Members to have the option to attend any meeting of the Council either in person or remotely.

The **MOTION** was **MOVED** by Councillor L D Taylor and seconded by Councillor B Holdman.

In accordance with Procedure Rule 14.4, the Chairman of the Council had ruled that the matter be discussed at this meeting.

Following a lengthy discussion and upon a vote being taken, the **MOTION** was declared to have been **CARRIED.**

9 **Reports - Cabinet - Report of the meeting held on 23 April 2020 (1-32-38)**

The Leader presented the report of the meeting of the Cabinet held on 23 April 2020.

10 **Cabinet - Report of the meeting held on 7 May 2020 (1-34-25)**

The Leader presented the report of the meeting of the Cabinet held on 7 May 2020.

11 **Cabinet - Report of the meeting held on 11 June 2020 (1-35-04)**

The Leader presented the report of the meeting of the Cabinet held on 11 June 2020.

12 **Scrutiny Committee - Report of the meeting held on 18 May 2020 (1-36-16)**

The Chairman of the Scrutiny Committee presented the report of the meeting of the Committee held on 18 May 2020.

13 **Scrutiny Committee - Report of the meeting held on 1 June 2020 (1-37-00)**

The Chairman of the Scrutiny Committee presented the report of the meeting of the Committee held on 1 June 2020.

14 **Scrutiny Committee - Report of the meeting held on 22 June 2020 (1-37-36)**

The Chairman of the Scrutiny Committee presented the report of the meeting of the Committee held on 22 June 2020.

15 **Audit Committee - Report of the meeting held on 2 June 2020 (1-38-59)**

The Chairman of the Audit Committee presented the report of the meeting of the Committee held on 2 June 2020.

16 **Audit Committee - Report of the special meeting held on 23 June 2020 (1-39-38)**

The Chairman of the Audit Committee presented the report of the special meeting of the Committee held on 23 June 2020.

17 **Environment Policy Development Group - Report of the meeting held on 10 March 2020 (1-40-12)**

The Chairman of the Environment Policy Development Group presented the report of the meeting of the Group held on 10 March 2020..

18 **Homes Policy Development Group - Report of the meeting held on 17 March 2020 (1-41-21)**

The Chairman of the Homes Policy Development Group presented the report of the meeting of the Group held on 17 March 2020.

19 **Economy Policy Development Group - Report of the meeting held on 12 March 2020 (1-42-00)**

The Chairman of the Economy Policy Development Group presented the report of the meeting of the Group held on 12 March 2020.

20 **Economy Policy Development Group - Report of the meeting held on 4 June 2020 (1-42-43)**

The Chairman of the Economy Policy Development Group presented the report of the meeting of the Group held on 4 June 2020.

21 **Planning Committee - Report of the meeting held on 11 March 2020 (1-44-49)**

The Chairman of the Planning Committee presented the report of the meeting of the Committee held on 11 March 2020.

22 **Planning Committee - Report of the meeting held on 20 May 2020 (1-45-28)**

The Chairman of the Planning Committee presented the report of the meeting of the Committee held on 20 May 2020.

23 **Planning Committee - Report of the meeting held on 17 June 2020 (1-46-10)**

The Chairman of the Planning Committee presented the report of the meeting of the Committee held on 17 June 2020.

24 **Standards Committee - Report of the meeting held on 10 June 2020 (1-47-07)**

The Chairman of the Standards Committee presented the report of the meeting of the Committee held on 10 June 2020.

25 **Licensing Committee - Report of the meeting held on 19 June 2020 (1-47-39)**

The Chairman of the Licensing Committee presented the report of the meeting of the Committee held on 19 June 2020.

26 **Regulatory Committee - Report of the meeting held on 19 June 2020 (1-48-08)**

The Chairman of the Regulatory Committee presented the report of the meeting of the Committee held on 19 June 2020.

1. **Animal Welfare Licensing Policy (Minute 8)**

The Chairman of the Regulatory Committee **MOVED** seconded by Councillor D R Coren:

**THAT** the recommendations of the committee as set out in Minute 8 be **ADOPTED**.

Upon a vote being taken, the **MOTION** was declared to have been **CARRIED**.

27 **Questions in accordance with Procedure Rule 13 (1-52-21)**

There were no questions submitted under Procedure Rule 13.2.

28 **Political Allocation (1-52-27)**

The Council had before it a revised *allocation of seats reflecting the current membership of the Council.

To allow the tables to balance the line shown highlighted in yellow (Committee:Total) indicated that both the Liberal Democrat Group and the Independent Group needed to lose a committee/PDG seat each. The Green Group needed to gain 2 seats.

It was **AGREED** that the Green Party gain a seat on the Environment Policy Development Group provided by the Liberal Democrats and that the Green Party gain a seat on the Planning Committee provided by the Independent Group.

The Chairman **MOVED** that: the Tables (as amended) be approved with regard to the allocation of seats on Committees and other bodies.

Upon a vote being taken, the **MOTION** (as amended) was declared to have been **CARRIED**.

Note: * Allocation of seats previously circulated, copy attached to minutes.

29 **Special Urgency Decisions (1-59-05)**

With regard to any decisions taken under Rule 16 (of the Constitution) Special Urgency – between January and June 2020, the Chairman informed the meeting that no such decisions had been taken in this period.

30 **Annual Reports of Audit Committee, Scrutiny Committee and the Policy Development Groups (1-59-17)**

The Chairmen of the Audit Committee and the Scrutiny Committee and the Chairmen of the Environment, Homes and Economy Policy Development Groups presented their Annual Reports* to the Council.

Note: *Reports previously circulated, copy attached to minutes.

31 **Questions to Cabinet Members (1-59-45)**

Cllr R Evans addressing the Cabinet Member for Finance stated that given the known and continued effects that Covid 19 has brought to our high streets could Mid Devon seek to lead the way in offering additional assistance to our town centres and shop keepers. The recent 'Love your Town Centre Fund' is a welcome initiative but the current situation demands us to be more proactive and offer more immediate assistance. Shops have been given the green light at last to open up and to welcome the public back through their doors. Can Mid Devon seek to offer an immediate benefit of some free parking for an agreed period of time within the 3 main town centres as other town councils have, Wellington and Taunton are 2 relatively local examples. Such a gesture would help to give a much needed boost to shops and businesses and would show the residents of Mid Devon our commitment to our town centres. Funding could be taken from money available from a second tranche of town centre grants and town councils could also be asked to consider contributing from the precept monies that they raise to assist towns in a number of ways.

The Cabinet Member for Finance responded stating that yes he did agree that this would be a positive step for our towns to be able to offer some free parking for a limited period of time in order to make a surge in the town centre and to get more people in there. I am aware that huge job losses are being announced across the board in town centres across the country and this is a very worrying time for lots of people and anything that we can do to try to stimulate a resurgence in our town centres is a really positive thing. I know that a lot of people during the pandemic have been shopping locally and we would want to continue to support that. Please be rest assured that this has been raised with the S151 Officer and we are looking into when we would be able to implement this, at the earliest opportunity. When we are able to do this I will then revert back to the Council.

Cllr R Stanley, addressing the Cabinet Member for Housing and Property Services stated that some of your Cabinet colleagues have over recent times provided a useful written resume of their portfolio and other things, unfortunately no such briefing has been received from yourself covering matters within your portfolio, it would be most useful if you are able tonight to provide members with a brief verbal report on those matters that you are responsible for.

The Cabinet Member responded stating that he would be publishing in the next couple of days an update which he hoped to do on a fortnightly basis from now on.

Cllr Wilce, addressing the Leader stated that this administration has said many times that it wants to be open and transparent in its affairs but I would say that there remains significant room for improvement, especially relating to matters of 3 Rivers. To that end, I commend the Leader for stating publicly the questions rather than take them to the private meeting tomorrow as was suggested by Cllr Evans. Transparency should always be the starting point and not secrecy, will you commit to taking action to ensure that all future reports presented to Council are in such a way that only information that is actually considered to be exempt for publication is withheld from the public and not the entire contents of those reports. Will you also commit to ensuring that the minutes of confidential meetings comply with the Local Government

Act in that they provide the public with sufficient information as to know what business was transacted in private without releasing confidential information?.

The Leader referring to the previous question stated that the Cabinet were very alive to what was going on in the town centres and referred to the road closures in Tiverton and that the Cabinet were looking at what they might do to alleviate the lack of on-road parking spaces by making an adjustment perhaps to one of the car parks.

The Leader referring to Cllr Wilce's question stated that he could assure him that he would be in discussion with the Monitoring Officer to discuss how all future reports presented to Council be more fulsome and transparent in order that discussions, whatever the subject can be held in Part I and that Part II discussions will be reduced to the absolute minimum. The lack of open discussion at public meetings has led to frustration on the part of both members and the public and that obviously feeds false rumours and cannot be of benefit either to this Council or to the public perception in the way that this Council operates. I can assure you that the discussions with the Monitoring Officer will also cover the extent of minutes of confidential meetings and their compliance with the Local Government Act.

The Monitoring Officer stated that the members of the Audit Committee would recall and that it was in the minutes of the meeting held on 23 June, that she had undertaken to bring a report to Council to have a consistent approach to minutes in the future.

Cllr Wilce addressing the Leader stated that we have received audit reports detailing what governance issues were identified for the running of 3 Rivers along with recommendations for action. Such reports do not go into detail as to how and why these issues came about or who was responsible for them. This should not be taken to mean that mistakes have not been made nor deliberate acts of omissions that gave rise to the rest of these issues, as yet we don't know how or why these things happened because no one has elected to provide that information and so we are obliged to carry out that further piece of work if we are to do our jobs properly. In doing so we must be mindful that the actions of others have also had a serious affect on governance, such as the delegation of shareholder responsibility to the Chief Executive by the previous Cabinet. I have also heard criticism that you have contributed to the problem by not acting as swiftly as you might have once you became aware of these issues. Would you like to respond to this criticism?

The Leader responded stated that he wanted to set the record straight, on May 23 2019 the day after I was appointed as your Leader I sat in the Chief Executive's office and one of the topics that was discussed, as you would expect was 3 Rivers. I did request at that meeting that I wished to be told of any problems before the end of May 2019 and any such disclosures would be dealt with as appropriate on a non blame basis. I could give no guarantees as to how I would respond if problems came to light subsequently. Over the next 5 months, I regularly requested that an external report be commissioned in order that we might have an assessment of any remedial action that may be necessary to take in respect of 3 Rivers. You will be aware that for over the previous 12 months, both the Chair of Audit, myself and many other members had a concern about a potential conflict of interest by individual directors, these conversations came to nothing until November 2019, at which point it was admitted that it was thought it was only me who was interested in finding out about 3 Rivers and that by definition, I did not have the support of my Cabinet. In November

2019, Anthony Collins Solicitors were commissioned to write the report that I wanted, except that when this was produced in December 2019, the report only addressed a question in relation to winding up 3 Rivers. That did not reflect what I had been asking for in the previous 6 months. Anthony Collins Solicitors were then commissioned to review 3 Rivers in the light of my constant request - ie what would the recommendation be regarding the company to support continuing with 3 Rivers, with the existing directors, continuing with 3 Rivers with a new board of directors, winding down the company (completing existing projects but not starting any new projects) and winding up the company. You have seen the report of Anthony Collins Solicitors which was produced in February 2020 and at their recommendation a further report was commissioned from Bishop Fleming which was received in May 2020. Unlike my previous life in London in international banking where matters such as 3 Rivers would have been dealt with in 13 days, in the Local Authority world it takes 13 months and counting. Tomorrow you are all invited to discuss with the 3 existing directors the company's performance since its inception. I consider the 3 Rivers debacle to be totally non political and I don't see any future in it becoming a political issue, I have been trying with the support of my Cabinet to resolve the issues with 3 Rivers as quickly as possible. Without 6 months of unreasonable delay, 3 Rivers would now be up and running and we would now know how they were going to perform going forward. The delay has held up 3 Rivers activity, but Covid 19 has not assisted. I am not going to accept any liability for this delay.

Cllr Wilce addressing the Cabinet Member for the Working Environment and Support Services asked whether she would join him in thanking Mrs Irene Hill for her services to the District Council and could she assure members that improvements will be made to ensure that all members and staff are positively enabled to perform their duties.

The Cabinet Member responded stating that she would of course thank Cllr Irene Hill for her service to the Council and her constituents, despite her difficulties she went to great efforts to contribute fully and I regret her personal decision to resign, I can assure members that officers are currently working on reviewing practices to see what more support can be given to members in similar circumstances.

Cllr Wilce addressing the Cabinet Member for Finance, stated that before racing into a decision to offer free parking, will he ensure that a study is made into the impact of doing that in the past and to establish whether or not it does actually provide a positive benefit?

The Cabinet Member responded stating that discussions were being had with the S151 Officer into affordability and as to whether this would improve the situation, we need to get the latest data with regard to the number of receipts we are having and we will look at the next steps.

Cllr Warren addressing the Leader stated that over an extended period of time concerns have been raised by members of the public and elected members over the operation and governance of 3 Rivers Developments Limited, this company is wholly owned by MDDC and elements of its operation and financing has been the subject of independent reports and discussions in private without the press and public being present at various committees. Various concerns have been raised reflecting alleged short comings in governance and loans and staff payments, has anyone accepted responsibility for that or even that these concerns are justified. If they have can we

please be made known and can we then please move on to either making 3 Rivers a viable operation or failing that make suitable arrangements for the closure of the operation with the minimum amount of financial damage to the Council.

The Leader responded stating that the short reply was no and no. As no responsibility has been accepted I cannot make any acceptance known. The approach to 3 Rivers at all meetings to date not withstanding that they have always been in Part II have been on the basis of discussions being non-political and non judgmental and I trust that future meetings including tomorrow evening will be conducted on the same basis. Members will already have read not only the comments and recommendations in the Anthony Collins Solicitors and Bishops Fleming reports but will also have assimilated the comments for the Devon Audit Partnership and the Grant Thornton Audit reports. You can make up your own minds to where things should have been done differently and the person or persons who should have conducted more vigorous oversight, it will be difficult to pin point on any individual any blame as I have realised that within the Local Authority world. It would appear to be ungentlemanly to acknowledge any fault unlike in the real world. it is my and the Cabinet's intention that we pick up the pieces of 3 Rivers and restore it to a viable company, but obviously there are various and extensive changes to be made to the operation of the relationship between 3 Rivers and its parent company Mid Devon District Council and to the performances of individuals in both entities. Obviously if it takes too long to set up 3 Rivers on a satisfactory basis, both in terms of its legal approach, governance and financial arrangements coupled with a new board, then procrastination to achieve that may lead to the premature closure of the operation. Whether the company survives is substantially dependent on the will and cooperation of the company's sole shareholders representative. As Members will realise, Cabinet have not had the best assistance or cooperation over the last 13 months and that approach needs to change for the benefit of 3 Rivers and the Council investment of public funds.

32 **Members Business (2-23-12)**

Clarity was provided with regard to the road closures in Bampton Street and Gold Street, Tiverton.

Cllr Wilce stated that the Governance Working Group had agreed to set up a sub working group, but that unfortunately there had been no volunteers to date.

Cllr Mrs Griggs wanted to thank officers in these difficult times for the helpful and positive way they had helped members.

The Leader reminded all those present of the meeting to be held the following evening with the directors of 3 Rivers.

(The meeting ended at 8.30 pm) **CHAIRMAN**

**MID DEVON DISTRICT COUNCIL**

**MINUTES** of a **MEETING** of the **COUNCIL** held on 29 July 2020 at 6.00 pm

**Present**
**Councillors** L J Cruwys (Chairman)
G Barnell, E J Berry, J Cairney, R J Chesterton, S J Clist, Mrs C Collis, Mrs F J Colthorpe, D R Coren, N V Davey, Mrs C P Daw, R M Deed, R J Dolley, J M Downes, C J Eginton, R Evans, Mrs S Griggs, B Holdman, T G Hughes, D J Knowles, F W Letch, B A Moore, Miss J Norton, D F Pugsley, R F Radford, C R Slade, Mrs M E Squires, R L Stanley, L D Taylor, Ms E J Wainwright, B G J Warren, A White, A Wilce, Mrs N Woollatt and A Wyer

**Apologies**
**Councillors** Mrs E M Andrews, S J Penny and J Wright

33 **Apologies (00-08-00)**

Apologies were received from Councillors: Mrs E M Andrews S J Penny and J Wright.

34 **Remote Meetings Protocol (00-08-42)**

The protocol for remote meetings was noted.

35 **Public Question Time (00-08-57)**

Mr Byrom referring to Item 6 (Local Plan Review – Inspectors Report on Adoption) on the agenda stated that: I truly hope the new Local Plan will be adopted this evening and speak in favour of Cllr Norton's proposed amendment.

In 2016 this Council gave three promises of protection when site SP2 was allocated at the very last minute.

- It would not be developed before work began at Junction 27;
- it would not be developed before new slip roads onto the A361 were built;
- and no development would be allowed on the highest land at the site.

This Council has abandoned its first two promises. The third is in serious danger. That is why we need one further minor-modification. I gave my reasons in your Appendix A and I backed them up in the paper that I sent you last Friday.

Cllr Norton's amendment would strengthen that third promise of protection by leaving all SP2's highest ground as Green Infrastructure in the countryside, as is done in

nine other locations. I believe my two papers show that this is simple, lawful and necessary.

The Head of Planning and Regeneration assured Cabinet that Policy SP2 provides all the protection that is needed. You may hear this again today.

I will be frank: I do not believe those assurances. As part of an on-going appeal, an officer has already signed (but not sealed) an agreement with a would-be developer of the SP2 site. The map in that 'Section 106' agreement clearly allows development on land that both the 2013 SHLAA assessment and Policy SP2 say must remain undeveloped. The S106 agreement breaks the third promise of protection.

Members, a leading QC has suggested that Policy SP2 is a strong enough basis for reaching a section 106 agreement to protect the highest ground at the site. But was he shown how the officers who wrote Policy SP2 have already signed a S106 agreement that gives away that promised protection?

This Council meeting is not entitled to discuss the merits of the appeal. But it is entitled – and has a duty – to assure the public that the long-awaited Local Plan will be fully respected in practice. This is about trust.

So, in conclusion, I have two questions for the Head of Planning and Regeneration -

1. Will you now state unambiguously to our representatives, the Councillors, that, once the local plan is adopted, no officer will do anything in the lifetime of the plan that would allow development of the highest ground at the SP2 site? I repeat 'unambiguously' and 'no development'.

2. You have provided Councillors with the legal opinion in Appendix B. Will you now please tell them whether or not the QC had seen a copy of the Section 106 agreement that breaks Policy SP2 before he wrote that opinion?

Members, please support the change proposed by Cllr Jo Norton.

Mr Quinn referring to Item 7 (Part 2 Business – Minutes and Drafting Conventions) stated that: In this report, the Monitoring Officer confirms that some Part 2 matters are not being dealt with properly and that changes are required. However, her report only addresses one part of the problem - the poor minutes. It does not address the main cause of public dissatisfaction - which is the current practice of excluding whole reports from the public.

I understand that there are times when exempt information has to be put before Members, but at the moment this is scattered all through the reports given and it is not obvious which bits of information are exempt and which are not.

This scattering, means that reports cannot be made available to the public before the meeting and Members are forced to exclude the public from any debate.

Many Members are aware of this situation and have commented on the poor way reports are written.

The solution is to revise the way that reports are prepared in the first place.
It would be much better if any exempt information was clearly identified and separated from the report. It should be put in a confidential (Part 2) Appendix.
In this way Members, and the public, can be provided with reports which may be discussed in open session. The public would still be excluded from the Part 2 Appendix, and any discussion of it.

Such an approach is consistent with the legislation, which specifically allows for the exclusion of the public from the discussion of part of a report.

This new way of presenting reports would allow the Council to be more open and transparent. It would allow the public to understand the matters being discussed but still maintain the exemptions required by the legislation.

My question is: As part of your consideration tonight, in order to allow more transparency: Will Council please ask for the specific identification, and separation, of exempt information in future reports to Members?

The Chairman indicated that answers to questions posed would be considered when the items were debated.

36 **Declarations of Interest under the Code of Conduct (00-15-55)**

All Members present declared that they had received correspondence with regard to Item 6 (Local Plan Review – Inspector's Report on Adoption) on the agenda.

37 **Chairman's Announcements (00-17-30)**

The Chairman had the following announcements to make:

a) This was the first meeting of the Council following the sad passing of Honorary Alderman Mrs Susan Meads. He referred to her long service as a councillor, her commitment to the residents of Mid Devon and he sent his condolences to her family.
b) Urgent Item of Business – he had agreed to allow an urgent item of business to be considered, it was an item arising from the new Business and Planning Act 2020 which had received Royal Assent the previous week and although the Cabinet had agreed delegations for Pavement Licenses at its meeting on 9 July, a last minute change to the Bill took the function away from the Cabinet and it was therefore necessary for the delegations to be reconsidered by the Council. He proposed to take the urgent item at the conclusion of the remainder of the business that evening.

38 **Local Plan Review - Inspectors Report on Adoption (00-21-11)**

The Council had before it an *extract from the Cabinet meeting of 9 July 2020 with regard to the Local Plan Review.

The Chairman requested that the Head of Planning Economy and Regeneration inform the meeting of the history of the Local Plan Review. The officer stated that the process had started in 2013/14 and that the Local Authority was obliged to keep the Local Plan up to date, this was a continual process of assessing development plans.

The report before the meeting was the culmination of this process following several stages of public consultation. She outlined the role of the Planning Inspector who provided an independent examination role and considered the representations and heard directly from those interested parties at examination hearings. In December 2019, main modifications to the plan were agreed and consulted upon and then considered by the Inspector. The Inspectors main findings had been received on 26 June 2020; he had accepted the schedule of main modifications, made some minor updates and found the plan to be legally compliant. With the schedule of modifications the plan was now capable of being adopted.

Responding to questions from Mr Byrom posed in Public Question Time, the officer stated that the S106 agreement he referred to formed part of the emerging papers for the planning appeal on the site, the agreement had not been signed or sealed, although it had been signed by the landowner and the appellant. If changes were required they could still be made. With regard as to whether the QC had knowledge of the S106 agreement, the answer was no, he had not see it, he was only commissioned to advise on whether the map could be amended. With regard to no officer doing anything in the lifetime of the plan that would allow development of the highest ground at the SP2 site, this was not an undertaking that she could give, there was no planning application that would affect that area and she didn't know if any application would be received in the future or what it might be for. If an application was received it would need to be considered on its merits.. The adoption of the Local Plan and the wording of policy SP2 would be a material consideration of any such application.

Councillor Miss J Norton had submitted the following **AMENDMENT**, seconded by Councillor B G J Warren

At the end of recommendation (b), add the following words:

"save that the amended line of the settlement limit, shown by a broken black line on Plan MM45 (Appendix 10), be further amended so that, for policy SP2 it runs along the line of division between the proposed Green Infrastructure and the Proposed Residential (as illustrated by Figure 4 in Appendix A (page 28), thus placing the entirety of the Green Infrastructure outside the settlement limit of Sampford Peverell."

Consideration was given to:

- A presentation slide which identified the original settlement limit boundary and that proposed by the amendment
- Members views with regard to the need for the green infrastructure to be in the countryside and not within the settlement limit so that the land could be protected
- The opinion of Counsel with regard to amending the map and that the inspector had been informed of the amendment. The view of both being that the map could be amended without the need to amend policy SP2 or the text
- That the amendment would not delay the adoption of the plan.
- The amendment gave assurance to local residents that the green infrastructure would remain as such
- By moving the settlement limit line on the map this would be consistent with other green infrastructure areas in the district

- An error in Counsel's advice in that he had not incorporated main modification 42 in his advice

Upon a vote being taken the **AMENDMENT** was declared to have been **CARRIED**.

Further consideration was then given to the rest of the plan:

- The enormous amount of work and effort required to produce the plan as a whole
- The opportunities made available for public involvement in the plan
- The need to look forward towards the creation of a subsequent plan which considered green policies which matched the council's desires with regard to climate change
- The importance of having an adopted plan

Councillor G Barnell **MOVED** the **SUBSTANTIVE MOTION,** this was seconded by Councillor Mrs C P Daw: **THAT:**

(a) The Council adopts the Mid Devon Local Plan Review 2013 – 2033 (Appendix 1), under Regulations 26 and 35 of the Town and Country (Local Planning)(England) Regulations 2012, including main modifications pursuant to section 23 of the Planning and Compulsory Purchase Act 2004 confirmed by the Inspector in his report (Appendix 3), and the Council's additional (minor) modifications (Appendix 4).

(b) The Council adopts the Mid Devon Local Plan Review 2013 – 2033 Policies Map (Appendix 2) together with any changes needed to this through the Inspector's main modifications in his report (Appendix 3) including Plan MM35 (Appendix 9), Plan MM45 (Appendix 10) and the Council's additional (minor) modifications (Appendix 4) as described in Section 6 to this report, save that the amended line of the settlement limit, shown by a broken black line on Plan MM45 (Appendix 10), be further amended so that , for policy SP2 it runs along the line of division between the proposed Green Infrastructure and the Proposed Residential (as illustrated by Figure 4 in Appendix A (page 28)), thus placing the entirety of the Green Infrastructure outside the settlement limit of Sampford Peverell."

(c) The Council notes that, in accordance with Regulations 26 and 35 of the Town and Country (Local Planning)(England) Regulations 2012 the following documents will be published on the Council's website, and will be made available for inspection, free of charge at the Council's Phoenix House office during its opening times and in local libraries in Mid Devon once this becomes possible following a relaxation of restrictions of movement and public gatherings currently in place due to the Covid-19 pandemic:

(i) Mid Devon Local Plan Review 2013 – 2033

(ii) Mid Devon Local Plan Review 2013 – 2033 Adoption Statement (Appendix 5); and

(iii) Sustainability Appraisal Report (Appendix 6) and Sustainability Appraisal Post-Adoption Statement (Appendix 7).

(d) The Council notes that the Adoption Statement (Appendix 5) is sent to the Secretary of State and to any person who has asked to be notified of the adoption of the Mid Devon Local Plan Review 2013- 2033.

(e) The Council approves the Sustainability Appraisal Report (Appendix 6) and the Sustainability Appraisal Post-Adoption Statement (Appendix 7).

(f) Delegated authority is given to the Head of Planning, Economy and Regeneration in consultation with the Cabinet Member for Planning and Economic Regeneration to make any typographical, grammatical, graphical and presentational changes to the Mid Devon Local Plan Review 2013 – 2033 (e.g. paragraph and table numbers) and its Policies Map to finalise the plan before it is published, including any changes that are necessary to the Policies Map to reflect the Devon Minerals and Waste Plans.

Upon a vote being taken the **SUBSTANTIVE MOTION** was declared to have been **CARRIED**.

Note: *Extract previously circulated, copy attached to minutes.

39 **Part 2 Business - Minutes and Drafting Conventions (1-16-02)**

The Council had before it a *report of the Head of Legal (Monitoring Officer) providing members with the opportunity to consider and discuss the drafting conventions of minutes of Part 2 business.

Consideration was given to:

- The importance of transparency and for a Part II minute to have some meaning.
- Referring to the question posed in Public Question Time, the need to separate exempt information within reports and use an appendix for such information, therefore allowing the majority of the report to be made available to the public, the Head of Legal (Monitoring Officer) stated that she would take this forward.
- The Local Authorities (Executive Arrangements) (Meetings and Access to Information)(England) Regulations 2012, and the need for the reason for the decision to be published.

Councillor Mrs N Woollatt **MOVED** seconded by Councillor A White that:

Option 3 (to include a summary plus reasons) be adopted

Upon a vote being taken the **MOTION** was declared to have been **CARRIED**.

Note: *Report previously circulated, copy attached to minutes.

40 **Urgent Item of Business - Business and Planning Bill - Pavement Licenses**

There was a need to consider an urgent item of business with regard to the Business and Planning Bill, this item was previously considered by the Cabinet on 9 July 2020, however following an amendment to the Bill by the House of Lords on 21 July 2020, there was a need for Council to consider the item.

Therefore the Council; had before it a report* of the Group Manager for Public Health and Regulatory Services providing details of the emerging licensing changes and requesting that the Group Manager for Public Health and Regulatory Services be given delegated authority to enable pavement licences to be properly administered by the service, which included setting the relevant fee.

The Cabinet Member for Community Well-Being outlined the contents of the report explaining the need for the new delegation.

Councillor D J Knowles **MOVED,** seconded by Councillor A Wilce that:

1. The provisions of the Business and Planning Bill be **NOTED**

2. Delegated authority be given to the Group Manager for Public Health for the administration and enforcement of the provisions within the Business and Planning Bill on its passing into law. These delegations can then be sub-delegated to relevant officers.

3. Delegated authority be given to the Group Manager for Public Health for the setting of the fee for pavement licences.

Upon a vote being taken, the **MOTION** was declared to have been **CARRIED**.

Note: * Report previously circulated, copy attached to minutes.

(The meeting ended at 7.34 pm) **CHAIRMAN**

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**MID DEVON DISTRICT COUNCIL**

**MINUTES** of a **MEETING** of the **CABINET** held on 9 July 2020 at 6.00 pm

**Present Councillors** R M Deed (Leader)
L D Taylor, G Barnell, S J Clist, D J Knowles, Ms E J Wainwright, A White and Mrs N Woollatt

**Also Present Councillor(s)** E J Berry, Mrs C P Daw, R Evans, F W Letch, Miss J Norton, R F Radford and B G J Warren

**Also Present Officer(s):** Stephen Walford (Chief Executive), Jill May (Director of Corporate Affairs and Business Transformation), Andrew Jarrett (Deputy Chief Executive (S151)), Jenny Clifford (Head of Planning, Economy and Regeneration), Kathryn Tebbey (Head of Legal (Monitoring Officer)), Ian Chilver (Group Manager for Financial Services), Christie McCombe (Area Planning Officer), Simon Newcombe (Group Manager for Public Health and Regulatory Services), Tristan Peat (Forward Planning Team Leader), Adrian Welsh (Group Manager for Growth, Economy and Delivery), Catherine Yandle (Group Manager for Performance, Governance and Data Security) and Sally Gabriel (Member Services Manager)

192. **APOLOGIES (00-03-19)**

There were no apologies.

193. **PROTOCOL FOR REMOTE MEETINGS (00-03-27)**

The protocol for remote meetings was **NOTED**.

194. **PUBLIC QUESTION TIME (00-03-49)**

Mr Byrom referring to Item 6 (Local Plan Review – Inspectors report on adoption) on the agenda stated that he had no intention to try to block or change the plan but would formally like to pose the following question: Please will this Cabinet today do what is needed to make the following recommendation to full Council on 29 July 2020:

"MDDC Cabinet recommends that an additional (minor) modification be made to the policies map for SP2. The dotted line marking the extension of the village settlement area should be moved so that all the Green Infrastructure at the site is left in countryside" and he referred to the plan circulated to the Cabinet which referred to figure 4.

He added that the proposed change would not materially affect the plan. It would –

- leave every word of the text of SP2 unaltered from that finally recommended by the Inspector
- keep the location and extent of the Green Infrastructure exactly as shown on the policies map
- be entirely consistent with and reinforce the clear intent of the policy concerning the area of Green Infrastructure
- leave all the policy's Green Infrastructure in the countryside, providing it with extra protection against development under Policy S14
- require minimal work - no more than a simple alteration to one map
- be consistent with the way GI is treated at Tiverton, Cullompton and Crediton where GI can already be found beyond the edge of settlements.

The Chairman indicated that an answer would be provided when the item was debated.

The Chairman read a statement on behalf of Mr Quinn referring to, Item 10: Annual Treasury Management Review 2019/20.

In Section 8, sub section 2 (Non-Treasury Management Investments), figures are given for the Council loans to the Company and it is stated that: "these loans are subject to overarching management review on a regular basis. This is reflected in the impairments, made in periodic monitoring reports and in a year-end review, totalling £790,000".

Yet the Company was loaned nearly six and a half Million Pounds in this year.

Lending such an amount to a Company that is openly saying it might not pay its' debts on time, inevitably raises questions.

One such question was asked at Audit Committee, on 23 June 2020, where the Committee was asked for "an assurance that all loans were made with due diligence and competence by MDDC Officers, fully in accordance with the usual business risk management processes".

The Deputy Chief Executive/ S151 Officer promised a "*full and thorough response*" - but no response appears in the Audit Committee Minutes.

My first question is: Where can I see this response?

With regard to Agenda item 13:- 3 Rivers Developments Ltd Feedback.

In the second paragraph of the 'Legal Implications' section, the Chief Executive makes a clear statement that: "Neither Officers nor Members are able to put themselves in a situation where their duty to the Council conflicts with their duty to the Company".

He then retracts this clarity by continuing: "in so far as Officers are concerned - as their duty to the Council arises from their terms and conditions of employment. The Council, as their employer, is able to amend the terms and conditions, so that when

Officers are acting in their role as a Director of the Company, they act in the best interests of the Company".

My second question is: Has any Officer ever had their terms and conditions of employment amended in the way that the Chief Executive describes?

The Chairman indicated that that a response would be sent in due course.

195. **DECLARATIONS OF INTEREST UNDER THE CODE OF CONDUCT (00-10-51)**

At this point in the meeting the following declarations were made:

Cllr Mrs N Woollatt declared a personal interest in Item 8 (Cullompton Town Centre Masterplan as the report referred to a property that she owned and the leat , she informed the meeting that she was member of the Cullompton Leat Conservation Board.

All members of the Cabinet had received correspondence from Mr Byrom and declared this at this point.

196. **MINUTES OF THE PREVIOUS MEETING (00-12-47)**

The minutes of the previous meeting were approved as a correct record.

Note: Cllr Mrs N Woollatt requested that her vote against the decision be recorded.

197. **LOCAL PLAN REVIEW - INSPECTOR'S REPORT ON ADOPTION (00-15-12)**

The Cabinet had before it a *report of the Head of Planning, Economy and Regeneration presenting the Inspector's report into the adoption of the Mid Devon Local Plan Review 2013-2033 including main modifications and additional (minor) modifications.

The Cabinet Member for Planning and Economic Regeneration outlined the contents of the report stating that the Council had received the Inspector's report on 26th June in which he set out his conclusions on the examination of the Mid Devon Local Plan Review 2013 – 2033.

The Inspector had confirmed that the Local Plan Review provided an appropriate basis for the planning of the district and had set out where 55 Main Modifications were needed in order for the Local Plan Review to be found sound and so that it could be adopted by the Council. Once adopted, the Local Plan Review would replace existing Local Plans for Mid Devon and would carry full weight for the determination of planning applications, as part of the development plan alongside the Devon Minerals and Waste Plans and Neighbourhood Plans. He stated that it was vital to understand that with an adopted plan this would safeguard against speculative development and give greater control where development took place.

The Inspector's recommended Main Modifications concerned matters that were discussed at the examination hearings. They followed from proposed Main Modifications that were approved by the Council on 4th December 2019 for the purpose of public consultation, alongside an updated Sustainability Appraisal. Habitat

Regulations Assessment and Equalities Impact Assessment. The Inspector's Main Modifications overcame his previous concerns about housing delivery in the early years of the housing trajectory and should ensure a rolling five-year supply of deliverable housings sites. The Inspector had amended the detailed wording of modified policies for new Gypsy and Traveller sites to allow more flexibility for off-site provision to be made where sites were required on the major urban extensions. He had also made clearer why a full Retail and Leisure Impact Assessment was needed for any planning application which includes a designer outlet shopping centre at Junction 27.

A question was raised with regard to the suggestion made by Mr Byrom with regard to the green infrastructure being protected and whether modifications to the map could be made prior to adoption and the implications of any amendments to the plan.

The Head of Planning, Economy and Regeneration stated that whilst the modification may seem minimal and a minor modification, there would be a consequential main modification to the policy, the site was 6 ha including the green infrastructure and criterion f highlighted the 2.5 ha of green infrastructure. The text within the policy also referred to the green infrastructure so if a minor modification was made to the map it would introduce an inconsistency with the policy which would require a main modification.

Consideration was given to:

- Whether the settlement line and the allocation area (SP2) had the same boundary
- Whether the Local Plan with regard to green infrastructure was inconsistent
- Whether the Local Plan should be adopted at any cost as the Council had a responsibility to the local community
- The size of all the documentation before Members
- Whether typographical, grammatical and presentational changes should be made before the documents were considered by Council
- The need for a 'clean' plan without track changes to be presented to Council if possible
- Whether the 2.5ha of green infrastructure within Policy SP2 could be guaranteed without an amendment to the plan; with the Head of Planning, Economy and Regeneration Economy and Regeneration referred to text accompanying the policy stating that 'development of the highest ground should remain as undeveloped green infrastructure'. She believed the green infrastructure could be safeguarded through the policy
- The Climate Change Declaration of 2019 and the need for a stronger provision for the climate goals agreed and whether this would be considered in the next version of the plan
- The Local Development Scheme considered the timetable for producing the next plan

**RESOLVED** that a briefing note be prepared with regard to any modification to the map for Policy SP2 and for it to be considered by Council.

(Proposed by Cllr Mrs N Woollatt and seconded by Cllr L D Taylor)

It was therefore

**RECOMMENDED TO COUNCIL that:**

It notes the Inspector's Report at Appendix 3; and that:

(a) The Council adopts the Mid Devon Local Plan Review 2013 – 2033 (Appendix 1), under Regulations 26 and 35 of the Town and Country (Local Planning)(England) Regulations 2012, including main modifications pursuant to section 23 of the Planning and Compulsory Purchase Act 2004 confirmed by the Inspector in his report (Appendix 3), and the Council's additional (minor) modifications (Appendix 4).

(b) The Council adopts the Mid Devon Local Plan Review 2013 – 2033 Policies Map (Appendix 2) together with any changes needed to this through the Inspector's main modifications in his report (Appendix 3) including Plan MM35 (Appendix 9), Plan MM45 (Appendix 10) and the Council's additional (minor) modifications (Appendix 4) as described in Section 6 to this report.

(c) The Council notes that, in accordance with Regulations 26 and 35 of the Town and Country (Local Planning)(England) Regulations 2012 the following documents will be published on the Council's website, and will be made available for inspection, free of charge at the Council's Phoenix House office during its opening times and in local libraries in Mid Devon once this becomes possible following a relaxation of restrictions of movement and public gatherings currently in place due to the Covid-19 pandemic:

(i) Mid Devon Local Plan Review 2013 – 2033

(ii) Mid Devon Local Plan Review 2013 – 2033 Adoption Statement (Appendix 5); and

(iii) Sustainability Appraisal Report (Appendix 6) and Sustainability Appraisal Post-Adoption Statement (Appendix 7).

(d) The Council notes that the Adoption Statement (Appendix 5) is sent to the Secretary of State and to any person who has asked to be notified of the adoption of the Mid Devon Local Plan Review 2013- 2033.

(e) The Council approves the Sustainability Appraisal Report (Appendix 6) and the Sustainability Appraisal Post-Adoption Statement (Appendix 7).

(f) Delegated authority is given to the Head of Planning, Economy and Regeneration in consultation with the Cabinet Member for Planning and Economic Regeneration to make any typographical, grammatical, graphical and presentational changes to the Mid Devon Local Plan Review 2013 – 2033 (e.g. paragraph and table numbers) and its Policies Map to finalise the plan before it is published, including any changes that are necessary to the Policies Map to reflect the Devon Minerals and Waste Plans.

(Proposed by Cllr G Barnell and seconded by Cllr D J Knowles)

Notes:

i) Cllr Warren declared that as Chairman of Willand Parish Council he had closely following the journey of the Local Plan since 2014 and had spoken at committee and at the enquiries with regard to this matter.

ii) *Report previously circulated, copy attached to minutes.

198. **REOPENING HIGH STREETS SAFELY FUND (00-55-25)**

The Cabinet had before it a *report of the Head of Planning, Economy and Regeneration with regard to the 'Reopening High Streets Safety Fund (RHSSF).

The Cabinet Member for Planning and Economic Regeneration outlined the contents of the report stating this Council had been awarded £73,686 from the fund. This would enable the authority to put in place urgent measures to support economic recovery in the towns, particularly in the high streets through a mix of advice/support and implementation of a range of measures.

Monday 15th June 2020 saw the permitted reopening of the High Streets with restrictions on non-essential retail being lifted. The fund was to respond to the immediate needs in 2020 with the Government is encouraging early spend. The fund was not intended for capital works and was focussed on:

- Supporting development of an action plan for how the local authority may begin to safely reopen the local economies;
- Communications and public information activity to ensure that reopening of local economies could be managed successfully and safely;
- Business-facing awareness raising activities to ensure that reopening of local economies could be managed successfully and safely; and
- Temporary public realm changes to ensure that reopening of local economies could be managed successfully and safely.

Initial work had been undertaken to form an action plan and as this was a live document this would be updated over the coming months as risk assessments in the town centres were reviewed. This Action Plan was broken down into a three stage implementation process. A phased approach was considered appropriate given that the situation was ever changing. The first related to the immediate measures that were needed to be implemented prior to High Streets opening on the 15th June. The second phase covered the medium term actions (2-3 months) informed by ongoing dialogue with the Town Councils, business organisations/trader groups and DCC. The final phase would respond to any changes needed over the autumn which could arise from a number of issues including customer/trader perceptions and behaviour, changing Government guidance and crucially the extent of the virus at that time.

Section 4 of the report identified initial works undertaken in advance of the high streets opening including reconfigured pedestrian arrangements.

He informed the meeting that the proposals have been developed in liaison with local Ward Members, the Town Councils and the Local Resilience Forum. The business community had also been contacted through business fora and trader organisations to share information and advice via our webpages. A forum for discussion with the Town Mayors had also been established. This had led to greater collaborative working.

Consideration was given to:

- The work undertaken by the officers in the 3 main towns
- Additional items that could be put in place were suggested, for example hand sanitiser stations at bus stops and car park ticket machines
- The work of the forum with the town mayors and local businesses was deemed to be important and was fully supported
- The need to consider in the autumn the additional footfall of school students using the high streets
- How the plan dovetailed with the economic recovery plan and in particular the green recovery and the need for further communication to obtain local buy-in
- Signage in the market area of Tiverton
- An open invitation was extended to members to attend the town forum meetings
- Discussions were taking place with regard to offering free parking for a limited period

**RESOLVED** that:

***a) The report be noted.***

***b) The action plan to date be approved and delegated power be granted to the Group Manager for Growth Economy and Delivery and the Group Manager for Corporate Property and Commercial Assets in consultation with the Cabinet Member for Planning and Economic Regeneration to continue to develop and review the action plan, to implement or fund measures within scope of the Government guidance in accordance with the action plan.***

(Proposed by Cllr G Barnell and seconded by Cllr S J Clist)

Note: *Report previously circulated, copy attached to minutes.

199. **CULLOMPTON TOWN CENTRE MASTERPLAN (1-09-19)**

The Cabinet had before it a *report of the Head of Planning, Economy and Regeneration considering the key themes outlined in the reports and to seek approval to progress with the production of the Cullompton Town Centre Masterplan and Delivery Plan taking into account the comments received during the stage 1 public consultation.

The Cabinet Member for Planning and Economic Regeneration outlined the contents of the report outlining the recommendations and invited the Cabinet to agree the recommendations so that the masterplan could move to Stage II, he added that the Cullompton Town Centre masterplan would form a key document for the regeneration of the town; enhancing the town's economic prospects and providing a clear strategy to ensure the town met its full potential as an attractive and thriving town post Covid19 and into the 21st century. It would provide the umbrella framework

within which the Cullompton Future High Street Heritage Action Zone (HAZ) works could be delivered. He outlined the consultation process that had taken place

Feedback had been invited on six town wide initiatives including:

- The enhancement and restoration of Cullompton's distinctive historic buildings and landscape
- The rediscovery of Cullompton's historic role as a place to work and to make
- Creating an enticing experience for visitors to draw them into the town centre
- A reclaiming and redesign of Cullompton's spaces to support a vibrant community life
- Ensuring a sustainable town for its growing community: with homes, education, community and recreational facilities
- Ability to move around on foot, on bicycle, by bus and by train easily.

He identified Section 3 of the report which analysed the consultation responses.

A number of key themes have emerged from the stage 1 consultation:

a) Enhanced public realm. This was regarded as an important element that could provide significant benefits in improving the visual appearance of the town. A particular focus could be the Bull Ring and main gateways into the town at Station Road and Exeter Road.

b) Care of Historic Buildings. The Cullompton High Street HAZ bid identified an improvement scheme for high priority buildings. It sought to unlock retail and residential potential of properties through a focused grant scheme.

c) Traffic Management. A planning application for the Cullompton Relief Road had been received. Should it be approved it would provide the first step towards alleviating traffic flows through the town centre.

d) Green Spaces. Enhancement of existing and delivery of new green spaces through public realm works and scheme development.

e) Vision. A clear understanding of the vision and the unique selling point of the town was required, but with a clear distinction between what was an 'aspiration' and what was deliverable.

The Area Planning Officer (Projects) highlighted by way of presentation the strategy for the town and the key themes that had been identified for consultation. She explained the process of the consultation, the events that had taken place and the emerging themes from the consultation that had been explained by the Cabinet Member and how the funding could be used.

Consideration was given to:

- Traffic management in Fore Street and whether a one way system could be created
- The need for discussion with the Devon County Council and the Highway Authority with regard to providing safe crossing links from the Garden Village across the motorway to the town

- The need for the masterplan to be deliverable
- The need for cycling and walking to be supported
- The work that was taking place with the Garden Village forums with regard to an integrated approach for linking the Garden Village with the town

**RESOLVED** that:

a) The responses to the Cullompton Town Centre Masterplan Supplementary Planning Document (SPD) Public Consultation at Stage 1 be noted; and

b) The production of a draft masterplan SPD for Cullompton Town Centre be progressed taking into account the comments received through Stage 1 public consultation.

(Proposed by Cllr G Barnell and seconded by Cllr S J Clist)

Notes:

i) Cllr Mrs N Woollatt declared a personal interest as the property that she owned was mentioned in the report and that she was a member of the Cullompton Leat Conservation Board.

ii) *Report previously circulated, copy attached to minutes.

200. **REVENUE AND CAPITAL OUTTURN 2019/20**

The Cabinet had before it a *report of the Deputy Chief Executive (S151) presenting the revenue and capital outturn figures for the financial year 2019/20.

The Cabinet Member for Finance outlined the contents of the report stating that the outturn report was a set of management reports that showed the year end position on all service areas. Appendix 1 showed the overall performance, the recharges and interest charges and that the deficit had been reduced by £20k. He identified the details of the Housing Revenue Account, the total direct expenditure and income, the development at Palmerston park and the Right to Buys that had been repurchased. With regard to the Capital Programme, he highlighted the spends to date and the underspend that would be carried forward. He then thanked the officers within the finance team for their hard work.

Consideration was given to:

- A previous request to highlight the 3 Rivers figures on a separate line within the tables
- The increase in the number of parking permits that had been purchased which had been aided by additional advertising
- The consultancy budget for the boundary review which had not been required
- The slippage on the play areas budget which would be rolled forward

**RESOLVED** that:

a) The General Fund outturn achieved in 2019/20 which shows an overall overspend of £232k be noted. This deficit is proposed to be taken from

General Fund reserve which will still leave the balance above our minimum recommended level.

b) The net transfers to earmarked reserves of £686k detailed in the General Fund service budget variance reports shown in Appendix 1 and summarised in Appendix 3 be approved.

c) The positive position achieved on the Housing Revenue Account which shows a saving of £608k be noted and the "earmarking" of the extra £608k shown in paragraph 4.2, as well as the utilisation of reserves totalling £859k identified in Appendices 2 be approved; and

d) The carry forward of £9.741m from the 2019/20 capital programme (see paragraph 6.3) be approved as all of the schemes will be delivered in 2020/21 or later years. Also the transfer to earmarked reserves of the un-spent £208k identified in Appendix 4 be approved.

(Proposed by Cllr A White and seconded by Cllr L D Taylor)

Note: *Report previously circulated, copy attached to minutes.

201. **ANNUAL TREASURY MANAGEMENT REPORT (1-47- 10)**

The Cabinet had before it a *report of the Deputy Chief Executive (S151) providing a review of activities and the prudential treasury indicators on actuals for 2019/20.

In response to a question asked in public question time, the Deputy Chief Executive (S151) stated that he could give assurance that all relevant due diligence had taken place, if the Audit Committee minutes did not show his response, he would deal with this at the next meeting and he would respond to Mr Quinn directly.

The Cabinet Member for Finance outlined the contents of the report stating that the Council was required by regulations issued under the Local Government Act 2003 to produce an annual treasury management review of activities and the actual prudential and treasury indicators for 2019/20. The following areas were covered in the report: the councils capital expenditure and financing, the end of year treasury provision, the investment strategy, the fact that no borrowing had been undertaken during the year. The amounts invested in Churches, Charities and Local Authorities (CCLA) and 3 Rivers Development Limited and the credit risk related to loans.

Consideration was given to the table of investments specifically those with other councils.

**RECOMMENDED** to Council that:

a) The treasury activities for the year to be noted.

b) The actual 2019/20 prudential and treasury indicators outlined in the report be approved.

(Proposed by Cllr A White and seconded by Cllr L D Taylor)

Note: *Report previously circulated, copy attached to minutes.

202. **PAVEMENT LICENCES: NEW LEGISLATION AND DELEGATION OF POWERS (1-53-45)**

The Cabinet had before it a * report of the Group Manager for Public Health and Regulatory Services outlining the details of the Business and Planning Bill.

The Cabinet Member for Community Well-Being outlined the contents of the report stating the COVID -19 pandemic had had a significant impact on a range of businesses especially the hospitality sector. In order to support businesses in reopening, the Government had published the Business and Planning Bill on 25 June 2020 which had identified significant new licensing requirements. The Bill had introduced a new pavement licencing regime to be administered by the Local Authority to allow the serving of food and drink by local businesses on certain highways; fees for the licence would not exceed £100 and the details of the licence could be specified by the Licensing Authority.

The Group Manager for Public Health and Regulatory Services informed the meeting that the Bill was still passing through parliament and that there was still scope for further amendments.

**RESOLVED** that

a) The provisions of the Business and Planning Bill be noted;

b) Delegated authority be given to the Group Manager for Public Health and Regulatory Services for the administration and enforcement of the provisions within the Business and Planning Bill on its passing into law. These delegations can then be sub-delegated to relevant officers; and

c) Delegated authority be given to the Group Manager for Public Health for the setting of the fee for pavement licences.

(Proposed by Cllr D J Knowles and seconded by Cllr Miss E Wainwright)

Note: *Report previously circulated, copy attached to minutes.

203. **NOTIFICATION OF KEY DECISIONS (1-59-26)**

The Cabinet had before it and **NOTED** its *rolling plan for July 2020 containing future key decisions.

204. **3 RIVERS DEVELOPMENTS LTD FEEDBACK FROM SCRUTINY & AUDIT (2-02-22)**

The Cabinet had before it a * report of the Chief Executive providing the feedback received from the Scrutiny and Audit Committees as requested by the Cabinet at its meeting on 11 June 2020.

In answer to a question posed in public question time, the Chief Executive stated that it was his understanding that we could do that but he would check with HR and respond to Mr Quinn in writing.

The Leader outlined the contents of the report stating that comments had been sought from the Scrutiny and Audit Committees with regard to the additional recommendations that they had requested be considered by the Cabinet. 15 additional recommendations had been put forward for consideration.

Consideration was given to:

- A revised shareholder agreement
- Recommendation 14 with the addition of 'such changes to be subject to agreement by the Cabinet'.
- Recommendation 12 and the appointment of non-executive directors and any conflict of interest and whether that conflict of interest could be mitigated
- Whether the Cabinet Member for Finance would be comfortable as an non-executive director
- The formation of an action plan identifying all the recommendations with clear actions and timescales for completion.

It was therefore:

**RESOLVED** that:

a) Recommendations 1-11 be approved,
b) Recommendation 12 be removed,
c) Recommendation 14 be amended to include the wording 'such changes to be subject to agreement by the Cabinet'
d) Recommendations 13 and 15 be approved.

(Proposed by the Chairman)

Note: * Report previously circulated, copy attached to minutes.

(The meeting ended at 8.26 pm) **CHAIRMAN**

**Cabinet**
**09 July 2020**

# Annual Treasury Management Review 2019/20

**Cabinet Member:** Councillor Alex White
**Responsible Officer:** Deputy Chief Executive (S151), Andrew Jarrett

**Reason for Report:** To provide Members with a review of activities and the prudential treasury indicators on actuals for 2019/20.

**Recommendations(s):**

1. **That Members note the treasury activities for the year.**
2. **Approve the actual 2019/20 prudential and treasury indicators in this report.**

**Relationship to the Corporate Plan**: Maximising our return from all associated treasury activities enables the Council to support current levels of spending in accordance with our Corporate Plan.

**Financial Implications:** Good financial management and administration underpins the entire strategy.

**Legal Implications:** Authorities are required by regulation to have regard to the Prudential Code when carrying out their duties under Part 1 of the Local Government Act 2003.

**Risk Assessment:** The S151 Officer is responsible for the administration of the financial affairs of the Council. Implementing this strategy and the CIPFA Code of Practice on Treasury Management manages the risk associated with the Council's treasury management activity.

**Equality Impact Assessment**: No equality issues identified for this report.

**Impact on Climate Change**: No impacts identified for this report.

## 1. Introduction

This Council is required by regulations issued under the Local Government Act 2003 to produce an annual treasury management review of activities and the actual prudential and treasury indicators for 2019/20. This report meets the requirements of both the CIPFA Code of Practice on Treasury Management (the Code) and the CIPFA Prudential Code for Capital Finance in Local Authorities (the Prudential Code).

During 2019/20 the minimum reporting requirements were that the Full Council should receive the following reports:

- an annual treasury strategy in advance of the year (Council 27/02/2019)
- a mid-year (minimum) treasury update report (Council 06/11/2019)
- an annual review following the end of the year describing the activity compared to the strategy (this report)

The regulatory environment places responsibility on members for the review and scrutiny of treasury management policy and activities. This report is, therefore, important in that respect, as it provides details of the outturn position for treasury activities and highlights compliance with the Council's policies previously approved by members.
This Council confirms that it has complied with the requirement under the Code to give prior scrutiny to all of the above treasury management reports by Cabinet before they were reported to the Full Council. Member training on treasury management issues was undertaken during 2019 in order to support members' scrutiny role.

## 2. The Council's Capital Expenditure and Financing

The Council undertakes capital expenditure on long-term assets. These activities may either be:

- Financed immediately through the application of capital or revenue resources (capital receipts, capital grants, revenue contributions etc.), which has no resultant impact on the Council's borrowing need; or
- If insufficient financing is available, or a decision is taken not to apply resources, the capital expenditure will give rise to a borrowing need.

The actual capital expenditure forms one of the required prudential indicators. The table below shows the actual capital expenditure and how this was financed.

| General Fund | 2018/19 Actual £000 | 2019/20 Actual £000 |
|---|---|---|
| **Capital expenditure** | 3,406 | 8,983 |
| Financed in year | (901) | (1,941) |
| **Unfinanced capital expenditure** | 2,505 | 7,042 |
| **HRA** | | |
| **Capital expenditure** | 6,030 | 4,006 |
| Financed in year | (6,030) | (4,006) |
| **Unfinanced capital expenditure** | 0 | 0 |

## 3. The Council's Overall Borrowing Need

The Council's underlying need to borrow to finance capital expenditure is termed the Capital Financing Requirement (CFR).

**Gross borrowing and the CFR** - in order to ensure that borrowing levels are prudent over the medium term and only for a capital purpose, the Council should ensure that its gross external borrowing does not, except in the short term, exceed the total of the capital financing requirement in the preceding year (2019/20) plus the estimates of any additional capital financing requirement for the current (2020/21) and next two financial years. This essentially means that the Council is not borrowing to support revenue expenditure. This indicator allowed the Council some flexibility to borrow in advance of its immediate capital needs in 2019/20. The table below highlights the Council's gross borrowing position against the CFR. The Council has complied with this prudential indicator.

| | 31 March 2019 Actual £000 | 31 March 2020 Actual £000 |
|---|---|---|
| CFR General Fund | 9,059 | 15,682 |
| CFR HRA | 41,385 | 40,431 |
| Total CFR | 50,577 | 56,113 |
| Gross borrowing position | 41,029 | 39,916 |
| (Under) / over funding of CFR | (9,548) | (16,197) |

**The authorised limit** – the authorised limit is the "affordable borrowing limit" required by s3 of the Local Government Act 2003. Once this has been set, the Council does not have the power to borrow above this level. The table below demonstrates that during 2019/20 the Council has maintained gross borrowing within its authorised limit.

**The operational boundary** – the operational boundary is the expected borrowing position of the Council during the year. Periods where the actual position is either below or over the boundary are acceptable subject to the authorised limit not being breached.

| | 2019/20 £000 |
|---|---|
| Authorised limit | 72,000 |
| Maximum gross borrowing position during the year | 41,029 |
| Operational boundary | 63,000 |
| Average gross borrowing position | 40,473 |

## 4. Treasury Position as at 31 March 2020

At the beginning and the end of 2019/20 the Council's treasury position was as follows:

| DEBT PORTFOLIO | 31 March 2019 Principal £000 | 31 March 2020 Principal £000 |
|---|---|---|
| **Fixed rate funding:** | | |
| **-PWLB** | 40,718 | 38,937 |
| **Total debt** | 40,718 | 38,937 |
| **CFR*** | 50,266 | 55,133 |
| **(Under) / over borrowing** | (9,548) | (16,197) |
| **Total investments** | 22,000 | 20,000 |
| **Net debt** | 18,718 | 18,937 |

- Excludes finance leases

The maturity structure of the debt portfolio was as follows:

| | 31 March 2019 Actual £000 | 31 March 2020 Actual £000 |
|---|---|---|
| Under 12 months | 1,780 | 1,833 |
| 12 months and within 24 months | 1,833 | 1,870 |
| 24 months and within 5 years | 5,730 | 5,836 |
| 5 years and within 10 years | 10,471 | 10,778 |
| 10 years and within 20 years | 20,679 | 18,620 |
| 20 years and within 30 years | 224 | 0 |

| INVESTMENT PORTFOLIO | Actual 31/03/19 £000 | Actual 31/03/19 % | Actual 31/03/20 £000 | Actual 31/03/20 % |
|---|---|---|---|---|
| **Treasury investments** | | | | |
| Banks | 13,500 | 50% | 10,000 | 40% |
| Local authorities | 6,500 | 24% | 9,000 | 36% |
| Other Government Organisations | 2,000 | 7% | 1,000 | 4% |
| **Total managed in house*** | **22,000** | **81%** | **20,000** | **80%** |
| Property funds (CCLA) | 5,000 | 19% | 5,000 | 20% |
| **Total managed externally** | **5,000** | **19%** | **5,000** | **20%** |
| **TOTAL TREASURY INVESTMENTS** | **27,000** | **100%** | **25,000** | **100%** |

*See Appendix 1 for a breakdown of internally managed investments held as at 31 March.

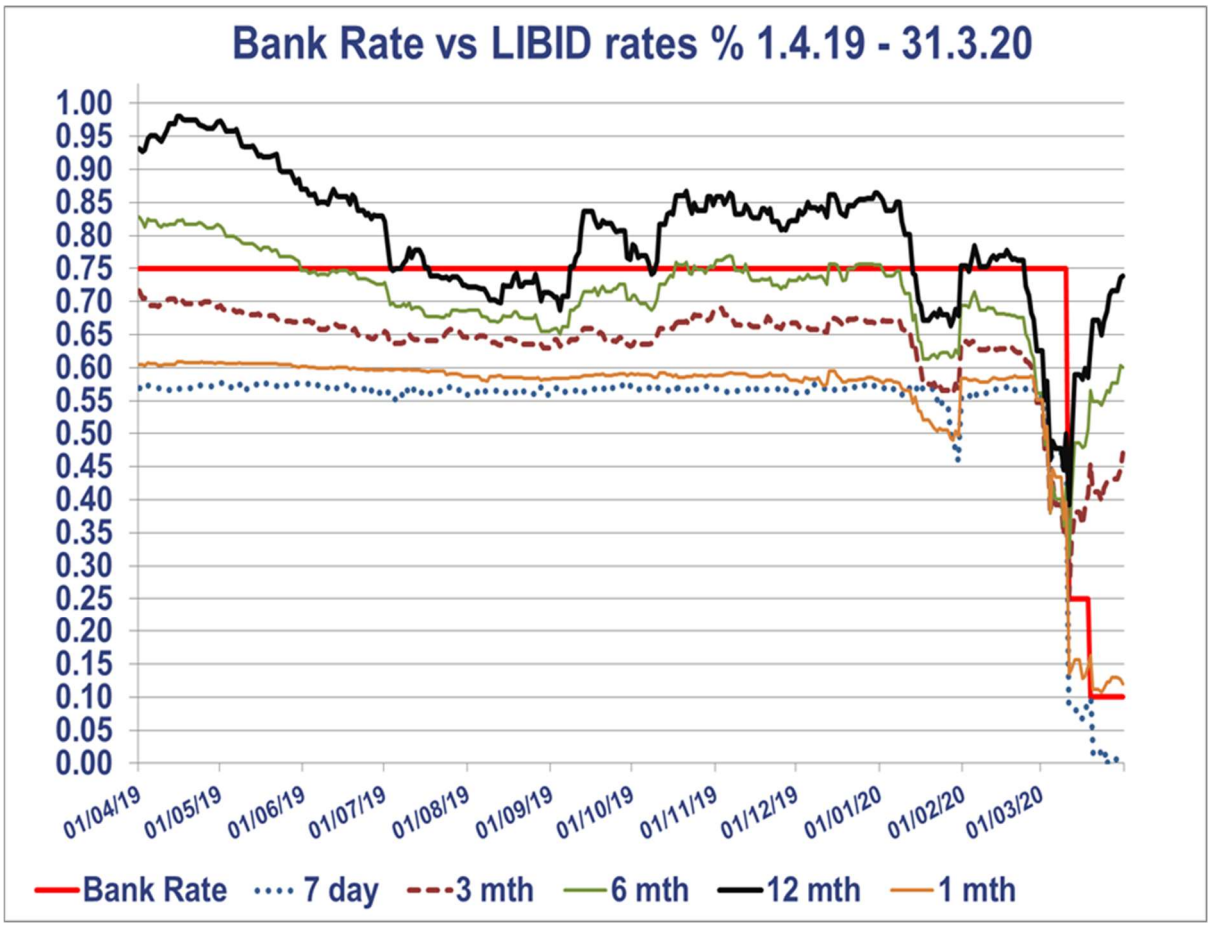
| | | | | |
|---|---|---|---|---|
| **Non Treasury investments** | | | | |
| Subsidiaries (3 Rivers Ltd) | 2,613 | 100% | 9,061 | 100% |
| **TOTAL NON TREASURY INVESTMENTS** | **2,613** | **100%** | **9,061** | **100%** |

On 25 March 2020, due to the economic impact of the Covid-19 pandemic, CCLA suspended all trading of shares in the property fund. This was done to protect the value of the fund and prevent disadvantage to parties buying or selling shares at unreliable market values. Trading will remain frozen until certainty in market values is re-established, however dividends will continue to be paid on existing shares.

The value shown in the above table for the Council's CCLA investment is the amount paid by the Council on share acquisition. This differs to the carrying amount in the year end accounts of £4,759k (£4,935k in 2018/19) as there is a requirement to carry the investment at fair value. It is expected that the fair value of the fund will recover over the longer term, and so this temporary drop in value is unlikely to be realised as a loss to Council funds.

## 5. The strategy for 2019/20

### 5.1 Investment strategy and control of interest rate risk




Investment returns remained low during 2019/20. The expectation for interest rates within the treasury management strategy for 2019/20 was that Bank Rate would stay at 0.75% during 2019/20 as it was not expected that the MPC would be able to deliver on an increase in Bank Rate until the Brexit issue was finally settled. However, there was an expectation that Bank Rate would rise after that issue was settled, but would only rise to 1.0% during 2020.

Rising concerns over the possibility that the UK could leave the EU at the end of October 2019 caused longer term investment rates to be on a falling trend for most of April to September. They then rose after the end of October deadline was rejected by the Commons but fell back again in January before recovering again after the 31 January departure of the UK from the EU. When the coronavirus outbreak hit the UK in February/March, rates initially plunged but then rose sharply back up again due to a shortage of liquidity in financial markets. As longer term rates were significantly higher than shorter term rates during the year, value was therefore sought by placing longer term investments where cash balances were sufficient to allow this.

While the Council has taken a cautious approach to investing, it is also fully appreciative of changes to regulatory requirements for financial institutions in terms of additional capital and liquidity that came about in the aftermath of the financial crisis. These requirements have provided a far stronger basis for financial institutions, with annual stress tests by regulators

evidencing how institutions are now far more able to cope with extreme stressed market and economic conditions.

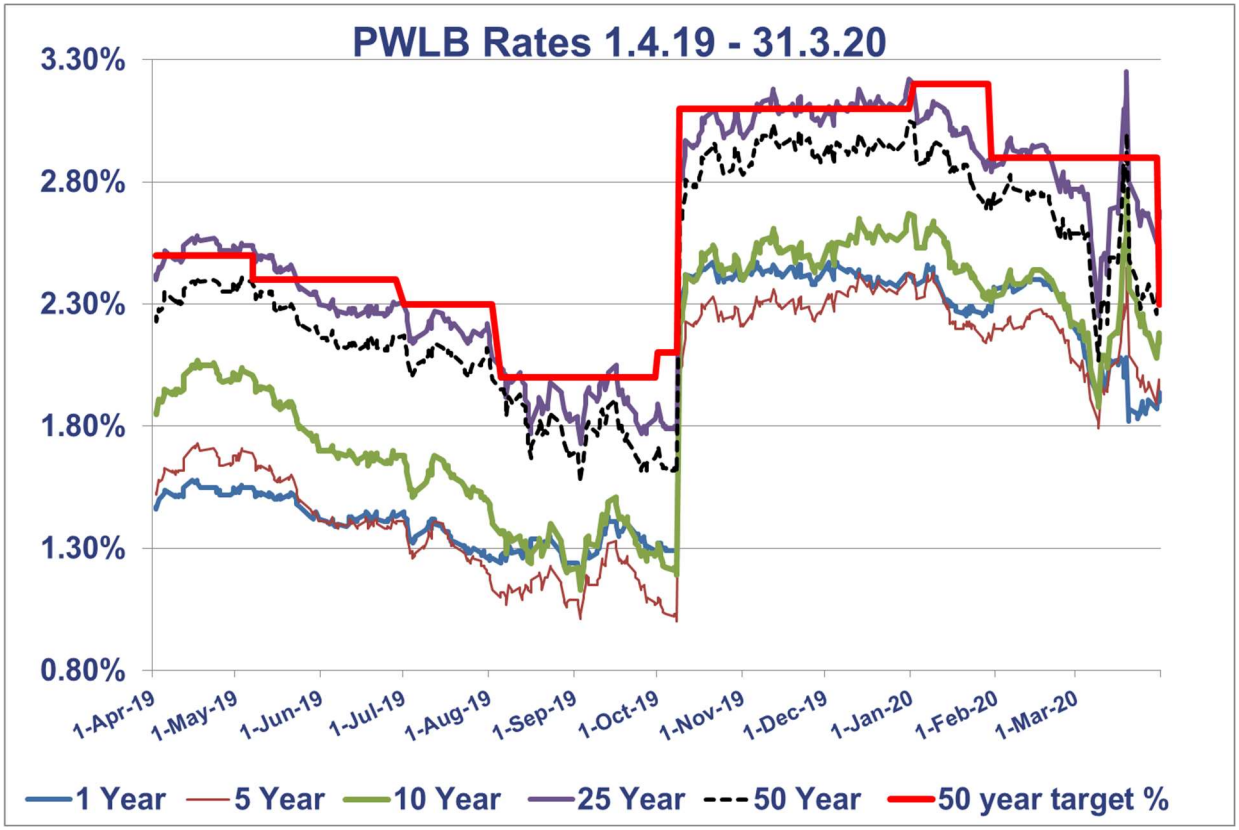
Investment balances have been kept to a minimum through the agreed strategy of using reserves and balances to support internal borrowing, rather than borrowing externally from the financial markets. External borrowing would have incurred an additional cost, due to the differential between borrowing and investment rates as illustrated in the charts shown above and below. Such an approach has also provided benefits in terms of reducing the counterparty risk exposure, by having fewer investments placed in the financial markets.

**5.2 Borrowing strategy and control of interest rate risk**

During 2019-20, the Council maintained an under-borrowed position. This meant that the capital borrowing need (the Capital Financing Requirement) was not fully funded with loan debt, as cash supporting the Council's reserves, balances and cash flow was used as an interim measure. This strategy was prudent as investment returns were low and minimising counterparty risk on placing investments also needed to be considered.

The policy of avoiding new borrowing by running down spare cash balances, has served us well over the last few years. However, this was kept under review to avoid incurring higher borrowing costs in the future when this authority may not be able to avoid new borrowing to finance capital expenditure and/or the refinancing of maturing debt.

Interest rate forecasts expected only gradual rises in medium and longer term fixed borrowing rates during 2019/20 and the two subsequent financial years. Variable, or short-term rates, were expected to be the cheaper form of borrowing over the period.



| | 1 Year | 5 Year | 10 Year | 25 Year | 50 Year |
|---|---|---|---|---|---|
| 01/04/2019 | 1.46% | 1.52% | 1.84% | 2.41% | 2.24% |
| 31/03/2020 | 1.90% | 1.95% | 2.14% | 2.65% | 2.39% |
| Low | 1.17% | 1.00% | 1.13% | 1.73% | 1.57% |
| Date | 03/09/2019 | 08/10/2019 | 03/09/2019 | 03/09/2019 | 03/09/2019 |
| High | 2.47% | 2.45% | 2.76% | 3.25% | 3.05% |
| Date | 21/10/2019 | 19/03/2020 | 19/03/2020 | 19/03/2020 | 31/12/2019 |
| Average | 1.83% | 1.77% | 2.00% | 2.56% | 2.40% |

| Link Asset Services Interest Rate View | 31.3.20 | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | Jun-20 | Sep-20 | Dec-20 | Mar-21 | Jun-21 | Sep-21 | Dec-21 | Mar-22 |
| Bank Rate View | 0.10 | 0.10 | 0.10 | 0.10 | 0.10 | 0.10 | 0.10 | 0.10 |
| 3 Month LIBID | 0.45 | 0.40 | 0.35 | 0.30 | 0.30 | 0.30 | 0.30 | 0.30 |
| 6 Month LIBID | 0.60 | 0.55 | 0.50 | 0.45 | 0.40 | 0.40 | 0.40 | 0.40 |
| 12 Month LIBID | 0.75 | 0.70 | 0.65 | 0.60 | 0.55 | 0.55 | 0.55 | 0.55 |
| 5yr PWLB Rate | 1.90 | 1.90 | 1.90 | 2.00 | 2.00 | 2.00 | 2.10 | 2.10 |
| 10yr PWLB Rate | 2.10 | 2.10 | 2.10 | 2.20 | 2.20 | 2.20 | 2.30 | 2.30 |
| 25yr PWLB Rate | 2.50 | 2.50 | 2.50 | 2.60 | 2.60 | 2.60 | 2.70 | 2.70 |
| 50yr PWLB Rate | 2.30 | 2.30 | 2.30 | 2.40 | 2.40 | 2.40 | 2.50 | 2.50 |

HM Treasury has imposed **two changes in the margins over gilt yields for PWLB rates** in 2019-20 without any prior warning; the first on 9 October 2019, added an additional 1% margin over gilts to all PWLB rates. That increase was then partially reversed for some forms of borrowing on 11 March 2020, at the same time as the Government announced in the Budget a programme of increased spending on infrastructure expenditure. It also announced that there would be a consultation with local authorities on possibly further amending these margins; this was due to end on 4 June but has recently been extended to 31 July due to the Covid-19 pandemic. It is clear that the Treasury intends to put a stop to local authorities borrowing money from the PWLB to purchase commercial property if the aim is solely to generate an income stream.

Following the changes on 11 March 2020 in margins over gilt yields, the current situation is as follows: -

- **PWLB Standard Rate** is gilt plus 200 basis points (G+200bps)
- **PWLB Certainty Rate** is gilt plus 180 basis points (G+180bps)
- **PWLB HRA Standard Rate** is gilt plus 100 basis points (G+100bps)
- **PWLB HRA Certainty Rate** is gilt plus 80bps (G+80bps)
- **Local Infrastructure Rate** is gilt plus 60bps (G+60bps)

There is likely to be little upward movement in PWLB rates over the next two years as it will take national economies a prolonged period to recover all the momentum they will lose in the sharp recession that will be caused during the coronavirus shut down period. Inflation is also likely to be very low during this period and could even turn negative in some major western economies during 2020-21.

## 6. Borrowing Outturn

**Borrowing**
Due to delays in a number of planned capital projects coupled with investment concerns, both counterparty risk and low investment returns, no borrowing was undertaken during the year.

**Borrowing in advance of need**
The Council has not borrowed more than, or in advance of its needs, purely in order to profit from the investment of the extra sums borrowed.

**Rescheduling**
No rescheduling was done during the year as the average 1% differential between PWLB new borrowing rates and premature repayment rates made rescheduling unviable.

## 7. Investment Outturn

**Investment Policy** – the Council's investment policy is governed by MHCLG investment guidance, which has been implemented in the annual investment strategy approved by the Council on 27/02/2019. This policy sets out the approach for choosing investment counterparties, and is based on credit ratings provided by the three main credit rating agencies, supplemented by additional market data from our treasury advisers (Link Asset Services).

The investment activity during the year conformed to the approved strategy, and the Council had no liquidity difficulties.

**Investments held by the Council**

- The Council maintained an average balance of £21m of internally managed funds.
- The internally managed funds earned interest of £238k giving an average rate of return of 0.90%.
- The comparable performance indicator is the 3 month LIBID rate, which was 0.6339%.
- The Council held £5m invested in Churches, Charities and Local Authorities (CCLA) property funds earning dividends of £213k (4.27%) in 2019/20.
- Interest received from 3 Rivers Ltd amounted to £251k in 2019/20.

## 8. Other Issues

**1. IFRS 9 fair value of investments**
Following the consultation undertaken by the Ministry of Housing, Communities and Local Government (MHCLG) on IFRS 9 the Government has introduced a mandatory statutory override for local authorities to reverse out all unrealised fair value movements resulting from pooled investment funds. This came into effect on 1 April 2018 for 2018/19. The statutory override applies for five years from this date. Local authorities are required to disclose the net impact of the unrealised fair value movements in a separate unusable reserve throughout the duration of the override in order for the Government to keep the override under review and to maintain a form of transparency.

Risk management will need to take account of the 2018/19 Accounting Code of Practice proposals for the valuation of investments. Whilst for many authorities, this may not be a significant issue, key considerations include:

- Expected credit loss model. Whilst this should not be material for vanilla treasury investments such as bank deposits, this is likely to be problematic for some investments such as property funds, loans to third parties or loans to subsidiaries.
- The valuation of investments previously valued under the available for sale category e.g. equity related to the "commercialism" agenda, property funds, equity funds and similar, have been changed to **Fair Value through the Profit and Loss (FVPL).**

**2. Non-treasury management investments.**
As shown in the table in section 4 part relating to non-treasury investments, the Authority holds a 100% interest in 3 Rivers Development Limited, a private limited company engaged in construction in the Mid Devon area. The Authority advances funds to the Company to facilitate operations with the intention that they are repaid from the proceeds of the sale of the developments.

During the year ended 31 March 2020, £6.446m was loaned to the Company and total loan value at this date was £9.061m. During the year £251k interest was paid to the Authority in respect of these loans.

These loans are subject to overarching management review on a regular basis. This is reflected in the impairments made in both periodic monitoring reports and in the year end financial statements. The year end review, carried out in compliance with IFRS 9 Financial Instruments, led to impairments totalling £790k in respect of one of the project loans and the working capital loan.

**3. Counterparty limits**
At the end of March 2020 approval was given by the S151 Officer and the Cabinet Member for Finance to exceed the £5m limit on deposits held with the Council's bank, NatWest, for a period of 3 months, in order to administer the Small Business Grants Fund and the Retail, Hospitality and Leisure Business Grants Fund. £22.732m was received from Government on 1st April 2020 in respect of these.

**Contact for further information:**
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**Appendix 1: Investment Portfolio**

Internally managed investments held as at 31 March:

| Bank/Building Society/Local Authority/PCC | Term | | Fixed Interest Rate % | 31/03/19 | 31/03/20 |
|---|---|---|---|---|---|
| | From | To | | £000 | £000 |
| Santander | 06/04/2018 | 05/04/2019 | 1.01% | 2,000 | |
| Barclays | 01/08/2018 | 31/07/2019 | 0.94% | 2,500 | |
| Lloyds | 05/04/2018 | 05/04/2019 | 0.90% | 1,000 | |
| Lloyds | 28/03/2019 | 30/12/2019 | 1.05% | 2,000 | |
| Goldman Sachs | 26/04/2018 | 26/04/2019 | 1.22% | 2,000 | |
| Santander | 15/08/2018 | 15/05/2019 | 0.93% | 1,000 | |
| Goldman Sachs | 16/01/2019 | 16/05/2019 | 0.91% | 1,000 | |
| Eastleigh Borough Council | 22/01/2019 | 22/05/2019 | 0.82% | 1,000 | |
| Salford City Council | 10/12/2018 | 10/06/2019 | 0.95% | 2,000 | |
| Salford City Council | 01/10/2018 | 01/07/2019 | 0.90% | 2,000 | |
| Police & Crime Comm for Northumbria | 31/01/2019 | 04/07/2019 | 0.95% | 2,000 | |
| Goldman Sachs | 15/10/2018 | 15/10/2019 | 1.22% | 2,000 | |
| Stirling Council | 11/03/2019 | 11/06/2019 | 0.93% | 1,500 | |
| Close Brothers | 04/09/2019 | 02/09/2020 | 1.10% | | 1,000 |
| Santander | 17/09/2019 | 17/09/2020 | 0.94% | | 2,000 |
| Santander | 01/10/2019 | 01/04/2020 | 0.83% | | 1,500 |
| Santander | 07/10/2019 | 07/04/2020 | 0.83% | | 1,500 |
| Rugby Borough Council | 09/10/2019 | 07/10/2020 | 0.90% | | 1,000 |
| Goldman Sachs | 29/10/2019 | 29/04/2020 | 0.95% | | 1,000 |
| Goldman Sachs | 05/11/2019 | 05/05/2020 | 1.00% | | 1,000 |
| Highlands Council | 27/11/2019 | 25/11/2020 | 0.92% | | 1,000 |
| Lloyds | 30/12/2019 | 30/12/2020 | 1.10% | | 2,000 |
| Merseyside PCC | 02/01/2020 | 30/04/2020 | 0.85% | | 1,000 |
| Nottingham City Council | 02/03/2020 | 17/04/2020 | 0.80% | | 2,500 |
| Central Bedfordshire Council | 03/03/2020 | 27/05/2020 | 0.95% | | 2,000 |
| Eastleigh Borough Council | 13/03/2020 | 14/04/2020 | 1.10% | | 1,500 |
| Cheltenham Borough Council | 20/03/2020 | 20/04/2020 | 0.95% | | 1,000 |
| **Total** | | | | **22,000** | **20,000** |

**MID DEVON DISTRICT COUNCIL**

**MINUTES** of a **MEETING** of the **CABINET** held on 6 August 2020 at 6.00 pm

**Present Councillors** R M Deed (Leader)
L D Taylor, G Barnell, S J Clist, D J Knowles, Ms E J Wainwright, A White and Mrs N Woollatt

**Also Present Councillor(s)** Mrs C P Daw, R Evans, F W Letch, Miss J Norton, R F Radford, B G J Warren and A Wilce

**Also Present Officer(s):** Andrew Jarrett (Deputy Chief Executive (S151)), Jill May (Director of Corporate Affairs and Business Transformation), Jenny Clifford (Head of Planning, Economy and Regeneration), Kathryn Tebbey (Head of Legal (Monitoring Officer)), Ian Chilver (Group Manager for Financial Services), Nicola Cuskeran (Senior H R Business Partner), Dean Emery (Group Manager for Revenues and Benefits), Claire Fry (Group Manager for Housing), Lisa Lewis (Group Manager for Business Transformation and Customer Engagement), Tina Maryan (Area Planning Officer), Christie McCombe (Area Planning Officer), Tristan Peat (Forward Planning Team Leader), Aarron Beecham (Forward Planning Officer), Chris Shears (Economic Development Officer) and Sally Gabriel (Member Services Manager)

205. **APOLOGIES (00-03-10)**

There were no apologies for absence.

206. **REMOTE MEETINGS PROTOCOL (00-03-19)**

The protocol for remote meetings was **NOTED**.

207. **PUBLIC QUESTION TIME (00-03-45)**

The Chairman read a statement on behalf of Mr Quinn referring to Item 5 on the agenda – minutes of the previous meeting:

At the last Cabinet meeting, I asked two questions.

One was answered in writing after the meeting, but the other has not been.

I had asked where I could see the answer to a question posed at the Audit Committee meeting of 23 June 2020.

In section 201 of the minutes of your previous meeting, at the end of the second paragraph, it is recorded that the Deputy Chief Executive "*would respond to Mr Quinn directly*".

I have not had any response from the Deputy Chief Executive since that Cabinet meeting - so I still have not received an answer to my question.

My question is:

Why has the Deputy Chief Executive not provided the response he is shown as promising in the Minutes of the Previous Meeting?

Mr Allan referring to Item 11 (Greater Exeter Strategic Plan) on the agenda stated:

I am concerned that the economic development assessment is dated March 2017 and the assumptions in it date back to 2015 - it seems that the economic numbers that are unpinning the plan seem to ignore both the risk of a hard Brexit and even more the current economic situation due to the Covid virus.

Secondly the 'attitudes to growth' survey suggests that there is a net negative of 15.6% about the prospects for Mid Devon which clearly seems to be linked to the scale of the development which I think if economic growth is going to be slower, you should rethink whether that is appropriate.

Thirdly there is encouraging talk of the wish to maintain visual and technical separation of Kentisbeare, however on the one hand the map seems to show that the Garden Village is creeping closer to the A373 and also there are 2 different maps, one on page 98 and the other on page 156 which conflict with each other. One suggests the border at Dead Lane and the other suggests the border halfway between Dead Lane and Hole Road, so it is actually not quite clear what is proposed. Some of the scoring is odd - given the likelihood of creating a commuter town using the M5, its sits rather oddly with scoring for the Garden Village as having significant effects on climate change. It also refers to constraints of flooding in the Garden Village. I have after the last Delivery Board Meeting been in contact with Connecting the Culm, which they say that all future development is neutral which is not really what we were promised, which was that they would look at the impact of the scale of development that was intended both here and at J27, instead of just deciding that it was neutral and just mapping up the Culm regardless. My question is whether it makes sense to go out to public consultation without reworking the plan with objectives that look both more realistic to the time we are now in and closer to the wishes of the people who live in Mid Devon.

The Committee Clerk then read a letter from Cllr Enright (Chairman -Newton St Cyres Parish Council) referring again to Item 11 (Greater Exeter Strategic Plan) on the agenda:

I am dismayed to see that in the Greater Exeter Strategic Plan my village of Newton St Cyres has been singled out for at least 1200 new dwellings. Our village presently has under 800 dwellings.

The sites chosen are very difficult to access and partly prone to flooding.

A few days ago, the Full Mid Devon District Council voted to adopt the Mid Devon Plan Review. It follows that you should today formally reject the Greater Exeter Strategic Plan.

Should you require more housing then my suggestion would be that you build a new road from North of Crediton to the A30 and fund the road by strategically placed housing estates.

This would result in fewer cars and lorries needing to use the A377 to access Exeter and would be better for the local environment.

My question is this. Having just adopted the Mid Devon Plan Review will you today vote to not allow our villages to become a part of Greater Exeter by agreeing not to adopt the Greater Exeter Strategic Plan?.

The Chairman indicated that answers to questions would be provided when the items was debated.

208. **DECLARATIONS OF INTEREST UNDER THE CODE OF CONDUCT (00-11-04)**

Members were reminded of the need to make any declarations of interest when appropriate.

209. **MINUTES OF THE PREVIOUS MEETING (00-11-30)**

The minutes of the previous meeting were approved as a correct record.

210. **DEVON DISTRICT COUNCIL'S JOINT SAFEGUARDING POLICY AND MDDC GUIDANCE AND PROCEDURES (00-12-11**

Arising from a *report of the Director of Corporate Affairs and Business Transformation, the Community Policy Development Group had requested that following review it be noted that no amendments had been made to the policy in the last 12 months.

The Cabinet Member for the Working Environment and Support Services outlined the contents of the report stating that this was an annual report, the policy had been reviewed and there had been no amendments.

Consideration was given to whether DBS checks should be made mandatory for councillors and it was requested that a further report be prepared for consideration by the Cabinet.

**RESOLVED** that the report be noted.

(Proposed by the Chairman)

Note: *Report previously circulated, copy attached to minutes.

211. **HYDRO MILLS PROJECT - TIVERTON WEIR (00-14-38)**

The Cabinet had before it a * report of the Head of Planning, Economy and Regeneration updating Cabinet Members on the development of the Tiverton Weir element of the Hydro-Mills project and seeking approval to progress the project through the planning process and for the project to be funded through the revised capital programme.

The Cabinet Member for Planning and Economic Regeneration outlined the contents of the report stating that the project would see the development of a twin Archimedes screw hydro-electric generation system and the related building, on the town weir adjacent to Rotary Way in Tiverton. Cabinet were being asked to agree that it goes forward through to the submission of a full planning application and is put onto the capital programme. This would allow the project to progress, but would still give Cabinet the opportunity to review the scheme and make a final decision once full cost details were established and all relevant decisions relating to the statutory requirements for the project had been approved. The full business case would be made available in December and would include cost and sensitivity analysis so that a final decision could be made before the project entered the tendering stage.

The project was a high profile low-carbon initiative for Mid Devon, which could mitigate the energy requirements for Phoenix House, with potential for selling additional energy through a power purchasing agreement. The scheme had been developed in partnership with a number of organisations, including the Hydro Mills Group Ltd (a local group of private riparian owners who were also bringing forward hydro schemes within the District), and in consultation with the Rivers Trust and Anglers Association. Its aim was to not only provide clean, renewable energy for MDDC, but to provide a host of other benefits, including enhanced biodiversity along the River Exe and a facility for people to learn about renewable technologies and to view the system in operation.

Consideration was given to:

- The need for any design to be tasteful and to fit in with aspects of the Exe Valley
- This was major infrastructure which shared the net zero aims of the council.
- The project could open up interest from other funding sources and that the project would bring the river into the forefront of the town and could become a tourist attraction
- Concerns were raised with regard to funding and the need for it to be controlled
- The private riparian owners and the schemes being discussed across the district and whether one of the PDG's could be updated on this work
- The need to pursue purchasing the titles so that the area could be maintained to a specific standard
- Possible lighting issues for the area and any detrimental impact on wildlife and the need for extensive environmental studies to take place
- The need for fish passes to be progressed

**RESOLVED** that :

a) the project be supported and it is agreed that officers proceed to submit the planning application

b) It is agreed that officers bring the scheme forward for inclusion within the revised capital programme

(Proposed by Cllr G Barnell and seconded by Cllr S J Clist)

Reason for the decision

This would allow the scheme to proceed to the stage of planning application submission and to include the project within the revised capital programme.

Note:

i) Cllr Mrs N Woollatt declared a personal interest as a private riparian owner;

ii) *Report previously circulated, copy attached to minutes.

212. **CUSTOMER EXPERIENCE WORKING GROUP - RECOMMENDATIONS FROM THE SCRUTINY COMMITTEE (00-32-29)**

The Cabinet had before it a *report of the Scrutiny Working Group "Review of Customer Experience in Mid Devon District Council" which had been considered by the Scrutiny Committee at its meeting on 20th July 2020 and it had made the following recommendations:

1. That a business case for a new Customer Relationship Management (CRM) system to replace the existing technology is developed and considered by the Cabinet. That any new system be designed with customer need at the centre of the process.
2. That systems work to full capacity and meet the needs of the customer first and foremost. Back offices should carry out service reviews and review business processes to ensure they are customer focused.
3. To ensure customers are at the heart of the Council, a customer focused culture should be promoted across the whole organisation - for all staff from the top down. This could include training (for Leadership Team, Officers and Members), Members/staff workshops or the use of advocates/case studies to promote a new system.
4. That a customer survey is carried out with members of the public regarding their experience and satisfaction as customers of the Council. Results are reported back to the Working Group when available.
5. That the Planning Department consider re-establishing a dedicated phone answering system, to ensure officers have capacity to focus on applications.
6. That the phone waiting times are reduced. A review of why the Service Level Agreement is not being met is carried out.

The Cabinet Member for the Working Environment and Support Services thanked the members of the working group and the officers who had put forward the excellent report. The work had been a valuable exercise looking broadly across the work of the whole authority. The report had highlighted some system processes that could be improved and had considered system used by other councils. She looked forward to receiving feedback from officers with regard to the work that was taking place and requested that timescales be put in place for some of the action points.

Consideration was given to: the work of the working group, the clean processes that were already in place in some departments and the need for the CRM system to be updated.

It was requested that special thanks to the Policy/Research Officer be recorded for her work on the project..

**RESOLVED** that the recommendations of the Scrutiny Committee be approved.

(Proposed by Cllr Mrs N Woollatt and seconded by Cllr L D Taylor)

Reason for decision

In light of the recent Covid challenges for the public and the authority, as an organisation we need to ensure that we continue to meet customer needs and a review of our customer approach is overdue. Acting on the recommendations from the report would serve as a useful exercise to also review lessons learned from the last few months in how we as an organisation are able to do things differently.

Note: *Report previously circulated, copy attached to minutes.

213. **STATEMENT OF COMMUNITY INVOLVEMENT REVIEW 2020 (00-41-07)**

The Cabinet had before it a * report of the Head of Planning, Economy and Regeneration regarding the revised Mid Devon Statement of Community Involvement (SCI) July 2020, and also temporary amendments in light of Government restrictions on people's movement and the need for social distancing.

The Cabinet Member for Planning and Economic Regeneration outlined the contents of the report stating that the Statement of Community Involvement (SCI) set out in detail how the Council would consult on local plans, Supplementary Planning Documents and planning applications.

The Council's existing SCI was adopted in 2016. And a review had been undertaken to take account of the following:

- The revised National Planning Policy Framework (2019)
- The Council's policies for giving advice in relation to neighbourhood planning
- Changes to Government legislation and a review of cost implications associated with consultation on planning applications.

The Head of Planning, Economy and Regeneration then addressed the meeting stating that the SCI also proposed a series of temporary amendments due to Covid-19 and restrictions on movement and gatherings.

Section 6.0 set out the level of support to be provided by the Council at each stage of the neighbourhood plan preparation process including area designation, submission, examination, referendum and adoption. It also set out additional optional support that the Council may be able to provide. In relation to planning applications, the revised documents set out how the authority consulted on planning applications and the different methods used, both electronic communications and neighbour notification

letters. The document also set out how communication would take place with regard to plan making and local plans. The draft SCI had been considered by the Planning Policy Advisory Group (PPAG), the report would be updated to include all the amendments arising from the PPAG before it was presented to Council.

Consideration was given to:

- Whether viability information would be published
- The need to consider under represented groups and how we would consult with residents via non-electronic means
- Neighbourhood Plans and the 2 stages of consultation and for Ward Members to receive the Council's draft responses to the consultation
- The need to increase liaison with customers electronically
- The need for 'Public Access' to be kept updated in a timely manner so that documents could be in order and clearly identifiable
- The request that the Planning Committee to be provided with copies of policy documents for reference
- In the summary of planning application processes, that outline applications can include access
- The S106 Governance report that was expected

**RECOMMENDED** to Council that:

a) The Mid Devon Statement of Community Involvement (SCI) July 2020 (Appendix 1) including amendments arising from the meeting of Planning Policy Advisory Group meeting of 24th June 2020 is adopted and published on the Council's website.

b) The temporary amendments to the Mid Devon Statement of Community Involvement (SCI) July 2020 (Appendix 2) are adopted until 31st December 2020 and published on the Council's website.

c) Delegated authority be given to Head of Planning, Economy and Regeneration in consultation with the Cabinet Member for Planning and Economic Regeneration to review and update the temporary amendments to the Mid Devon Statement of Community Involvement (SCI) July 2020 (Appendix 2 should Government advice change or the Regulations be further amended in terms of restrictions on the movement of people and gatherings. Such review to include withdrawal of the temporary amendments in advance of 31st December 2020 should circumstances allow.

(Proposed by Cllr G Barnell and seconded by Cllr D J Knowles)

Reason for decision

So that the Council can meet its legal requirements under Section 18 of the Planning and Compulsory Act 2004. A decision is also needed to recommend the grant of delegated authority to review and update or withdraw the temporary amendments should Government advice or the Regulations be amended.

Note: *Report previously circulated, copy attached to minutes.

214. **TIVERTON TOWN CENTRE MASTERPLAN UPDATE (1-10-23)**

The Cabinet had before it a * report from the Head of Planning, Economy and Regeneration updating members on work to date, but also critically to provide an indication of future direction in response to the pandemic and the climate change declaration. It also provides an indication of when future reports will be considered by Cabinet and identifies key potential geographical areas for strategic intervention.

The Cabinet Member for Planning and Economic Regeneration stated that the work relating to regeneration and investment masterplanning for Tiverton town centre commenced prior to the current pandemic. Given the implications of COVID19 upon the local economy and town centre activity and the opportunities to embed tackling climate change into our approach to town centre regeneration, the report set out a way forward to encapsulate those issues with regard to strategic planning for Tiverton town centre.

Work on the Town Centre Regeneration Masterplan for Tiverton commenced in 2017 and was to set a basis for enhancing the economic prospects of the town in a way that was broader than a purely spatial plan. It was to include wider issues than the look and environment of the town centre, but the role and function of the town centre, Tiverton's identity and its unique selling points.

Initial public consultation was undertaken between 30th April and 10th June 2018 with a summary of the consultation feedback being presented to Cabinet during November 2018. The results of the consultation had informed both the masterplanning work undertaken since and the 'quick win' proposal for Fore Street which was subsequently paused. In addition, the Premier Inn had been opened and the multi-storey car park had been refurbished. An overhaul of the pedestrian signage had also been initiated with designs agreed with the Town Council and the Town Centre Partnership.

Mid Devon District Council had also adopted the Devon Climate Change Declaration with a commitment for net-zero carbon emissions by 2030.

More recently, high streets had suffered the biggest decline in their fortunes in living memory due to COVID19 - particularly the effect on our local economy and high street businesses. Any regeneration plans for the town needed to consider those impacts if they are going to be 'fit for purpose' in a changing high street environment.

This report therefore set out a process to develop a long term town centre recovery plan. It described a range of outputs including prioritisation of strategic interventions and proposals that could be delivered in the short term to make a meaningful and lasting contribution towards COVID19 related recovery. The work would complement immediate work being undertaken to enable the town to reopen and operate safely during the pandemic. Importantly, work towards COVID19 recovery also provides opportunities to put the Council's commitment to the climate change declaration at the heart of the town centre's role, function and regeneration.

Given the scale of the challenge and the complexities involved in town centre regeneration a suite of documents were proposed and identified.

Given the scale of the impact of COVID 19 and the need to ensure that the Council's commitment to climate change was adequately reflected in Tiverton's regeneration plans there were a number of initial steps that needed to be taken and/or reviewed:

The Town Centre Vision
The emerging key themes from public consultation
Key geographic areas for intervention
Prioritisation and identification of quick win projects

It was proposed that these work streams were developed with close working between officers, Cabinet and Ward Members, the Town Council, the Tiverton Town Centre Partnership and other stakeholders. It was hoped that the draft masterplan to be presented to Cabinet in December 2020

Consideration was given to:

- To the cost of yet another consultation on the masterplan, what the proposals would be, what was the branding and the marketing proposed and how much would that cost.
- The need for the masterplan to have 2 stages of consultation in line with the supplementary planning document guidance and the need to include the climate declaration

**RESOLVED** that:

a) the report be **NOTED.**

b) the direction of travel of the emerging work including the potential locations for intervention be endorsed and informs the next stage of work in preparing a draft Masterplan document and accompanying documentation including a Delivery Plan.

(Proposed by Cllr G Barnell and seconded by Cllr S J Clist)

Reason for decision:

To endorse the direction of travel over emerging work, the locations for intervention and to inform the next stage of work.

Note: *Report previously circulated, copy attached to minutes.

215. **GREATER EXETER STRATEGIC PLAN (1-22-46)**

The Cabinet had before it a * report from the Head of Planning, Economy and Regeneration with regard to the Greater Exeter Strategic Plan Draft Policies and Site Options consultation document and its Sustainability Appraisal Report and Habitat Regulations Assessment Report.

The Leader stated that the concept of the GESP had been supported by the previous administration and by the Council as a whole, it was now time to approve the draft policies and plans for consultation. The report before the meeting contained a list of

draft policies and a site options paper with indicative plans. Of the recommended site options, 5 were in Mid Devon although no formal allocation had been made. There was a need to look at the options and consider the recommendations in the pack. He outlined the other authorities in the partnership which was being supported by Devon County Council. He reported that East Devon were considering withdrawing from the partnership and that a decision would be made by its Council on 20 August but that it wanted to continue to liaise with other authorities. He hoped that Mid Devon would continue to work with other authorities in respect of the GESP.

The Planning Officer (Forward Planning) addressed the meeting highlighting by way of presentation:

- The importance of the document before members and it being the culmination of a very significant volume of work by officers from partner councils following a significant evidence gathering process
- The involvement of members throughout the process
- Not all the site options within the documents would be required
- The involvement of the reference forum and the PPAG in formulating the draft plan
- The further opportunities to shape the GESP post consultation
- The reasons for the plan in line with the NPPF, joint plan making encouraged by central Government, the existing and growing functional link between the administrative boundaries which included the travel to work area, the economic area and the housing market area.
- By working together additional funding could be sought from Government
- The need for the GESP – so that a overarching strategic plan could be formed, the coordination of growth across the 4 areas and the duty to cooperate required constructive, active and ongoing engagement with partners
- The relationship of the GESP with other individual plans, the contents of the plan with the strategic overview, the overarching vision for the area, policies which referred to the climate emergency, prosperity and homes, movement and communication, nature and infrastructure.
- 39 sites had been identified with 5 site options in Mid Devon
- The timetable for approval of the plan.

The Head of Planning, Economy and Regeneration then answered the questions posed in public question time:

- With regard to the economic development needs, she was aware that things had moved on with regard to Brexit and the Covid situation, however the consultation responses would be help to bring things up to date

- With regard to the growth survey, people were asked to think about their local areas and what was important to them and the results informed the draft document. The consultation process would help understand those views further
- With regard to the maps, these were separate base maps accounting for the apparent boundary difference
- With regard to the scoring of the Garden Village in the sustainability appraisal, she would reply to Mr Allan once she had considered the issue
- With regard to flood risk, a catchment wide approach was being taken as part of the Connecting the Culm project and strategic flood risk assessment would be considered
- With regard to Cllr Enright's question – there would be an opportunity as part of the consultation for residents to put forward their views on the issues that he raised.

She continued by highlighting the GESP process to date, the decision of the Council in 2016 to enter into the process and the benefits that were agreed. Since that date the climate declaration has been made and this was referred to in the GESP documents. The housing market areas, travel to work and transport patterns and the cross boundary issues which the strategic plan sought to tackle. There was also the duty to cooperate need. She outlined the other advantages of the plan, the need for infrastructure planning, the investment packages available from the Government for highways and railways, the duty to cooperate, the coordinated approach to funding and the need to have a plan at a sub regional scale.

Consideration was given to the views of Members

- Exeter had largely unachievable sites with some housing proposals being identified next to industrial estates and the motorway
- There were sites also unachievable in Teignbridge and this could impact on Mid Devon with the need to make up the balance
- Concerns about a boundary blind concept and whether we were creating a suburb of Exeter
- Concerns that East Devon may pull out of the partnership and the impact of this on Mid Devon
- 4 of the 5 option sites for consideration in Mid Devon had large floodplains – when these sites were selected did the Environment Agency have any input?
- The Exeter student housing did not form part of the 5 years housing allocation figures for Exeter and concerns that Mid Devon were being asked to build more houses than it needs to
- Concerns with regard to job creation funnelling workers into Exeter and whether economic development should be encouraged in Mid Devon
- Whether any decision should be put on hold until East Devon had made its decision
- The need for independence of decision making for local authorities and the need for local democracy
- The need for the Council to have a view
- The impact on officer resource if East Devon were to pull out of the partnership
- The timing of the decision and the need to consider the impact of Brexit and the pandemic and the knock on effects of these

- Housing need was not all about supply but the need for homes in the right places – what kind of homes did the communities want
- The need for realistic assessments of the carbon zero goals set out in the plan
- The need for affordable housing in the rural areas and that the plan would develop housing hot spots
- Concern that the strategic plan was entering a unitary authority via the back door
- Housing figures provided by the CPRE which did not match of the GESP and whether we are being asked to solve Exeter's problems
- The impact of the proposal at Sampford Peverell and the flooding issues in that area of the village
- The impact of the site at Hartnoll Farm on the villages of Halberton and Sampford Peverell
- Concerns about giving delegated authority to agree changes to the documents arising from decisions from other GESP authorities
- The rail network and the flooding issues in the area
- Poor maintenance on the district's cycle paths
- How much of the 30,000 houses related to a housing need in Mid Devon
- The Local Plan could become subservient, reduced accountability and control and the need for the Local Plan to be the control document and for the Local Plan to have an early review
- The impact of the proposed allocations options on the villages of Newton St Cyres, Sampford Peverell and on Tiverton

It was therefore suggested that:

This Cabinet believes that GESP presents Mid Devon with an unacceptable risk of large scale developments that are not warranted by any formal measure of local housing need.

The Cabinet, therefore, does not approve the recommendations of the Head of Planning in her report on the GESP draft policies and site options.

**RECOMMENDED TO COUNCIL** that: Mid Devon:-

1. Withdraw from GESP
2. Bring forward the preparation of the next Local Plan Review
3. Enter into discussions with our former GESP partners on a new Joint Strategic Planning Framework that ensures responsibility for development site allocations and targets is retained with the Local Plan

(Proposed by Cllr L D Taylor and seconded by Cllr A White)

Reason for decision:

This Cabinet believes that GESP presents Mid Devon with an unacceptable risk of large scale developments that are not warranted by any formal measure of local housing need.

Notes:

i) The Leader requested that his vote against the decision be recorded;

ii) *Report previously circulated, copy attached to minutes.

216. **REVISED GESP STATEMENT OF COMMUNITY INVOLVEMENT (SCI) (3-07-37)**

The Cabinet had before it a * report of the Head of Planning, Economy and Regeneration requesting it to consider and recommend to Council that it approves the Joint Statement of Community Involvement for the Greater Exeter Strategic Plan (GESP).

The Cabinet Member for Planning and Economic Regeneration stated that following the recommendation made in the previous item the document twould only be required if Council approved the recommendations in the officers report. It was therefore put forward that:

In the event that Council decides to continue with the Greater Exeter Strategic Plan then:

**RECOMMENDED** to Council that:

a) The Council approves the contents and adopts the Joint SCI that has been prepared for the Greater Exeter Strategic Plan (GESP); and

b) The Council gives delegated authority to the Leader, in consultation with the Portfolio Holder and Chief Executive, to agree changes to the Joint SCI arising from decisions by the other GESP local planning authorities and to approve it as a Local Development Document, noting that it will apply jointly to East Devon District, Exeter City, Mid Devon District and Teignbridge District Councils.

(Proposed by Cllr G Barnell and seconded by Cllr A White)

Reason for decision

If the decision of the Council is to accept the Greater Exeter Strategic Plan then the GESP Joint Statement of Community Involvement sets out how consultation on, and involvement in, the preparation of the GESP will take place, together with delegated authority to agree changes will be required.

Note: *Report previously circulated, copy attached to minutes.

217. **FINANCIAL MONITORING (3-13-58)**

The Cabinet had before it and **NOTED** a * report of the Deputy Chief Executive (S151) presenting a financial update in respect of the income and expenditure so far in the year.

The Cabinet Member for Finance outlined the contents of the report stating that this was the first financial monitoring statement produced since lockdown. The Covid 19 pandemic had had a significant impact on the financial performance of the Council in the first quarter and whilst there were areas of additional expenditure due to the pandemic, the greatest effect related to the loss of income with a full year deficit of £2.9m, this reflected not only the effects of the lockdown, but also the ongoing underperformance as service activity would take time to recover. The current forecasted General Fund deficit for the current year was £1.503K after transfers to and from earmarked reserves as shown in appendix 1 of the report.

He reported that the HRA was in a satisfactory condition however there were concerns for when the furlough programme ended. Appendix C of the report highlighted the actuals against proposed budget. He informed the meeting that a revised budget would be considered at the next Cabinet meeting.

Note: *Report previously circulated, copy attached to minutes.

218. **PERFORMANCE AND RISK (3-19-54)**

The Cabinet had before it and **NOTED** a * report of the Director of Corporate Affairs and Business Transformation providing Members with an update on the performance against the Corporate Plan and local service targets.

Note: *Report previously circulated, copy attached to minutes.

219. **NOTIFICATION OF KEY DECISIONS (3-20-31)**

The Cabinet had before it and **NOTED** its rolling plan for August 2020 containing future key decisions.

Note: * Plan previously circulated copy attached to minutes.

220. **COUNCILLOR A WILCE (3-22-00)**

Cllr Wilce raised the issue of unanswered questions from public question time stating that:

The question Mr Quinn asked this evening hasn't been answered…he asked why his question at the last Cabinet meeting had not been answered by Mr Jarrett who is present tonight and so is able to answer that question.

His other question from that meeting has also not been fully answered. He asked whether there were releases in place for Mid Devon employees that are seconded to 3R. The answer given related to only one seconded full time person. His enquiry did not specify full time or otherwise employment. We all know there is more than one

MDDC employee seconded to 3R. The answer suggests but doesn't say it explicitly that there is or was another Mid Devon employee seconded to 3R without having been released from their legal obligation to the Council. I wish to know whether or not this is the case.

The Deputy Chief Executive (S151) stated that he would look into the matter and respond to Mr Quinn by the end of the week..

(The meeting ended at 9.24 pm) **CHAIRMAN**

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Mr Quinn's written questions and responses

Cabinet - 9th July 2020

The Chairman read a statement on behalf of Mr Quinn referring to, Item 10: Annual Treasury Management Review 2019/20.

In Section 8, sub section 2 (Non-Treasury Management Investments), figures are given for the Council loans to the Company and it is stated that: "these loans are subject to overarching management review on a regular basis. This is reflected in the impairments, made in periodic monitoring reports and in a year-end review, totalling £790,000".

Yet the Company was loaned nearly six and a half Million Pounds in this year.

Lending such an amount to a Company that is openly saying it might not pay its' debts on time, inevitably raises questions.

One such question was asked at Audit Committee, on 23 June 2020, where the Committee was asked for "an assurance that all loans were made with due diligence and competence by MDDC Officers, fully in accordance with the usual business risk management processes".

The Deputy Chief Executive/ S151 Officer promised a "full and thorough response" - but no response appears in the Audit Committee Minutes.

My first question is: Where can I see this response?

*As this question was asked at Audit Committee on the 23 June 2020 the next available committee meeting is scheduled for the 11 August 2020. The Deputy CE and S151 will ensure the following response is provided at the meeting.*

*I can provide full assurance that qualified finance staff review all loan transactions on a monthly basis and these are the same professional officers who assess the timing/frequency and likely level of repayment of all loans and it is these officers that calculate the impairment figure included in the Council's monthly financial monitoring reports. This formal review process also takes account of any associated business, economic and sales risks.*

*In addition to the review undertaken by the Council's finance staff, 3Rivers also has an annual review by Devon Audit Partnership who also report back to the Audit Committee their overarching findings relating to all financial and operational control measures, which includes commentary on any/all risk mitigation processes.*

With regard to Agenda item 13:- 3 Rivers Developments Ltd Feedback.

In the second paragraph of the 'Legal Implications' section, the Chief Executive makes a clear statement that: "Neither Officers nor Members are able to put themselves in a situation where their duty to the Council conflicts with their duty to the Company".

He then retracts this clarity by continuing: "in so far as Officers are concerned - as their duty to the Council arises from their terms and conditions of employment. The Council, as their employer, is able to amend the terms and conditions, so that when

Officers are acting in their role as a Director of the Company, they act in the best interests of the Company".

My second question is: Has any Officer ever had their terms and conditions of employment amended in the way that the Chief Executive describes?

Response of the Chief Executive

*Dear Mr Quinn*
*Thank you for your question at last week's cabinet meeting (of 09/07/20). I believe you were listening when I commented on this during the item in question; I stated at the time that I had discussed this briefly with my HR colleagues but that I believed it could be done via providing a formal 'release' when in a seconded role working for the company – rather than having to specifically change any individual's terms and conditions.*
*I undertook to get back to you once I had clarified the position. I have since followed this up and can confirm that the necessary release has been officially provided from the HR department to the employee that has been seconded on a full-time basis to the company.*
*Regards*

*Stephen*

Cabinet 6 August 2020

At the last Cabinet meeting, I asked two questions.

One was answered in writing after the meeting, but the other has not been.

I had asked where I could see the answer to a question posed at the Audit Committee meeting of 23 June 2020.

In section 201 of the minutes of your previous meeting, at the end of the second paragraph, it is recorded that the Deputy Chief Executive "would respond to Mr Quinn directly".

I have not had any response from the Deputy Chief Executive since that Cabinet meeting - so I still have not received an answer to my question.

My question is:

Why has the Deputy Chief Executive not provided the response he is shown as promising in the Minutes of the Previous Meeting?

As confirmed in my response to Mr Quinn's initial question this response will be provided at the next Audit Committee scheduled to be held on the 11/8/20. Apologies that this response wasn't provided directly to Mr Quinn more promptly as previously agreed.

**CABINET**
**6 AUGUST 2020**

**REPORT OF THE HEAD OF PLANNNING, ECONOMY AND REGENERATION**

**MID DEVON STATEMENT OF COMMUNITY INVOLVEMENT JULY 2020**

**Cabinet Member:** Cllr Graeme Barnell
**Responsible Officer:** Mrs Jenny Clifford, Head of Planning, Economy and Regeneration

**Reason for Report:**
To consider the revised Mid Devon Statement of Community Involvement (SCI) July 2020, and also temporary amendments in light of Government restrictions on people's movement and the need for social distancing. The Statement of Community Involvement sets out the policy of the Council to the involvement of those with an interest in the development of land in the area when the Council is exercising its planning powers.

**RECOMMENDATION(S):**

**That Cabinet recommends to Council that:**

**i) The Mid Devon Statement of Community Involvement (SCI) July 2020 (Appendix 1) is adopted and published on the Council's website.**

**ii) The temporary amendments to the Mid Devon Statement of Community Involvement (SCI) July 2020 (Appendix 2) are adopted until 31st December 2020 and published on the Council's website.**

**iii) Delegated authority be given to Head of Planning, Economy and Regeneration in consultation with the Cabinet Member for Planning and Economic Regeneration to review and update the temporary amendments to the Mid Devon Statement of Community Involvement (SCI) July 2020 (Appendix 2 should Government advice change or the Regulations be further amended in terms of restrictions on the movement of people and gatherings. Such review to include withdrawal of the temporary amendments in advance of 31st December 2020 should circumstances allow.**

**Financial Implications:**
The revised Statement of Community Involvement commits the Council to carrying out specific consultation procedures which will have financial implications.

**Budget and Policy Framework:** The Statement of Community Involvement forms part of the Council's policy framework.

**Legal Implications:**
The preparation of a Statement of Community Involvement is a requirement under Section 18 of the Planning and Compulsory Purchase Act 2004. Failure to follow the revised Statement of Community Involvement (once adopted) could lead to the Council's planning policy documents being found unsound and decisions legally challenged.

**Risk Assessment:**
Failure to follow the revised Statement of Community Involvement (once adopted) could lead to the Council's planning policy documents being found unsound and decisions legally challenged which would waste significant Council resources.

**Equality Impact Assessment:** A full Equality Impact Assessment has been prepared as part of the Local Plan Review Evidence Base. The Statement of Community Involvement stipulates that the Council will adopt an inclusive approach to community involvement ensuring as far as possible all sections of the community can be involved.

**Impact on Climate Change:** No direct impacts on climate change have been identified.

**Relationship to Corporate Plan:**
Implementation of the revised Statement of Community Involvement will help to ensure that our services are accessible and meet the needs of our community as well as helping to maximise the potential health and well-being of our communities. It will therefore help deliver all four of the Corporate Plan priorities.

## 1.0 Introduction

1.1 A Statement of Community Involvement (SCI) is required by section 18 of the Planning and Compulsory Purchase Act 2004. It is intended to set out in detail how the Council will consult on its local plans, supplementary planning documents and planning applications. If the Council does not accord with its provisions in publicising a local plan then it may be found unsound. A planning application which has not been consulted on in accordance with the SCI could be legally challenged and planning permission potentially quashed.

**1.2** The Council's existing SCI was adopted in 2016 to reflect changes in legislation and national planning policy at that time. This review has been undertaken to take account of the revised National Planning Policy Framework published in June 2019 and to reflect the provisions of the Neighbourhood Planning Act 2017 which requires Councils to set out the local planning authorities' policies for giving advice in relation to neighbourhood planning. A number of amendments are also proposed to the Council's approach to consultation on planning applications. These reflect recent changes to Government legislation as well as ongoing review of cost implications associated with consultation procedures. The revised SCI is shown in **Appendix 1** to this report with the revisions to the SCI adopted in 2016 identified in **bold** with ~~strikethrough~~ for deletions from the text of the underlining for additions to the text.

## 2.0 Proposed Revisions

2.1 The majority of the revised Statement of Community Involvement remains the same as the 2016 version. Principally, it sets out how the Council intends to engage with communities through the planning process. It states that the Council will adopt an inclusive approach to community involvement ensuring as far as possible all sections of the community can be involved. It also requires the Council to promote the earliest possible consultation with interested parties and produce planning documents in plain and clear language, aimed at being understood by non-planning professionals. However, the Council will balance wide involvement in the planning process with the need for effective operation of the planning system. This difficult balancing act will reflect the level or resources available to the Council, the level of discretion that the Council has over a particular decision and the likely social, environmental and economic impacts of the policy or proposal under consideration.

*Neighbourhood Planning Support*

2.2 The Neighbourhood Planning Act 2017 (Section 6) requires authorities to set out in their Statement of Community Involvement their policies for giving advice or assistance to neighbourhood planning groups. Consequently, Section 6.0 of the revised SCI sets out the level of support to be provided by the Council at each key stage of the plan preparation process including the area designation, submission, examination, referendum and adoption.

2.3 The Council has a duty to support neighbourhood planning groups during each of these stages. This extends to agreeing and formally designating a

neighbourhood area, and arranging the subsequent examination and referendum for a neighbourhood plan. Mid Devon District Council is required to fund these stages. An indicative cost of £5,000 - £7,500 can be expected for an examination although this ultimately depends on the complexity of the content proposed within a draft neighbourhood plan. The cost of referenda is likely to cost approximately £1.80 per elector and will therefore vary considerably depending on the population of the neighbourhood area. However, Mid Devon District Council is able to claim £20,000 from the Government for each neighbourhood plan following a successful examination and once a date is set for a referendum, where a neighbourhood plan has not previously been made for that area. In most cases, it is expected that this will cover or be close to the total cost of arranging the examination and referendum.

2.4 Notwithstanding the above, it is considered that the Council can provide support to neighbourhood plan groups over and above the minimum required, where resources allow. Therefore, the revised SCI stipulates that the Council can provide further support, where feasible which may include:

- Initial advice on suitability and scope of a neighbourhood plan;
- Ongoing advice and support throughout the process including technical input into key stages. This will be focussed on the conformity of the Neighbourhood Plan with national and local planning policy;
- Share existing information and evidence base work held by the local planning authority as appropriate.
- Practical assistance such as mapping and IT advice;
- Guidance and interpretation of the relative legislative requirements;
- Provide constructive comments on the emerging neighbourhood plan or order proposal prior to submission and discuss the contents of any supporting documents, including the basic conditions statement.
- Provide relevant contact information for consultation with statutory consultees and advice on undertaking consultation, publicity and engagement.

2.5 This additional support reflects the Council's positive approach to neighbourhood planning and the level of support currently being provided to neighbourhood plan groups by the Planning Service. The support does not include the project management for the preparation neighbourhood plans.

*Consultation on planning applications*

2.6 Since 2016 members of the public have increasingly used electronic means for communication across all engagement activities for the planning process in Mid Devon.

2.7 In 2018 a cost analysis of the consultation process for planning applications was carried out by the Council in partnership with CIPFA. The report of 30th October 2018 identifies that the cost of the consultation process for planning and other applications was in the order of £111,000 per annum including the cost of staff time. Changes are suggested to the SCI (policy SCI/7) to reduce these costs whilst still complying with the legislative requirements set out by the Government and providing our customers with an efficient planning application consultation process. Following initial application publicity upon its validation, it is proposed thereafter to encourage a customer self-service approach through monitoring the updates and material relating to the application on the website. This approach is already in operation by other Councils within the region.

2.8 Accordingly, the following key changes are proposed to the Planning Applications section of the SCI:

- Consultation on amendments and variations – The revised SCI stipulates that this will be carried out in accordance with the regulations. Customers who are interested in a particular application are also advised to monitor the website to keep up to date with changes.

- Direct notification during the planning application process (assessment/determination) -. The Council will carry out direct notification on applications where there has been a substantial change to the planning application, and update information on each application on its website and it will be for anyone interested in an application to monitor information on the website. This will be the primary means for anyone interested in an application to gain updates over its progress, whether additional information or plans have been received, any comments submitted and whether it is to be determined under delegated powers or by planning committee.

## 3.0 Temporary amendments due to Covid-19 and restrictions on movement and gatherings

3.1 The country is currently facing the unprecedented challenge arising from the coronavirus COVID-19 pandemic and a national emergency has been declared. In order to combat the spread of the virus limitations are in place to reduce physical contact, movement and gatherings. At the time of writing this

report he most vulnerable in society by age and underlying medical condition are being 'shielded' via self-isolation in order to reduce exposure, although there is an expectation there may be a degree of relaxation to this approach in short order. All the population are deploying social distancing to reduce infections and save lives. The impact upon society has been profound.

3.2 The Health Protection (Coronovirus, Restrictions) (England) Regulations 2020 (Revised) place restrictions on the movement of people and gatherings, which impact on the ability of the Council to fulfil some of the requirements that are set out in the SCI.

3.3 The Town and Country Planning (Development Management Procedure, Listed Buildings and Environmental Impact Assessment) (England) (Coronavirus) (Amendment) Regulations 2020 amend, on a temporary basis until 31st December 2020, certain requirements placed on local planning authorities and applicants for development requiring an Environmental Impact Assessment (EIA) for publicity and inspection of documents where the authority or applicant (as the case may be) is not able to comply with a particular requirement because it is not reasonably practicable to do so for reasons connected with the coronavirus. The regulations gives more flexibility to local planning authorities to meet their publicity requirements so that they can continue to make sound decisions on planning applications.

3.4 The Government has made it clear that measures need to be taken to help the economy and Councils are being asked to make every effort to continue to provide vital public services. On 23rd March 2020 the Chief Planner for England within the Ministry of Housing, Communities and Local Government issued advice on planning decision making:

*'We understand that some councils are concerned about the implications of COVID-19 for their capacity to process planning applications within statutory timescales. It is important that authorities continue to provide the best service possible in these stretching times and prioritise decision-making to ensure the planning system continues to function, especially where this will support the local economy.*

*We ask you to take an innovative approach, using all options available to you to continue your service. We recognise that face-to-face events and meetings may have to be cancelled but we encourage you to explore every opportunity to use technology to ensure that discussions and consultations can go ahead…. We encourage you to be pragmatic and continue, as much as possible, to work proactively with applicants and others, where necessary agreeing extended periods for making decisions'*

3.5 Government guidance issued on 13th May 2020 for Covid-19 and plan making states:

*"Where any of the policies in the Statement of Community Involvement cannot be complied with due to current guidance to help combat the spread of coronavirus (COVID-19), the local planning authority is encouraged to undertake an immediate review and update the policies where necessary so that plan-making can continue. Local planning authorities will need to assess their Statements of Community Involvement to identify which policies are inconsistent with current guidance on staying at home and away from others or any superseding guidance. This could include, for example, holding face-to-face community consultation events or providing physical documents for inspection. The local planning authority should then make any temporary amendments that are necessary to allow plan-making to progress, and that continue to promote effective community engagement by means which are reasonably practicable. Local planning authorities are strongly encouraged to use online engagement methods to their full potential."*

3.6 **Appendix 2** includes a schedule of temporary amendments to the SCI. These temporary amendments are necessary due to the Health Protection (Coronavirus, Restrictions) (England) Regulations 2020 (Revised), and the The Town and Country Planning (Development Management Procedure, Listed Buildings and Environmental Impact Assessment) (England) (Coronavirus) (Amendment) Regulations 2020 that will remain in force until 31st December 2020. They also reflect the Government Chief Planner's advice and the Government's recent guidance for Covid-19 and plan-making. It is intended the temporary amendments remain in place until 31st December 2020, but shall be kept under review and requirements of the Statement of Community Involvement that have been removed may be re-introduced sooner should Government advice change or the regulations be amended in terms of restrictions on the movement of people and gatherings.

3.7 While the temporary amendments indicate where some of the requirements of the SCI may not be able to be met, some policies in the Mid Devon Statement of Community Involvement (SCI) July 2020 (**Appendix 1**) include permanent revisions for 'other forms of on-line engagement', which can provide for greater flexibility and choice of methods to engage with communities. For example, these methods could include on-line videos and virtual meetings, workshops and focus groups.

**4.0 The views of other Member Groups**

4.1 The Planning Policy Advisory Group has considered the revised SCI and its temporary amendments at its meeting on 24th June 2020 and recommended

that Cabinet approve the document for adoption by Council subject to the following amendments:

- SCI/4 – Deletion of "(as determined by the Planning Service)"
- SCI/4 – Paragraph 5.4 – Insert "digital/physical" after "made in writing" to clarify how representations will be accepted.
- SCI/6 – Paragraph 6.1 – Clarify meaning of bullet point two with regards to housing requirements. This has now been updated to state "Upon request, set out a housing requirement…"
- Section 7.0 Planning Applications – Delete paragraph 7.5. The following paragraph numbers have also been amended accordingly.
- SCI/7 Application Consultation – Paragraph 7.15 – Include reference to public question time as follows: "There is also a public question time at the beginning of the meeting for those present to ask questions about any item on the agenda, or to speak briefly by way of background or introduction to those questions, including planning applications."

4.2 There is no requirement in legislation for local planning authorities to consult when reviewing and updating their Statement of Community Involvement, however the Council has previously done so in the interests of transparency and inclusive engagement in the planning process. However, in this instance, the changes sought are necessary to respond to the updated Government requirements in connection with Neighbourhood plans, the effects of the ongoing COVID-19 pandemic and to reflect temporary Regulations introduced by Government. This ultimately narrows the scope of any consultation and the Council's ability to conduct the consultation in a meaningful way. Accordingly, it would not be proportionate to hold a public consultation on these changes.

**Contact for more Information:** Tristan Peat, Forward Planning Team Leader – (01884 234344) / tpeat@middevon.gov.uk. Arron Beecham, Forward Planning Officer – 01884 234221 / abeecham@middevon.gov.uk

**Circulation of the Report:** Cllr Graeme Barnell

**List of Background Papers:**

Mid Devon Statement of Community Involvement (Adopted October 2016)

Chief Planning Officer Letter – Update on financial support for neighbourhood planning in 2018/19 (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/717060/180605_Chief_Planner_Letter_NPG_18-19_-_revised.pdf)

The Health Protection (Coronovirus, Restrictions) (England) Regulations 2020 (Revised) http://www.legislation.gov.uk/uksi/2020/350

The Town and Country Planning (Development Management Procedure, Listed Buildings and Environmental Impact Assessment) (England) (Coronavirus) (Amendment) Regulations 2020

http://www.legislation.gov.uk/uksi/2020/505/pdfs/uksiem_20200505_en.pdf

Government guidance on Covid-19 and plan-making
https://www.gov.uk/guidance/plan-making#covid19

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# Statement of Community Involvement

~~October~~ 2016 Revised July 2020

Mid Devon DISTRICT COUNCIL

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# 1.0 Introduction

1.1 This document sets out how the Council intends to engage with communities through the planning process. This includes the preparation of new local plans and Supplementary Planning Documents, and procedures for consulting the public on the planning applications we receive. However, this does not apply to minerals, waste and county council developments which fall within Mid Devon as these are addressed in Devon County Council's SCI.

1.2 The Localism Act 2011 introduced the ability for town and parish councils in Mid Devon to draw up their own neighbourhood plans which can add detail beyond the strategic elements of the district council's local plans. In accordance with planning legislation, th~~e~~**is** Statement of Community Involvement ~~**does not include a policy on neighbourhood planning**~~ **sets out how the Council will support neighbourhood planning groups. ŧT**he Council has a duty to support neighbourhoods in the preparation of their plans, and may **also** set out procedures or intentions for this outside of the Statement of Community Involvement.

1.3 The preparation of a Statement of Community Involvement is required under Section 18 of the Planning and Compulsory Purchase Act 2004. Mid Devon District Council's first Statement of Community Involvement was adopted in February 2007 and was updated in 2012 **and 2016** to ~~**reflect the current legislation, including the provision of the Planning Act 2008, Localism Act 2011, The Town and Country Planning (Local Planning) (Regulations) 2012 and the National Planning Policy Framework**~~ **reflect changes in legislation and national planning policy**. This review has been undertaken to take account of recent changes in planning legislation, **the National Planning Policy Framework (June 2019)** and to reconsider the most effective methods of community involvement in the planning process. The Council is legally obliged to comply with its Statement of Community Involvement, once it is adopted.

# 2.0 Consultation Approach

2.1 The Council will adopt an inclusive approach to community involvement ensuring as far as possible all sections of the community can be involved. No one will be unfairly discriminated against or receive less favourable treatment on grounds of race, colour, ethnic or national origin, sexuality, gender, disability, age, religious beliefs or social class.

2.2 All documents will be written in plain and clear language, aimed at being **easily** understood ~~**by non-planning professionals**~~. Jargon will be avoided and glossaries will be provided to explain the necessary technical terms. The Council will make reasonable effort to ensure that people with particular requirements will not be overlooked. Documents in other formats will be available where necessary, for example, large print, audio or translation in other languages.

2.3 The Council will promote the earliest possible consultation with and involvement of interested parties and will promote consensus solutions where possible. Where conflicting views cannot be resolved, the Council will take into account the various points of view, and will aim to take a balanced decision based on the full facts. All ~~**comments**~~ **representations** received as a result of consultation exercises **and within their consultation periods** will be considered and the Council will set out public responses to issues raised when decisions are made.

2.4 The Council will balance wide involvement in the planning process with the need for effective operation of the planning system. This difficult balancing act will reflect the level of resources available to the Council, the level of discretion that the Council has over a particular decision and the likely social, environmental, and economic impacts of the policy or proposal under consideration.

# 3.0 Local Planning - General Policies

3.1 The National Planning Policy Framework (NPPF), published in ~~**2012 reintroduced the requirement to produce a single local plan. Local plans (also known as Development Plan Documents) set out strategic planning policy, land allocations for development, and detailed policy on development management and allocated sites. Supplementary Planning Documents provide additional detail on any environmental, social, design and economic objectives that help to achieve sustainable development.**~~ **June 2019**, **stipulates that the planning system should be genuinely plan-led and must include strategic policies to address each local authority's priorities for the development and use of land in its area. These strategic policies can be produced in different ways, depending on the issues and opportunities facing each area. They can be contained in joint or individual local plans. Policies to address non-strategic matters should be included in local plans, and/or neighbourhood plans. Supplementary Planning Documents can also be used to provide further detail to the policies in the Development Plan.**

3.2 The Local Plan is accompanied by the Authority's Monitoring Report, the Statement of Community Involvement, and the Local Development Scheme. The ~~**contents of the Local Plan are set out in a document called a Local Development Scheme. This**~~ **Council's Local Development Scheme** contains a timetable for production of local plans and other documents as appropriate.

3.3 Consultation Requirements are set out within the Town and Country Planning (Local Planning) (England) Regulations 2012. It is the role of the Statement of Community Involvement to provide an approach to public involvement tailored to the local area by supplementing these.

3.4 The Localism Act 2011 introduced a Duty to Cooperate on strategic planning matters that are 'larger than local'. **Furthermore, the National Planning Policy Framework (June 2019) includes the requirement to evidence effective joint working on cross-boundary matters through a Statement of Common Ground.** The Council will cooperate with its neighbouring local authorities and public bodies as defined in the Town and Country Planning (Local Planning) (England) Regulations 2012.

3.5 The Mid Devon Local Plan will go through clear stages of preparation and scrutiny. A simplified illustration of the process is shown overleaf.

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|---|---|
| **Preparation** | Survey and evidence gathering<br>Formulation of policy options<br>Report to Cabinet<br>Consultation<br>Consider consultation responses<br>Policy formulation |

| | |
|---|---|
| **Publication** | Report to Cabinet and full Council<br>Publication of local plan |
| **Submission** | Submission of local plan to Secretary of State<br>All associated documents including consultation responses are submitted with the local plan |
| **Examination** | Examination in Public<br>Planning Inspector holds an examination into the Local Plan, usually including public hearings.<br>Inspector's report published<br>Determines if plan is 'sound' |
| **Adoption** | Report to Cabinet and Full Council<br>Council adopts the Local Plan |

## SCI/1 Document Availability

The Council will make local plans and supplementary planning documents widely available. They will be:

a Placed on the Council's website for viewing and downloading;

b Deposited at Council offices and public libraries within Mid Devon during consultation periods;

c Sold at a price reflecting their production cost;

d Provided free to parish and town councils and on request to statutory consultees and local voluntary organisations.

3.6 The Council will use its website to provide the opportunity for everyone to view and print copies of the local plan or supplementary planning documents. Consultation documents, approved policy documents and other papers of planning interest will be made available to download.

3.7 Copies of all local plans and supplementary planning documents, as they are produced, will be available for inspection during normal office hours at the Council's main office at Phoenix House, Tiverton and at public libraries throughout Mid Devon.

3.8 Anyone wishing to purchase a paper copy of the plan will be charged a reasonable price reflecting the production cost. In the case of parish and town councils, statutory consultees and local voluntary organisations, a free hard copy will only be provided where requested as people are encouraged to use the website wherever possible.

# 4.0 Local Plans

4.1 The Council will consult a range of stakeholders on all local plans and Supplementary Planning Documents. Technical guidance from other organisations such as the Environment Agency or Natural England may be sought specifically, and will carry significant weight. In more general terms the Council will publicise its plans and seek to engage the community in the planning process through a wide range of methods. The Council will create opportunities for all sections of the community to contribute to the planning process and have a real say in the shaping of Mid Devon.

## SCI/2 Local Plan Preparation

The Council will prepare a report setting out the subject, scope and potential content of a local plan. Relevant stakeholders will be invited to comment on what the local plan ought to contain. The Council will use direct contact methods to consult the following stakeholders:

a relevant specific and general consultation bodies as defined in the regulations.

b parish and town councils adjoining or within Mid Devon

c residents or other persons carrying on business in the area, who are registered on the Council's Forward Planning consultation database and have requested to be notified

The Council will publicise the local plan to notify all other stakeholders, using the following methods:

i) Press release
ii) Information on the Council website
iii) Social media **and other forms of on-line engagement**
iv) Public exhibitions **(physical and on-line)**
v) Public meetings if requested by a town or parish council
vi) Site notices when development allocations are proposed

The Council's report will be made available for public inspection at Council offices and public libraries within Mid Devon.

In preparing the local plan, the Council will take into account any representation made in response to this consultation.

4.2 The Council will seek to understand the policies and priorities of a range of stakeholders in order that these can be reflected in the local plan if possible. If necessary, the Council will meet with interested parties to discuss proposals for the local plan. When considering strategic planning matters, specific and general consultation bodies and those who have made representations will be invited to attend workshops in which particular issues will be debated in detail. Direct contact will be made by letter, email or other such communication. As a minimum, these will give details of the location of documents on the Council's website. Specific methods will be used to reach underrepresented groups. These could include attendance at relevant community group meetings or forums, and publicity of local plans via social media.

4.3 Representations must be made in writing and include the sender's full name and postal address to be taken into account. Information and comments provided to the Council during planning involvement will be made publicly available. The name and address of each representation will be published but all other personal details (e.g. signatures, email addresses and telephone numbers) will be redacted.

4.4 Public consultation does not commence until the Council's Cabinet has considered the report on the proposed local plan and approved it for consultation. When a local plan proposes the allocation of specific sites for development, the Council's Cabinet will hold separate meetings in Tiverton, Crediton, and Cullompton to discuss the sites relevant to that area. These meetings will be well publicised.

## SCI/3 Local Plan Publication

The Council will publish the local plan before it is submitted to the Secretary of State for examination, to enable interested parties to make formal representations on its contents. The following consultation methods will be used:

Direct contact with:

a relevant specific and general consultation bodies as defined in the regulations

b parish and town councils adjoining or within Mid Devon

c residents or other persons carrying on business in the area, who are registered on the Council's Forward Planning consultation database and have requested to be notified

General contact methods to notify all other stakeholders, using the following methods:

i) Press release
ii) Information on the Council website
iii) Social media **and other forms of on-line engagement**
iv) Public exhibitions **(physical and on-line)**
v) Public meetings if requested by a town or parish council
vi) Site notices when development allocations are proposed

The local plan will be made available for public inspection at Council offices and in public libraries within Mid Devon.

4.5 When a local plan proposes the allocation of specific sites for development, the Council's Cabinet will hold separate meetings in Tiverton, Crediton, and Cullompton to discuss the sites relevant to that area.

4.6 If the Council approves the local plan at this stage, there is a formal period of consultation followed by submission to the Secretary of State. Any representations received at this stage are submitted to the Secretary of State along with the local plan, Sustainability Appraisal, any proposed changes that the Council considers appropriate and all other relevant documents. The Inspector who will hold the examination into the local plan must take account of public and other opinion in judging whether the plan is sound.

4.7 The Inspector will determine the procedure to be adopted at examination, subject to the right to attend and be heard. Informal hearing sessions may be held over several days or weeks. When all matters have been considered the Inspector will prepare a report. The Council must publish the Inspector's recommendations as soon as reasonably practicable after receiving the report, and notify anyone who has requested notification at this stage. The Council must make the local plan and any associated documents available for public inspection once the plan has been adopted.

# ~~4.0~~ 5.0 Supplementary Planning Documents

## SCI/4 Supplementary Planning Documents: Masterplans

In preparing a masterplanning Supplementary Planning Document, the Council will carry out two stages of consultation. Direct contact methods will be used to consult the following stakeholders:

a relevant specific and general consultation bodies as defined in the regulations

b parish and town councils adjoining or within Mid Devon

c residents or other persons carrying on business in the area, who are registered on the Council's Forward Planning consultation database and have requested to be notified

d immediately adjoining residents who are likely to be affected ~~**(as determined by the Planning Service)**~~

Masterplanning Supplementary Planning Documents will also be publicised as follows:

i) Press release
ii) Information on the Council website
iii) Social media **and other forms of on-line engagement**
iv) Public meetings if requested by a town or parish council
v) Site notices

In preparing the Supplementary Planning Document, the Council will take into account any representation made in response to this consultation.

~~4.1~~ **5.1** The Council will carry out an informal scoping consultation, primarily aimed at gathering evidence and information before a Supplementary Planning Document is produced. A Supplementary Planning Document often builds upon more strategic policies in a local plan, providing detail on the Council's environmental, social, design or economic objectives for development.
At the evidence-gathering and research stage, consultation is directed at those who are known to have technical expertise, relevant knowledge or have asked to be notified of any new Supplementary Planning Documents.

~~4.2~~ **5.2** The Council will prepare the draft Supplementary Planning Document taking into account any responses received to the scoping consultation. A formal public consultation will take place before the Supplementary Planning Document is adopted. Consultation will be carried out using a mixture of direct contact and general publicity, with additional measures to reach underrepresented groups, which could include attendance at relevant community groups, meetings or forums, and publicity of masterplans via social media. Direct contact will be made by letter, email or other appropriate means. When a masterplan is being considered for an area within Mid Devon, early community involvement is to be encouraged. In addition to the methods listed in Policy SCI**/**4, the Council will consider whether further measures such as leaflet-dropping, exhibitions or workshops are warranted. The level of consultation will endeavour to be proportionate to the likely impact of the plan.

~~4.3~~ **5.3** In certain circumstances the Council may consider it unnecessary to undertake two stages of consultation on sites where a masterplan requirement exists. For example, if a currently adopted masterplan already sets guiding principles, design considerations or infrastructure delivery requirements/phasing which apply over the proposed site, then it would be unnecessary to re-determine such issues through a scoping consultation. In these circumstances the framework set by the adopted SPD forms the starting point, and preparation could commence on the draft version of the masterplan, subject to one further stage of consultation. Where only one stage of consultation is proposed, the Council will provide a full justification.

~~4.4~~ **5.4 Unless specified otherwise, representations must be made in writing (digital e.g email/physical e.g letter) and include the sender's full name and postal address to be taken into account. Information and comments provided to the Council during planning involvement will be made publicly available. The name and address of each representation will be published but all other personal details (e.g. signatures, email addresses and telephone numbers) will be redacted. Comments made during the course of any consultation will be gathered and summarised by the Council, then taken into account as the final Supplementary Planning Document is produced.**

## SCI/5 Supplementary Planning Documents: Other

The Council will prepare the draft Supplementary Planning Document and make this available to view on its website and in public libraries and district Council offices. Direct contact methods will be used to consult the following stakeholders:

a relevant specific and general consultation bodies as defined in the regulations

b parish and town councils adjoining or within Mid Devon

c residents or other persons carrying on business in the area, who are registered on the Council's Forward Planning consultation database and have requested to be notified

General contact methods to notify all other stakeholders, using the following methods:

i) Press release
ii) Information on the Council website
iii) Social media **and other forms of on-line engagement**
iv) Public meetings if requested by a town or parish council

The Council will take into account any representation made in response to this consultation.

~~4.5~~ **5.5** There is only one consultation period for Supplementary Planning Documents that are not masterplans. It is therefore important that the draft document is clear about the proposals which are likely to be approved.

~~4.6~~ **5.6** Consultation will be carried out using a mixture of direct contact and general publicity, with additional measures to reach underrepresented groups, which could include attendance at relevant community group meetings or forums , and publicity of Supplementary Planning Documents via social media. In addition to the methods listed in Policy SCI**/**5, the Council will consider whether further measures such as leaflet-dropping, exhibitions or workshops are warranted. The level of consultation will endeavour to be proportionate to the likely impact of the plan.

~~4.7~~ **5.7 Unless specified otherwise, representations must be made in writing (digital e.g email/physical e.g letter) and include the sender's full name and postal address to be taken into account. Information and comments provided to the Council during planning involvement will be made publicly available. The name and address of each representation will be published but all other personal details (e.g. signatures, email addresses and telephone numbers)**

**will be redacted.** ~~**Representations must be made in writing and include the sender's full name and postal address to be taken into account.**~~ Comments made during the course of any workshops will be gathered and summarised by the Council, then taken into account as the final Supplementary Planning Document is produced.

# 6.0 Neighbourhood Plans/Orders

## SCI/6 Neighbourhood Plans/Orders

**The Council has a duty to provide advice and assistance to communities choosing to prepare a neighbourhood plan/order. As a minimum, the Council will:**

a) **Publicise and consult on an area designation application in accordance with the regulations**

b) **Agree and formally designate a neighbourhood area**

c) **Provide information and advice on the neighbourhood plan process**

d) **Upon submission, check that a draft plan or order complies with all relevant statutory requirements. Following this, the Council will publicise the proposal for a minimum of 6 weeks and invite representations**

e) **Appoint and fund the independent examiner**

f) **Provide an examination venue, if required, and providing no suitable parish venue is available**

g) **Publish the independent examiner's report on the Council's website and thereafter, consider whether to put a neighbourhood plan or order proposal to referendum**

h) **Fund and organise the public referendum**

i) **Adopt the Neighbourhood Plan as part of the overall development plan if supported through examination and referendum.**

**Where the Council is responsible for the neighbourhood plan process, it will make every effort to conclude each stage promptly, within prescribed time periods set out in legislation.**

**6.1 The Council actively supports and promotes neighbourhood planning and is committed to providing ongoing advice and support to groups who wish to prepare neighbourhood plans and orders. In addition to the support offered in SCI/6, the Council may also be able to provide further support, where feasible, by the following means:**

- **Initial advice on suitability and scope of a neighbourhood plan.**
- **Ongoing advice and support throughout the process including technical input into key stages. This will be focused on the conformity of the Neighbourhood Plan with national and local planning policy.**
- **Upon request, set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development in strategic policies and any relevant allocations**
- **Share existing information and evidence base work held by the local planning authority as appropriate (subject to any data protection or confidentiality issues).**
- **Practical assistance such as mapping and IT advice.**
- **Guidance and interpretation of the relative legislative requirements.**
- **Provide constructive comments on the emerging neighbourhood plan or Order proposal prior to submission and discuss the contents of any supporting documents, including the basic conditions statement.**
- **Provide relevant contact information for consultation with statutory consultees and advice on undertaking consultation, publicity and engagement exercises.**

**6.2 Neighbourhood planning enables communities to play a much stronger role in shaping the areas in which they live and work. It is therefore a process that must be led by the community and the Council will not be able to undertake consultation exercises on behalf of a neighbourhood plan steering group, provide project management services, draft the neighbourhood plan or any part or policy therein or undertake any required Strategic Environmental Assessment or Habitat Regulations Assessment (with the exception of providing a screening opinion).**

**6.3 The Local Planning Authority would not expect to be the sole source of planning advice and assistance to neighbourhood plans, with many groups choosing to secure separate and additional support resources. A wide range of resources are also available to download from the Locality Website.**

**6.4 If the neighbourhood plan receives support at referendum from more than 50% of those that vote, then Mid Devon District Council will formally adopt the neighbourhood plan. Once adopted, the Plan will form part of the Development Plan. It will be a material consideration in the determination of planning applications.**

# 7.0 Planning Applications

### Summary of planning applications processes

**7.1** A planning application is an application to the Council for the development of land and may include changes in use and extension to property. Applications are determined in accordance with the Development Plan unless material considerations indicate otherwise. Applications can be made as follows:

**Outline;** to establish the principle of development. ~~Outline applications can only be made for the erection of buildings.~~

**Full;** all details of the application should be submitted when the application is made.

**Approval of Reserved Matters;** details submitted following the grant of outline permission

**Permission in Principle;** to be granted on sites in plans and registers and for minor sites providing greater certainty of development based on 'in principle matters' such as land use, location and amount of development.

**Technical Details Consent;** Following permission in principle, full planning permission will only be secured once technical details consent has been obtained.

**Prior Approval;** a developer may require approval from the local planning authority that specified elements of the development are acceptable before work can proceed.

7.2 There are other forms of consent considered by the Local Planning Authority, such as Listed Building and Tree Preservation Order consents. These are not covered by the Statement of Community Involvement. The consultation requirements associated with permission in principle will be carried out in accordance with the regulations.

7.3 The Council has an adopted 'Scheme of Delegation' to exercise all the powers of the Council as a Local Planning Authority to determine certain planning applications that do not need to be referred to the Planning Committee.

7.4 Amendments and variations – ~~an amendment may be made to an application for planning permission before consent has been granted, provided that (i) it is of a very minor nature and would not need re- advertising or re-consulting, or (ii) it is of a minor nature and any consultation or re-advertising could be conducted within the timeframe for determination of the application. Where re-consultation is required, neighbours and those who have made objections or representations on an application may be notified, depending on the significance of the changes to be made. In cases where changes are material and are likely to have an impact a new application would normally be required.~~ **Consultation requirements on amendments will be carried out in accordance with the regulations. It is important to note that re-consultation of amendments is not always required and may not take place on an application, depending upon the nature and potential impact of the proposed amendments. All amended plans will be published on the Council's website and any customers who are interested in a particular application are advised to monitor the website to keep up to date with any changes.** Amendments and variations can also be made once planning permission has been granted. A non-material amendment is for very minor changes and will not require neighbour notification. Minor material amendments can be made via a 'variation of condition' application and in this case neighbour notification must be undertaken.

~~**7.5 Section 106 Obligations are binding legal agreements between the Council, developers and sometimes others associated with a grant of planning permission. They relate to matters linked to the proposed development, for example contributions toward public open space, affordable housing, and education, or infrastructure works to highways, sewage works or flood defences. The Council may receive requests from developers / landowners to vary or remove planning obligations. Once a request is received, the relevant consultees, the Chairman of Planning Committee, Ward Members and Parish / Town councils should be advised of the request and its nature and given 14 days within which to respond with comments. The Community Infrastructure Levy introduces an alternative system for infrastructure provision outside of a development site. This will streamline the process for taking contributions for necessary infrastructure and will supersede the need for the use of Section 106 agreements in most cases..**~~

7.~~6~~**5** There are legal minimum requirements for publicity on planning applications, set out in The Town and Country Planning (Development Management Procedure) (England) Order **2015** which require publication on the Council's website, publication of a site notice and/or that neighbours are notified directly (depending on the type of planning application). In some cases, such as for major developments, an advertisement is required in the local newspaper. Section 122 of the Localism Act 2011 has amended the Town and Country Planning Act 1990 to require applicants to carry out pre- application consultation where a proposed development is of a description specified in a development order. In accordance with the National Planning Policy Framework, the Council will make any viability assessments submitted to support an application publically available.

7.~~7~~**6** Pre-application discussions can significantly reduce the length of time it takes to determine a planning application, allowing for potential barriers to development to be identified early and addressed if possible. The level of consultation required will vary with the significance of the proposal and the likely impact. The Council is committed to seeking consensus solutions where possible, subject to planning policies and principles. ~~**It is proposed to set up a three tier approach to planning applications relating to their scale**~~. Policy ~~**SCI6**~~ **SCI/7** sets the recommended pre-application approaches for major applications.

7.~~8~~**7** Non-major applications are unlikely to raise issues of the scale and complexity of a major application, but they can be contentious in their own right. Accordingly, the Council may wish to recommend to scheme promoters that they consider some forms of public consultation before submitting. The Council does not necessarily endorse a proposal by assisting in pre-application consultation. Applicants are recommended to liaise with the community and to talk informally to their neighbours before submitting an application. This will minimise refusals and the possibility of neighbour disputes.

## SCI/~~6~~ 7 Major Applications Pre-Application Consultation

a Promoters of development proposals which would fall into the category of major applications (unless they are clearly of a non-controversial or straightforward nature) are strongly recommended to contact the Council at least 12 months before they expect to make an application to discuss the contents of their proposal and agree any necessary public involvement . Scheme promoters will be expected to resource the necessary surveys and consultation procedures.

b The Council will recommend to the promoters a level of local pre-application consultation, which reflects the scale, complexity, controversy, and policy/ sustainability issues raised and the sensitivity of the area to change. The Council may wish to negotiate a planning performance agreement with promoters to agree timescales, actions and resources for handling particular applications.;

c The following methods of local involvement on pre-application proposals may be appropriate **for the promoter**:

i Newspaper Notice
ii Press Release
iii Public meetings if requested by a town or parish council
iv Individual or group discussions
v Public exhibitions **(physical and on-line)**
vi Summary leaflets
vii Response forms
viii Letters to specific landowners/residents

d The scheme promoter will need to submit a document outlining the nature and results of this public consultation exercise for consideration with the planning application.

7.~~9~~**8** Major developments are proposals containing a minimum of:

- **For residential developments:**
  10 or more dwellings, or a 0.5 hectare site area; or
- **For non-residential developments:**
  1000 sqm gross floor area or a 1 hectare site area.

7.~~10~~**9** Pre-application discussion is a good way for the scheme promoter to confirm the principle of development and clarify the supporting information required by the planning authority. Pre application consultation by promoters for some applications is now required under the Town and Country Planning Act 1990 as a result of the Localism Act 2011.

7.~~11~~**10** Early public involvement in a scheme is beneficial to applicants, especially on major or controversial development proposals. It facilitates the process as applicants can understand local concerns before submitting the formal application. Applicants will be in a position to negotiate and build consensus with the public on the development proposal to avoid objections and subsequent delay during the formal application stage.

7.~~12~~**11** The level of public involvement should increase with potential difficulties and controversy. This will allow for misunderstandings to be reduced, key areas of concern to be clarified and potential compromise solutions to be reached. In order to ensure that sufficient time is allowed for these discussions, promoters are strongly advised to approach the Planning Authority 12 months before they plan to submit an application. This will allow time to undertake any necessary surveys, discuss alternative approaches and carry out appropriate local consultations. Where a major application is clearly uncontroversial or straightforward, then a shorter timetable is appropriate. ~~**The Council does not necessarily endorse a proposal by assisting in pre-application consultation.**~~

## SCI/~~7~~ 8 Application Consultation

The Council will undertake the following on receipt of a planning application:

a Consult all relevant statutory bodies once a planning application has been validated. In most cases, 21 days will be allowed for a response, unless provision exists for an extension of time by reference to relevant legislation.

b Consult relevant town and parish councils with a request for observations, allowing at least 21 days for response. Adjoining district, parish and town councils will also be consulted on development proposals for:

i wind turbines exceeding 10m height (to hub)
ii ground mounted solar arrays
iii agricultural buildings over 500m2 gross floorspace
iv anaerobic digesters

c Publicise all planning applications ~~**by means of a notice posted on or near the site or write to notify immediately adjoining neighbours giving 21 days for response**~~ **in accordance with Government requirements.**

d Publish a list of planning applications received **in a local paper (as long as is required by Government) and** on the Council's website ~~**and in a local paper as long as is required by government**~~.

e Make live applications and any supporting information available for inspection at the Main Council Office ~~**and provide copies where required**~~. All applications will be available to view free of charge on the Council's website.

f Keep an online register of planning applications and decisions for public inspection.

g The results of any consultation **and written comments** will be taken into account in decisions made by, and on behalf of, the Council.

~~**h Take account of written comments on applications.**~~

~~**i**~~ **h** Notify anyone making representations, on an electronic basis where possible, if the application is to be determined at the Planning Committee Meeting. The agenda and reports for these meetings will be made publicly available on the website prior to the committee.

~~**j**~~ **i** Publish the decision and the reasons for it, on the Council's website.

~~**k**~~ **j** When an appeal has been lodged against the refusal of a planning application or to remove or vary conditions the

Council will notify those who have made representations on the application and advise them of the process for making further representations.

7.~~13~~12 Once a planning application has been submitted, there is a limited time period within which a decision should be made. It is therefore difficult to carry out more than the minimum legal requirements on public involvement. This emphasises the importance of pre-application consideration and involvement on the more significant proposals. It should be noted that there is no requirement to consult certain bodies where they have published standing advice detailing their requirements for proposed development.

7.~~14~~13 The Council will notify anyone making representations, on an electronic basis where possible, if an application is to be determined by Planning Committee. However, notification letters will still be posted to those who do not provide an e-mail address. ~~**or to those who wish to receive notification in writing.**~~ **The Council will update information on each application on its website during the process of its assessment and determination. This will be the primary means for anyone interested in an application to gain updates over its progress, whether additional information or plans have been received, any comments submitted and whether it is to be determined under delegated powers or if by planning committee, the date of the relevant committee. It will be for anyone interested in an application to monitor information on the website. Any person interested in a particular application is advised to make themselves aware of a possible decision date or a committee date by monitoring the website.**

7.~~15~~14 The Council has an adopted 'Scheme of Delegation' to exercise all the powers of the Council as a Local Planning Authority to determine certain planning applications that do not need to be referred to the Planning Committee. Planning Committee meetings are public, and provide an opportunity for applicants and town/parish councils to make representations directly to the committee. One spokesperson is allowed to speak for the application (generally the applicant or agent) **and one spokesperson is allowed to speak against the application. There is also a public question time at the beginning of the meeting for those present to ask questions about any item on the agenda, or to speak briefly by way of background or introduction to those questions, including planning applications,**

7.~~16~~15 The Council **will** ~~**may**~~ consult **where appropriate** adjoining district, parish and town councils for the development proposals outlined in ~~**SCI7 (b)**~~ **SCI/8 (b)**. However, the Council will also consult more widely where warranted; for instance, where a development is likely to have visual impacts, including cumulative impacts, which affect parishes further afield than those adjoining the application site.

7.~~17~~16 Policy ~~**SCI7**~~ **SCI/8** applies only to applications for planning permission, when Mid Devon District Council is the Local Planning Authority responsible for determining the application. Express consent is not always required, and development or works may be subject to a prior notification procedure only. Policy ~~**SCI7**~~ **SCI/8** does not apply to ~~**the following**~~ notification procedures **including but not limited to the following:**

- Agricultural or forestry development
- Hedgerow Removal Notice
- Telecommunications development
- Demolition
- Works to a tree in a Conservation Area
- Change of use

# 8.0 Glossary

**Allocations -**

are proposals that a certain site or area of land should be developed for particular uses and/or buildings. They are shown on a Proposals Map, contained within the Local Plan. There will be a related policy setting out any parameters and criteria for the site, contained within the local plan.

**Authority's Monitoring Report -**

a document the Council produces annually, setting out how planning policies have been implemented for the previous financial year and whether it has achieved the milestones set out in its Local Development Scheme.

**Development Order -**

an order made under section 59 of the Town and Country Planning Act 1990 which either gives planning permission for certain kinds of development or allows Councils to grant permission if the provisions of an order are met.

**Development Plans -**

are plans which set out policies and proposals for changes of land use, new buildings, changes to existing buildings and other proposals which require planning permission.

**General Consultation Bodies -**

are organisations with an interest in the social, economic and environmental development of an area, and which may be consulted on the preparation of local plans and Supplementary Planning Documents.

**Local Development Scheme (LDS) -**

a project plan for the preparation of local plans.

**Local Planning Authority (LPA) -**

is a council with planning powers. For most purposes, this is Mid Devon District Council, but Devon County Council is the LPA for minerals and waste.

**Local Plans -**

are part of the Development Plan, covering the whole of a District (except for any areas within a National Park) and giving comprehensive policy coverage at a detailed level. They are also known as Development Plan Documents.

**Major Planning Applications -**

are applications for residential development with a minimum of 10 dwellings or a 0.5 hectare site area, and planning applications for non-residential development with a minimum of 1000 square metres gross floor area, or a 1 hectare site area.

**Non-Major Planning Applications -**

are planning applications which are not categorised as major.

**Other Planning Applications -**

are change of use applications and householder applications.

**Permission in Principle -**

to be granted on sites in plans and registers, and for minor sites providing greater certainty of development based on 'in principle matters' such as land use, location and amount of development.

**Policy -**

a written guideline or set of criteria which describes how the planning authority will deal with development proposals. They may relate to the whole district, or defined areas within the district and may be relevant to particular types of development or a range of developments. Policies contained within a local plan are the primary consideration for decisions on planning applications.

**Primary Consideration -**

planning applications are required by law to be determined in accordance with the Development Plan unless material considerations indicate otherwise. This means that when the local authority determines a planning application it will look at what Development Plan policies and proposals apply to a particular parcel of land or building and then see how closely the development proposal complies with the Plan. It will then consider other relevant issues (known as material considerations) and decide whether these are important enough to outweigh the policies of the Development Plan in that instance.

**Prior Approval -**

means that a developer has to seek approval from the local planning authority that specified elements of the development are acceptable before work can proceed.

**Proposals -**

see Allocations.

**Proposals Map / Adopted Policies Map -**

a map showing the areas or sites to local plan policies and proposals apply.. It will contain Inset Maps, showing particular areas in more detail.

**Registered Bodies -**

for the purposes of this Statement, are individuals or organisations which have asked to be consulted on Local Plan and Supplementary Planning Document preparation, details of whom are kept on a Council register. They will include all relevant General Consultation Bodies.

**Soundness -**

is a term describing the tests against which a local plan will be assessed at the Examination.

**Specific Consultation Bodies -**

are the bodies defined in the Local Planning Regulations which must be consulted when a local plan is produced. They include parish and town councils, English Heritage and similar statutory bodies.

**Statement of Community Involvement (SCI) -**

a statement within the Local Development Framework that sets out the Council's policies for the public involvement in the preparation of Local Plans, Supplementary Planning Documents and planning applications.

**Supplementary Planning Document (SPD) -**

a document within the Local Development Framework that sets out more detailed policies in support of those contained in a local plan. It does not form part of the Development Plan, but is a material consideration on planning applications.

**Sustainable Communities -**

are places where people want to live and work, now and in the future.

**Sustainable Development -**

is development which meets the needs of the present while not preventing future generations meeting their own needs. The sustainability of local plans must be assessed through Sustainability Appraisals and Strategic Environmental Assessment (SA/SEA).

**Technical Details Consent -**

Following permission in principle, full planning permission will only be secured once technical details consent has been obtained.

**Underrepresented Groups -**

are groups that rarely get involved in planning processes, including young people, minority ethnic groups, people with disabilities, new residents, people on low incomes and people who have difficulty reading, writing and speaking English.

**Useful Abbreviations:**

| | | |
|---|---|---|
| CS | - | Core Strategy |
| DPD | - | Development Plan Document |
| LDS | - | Local Development Scheme |
| SA | - | Sustainability Appraisal |
| SCI | - | Statement of Community Involvement |
| SEA | - | Strategic Environmental Assessment |
| SPD | - | Supplementary Planning Document |

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**MID DEVON STATEMENT OF COMMUNITY INVOLVEMENT JULY 2020**

## Appendix 2

## Temporary amendments until 31st December 2020 to the Mid Devon Statement of Community Involvement (SCI) July 2020 that are necessary to meet Government restrictions on movement and gatherings

Temporary amendments are identified in **bold**, with ~~strikethrough~~ for deletions from the text of the underlining for additions to the text.

| Page Number | Paragraph / Policy number | Temporary amendment |
|---|---|---|
| | Policy SCI/1 Document Availability | Delete clause b:<br><br>**~~"b Deposited at Council offices and public libraries within Mid Devon during consultation periods;"~~** |
| | Paragraph 3.7 | Delete paragraph 3.7:<br><br>**~~"3.7 Copies of all local plans and supplementary planning documents, as they are produced, will be available for inspection during normal office hours at the Council's main office at Phoenix House, Tiverton and at public libraries throughout Mid Devon."~~** |
| | Policy SCI/2 Local Plan Preparation | Delete clause iv), amend clause v) and delete clause vi) and the subsequent sentence:<br><br>**~~"iv) Public exhibitions~~**<br><br>v) Public meetings if requested by a town or parish council **where these are held on-line or by telephone**<br><br>**~~vi) Site notices when development allocations are proposed~~**<br><br>**~~The Council's report will be made available for public inspection at Council offices and public libraries within Mid Devon."~~** |
| | Paragraph 4.2 | Delete the second and third sentences:<br><br>**~~"If necessary, the Council will meet with interested parties to discuss proposals for the local plan. When considering strategic planning matters, specific and general consultation bodes and those who have made representations will be~~** |

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| | | ~~**invited to attend workshops in which particular issues will be debated in detail."**~~<br><br>Add the following words to the final sentence:<br><br>"These could include attendance at relevant group meetings or forums **where these are held on-line or by telephone**, and publicity of local plans via social media." |
| | Policy SCI/3 Local Plan Publication | Amend the final section of the policy as follows:<br><br>"General contact methods to notify all other stakeholders, using the following methods **which reflect the social distancing measures as a result of Covid-19**:<br><br>i) Press release<br>ii) Information on the Council website<br>iii) Social media<br>~~**iv) Public exhibitions**~~<br>v) Public meetings if requested by a town of parish council **where these are held on-line or by telephone**<br>~~**vi) Site notices when development allocations are proposed**~~<br><br>~~**The local plan will be made available for public inspection at Council offices and in public libraries within Mid Devon."**~~ |
| | Policy SCI/4 Supplementary Planning Documents: Masterplans | Amend the final section of the policy as follows:<br><br>"Masterplanning Supplementary Planning Documents will also be publicised as follows **which reflect the social distancing measures as a result of Covid-19**:<br><br>i) Press release<br>ii) Information on the Council website<br>iii) Social media<br>iv) Public meetings if requested by a town of parish council **where these are held on-line or by telephone**<br>~~**vii) Site notices**~~<br><br>In preparing the Supplementary Planning Document, the Council will take into account any representation made in response to this consultation." |
| | Paragraph 5.2 | Amend paragraph 5.2 as follows: |

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| | | "The Council will prepare the draft Supplementary Planning Document taking into account any responses received to the scoping consultation. A formal public consultation will take place before the Supplementary Planning Document is adopted. Consultation will be carried out using a mixture of direct contact and general publicity, with additional measures to reach underrepresented groups, which could include attendance at relevant community groups, meetings**, workshops** or forums **where these are held on-line or by telephone**, and publicity of masterplans via social media. Direct contact will be made by letter, email or other appropriate means. When a masterplan is being considered for an area within Mid Devon, early community involvement is to be encouraged. ~~**In addition to the methods listed in Policy SCI/4, the Council will consider whether further measures such as leaflet dropping, exhibitions or workshops are warranted.**~~ The level of consultation will endeavour to be proportionate to the likely impact of the plan." |
| | Paragraph 5.4 | In the last sentence add the following words:<br><br>"Comments made during the course of any workshops**, where these are held on-line or by telephone** will be gathered and summarised by the Council, then taking into account as the final Supplementary Planning Document is produced." |
| | Policy SCI/5 Supplemetary Planning Documents: Other | Amend the final section as follows:<br><br>"General contact methods to notify all other stakeholders, using the following methods **which reflect the social distancing measures as a result of Covid-19**:<br><br>i) Press release<br>ii) Information on the Council website<br>iii) Social media<br>iv) Public meetings if requested by a town or parish council **where these are held on-line or by telephone**<br><br>The Council will take into account any representation made in response to this consultation." |
| | Paragraph 5.6 | Amend paragraph 5.6 as follows: |

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| | | "Consultation will be carried out using a mixture of direct contact and general publicity, with additional measures to reach underrepresented groups, which could include attendance at relevant community groups, meetings**,** **workshops** or forums **where these are held on-line or by telephone**, and publicity of Supplementary Planning Documents via social media. ~~**In addition to the methods listed in Policy SCI/5, the Council will consider whether further measures such as leaflet dropping, exhibitions or workshops are warranted.**~~ The level of consultation will endeavour to be proportionate to the likely impact of the plan." |
| | Paragraph 5.7 | In the last sentence add the following words:<br><br>"Comments made during the course of any workshops**, where these are held on-line** will be gathered and summarised by the Council, then taking into account as the final Supplementary Planning Document is produced." |
| | Policy SCI/6 Major Applications Pre-Application Consultation | Amend the section C of Policy SCI/6 as follows:<br><br>"The following methods of local involvement on pre-application proposals may be appropriate for the promoter to consider **which reflect the social distancing measures as a result of Covid-19**:<br><br>i Newspaper Notice<br><br>ii Press Release<br><br>iii Public meetings if requested by a town or parish council **where these meetings are held on-line or by telephone**<br><br>iv Individual or group discussions **where these are held on-line or by telephone**<br><br>v **On-line** public exhibitions<br><br>vi Summary leaflets<br><br>vii Response forms<br><br>viii Letters to specific landowners/residents" |

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| | Policy SCI/7 Application Consultation | Amend clause e as follows:<br><br>"~~**Make live applications and any supporting information available for inspection at the Main Council Office.**~~ All applications will be available to view free of charge on the Council's website." |
| | Paragraph 7.15 | Amend paragraph 7.15 as follows:<br><br>"The Council has an adopted 'Scheme of Delegation' to exercise all the powers of the Council as a Local Planning Authority to determine certain planning applications that do not need to be referred to the Planning Committee. Planning Committee meetings **will be held on-line for the foreseeable future. They** are public and provide an opportunity to applicants and town/ parish councils to make representations directly to the committee. One spokesperson is allowed to speak for the application (generally the applicant or agent) and one spokesperson is allowed to speak against the application." |
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**CABINET**
**6 AUGUST 2020**

**REPORT OF THE HEAD OF PLANNING, ECONOMY AND REGENERATION**

**GREATER EXETER STRATEGIC PLAN (GESP): DRAFT POLICIES AND SITE OPTIONS CONSULTATION**

| | |
|---|---|
| **Cabinet Member(s):** | Cllr Graeme Barnell, Cabinet Member for Planning & Economic Regeneration |
| **Responsible Officer:** | Mrs Jenny Clifford, Head of Planning, Economy and Regeneration |

**Reason for Report:** To consider the Greater Exeter Strategic Plan Draft Policies and Site Options consultation document and its Sustainability Appraisal Report and Habitat Regulations Assessment Report.

**RECOMMENDATION(S):**

**1. The GESP Draft Policies and Site Options consultation document attached at Appendix A is approved for public consultation;**

**2. The GESP Draft Policies and Site Options Sustainability Appraisal Report attached at Appendix B is approved for public consultation;**

**3. The Initial Habitat Regulations Assessment Report attached at Appendix C is approved for public consultation;**

**4. The content and conclusion of the GESP Equality Impact Assessment Screening Report attached at Appendix E are noted;**

**5. Delegated authority is given to the Leader, in consultation with the Portfolio Holder and Chief Executive, to agree changes to the above documents arising from decisions by the other GESP authorities before they are published for consultation;**

**6. A further 'call for sites' process, to be held alongside the consultation on the GESP Draft Policies and Site Options document, is approved;**

**7. The content of the consultation statement for the 2017 Greater Exeter Strategic Plan Issues consultation attached at Appendix D is noted;**

**8. The GESP team is brought up to 8 full time equivalent members of staff and all Local Planning Authority staff resources are provided equitably to the team through equalisation arrangements. For Mid Devon District Council, subject to confirmation of the additional GESP staff roles that will be required, this is likely to equate to a total contribution of approximately £62,000 per annum**

**towards staff costs, or an additional c.£17,067 per annum on top of existing contributions.**

**Financial Implications:**
Each of the Greater Exeter local planning authorities (LPAs) have currently agreed to budget contributions totalling £170,000 for the preparation of the GESP. The Councils' budget contributions are being used mainly for evidence preparation which is necessary for the production of a sound plan. The budget also covers public engagement and therefore there is no need for further funding to be provided to cover the draft policies and site options consultation.

The budget contributions do not cover staffing. Having considered the potential future staffing arrangements for the GESP team as outlined in section 8 of this report, staff or financial contributions would be required from each LPA to bring the staffing levels up to 8 FTEs. Although the specific costs of this staffing will be determined in future once the composition of the team emerges, it is likely that total staff costs for each LPA will be approximately £62,000 per annum. Mid Devon is currently contributing staff time at an estimated annual staff cost equivalent of £44,933. Bringing staffing for GESP up to 8 FTE on an equitable basis between the four authorities would result in an annual cost increase to Mid Devon of c£17,067 via either financial contribution or staff time equivalent.

Looking at the wider GESP budget, additional budget contributions are not currently being sought. However, once the GESP has gone through its various consultation stages and has been submitted, an Inspector and Examination will be required and this could cost in the order of £150,000 which would require additional, equal budget contributions of around £37,000 from each of the four LPAs. This cost is likely to be incurred in around 2022/23. A further report to Cabinet will consider this matter further in due course.

**Budget and Policy Framework:**
The Greater Exeter Strategic Plan will form an important part of the Council's policy framework.

**Legal Implications:**
Section 19 of the Planning and Compulsory Purchase Act 2004 sets out a statutory requirement for LPAs to prepare development plans. These plans must identify the priorities for the development and use of land in the authority's area. This stage of the plan-making process is under "Regulation 18" of the 2012 Local Planning Regulations. The four LPAs formally agreed to prepare the GESP as a statutory joint development plan at various meetings during 2016 and the GESP is incorporated into their Local Development Schemes accordingly.

Under relevant legislation, development plans must be accompanied by a Sustainability Appraisal (SA) and Strategic Environmental Assessment (See Appendix A). These requirements are usually integrated into one document/process which considers the effects of the plan on the environment, people and the economy, considers reasonable alternatives, propose measures to mitigate harmful effects, and proposes monitoring measures. The SA report is provided at Appendix A.

Legislation also requires that a plan will not adversely affect the ecological integrity of European wildlife sites. This is considered through a Habitats Regulation Assessment (HRA). The initial HRA for this stage of the GESP plan-making process is included at Appendix C and is discussed in section 8 of this report.

Consultation on the GESP will be carried out in accordance with the Joint GESP Statement of Community Involvement, which is recommended for adoptions under a separate report to Cabinet after being consulted on in 2017. Further details about the specific approach to consultation on the GESP draft policies and site options will be included in an engagement strategy. This will specifically consider the current COVID-19 pandemic.

**Risk Assessment:**
The GESP is being jointly prepared by four Local Planning Authorities. This means that Committee decisions are required from the four LPAs to enable milestones such as consultations to be reached. There is a risk that one or more of the LPAs does not approve the GESP consultation or associated recommendations. However, significant steps have been taken to avoid this eventuality; Members from each of the LPAs have been involved in developing the GESP and given significant opportunities to shape the consultation documentation. It is acknowledged that revisions to the consultation material could be proposed through the Committee processes of the four LPAs. Recommendation 5 requests delegated authority for the Leader, in consultation with the Portfolio Holder and Chief Executive, to agree changes to the consultation material so that the consultation can be held in a timely manner. This same approach will be taken for all of the four LPAs.

**Equality Impact Assessment**:
Under the Equality Act 2010, the vision and draft policies of the GESP draft policies and site options consultation document have been considered through a screening process which has identified that the content does not require a full equality impact assessment (see section 7 of this report).

**Relationship to Corporate Plan:**
The recommended decisions will enable progress to be made towards the adoption of the GESP. Once adopted, the GESP itself will facilitate the delivery of all of the Council's Corporate Plan Priorities.

**Impact on Climate Change**:
The GESP incorporates a target that carbon emissions from the Greater Exeter area are net zero by 2040 at the latest. This is ten years earlier than the national target and reflects the priority given to the climate emergency by the Greater Exeter Councils. Furthermore, the draft policy goes on to state that decisions on infrastructure investment and development applications will consider their impact on achieving this target. More widely, the draft policies contain significant requirements for new developments to be carbon neutral, together with proposals for a low carbon transport strategy which would provide a significant contribution to meeting the target. Site options have been selected in large part because of their potential to

minimise carbon emissions due to location and the potential to minimise the need to travel. It should be noted that planning decisions are just one of the actions needed to proceed to a carbon neutral area and country. Individual Councils may proceed faster towards carbon neutrality in accordance with their own individual policies.

**Appendices**

**Appendix A:** GESP Draft Polices and Site Options consultation document
**Appendix B:** GESP Draft Policies and Site Options Sustainability Appraisal report
**Appendix C:** GESP Initial Habitat Regulations Assessment report
**Appendix D:** GESP Issues Consultation Statement
**Appendix E:** GESP Equality Impact Assessment Screening Report
**Appendix F:** GESP team staff resources: Future options

**MAIN BODY OF REPORT**

## 1. PURPOSE

1.1. This report seeks approval from Mid Devon District Council's Cabinet to consult on the Greater Exeter Strategic Plan (GESP) draft policies and site options consultation document and associated reports, hold a further 'call for sites' to inform the plan making process and increase staff resources in the GESP team.

## 2. INTRODUCTION

2.1. The Greater Exeter Councils are the local planning authorities of East Devon District Council, Exeter City Council, Mid Devon District Council and Teignbridge District Council, together with Devon County Council as a key infrastructure provider and the Minerals and Waste Planning Authority for the area. The Greater Exeter Councils formally agreed to prepare a statutory joint plan at various meetings during 2016 and incorporated the GESP into their Local Development Schemes accordingly.

2.2. The GESP will cover the local planning authority areas of East Devon, Exeter, Mid Devon and Teignbridge (excluding Dartmoor National Park). It is being prepared jointly by those four local planning authorities with the support of Devon County Council under Section 28 of the Planning and Compulsory Purchase Act. It will:

- Set an overall vision and strategy for the area in the context of national and other high level policy and in particular climate emergency declarations and the NPPF;

- Contain policies and proposals for strategic and cross boundary issues where these are best dealt with on a wider geography;
- Set the overall amount of development for the period 2020 – 2040;
- Promote the Liveable Exeter vision by allocating urban regeneration sites in the city of more than 100 dwellings;
- Implement the overall vision and strategy by allocating strategic sites of 500 or more homes outside of the city which may include urban extensions and new settlements, together with strategic employment sites; and
- Provide district and city council local plans with targets for non-strategic development.

2.3. The GESP was subject to an early round of public consultation during February to April 2017. That 'Issues' consultation launched the concept of the GESP and explored the key issues that the plan should address. Responses to the comments provided during that consultation are set out within the GESP Issues consultation statement at Appendix D.

2.4. The adopted Local Development Schemes (LDSs) of the Greater Exeter Councils set out the formal timetable for the GESP. The LDSs identify that the next round of public consultation on the GESP - the draft policies and site options consultation - was due to have commenced in June 2020. However, the COVID-19 pandemic has necessitated deferring the start of consultation until September 2020. In the future, the Councils' LDSs will need to be updated to reflect both this change and the longer term impacts of the pandemic on the GESP timetable.

2.5. The purpose of the draft policies and site options consultation is two-fold. Firstly, to invite comments on a number of draft strategic planning policies which would apply across the Greater Exeter area. These policies are limited to those which cover issues that are better dealt with consistently across the area, rather than on a district-by-district basis in local plans. Secondly, to discuss the proposed spatial development strategy for the area and provide the first indication of the potential housing and employment site options which may form part of the GESP. The proposed consultation document contains a total of 39 site options on which comments will be sought.

## 3. CONTENT OF THE GESP DRAFT POLICIES AND SITES CONSULTATION DOCUMENT

3.1. The four Greater Exeter Councils are being recommended to publish the draft policies and site options document for an 8 week period of consultation, commencing in September 2020. Because it is a joint plan, the document must be agreed by all four Councils before it is finalised.

3.2. The consultation document is divided into three main sections as follows:

- Section A: Purpose
  This describes why the GESP is being prepared and how it relates to local plans and neighbourhood plans. This was an issue raised during the earlier Issues consultation.

- Section B: Policies
  This section includes the draft vision for the Greater Exeter area. It has been revised to take account of comments received during the Issues consultation and work undertaken subsequently. The vision is split into three sections: 'the plan' which summarises the purpose of the GESP; 'the place' which explores the future of Greater Exeter; and finally a section on the 'priorities' for the area. The rest of Section B is divided into a series of thematic chapters which include the draft policies for the GESP and provide the associated explanatory text. The following thematic chapters are included:

  - Climate emergency;
  - Prosperity;
  - Homes;
  - Movement and communication;
  - Nature; and
  - Quality places and infrastructure.

- Section C: Spatial development strategy and site options
  This final section includes the spatial element of the GESP, setting out the amount of development required, a spatial development strategy and how this could come forward through a series of potential site options. The following elements are included:

  - The number of homes;
  - Existing housing sites and the number of houses on GESP allocations;
  - The spatial development strategy and associated map;
  - Four strategic growth areas covering the central, northern, southern and eastern areas of Greater Exeter;
  - The relationship with local plans and smaller sites; and
  - A series of 39 site options for housing and employment development which fall within the strategic growth areas.

3.3. It should be noted that not all of the site options will be required for further consideration and inclusion in the next stage of the GESP.

3.4. Spatial development strategy

As set out above, an important element of the draft policies and site options consultation document is the spatial development strategy contained in

Section C, from which the 39 site options have been identified. The spatial development strategy is based on the following key themes, which are themselves informed by the draft vision:

- Protecting key environmental assets;
- Recognising the impact of development distribution in terms of carbon production;
- Identifying accessible and well connected development locations;
- Seeking increased densities in our urban areas and around transport hubs;
- Connecting settlements by IT and other infrastructure, reducing the need to travel and minimising grey infrastructure requirements; and
- Ensuring growth has a clear purpose, leading to individual character.

3.5. Driven by these themes, the spatial development strategy focuses strategic development:

- On brownfield and greenfield land in Exeter and other main towns where there is an easily accessible range of jobs, services, transport facilities and the potential to enhance these factors; and

- In new or expanded settlements of scale on key transport corridors, particularly the rail corridors which extend out from Exeter, ideally where cycling is also a feasible option to access key jobs and services.

3.6. Members should note that in addition to strategic development allocations made in the GESP, local plans and neighbourhood plans will have a role to play in allocating smaller sites in accordance with locally determined priorities and needs. Such allocations will be necessary to ensure that the housing and economic development needs of the four Councils are met.

3.7. After explaining the derivation of the spatial development strategy, the consultation document identifies four potential strategic growth areas located across the Greater Exeter area where development would fit with the strategy. These strategic growth areas - central, northern, southern and eastern - have been assessed in the GESP Sustainability Appraisal (see section 5 of this report), which concludes that they offer the most appropriate combination of economic, social and environmental benefits (or minimised negative impacts) in terms of development. The four strategic growth areas also reflect the vision of an accessible and networked city region of linked and distinct communities. The site options contained in the consultation document are all

within one of these strategic growth areas. The strategic growth areas are summarised below.

3.8. Central strategic growth area

This large area includes Exeter and immediate surrounds, the “West End of East Devon” and the Tarka Line railway corridor as far as Crediton. It comprises the focal point of the Greater Exeter area’s transport connections. Much of the Central area has seen very substantial planned growth and investment. It contains the growing new town of Cranbrook, the Science and Sky Park economic hotspots (designated as an Enterprise Zone) and a number of major urban extensions to the city. It is a sustainable transport node with four railway lines, a series of stations (with additional stations planned), excellent bus and cycle provision and an emerging cycle and car club infrastructure. It is also the focus of the strategic road network, while major institutions such as the University of Exeter and the Met Office provide continued economic impetus. These conditions converge to drive significant demand for new homes and economic investment.

Within Exeter there is large brownfield regeneration potential for high quality sustainable development, as articulated in the Liveable Exeter vision for the city. The Central area also offers locations for further urban extensions and new settlements with good sustainability credentials. However, there are environmental sensitivities to consider, including the high quality historic environment and the internationally important Exe Estuary, Dawlish Warren and Pebblebed Heaths, which are potentially vulnerable to visitor pressure. High quality development, green infrastructure and habitat management will be key mitigation requirements, whilst an innovative and multi-modal transport strategy will support development. There are 26 site options within the Central strategic growth area.

3.9. North strategic growth area

Towards the northern boundary of the Greater Exeter area, about half way between Taunton and Exeter, the Northern strategic development area stretches from Tiverton to Cullompton. The existing mainline station at Tiverton Parkway combines with two motorway junctions to give excellent access and there are fewer national or international environmental sensitivities than in many other Greater Exeter locations. Proposals within the Mid Devon Local Plan Review include significant economic and housing expansion, with a new tourist and leisure hub at Junction 27 of the M5 and the initial phases of the Culm Garden Village, to the east of Cullompton. Improvements to the motorway junctions and a new railway station at Cullompton are key infrastructure requirements. There are 3 site options within the North strategic growth area.

3.10. South strategic growth area

Near the southern extent of Greater Exeter, Newton Abbot, Kingsteignton and Kingskerswell create a significant employment and housing area. This wider urban area has good transport links including the Great Western mainline railway, access to the strategic road network via the A38 and the recently completed South Devon Highway to Torbay. There is the potential to continue to develop the area's role with additional homes and employment, following on from the strategic development allocated on the edge of Newton Abbot in the existing local plan. There are sensitives to consider in this location; Dartmoor is within proximity of the northern part of the area, there are internationally important bat habitats and considerable reserves of the nationally significant ball clay mineral. Development impact would require mitigation, with green infrastructure likely needing to play an important role. There are 4 site options within the South strategic growth area.

3.11. East strategic growth area

Within the eastern part of the Greater Exeter area, the Waterloo Line provides a mainline rail service from Exeter to London together with important local connectivity between towns and to Exeter. The corridor is also well served by the strategic road network, including the A30 which provides good links east and west. The market towns of Honiton and Axminster have economic and housing potential, while settlements with existing stations may provide the opportunity for strategic expansion accompanied by sustainable transport options. Plans to improve frequencies along the Waterloo line would enhance the sustainability of proposals in this area. A key environmental consideration in the area is the presence of Areas of Outstanding Natural Beauty which would need to be protected. There are 6 site options within the East strategic growth area.

## 4. SUMMARY

4.1. The significant work that has been undertaken on the GESP forms a tangible further stage in the project. The draft vision, draft policies, suggested spatial development strategy and site options require consultation in order that views of the community and stakeholders can be gathered, understood and used to inform the next stage of the GESP. An engagement strategy will be produced to set out how the consultation for this stage of the GESP will be undertaken. This will be in accordance with the revised Joint SCI for the GESP, which is being brought to this Cabinet meeting for approval in a separate report, and will need to respond to the current Covid-19 situation.

4.2. Recommendation 1 requests approval for consultation on the GESP draft policies and site options document.

4.3. It should be noted that each of East Devon District Council, Exeter City Council, Mid Devon District Council and Teignbridge District Council need to

approve the consultation on the GESP draft policies and site options document and associated documents from September 2020. Consistent recommendations will be considered by the relevant decision-making body of each Council. During this process, there is the potential for some revisions to be identified by each Council. In order to enable such revisions to be considered through the democratic process in a timely manner, recommendation 5 requests that the Leader be given delegated authority, in consultation with the Portfolio Holder and Chief Executive, to agree changes to the consultation documents which may arise from decisions by the other GESP authorities, before they are published for consultation.

## 5. EVIDENCE

5.1. In order for a local plan or a strategic plan such as the GESP to be adopted, it must first be examined by an independent planning inspector and found 'sound'. The National Planning Policy Framework (NPPF) sets out four tests of soundness. One such test is that the plan must be 'justified'. This means that it must include '…an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence' (NPPF, paragraph 35). On the basis of the need for firm evidence, a range of studies, assessments and research has been undertaken during the preparation of this consultation document.

5.2. The evidence base for the GESP is continually evolving and is made available online at www.gesp.org.uk/evidence/. The evidence base currently covers a variety of themes including housing, economic development, transport, digital connectivity, retail and environmental matters. Additional evidence will be added to the GESP website when the consultation starts and as the plan progresses. This will include the reporting of the housing and economic land availability assessment (HELAA) which considers sites put forward during a 'call for sites' process held in 2017. It is important to recognise that there is no need to have all the evidence for the plan completed at this stage and that the evidence currently compiled is sufficient for this stage of the plan.

## 6. SUSTAINABILITY APPRAISAL/STRATEGIC ENVIRONMENTAL ASSESSMENT

6.1. One of the key evidence documents which will support the GESP as it progresses is the Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA). Preparing and consulting on the SA/SEA is a legal requirement of preparing a plan.

6.2. SA and SEA are similar processes. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals within a plan from the outset of its development while the SEA process focusses on environmental impacts. Because of the cross-over of these processes, they have been undertaken together for the GESP and are covered by the 'SA Report'.

6.3. The SA Report has been prepared to assess the GESP draft policies and site options consultation document. This is attached at Appendix B. The SA Report has been undertaken by 'LUC', an independent consultancy. It follows on from the SA scoping report which set out the way in which the Councils proposed to undertake SA and which was consulted on in 2017 alongside the GESP Issues consultation. The SA approach was subsequently refined to reflect consultation comments received and also to ensure that the assessment objectives reflect each of the topics required by the SEA regulations.

6.4. The current SA Report assesses the potential environmental, social and economic impact of the key elements of the draft policies and site options consultation document. In particular, it assesses the vision, draft policies, spatial development strategy and site options. It also assesses 'reasonable alternatives' to the draft policies and site options to ensure that the GESP is progressing with an appropriate strategy. A key feature of the assessment of reasonable alternatives is the consideration of a longer list of 78 potential residential and employment sites. These sites derive from the 2017 call for sites submissions, the associated housing and economic land availability assessment (HELAA) and a wider assessment of potential development locations from within the strategic growth areas. The site options in the main GESP consultation document are considered to be the most appropriate to take forward for further consideration.

6.5. The SA Report concludes that the GESP draft policies and site options consultation document provides a basis to ensure that the level, type and location of growth in the plan area is appropriately balanced between the need to maintain and enhance the natural and built environment, to support economic aspirations for the Greater Exeter area and improve health and social wellbeing.

6.6. Recommendation 2 seeks approval for consultation on the SA Report alongside the GESP draft policies and site options consultation document.

## 7. HABITATS REGULATIONS ASSESSMENT

7.1. In addition to the SA, a further key piece of evidence which will inform the preparation of the GESP is the Habitat Regulations Assessment (HRA). Undertaking this process is a legal requirement of preparing a plan to ensure that it does not adversely affect the ecological integrity of a European site. European sites include Special Protection Areas (SPAs), which are classified for their bird populations of European interest, and Special Areas of Conservation (SACs), which are designated for habitats and species of European interest. There are various European sites in the local area which could be affected by the content of the emerging GESP including the Exe Estuary SPA, Dawlish Warren SAC, the East Devon Pebblebed Heaths SPA/SAC, the South Hams SAC and the River Axe SAC.

7.2. An initial HRA report has been prepared to assess the GESP draft policies and site options consultation document. This initial HRA Report has been prepared by 'Footprint Ecology', an independent consultancy who have been involved in HRA work within the Greater Exeter area historically. The initial HRA Report is attached at Appendix C.

7.3. Producing an HRA is not a legal requirement at this stage of the plan-making process, because the content of the GESP is not yet established. However, consideration of HRA matters at this initial stage enables an early understanding of any likely impacts which the emerging GESP may have on European sites, what evidence we might need to gather to understand potential impacts on sites and what amendments to the GESP might be necessary to reduce or remove these impacts.

7.4. The initial HRA Report first includes an initial screening of the policy content and site options in the GESP consultation document for likely significant effects on the European sites. It then provides recommendations to clarify points that are related to HRA. These have been incorporated in the GESP consultation document. Following the screening, topics for the subsequent 'appropriate assessment' stage of the HRA (to be undertaken alongside later stages of the plan) are highlighted with any further evidence which will be needed as the plan progresses. A full HRA, informed by the initial HRA and consultation responses to its contents, will be prepared to support the next version of the GESP.

7.5. In summary, the initial HRA report flags the draft policies which could have an impact on European sites. These policies cover housing, economic and employment targets, the airport, gypsy and traveller accommodation and some of the transport policies. The report also identifies that the site options could have an impact on European sites when considered alone or in combination. The initial HRA will enable appropriate evidence gathering to ensure that impacts on European protected sites are minimised and appropriate mitigation is identified.

7.6. Recommendation 3 seeks approval for consultation on the initial HRA Report alongside the GESP draft policies and site options consultation document.

## 8. EQUALITY IMPACT ASSESSMENT SCREENING REPORT

8.1. Under the Equality Act 2010, local authorities have a legal duty to eliminate discrimination and promote equality within service delivery. Local authorities are required to have 'due regard' to the need to:

- Eliminate discrimination, harassment, victimisation and any other prohibited conduct;
- Advance equality of opportunity (remove or minimise disadvantage, meet people's needs, take account of disabilities, encourage participation in public life); and

- Foster good community relations between people (tackle prejudice and promote understanding).

8.2. The protected characteristics under the Equality Act are:

- Age;
- Disability – including physical disability, mental health;
- Gender reassignment;
- Marriage and civil partnership;
- Pregnancy and maternity;
- Race;
- Religion or belief;
- Sex/Gender; and
- Sexual orientation.

8.3. In accordance with the Equality Act, the GESP consultation document has been subject to an equality impact assessment. A screening exercise has considered whether the vision and draft policies are likely to have an impact, either positive or negative, on the protected characteristics above. The purpose of this screening stage is to assess whether or not it is necessary to carry out a full equality impact assessment.

8.4. The screening report is attached at Appendix E. It concludes that the equality impacts of the vision and some of the draft policies will be positive, and that the remaining draft policies are likely to have no impact due to neutral or negligible effects on groups with the protected characteristics. Therefore the screening report concludes that a full equality impact assessment of the GESP consultation document is not required.

8.5. Recommendation 4 requests that the content and conclusion of the Equality Impact Assessment Screening Report attached at Appendix E is noted.

## 9. CALL FOR SITES

9.1. A call for sites invites landowners, land agents, planning consultants and the wider public to identify sites which they consider are appropriate and available for development. This evidence is vital in the plan-making process as it helps Councils to demonstrate that the sites included in a plan have a realistic prospect of coming forward. In this regard, call for sites information is critical in ensuring that a plan is 'deliverable over the plan period'. This is a central element of the 'effective' test of soundness identified in the NPPF and against which a planning inspector will ultimately consider the plan.

9.2. A call for sites was held in early 2017 alongside the GESP Issues consultation. This work has informed the site options included in the GESP consultation document. However, because circumstances regarding land availability change over time, through for example, the buying and selling of land, it is necessary to update the evidence by holding another call for sites. This will demonstrate the deliverability of the site options and potentially result in further sites being proposed. It is therefore proposed that a second Greater

Exeter-wide call for sites be held concurrently with the GESP consultation in the autumn. The call would be a web-based process hosted on the GESP website, requiring basic site information and a plan to be provided. The information provided will be used as evidence for both the GESP and also the individual local plans of the four Greater Exeter Councils.

9.3. Recommendation 6 requests approval to hold a further call for sites, to be held alongside the GESP draft policies and site options consultation.

## 10. ISSUES CONSULTATION

10.1. In addition to a range of evidence, the progression of the GESP has been informed by the initial Issues consultation which was held in 2017. The issues consultation document can be found at https://www.gesp.org.uk/consultation-phases/issues/ together with the public comments received. These comments have been considered and, where appropriate, a response provided.

10.2. A variety of matters were raised in answering the six Issues consultation questions including:

- The need to clarify the role of the GESP, local plans and neighbourhood plans;
- The relevance and importance of the “duty to cooperate”;
- The role of government policies relating to housing need;
- The need for significant community involvement in preparing the GESP;
- Health and wellbeing;
- Environmental issues;
- Transport and other infrastructure provision;
- Housing matters;
- Employment issues; and
- The development strategy and the forms of new development.

10.3. It is a requirement that a statement is produced detailing the responses received during consultation and the way in which the preparation of the GESP has been informed by such responses. This consultation statement should then be made publicly available. The consultation statement for the previous GESP Issues consultation is therefore included at Appendix D. This will be made available on the GESP website.

10.4. Recommendation 7 requests that the content of the Issues Consultation Statement is noted.

## 11. COUNCILLOR INVOLVEMENT

11.1. Member involvement has been an important part of the work undertaken to develop the GESP. To facilitate Member engagement, the four Councils set up a Member Reference Forum to discuss and consider the GESP and its evidence as it was prepared. The Forum originally comprised 5 members per authority, but this was extended to 10 members per authority in 2019 to allow for greater representation of the wider Council membership. In its first format, the Forum met five times between April 2017 and March 2019. Once reconstituted, it met a further five times between November 2019 and March 2020.

11.2. Forum Members have inputted to the general strategy to consider growth constraints and opportunities, the implications of the climate emergency, transport strategy and housing need. In the last three of the Forum meetings, Members have considered the draft policy wordings and the site options. Suggested changes by Members at these Forum meetings have been considered and taken into account in the GESP consultation document.

## 12. FUTURE RESOURCING OF THE GREATER EXETER STRATEGIC PLAN TEAM

12.1. The GESP team was established in 2017 and is hosted by Exeter City Council at the Civic Centre in Exeter. It comprises planning officers from East Devon, Mid Devon and Teignbridge District Councils, Exeter City Council and Devon County Council. The team is established on an informal basis, with each officer continuing to be employed solely by their contractual employer.

12.2. From the outset, it was informally agreed by the authorities that each would contribute two officers to the team. However, due to individual authority demands this has not been consistently provided and the professional level and respective salary of individual officers provided by the different authorities varies. When established in April 2017, the GESP team included approximately 8.5 full time equivalents (FTEs). Over time this level of resource has fluctuated and as of March 2020, the number of staff had decreased to approximately 5.2 FTEs. In addition, in March 2020, the established team leader left the project. There are a number resourcing issues which currently need resolving:

- The staff contributions to date have not been split equally between the 4 local planning authorities and remain unequal within current arrangements;
- The current staffing levels have reduced by around 40%, significantly impacting on the ability of the GESP team to deliver the plan within identified timescales;
- There is no dedicated/appointed team leader responsible for project management, staff management (even if informal), Member liaison and wider engagement for the GESP (currently the team is being led by two principal planning officers); and
- There is no planning technician resource to assist with mapping and general IT/administration support.

12.3. Financing the staff resource is a particular consideration. Currently, each staff member is paid for by their respective authority. Because the professional level of the officers varies, there are different financial implications for each authority. It has been identified that there is a need to evenly distribute the financial costs relating to overall staffing between the four Local Planning Authorities. This will have budget implications for each of the authorities.

12.4. It should be noted that the County Council sits outside of this discussion because it is not a LPA for the purposes of the GESP. The County Council does however continue to support an informal arrangement for the input of its resources and has provided consistent staff resources since the GESP team was established.

12.5. Going forward, there is a need to resolve the GESP team staffing resources in order to progress the plan. A detailed analysis of likely future staffing requirements for the GESP team has been undertaken and is provided in Appendix F. Although there will be some fluctuations in future workload, the analysis demonstrates that it is appropriate for the GESP team to increase staffing levels to 8 FTEs to steer the project forwards. There is also a need to discuss the composition of the team to consider the potential for a dedicated team leader and technician. Looking more widely, it is necessary to evenly distribute the overall staff costs between the four LPAs.

12.6. A range of staffing options have been discussed with the Leaders of the Local Planning Authorities and are summarised below.

**Option 1: Maintain the status quo**

This option would see the GESP team remain at 5.2 FTEs, with each team member continuing to be employed solely by their individual authority. Under this option, there would be no financial equalisation agreement and a lack of resource in the team which would affect the GESP timetable.

**Option 2: Option 2: Retain existing staff and identify additional resource to bring staffing levels up to 8.0 FTEs**

There are 3 scenarios under this option:

2a. Identify resource from within the existing planning teams and, subject to how these staffing contributions come forward, agree financial equalisation arrangements as necessary between the four LPAs covering the full LPA resource. Officers would continue to be employed solely by their individual authority. This would require all LPAs to reprioritise current plan programmes in order to divert staff to the GESP.

2b. Recruit additional staffing resources through a competitive recruitment process. The full costs of LPA staff in the team would be apportioned equally between the four LPAs by way of a financial equalisation agreement, payable to a host authority. New officers appointed would be employed by a single

host authority. This would improve the contractual management arrangements for the GESP team.

2c. A hybrid between 2a and 2b whereby additional resources are obtained through a combination of existing team members and external recruitment. All contributions, whether financial or existing officers, would be balanced equitably through a financial equalisation agreement for the four LPAs. New officers appointed would be employed by a single host authority.

**Option 3: All GESP team members (excluding DCC officers) to be hosted by a single LPA**

This would comprise both existing and new GESP team members who would be seconded to a host authority, with all financial contributions underpinned by an equalisation agreement. As per option 2, additional staff members would be recruited to bring staffing levels up to 8.0 FTEs.

The financial implications of options 2 and 3 are summarised in the table below, which shows that the total GESP team staffing costs for each LPA would be approximately £62,000 per annum for a team of 8 FTEs.

| Options 2 and 3 – Equalisation (future only) | | | |
|---|---|---|---|
| | Estimated annual **existing staff** cost/contribution (£) | Annual equalised contribution or equivalent resource cost of the **additional staff** (£) | **Total annual equalised staff** cost/contribution (£) |
| Staff costs (TOTAL) | 145,952 | 103,000 | 248,952 |
| East Devon | 39,213 | 25,750 | £62,238 |
| Exeter | 28,670 | 25,750 | £62,238 |
| Mid Devon | 44,933 | 25,750 | £62,238 |
| Teignbridge | 33,136 | 25,750 | £62,238 |

Following the analysis of staffing options, recommendation 8 requests approval to increase staffing levels in the GESP team to 8 FTEs and for the total staff resource provided by the local planning authorities to be provided equitably, supported by an equalisation arrangement. Any additional staffing costs will need to be funded and taken into account in budget review.

## 13. OPTIONS RELATING TO THE GESP DRAFT POLICIES AND SITE OPTIONS CONSULTATION DOCUMENT

13.1. Consultation is a legal requirement of plan preparation. The first Issues consultation on the GESP was held in 2017. Subsequently there has been

significant work undertaken to develop evidence, draft policies and consider site options. It is appropriate to consult on this work so that communities and stakeholders have an opportunity to provide comments and shape the development of the plan. There are therefore no alternatives to undertaking consultation on the GESP draft policies and site options document and associated evidence.

13.2. Options relating to the future staffing arrangements for the GESP team are included in section 11.

## 14. Planning Policy Advisory Group (PPAG)

14.1. The Planning Policy Advisory Group (PPAG) considered the Greater Exeter Strategic Plan consultation documentation at its meeting of 7th July 2020. Members were presented with the full GESP Draft Policies and Site Options document and discussion took place on all policy themes and site options. PPAG members recommended that Cabinet approve the Greater Exeter Strategic Plan Draft Policies and Site Options document and its Sustainability Appraisal Report and Habitat Regulations Assessment Report for public consultation subject to addressing the following comments:

- Members identified that some of the parishes referred to within policy GESP13: Strategic Economic Assets are incorrect. These will be checked to see if parish or postal address is clearest to aid site identification in time for the consultation.
- Members also noted that the impacts of the Coronavirus pandemic will likely require changes to the 'Prosperity' chapter. PPAG Members felt that additional explanation should be included in order to make clear that these policies and associated evidence based were prepared before the impact of coronavirus (COVID-19) was felt. Any revisions necessary will be made as the plan moves towards its next consultation stage. The Greater Exeter councils will review the evidence base within the context of the coronavirus including implications for the local economy and transport. Consideration of wider coronavirus implications will also form part of the consultation process.
- PPAG Members also wished to see reference to post coronavirus recovery being environmentally led (green).

## 15. Scrutiny Committee

15.1. Scrutiny Committee considered the Greater Exeter Strategic Plan consultation documentation at its meeting of 20th July 2020. Members discussed the GESP in detail and raised various concerns including:

- The relevance of GESP to the Local Plan which was due to be formally adopted
- What was the definition of a larger definition
- Why a Statement of Common Ground could not be considered in the place of GESP
- If signing up to GESP would address employment opportunities in Mid Devon District Council
- GESP was too Exeter centric
- That Okehampton was not included as it fell outside of the district boundary of the GESP
- The effect of the GESP on property prices within Mid Devon and that the GESP appeared to be to solve Exeter's housing problems
- The numbers of new houses proposed by the GESP seemed to high to sustain employment opportunities
- Not enough time for Members to consider the documents and to make comments and that the GESP would take precedence over the MDDC Local Plan
- Previously rejected development sites had reappeared on the GESP
- The lack of provision for increased secondary education in Tiverton
- The current capability of digital networks and could it cope with more development
- The 8 week timescale of the initial public consultation was not long enough and how this would be presented to the public.
-

15.2. Members then went on to discuss the recommendations in the reports and specifically the recommendation that Cabinet give delegated authority to the Leader, in consultation with the Portfolio Holder and Chief Executive, to agree changes to the above documents arising from decisions by the other GESP authorities before they are published for consultation.

15.3. Following discussion, Scrutiny Committee agreed to note the recommendations to Cabinet subject to the following comments which the Scrutiny Committee asked to be brought to the attention of the Cabinet:

- That the Cabinet recognised the concerns within the GESP expressed by the Scrutiny Committee on 20th July including:
    - The democratic process
    - Lack of scope including neighbouring authorities
    - Over complexity
    - Overly Exeter focussed
    - Hierarchy of plans
    - Infrastructure concerns
- That any delegated authority given should be for minor editorial changes only.

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**Circulation of the Report:** Cllr Graeme Barnell

**List of Background Papers:**

| | |
|---|---|
| **Appendix A:** | GESP Draft Polices and Site Options consultation document |
| **Appendix B:** | GESP Draft Policies and Site Options Sustainability Appraisal report |
| **Appendix C:** | GESP Initial Habitat Regulations Assessment report |
| **Appendix D:** | GESP Issues Consultation Statement |
| **Appendix E:** | GESP Equality Impact Assessment Screening Report |
| **Appendix F:** | GESP team staff resources: Future options |





# Greater Exeter Strategic Plan

East Devon · Exeter City Council · Mid Devon District Council · Teignbridge District Council South Devon

## Draft Policies and Site Options Consultation



*Regulation 18*

*June 2020*













To request this information in an alternative format please call 01392 265177 or email gesp@devon.gov.uk

We consider requests on an individual basis.

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## Glossary

A number of words used in this document are technical. A glossary is provided at the end of the document with terms identified like *this*.

# Section A

## Summary and Purpose

# Chapter 1: Role of the Greater Exeter Strategic Plan

## Summary

1.1 The local authorities of East Devon, Exeter, Mid Devon, and Teignbridge are working together, engaging with stakeholders and communities, to prepare a new joint plan (in partnership with Devon County Council). By working together we are seeking to deliver the best possible outcomes for the provision of new homes, jobs and infrastructure for existing and future generations, whilst also protecting and enhancing the environment. The plan area is called Greater Exeter and it covers all of the four local authority areas, excluding Dartmoor National Park.

1.2 The Greater Exeter Strategic Plan (GESP) will be a formal statutory document, providing the overall spatial strategy and level of housing and employment land required in the period to 2040, together with key aspirations for the environment, infrastructure and digital communications. The document will provide the high level strategic planning policies for the area.

1.3 *Local plans* for each of the councils will continue to be prepared. They will contain more localised policies and allocations for smaller scale development. Communities are also still able to prepare *neighbourhood development plans*, looking even more closely at their local area. Our timetable is to have the GESP adopted by 2023.

## Geographical Area covered

1.4 The GESP covers the planning authority areas of East Devon, Exeter, Mid Devon and Teignbridge, an area of 2,200 square kilometres with a population of just under 450,000. The Greater Exeter area aligns with the Exeter *Travel to Work Area*. The fact that most people living in the Greater Exeter area also work here underlines the value of the four Greater Exeter councils coming together to achieve effective strategic planning.

1.5 Figure 1.1 illustrates the Greater Exeter area and how well aligned this is to the *Travel to Work Area*.

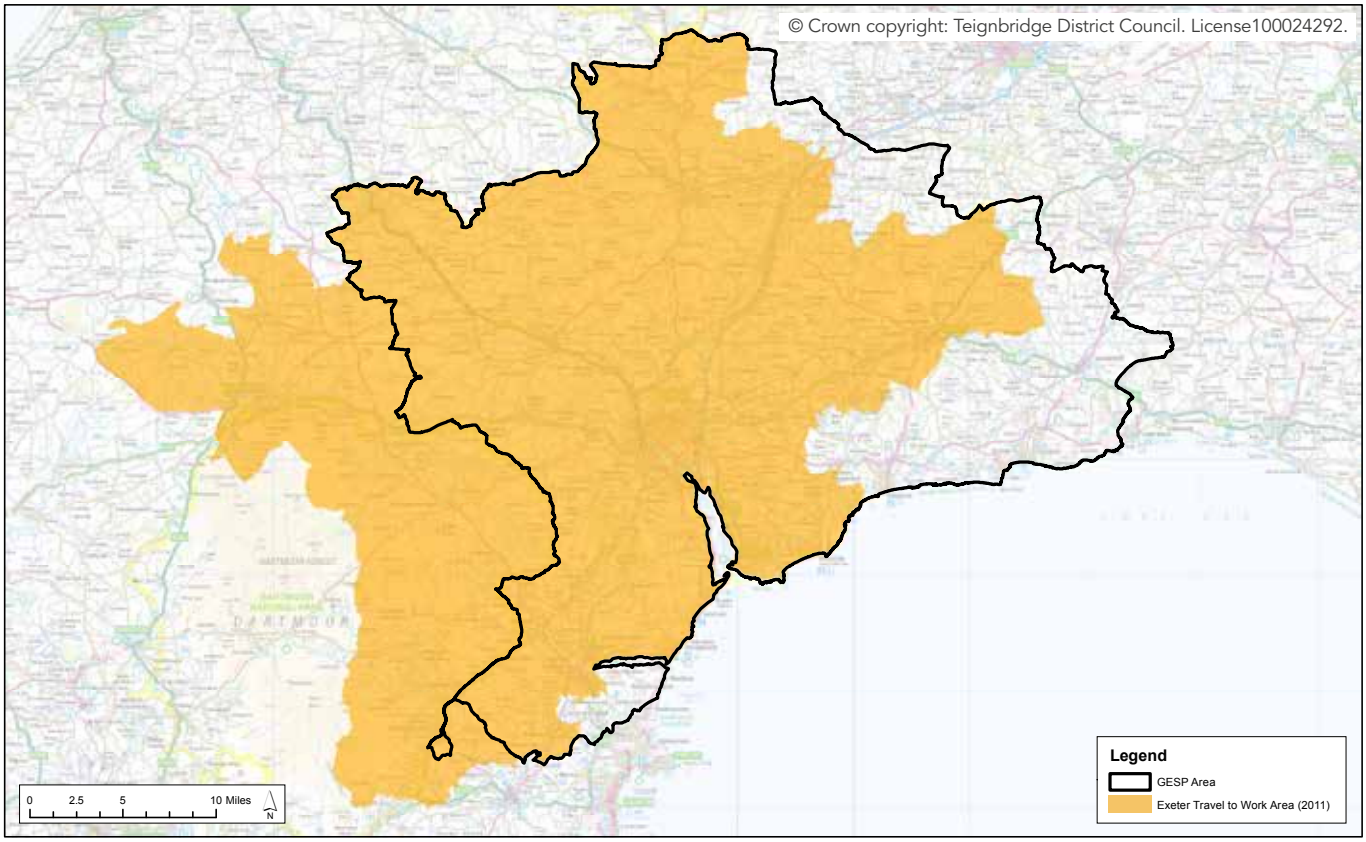



**Figure 1.1** Exeter *Travel to Work area* and GESP area

## Subjects and Scope of the Plan

1.6 The GESP focuses on key strategic issues which face the area. The plan's scope is driven by the application of the following principles:

- Cross-boundary issues where an agreed, consistent approach between two or more authorities is important to improve outcomes. The GESP should provide an added value compared with alternative approaches such as *duty to cooperate* discussions over individual *local plans*. Consistency is not necessarily sought for its own sake
- Avoiding overlap where possible. The majority of the GESP policies provide a "one stop shop" for that subject, without the need for later *local plans* to add detail. This will help to ensure that sites and infrastructure are deliverable, since it will avoid multiple *development plan* stages in a decision

1.7 Taking these into account, the GESP will:

- Set an overall vision
- Provide a spatial development strategy for the area, covering the overarching direction of the area considering climate emergency declarations, housing, economy, connectivity, environment and healthy and resilient communities
- Set the overall amount of growth for the period 2020 – 2040, also identifying what infrastructure is required to support that growth
- Promote the *Liveable Exeter* vision by allocating urban regeneration sites in the city for more than 100 homes and 1ha of employment land
- Implement the overall vision and spatial development strategy by allocating strategic sites of 500 or more homes and 5ha of employment land outside of Exeter which may include urban extensions and new settlements
- Provide district *local plans* with targets for non-strategic development and
- Identify monitoring indicators

1.8 Once adopted the plan will supersede specified strategic parts of the existing *development plan documents* of East Devon, Exeter, Mid Devon and Teignbridge.

1.9 This document covers 'Regulation 18' of the The Town and Country Planning (Local Planning) (England) Regulations 2012 and is an early stage in the preparation of the GESP.

1.10 The draft vision and policies proposed to be included in the GESP are contained in Section B of this document, across the following chapters:

4. Draft Vision
5. Climate Emergency
6. Prosperity
7. Homes
8. Movement and Communication
9. Nature
10. Quality Places and Infrastructure

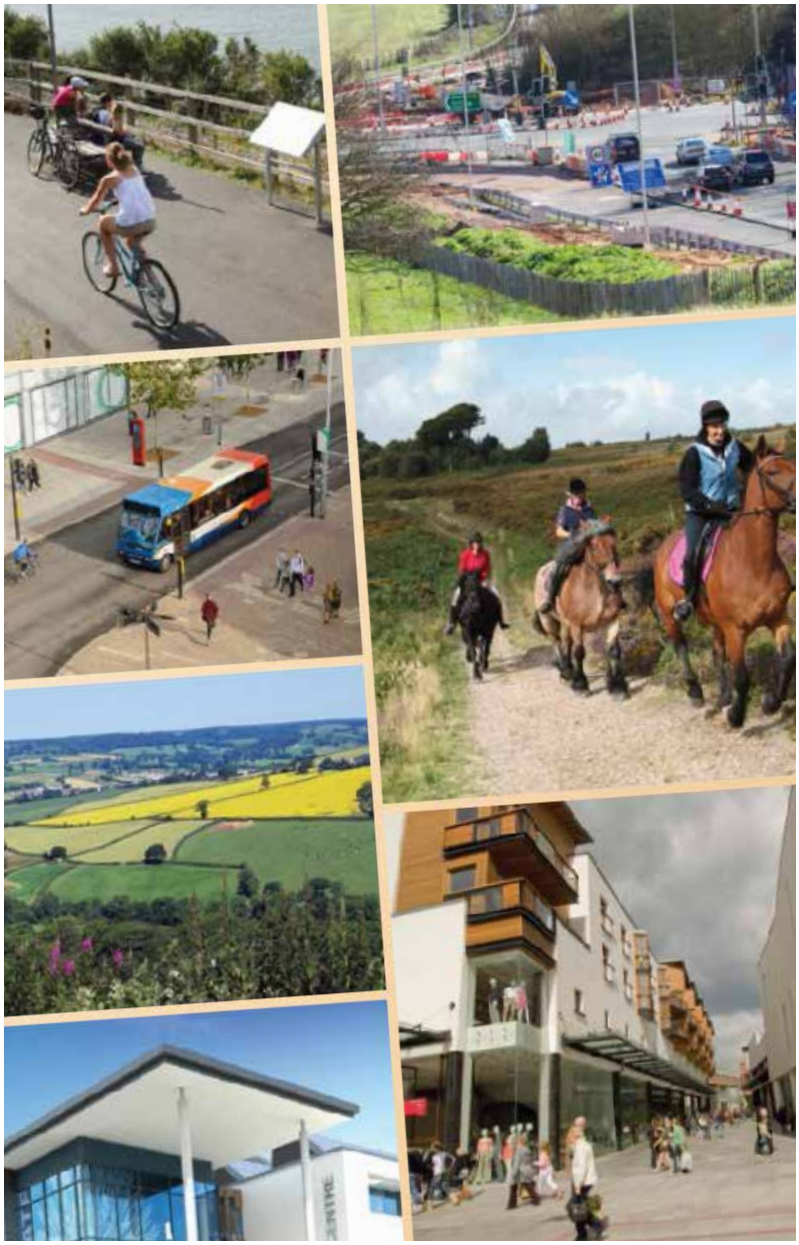
1.11 The spatial development strategy and options for strategic sites for potential inclusion in the GESP are considered in Section C.

## Role of Other Plans

1.12 Because the GESP will not contain the full suite of *development plan* policies necessary to guide all development, there will be a continued role for *local plans* and *neighbourhood development plans*.

1.13 *Local plans* are prepared by the planning authorities (East Devon, Exeter, Mid Devon and Teignbridge) and will continue to contain development management policies and smaller allocations for development. They will need to reflect some aspects of the GESP policies, avoiding overlap or undermining strategy, but otherwise they will generally be free to recognise their own circumstances and requirements.

1.14 *Neighbourhood development plans* are prepared by communities (often town or parish councils) and take an even more detailed, locally-based look at a small area. They are required to be in general conformity with the strategic policies of the GESP and *local plans*, but within that general guidance they will have licence to include a range of policies and proposals which meet their local needs. *Neighbourhood development plans* need to go through a local referendum before they are made.



1.15 Figure 1.2 illustrates the various plans and their relationships, emphasising the way that they work together without a "hierarchy". Each of the plans has its own function within the *development plan* as a whole. Where possible, overlap between those roles should be avoided by careful consideration of policies and proposals.

**Plan Timetable**

1.16 The GESP timetable is set out in our *Local Development Scheme*, which can be read on the website www.gesp.org.uk.

1.17 This currently states that the Greater Exeter councils are aiming to consult on a draft plan later in 2020 before a further consultation on the final draft in 2022. The aim is to adopt the plan in 2023. However, in light of the coronavirus and its impacts on communities, stakeholders and the Greater Exeter councils, the timetable will need to be reviewed. A revised *Local Development Scheme* will be published once the full implications for the existing timetable of the coronavirus have been considered.

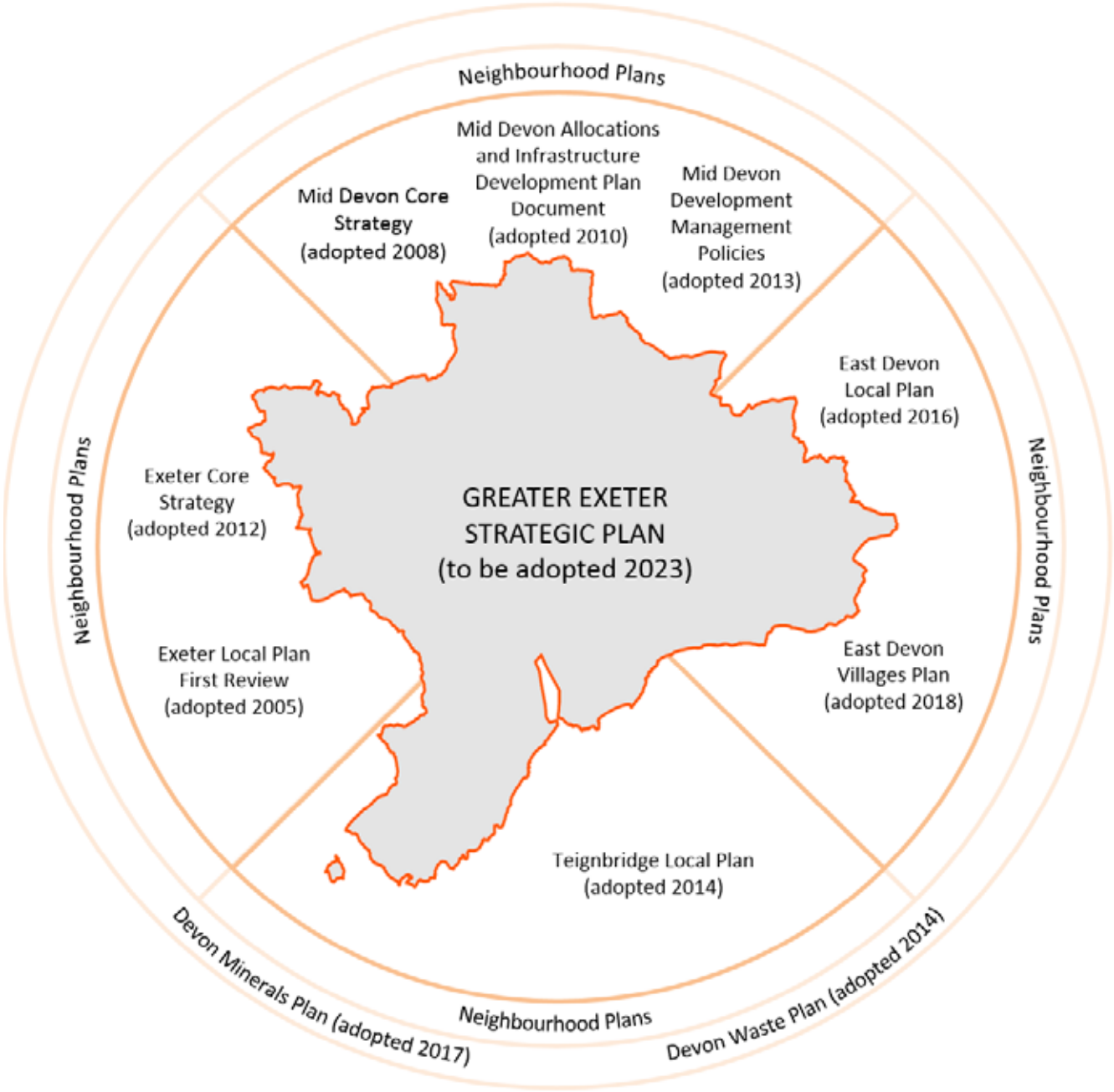



**Figure 1.2** Relationship between planning documents

Plans currently being worked on by Greater Exeter councils which will form/supersede parts of the Development Plan as adopted:

- East Devon Cranbrook Development Plan Document
- East Devon Gypsy and Traveller Development Plan Document
- Exeter Development Delivery Development Plan Document
- Mid Devon Local Plan Review
- Teignbridge Local Plan Review - Part 1 and Part 2

# Chapter 2: Consultation Process

2.1 We want to hear your views during this consultation. Details on how to respond are included below.

### Summary version of this consultation

A more interactive and accessible version of this consultation document is available at www.gesp.org.uk/XXX . It comprises a map- and image-based interactive version of the contents of this document.

### Responding to this consultation

**If you want to make a response to this consultation, please use the online form at www.gesp.org.uk/XXX**

2.2 Using the online form will mean that your comments drop directly into our responses database, saving the councils significant time and financial resources in collating them. You can choose which section of the plan you want to comment on and there is a function to save and return to your comments later.

2.3 We want to hear your thoughts on the various sections of the plan which are described below:

**Policies (Section B)**

2.4 Section B of this document contains draft wordings for the policies proposed to be included in the Greater Exeter Strategic Plan. For the most part the policies are designed to act as a "one stop shop" for strategic planning issues facing the area. Therefore additional policies on the majority of these issues will not be required in other documents like *local plans*. We also want the policies to be easy to understand so that developers and the wider community are clear on what is expected.

2.5 The policies have paragraphs of text below them which explain their purpose and give further relevant information. You can comment on those paragraphs too, using the online form.

2.6 You may want to suggest additional policies. This can also be done using the online form. However, please remember that an issue may be fully covered in a *local plan*, in which case there is no need to repeat it in the GESP.

**It should be noted that the evidence and preparation of this document was undertaken before the impact of coronavirus (COVID-19) was felt in 2020. As these impacts are understood more, appropriate revisions may be needed. Any revisions necessary will be made as the plan moves towards its next consultation stage.**

**Spatial Development Strategy and Site Options (Section C)**

2.7 Section C, Chapter 11 of this report contains the suggested spatial development strategy for the GESP with a focus on four strategic growth areas. These are the areas which we think are most appropriate for larger scale development in the Greater Exeter area. We would like to hear your views on these.

2.8 Within the strategic growth areas we have identified 39 site options where new development could theoretically occur. Not all of these sites are needed for the GESP.

We want to know your views on the site options, as this will help to inform the selection of sites for the final GESP. To help inform your comments, chapter 12 includes a map and brief description of each site together with a summary of its main development constraints, opportunities and emerging requirements. We would appreciate your comments on these summaries – for example, do you think any information is missing from the site constraints, opportunities and requirements that are identified?

2.9 Please note that the sites in this document are not the only ones we have looked at: they are the ones we think are the most likely to meet strategic development requirements sustainably. The *Sustainability Appraisal Report*, which is published alongside this document, contains a number of other sites which you may wish to comment on.

2.10 The sites in this document and those in the wider *Sustainability Appraisal Report* have been identified through:

i. the Housing and Employment Land Availability Assessment (HELAA) – which you can read at www.gesp.org.uk
ii. work by planning officers to identify other sites with the potential to meet the GESP's draft vision

2.11 If you have a new site which you would like us to consider, please submit it to us at www.gesp.org.uk/XXX. If you submitted a site in the 2017 *call for sites*, we encourage you to resubmit. That will let us know that the site is still available. We encourage all landowners to come forward regardless of the size of their site.

**Other Documents**

2.12 We are publishing, or have already published, a number of other documents alongside this consultation and we welcome comments on these as well. These documents are available online at **www.gesp.org.uk/xxxx.**

### Sustainability Appraisal Report

2.13 A legal requirement, the *Sustainability Appraisal* and *Strategic Environmental Assessment* details the likely social, economic and environmental impacts of the plan and "reasonable alternatives".

### Initial Habitats Regulations Assessment Report

2.14 An Initial *Habitats Regulations Assessment* Report considers the potential impact of the contents of this consultation document on our internationally important (*Natura 2000*) wildlife sites.

### Local Housing Needs Assessment 2nd Edition

2.15 The *Local Housing Needs Assessment* is a key piece of evidence that provides information on the amount and type of homes needed across Greater Exeter between 2020 and 2040.

### Housing and Employment Land Availability Assessment

2.16 This document reports on the sites submitted to us in 2017 during a *call for sites*. The report assesses the development potential of submitted sites. If you want to submit or resubmit a site for assessment, please do so at: **www.gesp.org.uk/XXX.**

### Other Evidence

2.17 There is also a series of other evidence documents covering various themes including transport, the economy, housing, digital technology, carbon and retail on www.gesp.org.uk/evidence. We welcome your comments on any of these reports on our online form at **www.gesp.org/xxx.**

# Section B

## Policies

# Chapter 3: List of Policies

3.1 Section B contains the proposed policies of the GESP on which we invite your comments. These cover general strategic issues. Some provide strategic guidance for the review of *local plans*. Others contain strategic planning criteria to take into account when considering relevant planning applications. And others define strategic approaches to infrastructure delivery and development which "hardwire delivery" in accordance with the draft GESP vision. Each policy has a supporting justification, which explains and gives the reasons for the policy.

3.2 The full list of policies is below:

**Chapter 4: Draft Vision**
GESP1: Sustainable Development

**Chapter 5:** *Low Carbon*
GESP2: Climate Emergency
GESP3: Net-Zero Carbon Development
GESP4: Low Carbon Energy
GESP5: Heat Networks
GESP6: Suitable Areas for Solar PV Development
GESP7: Suitable Areas for Onshore Wind Development
GESP8: Energy Storage

**Chapter 6: Prosperity**
GESP9: Economic Targets
GESP10: Transformational Sectors
GESP11: Employment Land
GESP12: Economic Delivery
GESP13: Strategic Economic Assets
GESP14: Exeter Airport
GESP15: Inclusive Employment and Skills

**Chapter 7: Homes**
GESP16: Housing Target and Distribution
GESP17: Affordable Homes
GESP18: Build to Rent Homes
GESP19: Custom and Self Build Homes
GESP20: Accessible Homes
GESP21: Accommodation for the Gypsy and Traveller Communities

**Chapter 8: Movement and Communication**
GESP22: Transport Strategy
GESP23: Sustainable Travel in New Developments
GESP24: Travel Planning
GESP25: Long Distance Strategic Trails
GESP26: Rail and Bus Projects
GESP27: Park and Ride around Exeter
GESP28: Electric Vehicles
GESP29: Highway Links and Junction Improvements
GESP30: Movement in Exeter
GESP31: Settlement Specific Enhancements
GESP32: Gigabit Ready Developments
GESP33: Digital Spine

**Chapter 9: Nature**
GESP34: Rebuilding Biodiversity
GESP35: Woodland Creation
GESP36: Exe Estuary, Dawlish Warren and East Devon Pebblebed Heaths
GESP37: Clyst Valley Regional Park

**Chapter 10: Quality Places and Infrastructure**
GESP38: Great Places
GESP39: Delivering Homes and Communities
GESP40: Garden City Principles
GESP41: Infrastructure Classification
GESP42: Strategic Infrastructure
GESP43: Viability

# Chapter 4: Draft Vision

**Introduction and Summary**

4.1 The draft GESP vision is the route-map for the area, setting out overarching aims and how to achieve them through a series of priorities.

4.2 The draft vision for the GESP is set out below. It is divided into three parts. It describes the role of the plan as a strategic document, concentrating on the big issues over the long term. It gives a pen portrait of the kind of place we are trying to achieve, as a sustainable, networked city region which is prosperous, inclusive and well on the path to being a carbon neutral economy. To give the impetus for achieving this, the vision identifies nine key priorities.

4.3 Draft policy GESP1 is an overarching policy recognising the importance of *sustainable development* and resilience in the future planning of the Greater Exeter area.



Exe estuary



## Greater Exeter – Draft Vision

**The Plan**

The Greater Exeter Strategic Plan makes the big, cross-boundary decisions about growth, infrastructure and environment in the Greater Exeter area looking many years ahead. The innovative planning and ambitious investment decisions taken together by the local authority partners aim to realise our potential by creating great places for all people to live full lives.

**The Place**

In 2040 we are a sustainable, accessible and networked city region of linked but distinct communities. Our economy is carbon neutral and productive. We invest in our citizens, celebrate the area's beauty and continue to work together for mutual long term benefit. We fully utilise our unique south western city-town-country-coast environment and our growing academic and skills base for smart growth. We enable prosperous and healthy lives in high quality homes and increasingly self-sufficient communities with access to great greenspaces and high quality jobs linked by a reliable, sophisticated and sustainable transport system.

**The Priorities**

- **Greater efficiency** - to be carbon neutral by 2040
- **Greater ambition** - hardwiring delivery in from the start
- **Greater innovation** - fast growth in cutting edge businesses including becoming the UK centre for data analytics, environmental futures, health innovation, smart transport and other digital future businesses
- **Greater connectivity** - gigabit ready communities with majority sustainable travel
- **Greater prosperity** - local wages rise to above the national average
- **Greater places for people** - providing the homes we need in high quality neighbourhoods with the right infrastructure in the right places
- **Greater places for nature** - rebuilding biodiversity and peoples' access to it
- **Greater education** - nurturing, attracting and retaining a world class workforce
- **Greater wellbeing** - healthy active communities with a range of facilities and services

## POLICY GESP1:
## Sustainable Development

In planning for the future of the Greater Exeter area, Local Planning Authorities and Neighbourhood Planning bodies will deliver sustainable development and resilience through the preparation and implementation of development plan documents which:

A. Help build a strong, responsive, competitive economy across the Greater Exeter area
B. Support strong, vibrant and healthy communities, both urban and rural
C. Protect and enhance our natural, built and historic environment

Policies in local plans and neighbourhood development plans should take local circumstances into account, to reflect the character, needs and opportunities of each area.

4.4 The GESP includes a draft vision of the kind of place we are trying to achieve. The components of the draft GESP vision provide the local expression of delivering *sustainable development* as identified in the *National Planning Policy Framework* and include the overarching economic, social and environmental threads from which all the other draft policies in the GESP can flow.

4.5 Draft policy GESP1 provides a basis for Local Planning Authorities and neighbourhood planning bodies to develop their own locally based policies that contribute towards *sustainable development* and address important local issues. Such policies will reflect local matters and therefore may differ across urban and rural areas.

# Chapter 5: Climate Emergency

**Introduction and Summary**

5.1 In June 2019, the Government announced a target of net-zero for UK greenhouse gas (GHG) emissions by 2050 following recommendations made by the Committee on Climate Change. Devon County Council declared a "climate emergency" in May 2019 and committed to ensuring that the County becomes *net-zero* carbon by 2050. All the Greater Exeter councils have also declared climate emergencies, although with some variation between *carbon emission* reduction targets. Consistent with these commitments, the Paris Agreement (2016) requires limiting the rise in global temperatures to well below 2°C above pre-industrial levels and intends to limit the global temperature increase to 1.5°C. Legislation requires *development plans* to include polices that contribute to the mitigation of, and adaptation to, climate change, with national planning policy confirming that planning plays a key role in meeting the challenges of climate change and the transition to a *net-zero carbon emissions* future.

5.2 As indicated by the draft GESP vision, we have identified that transitioning to a net-zero carbon future should be a key driver of the GESP.

5.3 Policies tackling energy and climate change can have wider medium- to long-term economic and social benefits potentially including: tackling energy security and fuel poverty; providing revenue from renewable energy generation; and achieving health and wellbeing improvements. The draft GESP vision also sets out proposals for the Greater Exeter area to transform its economy, reducing *carbon emissions* in all sectors. The economy is already transforming and businesses wish to invest in net-zero solutions. Setting ambitious local policies to reduce *carbon emissions* can add much needed clarity and certainty and provide an economic stimulus to the area.

5.4 The draft policies of this chapter set out measures to:

- Support the achievement of *net-zero carbon emissions* by 2040 at the latest
- Ensure all new development is carbon neutral and avoids overheating through design, construction and performance
- Help increase the use and supply of renewable and *low carbon* energy and heat
- Enable *decentralised energy networks* to provide local energy solutions that are smart, flexible and resilient in relation to future energy demands; and
- Enable the decarbonisation of existing and proposed *heat networks*, electricity and gas grids and transportation options through flexible utilisation of opportunities.

## POLICY GESP2: Climate Emergency

**To accord with the advice of the Intergovernmental Panel on Climate Change (IPCC), carbon emissions from the Greater Exeter area will need to decrease to net-zero by 2040 at the latest. Decisions on infrastructure investment and development applications will consider their impact on achieving this target.**

5.5 The Greater Exeter area should make a proportionate contribution towards meeting the Climate Change Act 2008 (as amended) target. In 2016 total emissions in the Greater Exeter area were 3.6 $MtCO_2e$. Transport emissions dominate (31%), followed by buildings (23%), agriculture (17%) and the power sector (16%). Minor contributors (13% total) include waste, fluorinated gases (F-gases) and heavy industry. By 2040 at the latest we aim to see emissions reduce to *net-zero*. However, the Greater Exeter councils will work collaboratively to achieve *net-zero* at an earlier date, consistent with individual authorities' climate emergency declarations.

5.6 Measures to reduce *carbon emissions* nationally have been driven by the power and waste sectors. However, all sectors will need to achieve significant carbon reductions to meet legally binding targets including transport and buildings, with the latter being easier than some others in which to initiate effective measures. *Development plan documents* are one of the areas where local authorities can influence *carbon emissions* at a local level.

5.7 This rest of this chapter contains draft policies which, working with the GESP spatial development and transport strategies, will support the achievement of this overall target. However, it is recognised that much of the progress will be met by decisions taken at a national and international level, such as through the continued decarbonisation of the country's energy supply.




Students protesting against climate inaction

## POLICY GESP3:
## Net-Zero Carbon Development

To ensure that developments within the Greater Exeter area contribute to meeting the overarching net-zero target set out in draft policy GESP2, applicants for all developments which propose the construction of new home(s) or non-residential floorspace or change of use will be required to submit to the local planning authority a carbon statement for approval and implementation. The carbon statement will demonstrate that proposals are designed, constructed and will perform to deliver net-zero carbon emissions, taking account of emissions from primary energy use and transport, broadly in compliance with the energy hierarchy.

In meeting the above requirement, proposals will demonstrate that they meet the sustainable and active transport targets which apply to the site and:

A. Minimise energy demand across the development and avoid temperature discomfort through:
   a. Passive design, solar masterplanning and effective use of on-site landscaping and green infrastructure
   b. The "fabric first" approach to reduce energy demand and minimise *carbon emissions* necessary for the operation of the building
   c. Low carbon solutions where additional energy is required for building services such as heating, ventilation and air conditioning
B. Maximise the proportion of energy from renewable or low carbon sources through:
   a. Ensuring that opportunities for on-site or nearby renewable energy generation or connection to a local decentralised energy scheme are exploited
   b. Ensuring that the ability to install future solar PV or vehicle-to-grid connections is not precluded
   c. Storage of on-site renewable energy generation
C. Ensure in-use performance is as close as possible to designed intent through:
   a. Use of a recognised building quality regime and consistent approach to calculating both, the designed and in-use performance
   b. Ensuring that at least 10% of buildings on major developments deliver in-use energy performance and generation and carbon emissions data to home owners, occupiers, developers and the local planning authority for a period of 5 years, clearly identifying regulated and unregulated energy use and any performance gap. Where a performance gap is identified in the regulated use, appropriate remedial action will be required

Where it is not feasible or viable to deliver carbon reduction requirements on-site, methods such as offsetting elsewhere will be considered. This will need to be through a specific deliverable proposal or financial contributions to an accredited carbon offsetting fund.

Development proposals should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.

5.8 Various proposed policies of the GESP and other *development plans* are designed to work together to reduce the carbon impact of new development in line with the draft vision and the *net-zero* target set out in draft policy GESP2. Draft policy GESP3 concentrates on development-specific requirements and seeks to ensure that proposals are designed, constructed and perform to deliver *net-zero carbon emissions*. To evidence this, the policy requires a "mock" *Standard*



Zero carbon homes in Exeter

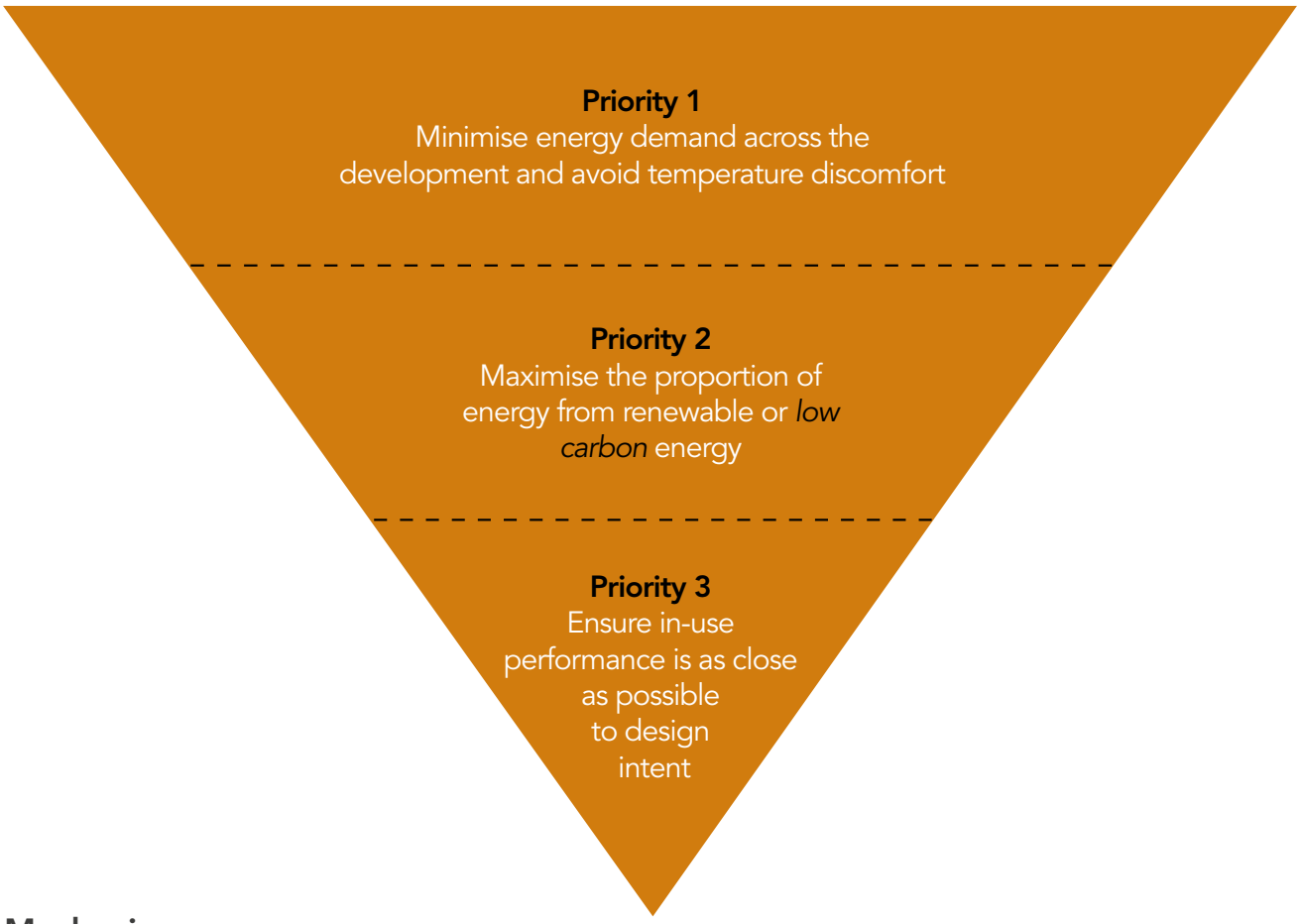


*Assessment Procedure (SAP), Simplified Building Energy Model (SBEM)* or *Dynamic Simulation Model (DSM)* test to be submitted as part of a *Carbon Statement*, and subsequently through the "real" SAP, SBEM or DSM test as the development passes through Building Control. To achieve *net-zero carbon emissions*, the draft policy proposes following an energy hierarchy of interventions, as set out below. The policy allows flexibility as to how that overarching target is met, but, through the energy hierarchy, advocates a "fabric first" approach before considering on-site renewable generation or off-site contributions. The hierarchy gives a sensible structure to the *Carbon Statement* required by the policy. The Greater Exeter councils will publish further guidance on the production of *Carbon Statements* in due course.

**The Energy Hierarchy**

5.9 Development location and sustainable transport investment is the most significant way to reduce *carbon emissions* from new development. By ensuring easy access to jobs and basic services/facilities by active travel and high quality public transport links, the need to travel by private car can be reduced. We propose this should be reflected in the GESP spatial development strategy and the location of its allocations for *major development*. Digital connectivity is also key to reducing the need to travel by enabling home working and access to online services. The draft policies in this chapter deal with this element of the hierarchy. *Carbon emissions* arising from travel associated with development will be minimised by applying the policies in the Movement and Communication chapter including draft policy GESP23: Sustainable travel in new developments and draft policy GESP24: Travel planning. Any residual *carbon emissions* from transport will then be taken into account in the submitted *Carbon Statement* and the delivery of *net zero carbon emissions*. The remaining elements of the hierarchy are set out on the next page.

## The Energy Hierarchy




## Mechanism

### Priority 1

- Use masterplanning to minimise energy demand through *passive design*.
- Effective use of landscaping and green/blue infrastructure.
- Adopt a 'fabric first' approach.
- Development should be designed to be climate resilient.

### Priority 2

- On-site renewable energy generation should reduce unavoidable *carbon emissions* associated with any residual energy use.
- Enable electric vehicles to discharge to the grid (*vehicle to grid*) and help meet the power needs of the building.
- Off-site measures are a potential option for developments where on-site measures are not practical/viable.
- Carbon offsetting could be used to fund a large scale energy efficiency programme in existing buildings, large scale renewable energy installations, community energy projects and heat network expansions for instance.

### Priority 3

- Use a recognised building quality regime and monitor in-use data to ensure the in-use performance of buildings is as close as possible to the way they were expected to perform
- Performance monitoring and evaluation will need to ensure that the sample data is representative of the development as a whole.
- Where a performance gap is identified corrective action should be taken.

**Figure 5.1** The Energy Hierarchy

## POLICY GESP4:
## Low Carbon Energy

Development of low carbon and renewable energy schemes and smart energy networks will be supported in principle. Community owned low/zero carbon energy projects which maximise the use of the resource, will, in particular, be considered favourably and are encouraged to be included in neighbourhood development plans.

Non-renewable forms of energy generation will only be permitted where it can be demonstrated that:

A. There is no reasonable prospect of allocated renewable energy facilities being delivered to meet demand
B. All reasonable opportunities for using zero or low emissions technology have been taken.

Proposals should avoid, or where reasonable, minimise and mitigate impacts upon local amenity and the natural and historic environment.Proposals will need to demonstrate no likely significant effect or no adverse effect on the integrity of Natura 2000 sites.

5.10 Increasing the amount of energy from renewable and *low carbon* technologies will be crucial in developing an effective response to the climate emergency. The GESP provides an excellent opportunity to deliver new renewable and *low carbon* infrastructure in locations where the local environmental impact is acceptable. Draft policy GESP4 sets out a positive strategy for energy generation from these sources while ensuring that adverse impacts are addressed satisfactorily. Specific planning considerations that apply to *heat networks*, solar photovoltaic and onshore wind developments are set out in draft policies GESP5-GESP7.



Solar panels in East Devon

5.11 *Smart energy networks* (including energy storage and management infrastructure) are key to enabling the grid to function flexibly and efficiently and supporting the proliferation of electric vehicles (EVs). On this basis, we suggest this infrastructure should be considered as *low carbon/* renewable energy development for the purposes of draft policy GESP4. Such infrastructure should be located to maximise co-location opportunities e.g. providing grid balancing to renewable generation or EV charging opportunities.

5.12 *Decentralised energy networks* are local networks where energy is generated and distributed close to where it will be used rather than the conventional approach of large power plants providing energy through the national grid. Decentralised energy has a number of benefits including a reduced loss of energy through transmission, an ability to use *waste heat* from energy generation and industrial processes, lower *carbon emissions*, and improved energy security. Schemes can serve single buildings, larger developments or be retrofitted to existing communities and across urban areas.

## POLICY GESP5:
## Heat Networks

Opportunities to connect to or deploy heat networks and utilise waste heat will be taken where viable and feasible. In particular:

A. If a heat network exists or is proposed within a 1km radius, connection will be required from:
   a. Major development
   b. Development proposals that produce more than 1 Megawatt thermal of waste heat

B. If no heat network currently exists or is proposed:
   a. New heat networks or combined heat and power (CHP) plants utilising low carbon energy sources should be deployed where developments (either alone or in combination) propose at least 1,200 homes or 10 hectares of commercial
   b. Development proposals that produce more than 1 Megawatt thermal of waste heat will incorporate measures to enable future connection to a heat network.

A project level HRA will be required if there is potential for a proposal to affect a Natura 2000 site.



5.13 *Heat networks* allow heat generated remotely to be used to provide heat and hot water to buildings on the network and allow for greater efficiency of space and energy use than individual boilers. Central *energy centres* are best suited to running *combined heat and power*, which make for more efficient energy production. *Heat networks* can also facilitate the collection and use of *waste heat* from nearby commercial/industrial installations and heat from the ground, air and water. Whilst many *heat networks* today are gas-fired, converting a large scale *energy centre* to new *combined heat and power* generating technologies will be easier to achieve zero carbon than decarbonising buildings individually. *Heat networks* are commercially viable where sufficient numbers of connected buildings require heat throughout the day.



Cranbrook Energy Centre

5.14 There are existing and planned *heat networks* in the Exeter area at Cranbrook/Skypark, Monkerton/Tithebarn, Marsh Barton/South West Exeter and through *DEXTCO* (a joint public sector venture to deliver efficient heat and power in the city centre). In addition to these, GESP allocations could identify new and expanded *heat networks*. Draft policy GESP5 sets out the circumstances where connection to *heat networks* should be considered. Existing and proposed *heat networks* will be identified on the policies map, to be published with the next version of the GESP.

5.15 The draft policy makes provision for utilising *waste heat* from new commercial, industrial and energy installations which produce more than 1 Megawatt thermal (MWth) of *waste heat* in any existing/proposed *heat network* in the locality. It also ensures that where no *heat network* exists or is proposed, construction does not preclude future connection to or development of such a network. This includes ensuring sufficient land is available for the installation of a heat pump.



District heating pipes

## POLICY GESP6:
## Suitable Areas for Solar PV Development

Proposals for solar photovoltaic (PV) development will be supported where, taking account of the carbon emission benefits of the proposal:

A. The proposal lies within the 'areas identified as suitable for solar PV development' as shown on the policies map [policies map to be published with the next version of the GESP]
B. There is no unacceptable landscape and visual impact, including cumulative impact
C. There is no unacceptable harm to the significance of heritage assets and their settings
D. There is no likely significant effect or no adverse effect on the integrity of Natura 2000 sites
E. Provision is made to ensure that the installations are removed when no longer in use and the land is restored to its previous use

5.16 The scale of resource available for solar energy in the Greater Exeter area is vast and largely untapped. Large scale solar PV arrays are likely to provide the best value for money in terms of the carbon saved for the investment required and would provide significant local economic advantages. As such, draft policy GESP6 identifies suitable areas for solar PV in order to support and encourage appropriate solar developments coming forward across the Greater Exeter area, whilst ensuring that adverse impacts are addressed satisfactorily. GESP allocations could also include land for solar PV/thermal arrays within and adjoining strategic *mixed use*, housing and employment sites.

## POLICY GESP7:
## Suitable Areas for Onshore Wind Development

Proposals for onshore wind development will be supported where, taking account of the climate change benefits of the proposal:

A. The proposal lies within the 'areas identified as suitable for onshore wind development' as shown on the policies map [policies map to be published with the next version of the GESP]
B. There is no unacceptable impact on residential amenity from noise, vibration, visual intrusion and shadow flicker effects
C. There is no unacceptable landscape and visual impact, including cumulative impact
D. There is no unacceptable harm to the significance of heritage assets and their settings
E. There is no likely significant effect or no adverse effect on the integrity of Natura 2000 sites
F. There are no significant adverse impacts on air traffic operations, radar and air navigational installations
G. Provision has been made for the removal of the facilities and reinstatement of the site when it has ceased to be operational

5.17 The *National Planning Policy Framework* requires suitable areas for new wind development to be clearly identified in the *development plan* (*local plan* or *neighbourhood development plan*) and have the backing of local communities. Whilst the scale of onshore wind resource available in the Greater Exeter area is constrained in comparison with solar PV, there are areas of unexploited potential. Draft policy GESP7 therefore seeks to identify suitable areas for onshore wind developments in order to make best use of this resource, whilst ensuring that adverse impacts are addressed satisfactorily. We also encourage local communities to develop their own wind energy proposals, through *neighbourhood development plans*, the benefits of which can include community ownership, revenue, and local jobs.



## POLICY GESP8:
## Energy Storage

Proposals for renewable and low carbon energy storage will be supported in principle. Developments should be sited:

A. At a suitable distance from residential areas and avoid, or where reasonable, minimise and mitigate impacts upon local amenity
B. Where an acceptable standard of road safety can be achieved
C. Where landscape and visual impacts can be satisfactorily mitigated
D. Where there is no unacceptable harm to the significance of heritage assets
E. Where they do not have a likely significant effect or adverse effect on the integrity of Natura 2000 sites.

In addition, applicants will need to demonstrate that there are no excessive noise impacts resulting from the proposal, including from heating, ventilation and air conditioning systems and cumulative noise.

5.18 The *National Planning Policy Framework* makes clear that the planning system should help to support renewable and *low carbon* energy and associated infrastructure. Energy storage is crucial to increasing the proportion of renewable and *low carbon* energy in the system.

We propose that the GESP will support energy storage systems in order to help meet the energy needs of the area and maximise renewable energy use whilst maintaining amenity and minimising environmental impact.

5.19 Storage encompasses a wide range of technologies. Lithium-ion batteries and pumped hydro-electric are the dominant technology types for storage schemes at present. Favoured locations have tended to be close to a suitable sub-station in order to provide grid services. Sites can be *brownfield* or greenfield. In addition, storage co-located with renewables is an emerging business model that may see more uptake in the near future.

5.20 The overall scale of energy storage developments is expected to be commensurate with immediate physical surroundings, particularly in the case of new build. Furthermore, proposals must take full account of any impacts, including cumulative, on health and safety and the environmental effects of noise, vibration or other forms of nuisance. A suitable distance for energy storage facilities from existing residential areas will be required to mitigate against noise impacts.

# Chapter 6: Prosperity

**Introduction and Summary**

6.1 The draft GESP vision emphasises the importance of providing economic opportunities to individuals and communities, but also the need to maintain an outward-facing and networked city region. The key focus is on increasing *productivity*, in line with the *Local Enterprise Partnership's Productivity Strategy* and emerging *Local Industrial Strategy*.

6.2 Other economic policies are, and will continue to be, contained within national guidance and *local plans*. This includes town centre and retail matters. Findings from the 2019 Greater Exeter Town Centre and Retail Study (Part Two) showed only a limited general quantitative need for new retail floorspace across the Greater Exeter area in the early stages of GESP, when this evidence is most robust. As such, *local plans* will continue to identify town centre hierarchies and plan for retail need. GESP site allocation policies for planned new urban extensions/communities will consider retail where shops and food stores can help anchor new local or district centres and provide easily accessible retail provision. The draft policies of this chapter include:

- A target of 35,000 extra jobs
- The aim to double the size of the economy, mainly through increasing *productivity*, supporting an increase in the area's earnings to above the national average
- Measures to encourage business growth, including, in particular, investment in the *transformational sectors* of *data analytics*, *environmental futures*, *health innovation*, *smart transport* and other *digital futures businesses*
- Support for *digital exchanges*, to foster growth in the key sectors
- The aim to deliver 150 hectares of employment land, which will be identified in the GESP
- Strategic guidance on the review and allocation of employment sites in *local plans* and with planning permission, currently totalling about 330 hectares
- Support for delivering economic and employment development
- Protection and support for key economic assets considered important to the continued success of the Greater Exeter economy
- Proposals to develop and enhance Exeter Airport
- Support for skills, education and training.

## POLICY GESP9: Economic Targets

In order to improve wellbeing and raise the standard of living in the Greater Exeter area the following targets are set for the economy by 2040:

A. Double the size of the economy to £20 billion
B. Increase average (median) earnings to above the national average (median)
C. Increase the number of jobs by 35,000

6.3 Economic success is one of the three arms of *sustainable development*, providing jobs, income and wealth to the local population as well as contributing to the region and nation. This success is necessary for standards of living and quality of life; through a thriving economy, offering jobs and prospects for local people and attracting the inward investment needed to deliver infrastructure and community facilities. Monetary values are in 2018 prices.



Exeter Science Park

6.4 Greater Exeter is dynamic and successful. The *Economic Development Needs Assessment* states that with Exeter at its heart it has experienced strong economic and job growth in recent years. The Greater Exeter area currently has a very good balance of jobs to people (92 jobs per 100 working age people in 2017, compared to a national figure of 83 per 100). The assessment suggests that this success is likely to be maintained with continued jobs growth.

6.5 Nevertheless it would be foolish to take a relaxed view of our prospects; there will always be risks to the local economy so significant investment continues to be necessary to improve local economic resilience. The GESP needs to give due prominence to the economic needs of the area; draft policy GESP9 sets three central economic targets which build on the vision and our evidence, taking full account of the *Local Enterprise Partnership's* strategies.

6.6 The *Local Enterprise Partnership* has published the *Productivity Strategy* and has drafted a *Local Industrial Strategy*. The headline target is to double the size of the economy, and therefore we consider this target should be carried into the GESP. This will be partially related to the jobs growth target, but a significant element of achieving this will be through increased *productivity* (as the strategy name implies). *Productivity* is the key to delivering better wages, better jobs, stronger businesses, better public services and a fantastic place for people and businesses to live and work. Taking an approach which considers the specific circumstances of a place is a building block for addressing the *productivity* challenge; we are proposing policies for the GESP that address the specific constraints that hold us back as an area and deliver the sites and projects that will have the most *productive* outcomes.

6.7 By concentrating on *productivity*, we want annual earning across the GESP area to increase in line with our draft GESP vision. Wages are below the national average. The 2017 estimated median full time wage was £26,281 in the Greater Exeter area, whereas in England and Wales the figure was £28,933. The main levers to improve *productivity* are considered to be:

- Improved housing affordability which improves labour mobility and access to skilled workers by local firms, including the retention of young talented people within the area
- Expansion of key high *productivity* economic sectors
- Improved training, skills and education

6.8 Draft policies and proposals included in later chapters help to deliver on these factors.

6.9 Despite the existing healthy job availability, continued population growth over the *plan period* will occur, so additional jobs in the area will be needed. The growth in working age population to 2040 is expected to be about 30,000. The Economic Development Needs Assessment calculates that 35,000 additional jobs (a 13% increase) is feasible, which is broadly consistent.

## POLICY GESP10:
## Transformational Sectors

To enhance the ability of the Greater Exeter area to expand in key transformational sectors and deliver productivity improvements with high quality well-paid jobs:

A. Significant weight in planning decisions will be given to the positive economic impact of investment in the following transformational sectors, including use of a gateway policy to control future uses in appropriate situations:
   a. Data analytics
   b. Environmental futures
   c. Smart transport
   d. Health Innovation
   e. Other digital future businesses
   f. Other sectors defined in a local plan
B. The GESP allocates about 70 hectares of employment land to meet the development needs of the transformational sectors
C. Provision of one or more Digital Exchanges will be supported
D. The Greater Exeter councils will work together to support the expansion of these sectors through appropriate reform of planning processes, improvements to digital and other infrastructure, improved education and training and "soft landing" packages
E. Continued investigations will be undertaken into potential barriers to investment and appropriate further actions taken

6.10 Improvements to *productivity* require that our economy changes and adapts, rather than just continuing to grow in the same way. For the Greater Exeter area, this means promoting those industries which will deliver *productive* jobs with higher pay. Work undertaken over a number of years, including the *Local Industrial Strategy*, has indicated that there are some key sectors which could promote this transformation. These are based on the presence of key knowledge and research organisations in the area such as University of Exeter and the Meteorological (Met) Office. A key location at present is formed by Exeter and the growth area to its east, in particular stretching from the University's Streatham Campus across to Exeter Science Park. We consider that the provision of additional growing room for some of the key assets in this area will provide a good basis for its continued growth and success.

6.11 *Transformational sectors* identified for the Greater Exeter area include:

- *Data Analytics*. *Data analytics* is the science of examining raw data using automated means with the purpose of drawing conclusions about that data. Increasingly, this involves massive amounts of data from disparate sources. This is a specialism which can support innovation across a range of industries and opportunities including the other *transformational sectors* referred to in the policy. The presence of *high performance computing* in the area, together with the analytical and research skills in the public sector organisations, gives a strong foundation for development.

- *Environmental Futures*. Supported by the *data analytics* specialism, there is a concentration of environmental expertise in the area, particularly climate change modelling and agricultural technology. The need for environmental innovation has never been higher, but it can be difficult to commercialise.
- *Smart transport*. More traditional logistics firms are attracted to the area by good road links and the airport. However, the role of innovative methods of transport planning in resolving urban and rural transport problems is an important element of developing the GESP strategy as well as to the area's economic future. Building on the *Sustainable Urban Mobility Plan* work being led by Devon County Council, as well as the direct investment by *Exeter City Futures*, there is potential for the area to benefit environmentally and economically from growing transport expertise and the role of technology and *data analytics*.
- *Heath Innovation*. The emerging *Local Industrial Strategy* recognises an emerging *health innovation* cluster in the area. The Royal Devon and Exeter NHS Trust and the University of Exeter fund the Joint Office for Clinical Research to facilitate and encourage commercial and non-commercial clinical research and trials. The *South West Digital Health Accelerator* is based in Exeter to provide support for local digital innovations in the health sector.
- Other *digital futures businesses*. Clearly, a key characteristic of innovation is that it is not predictable. Linking to the sectors above, we suggest that the Greater Exeter councils should support a wide range of other businesses considering our digital futures and other related science as part of the local innovation ecosystem, whether they be spinoffs from the University of Exeter or other local bodies, new start-ups or inward investment by existing firms.

6.12 Evidence indicates that *transformational sectors* have the potential to make the greatest contribution to increasing *productivity* and earnings within the GESP area. We consider that GESP policies should work alongside other partnership based strategies to accelerate the commercialisation of these specialisms, which has, in some respects, so far been slow.

6.13 We suggest that the Greater Exeter councils should avoid putting unnecessary barriers in the way of sectoral expansion. Draft policy GESP10 ensures that significant weight is given to the creation or growth of such businesses, encouraging a flexible and supportive approach. This means that where a development proposal will lead to investment in one or more of these sectors, the benefits of that investment will be given extra consideration in the overall planning balance of the proposal. It does not, of course, mean that this is the only consideration since there may be strong reasons why a development proposal should be resisted in a particular location. However, by taking a particularly positive approach to proposals in these sectors, this will ensure that there is not an over-reliance on specific sites or areas for the economic transformation being sought. It will help to support the expansion of these sectors away from the hotspots around Exeter, supporting economies and wages growth in the towns and rural areas of the Greater Exeter area. The imposition of a "gateway" requirement can be considered, which limits the future use of new developments to those within a *transformational sector*. For example, this may be appropriate where a new building has been permitted in accordance with this policy, where other forms of employment development would not have been allowed.

6.14 In addition, the GESP will allocate strategic sites for the *transformational sectors* to encourage particular types of development and remove barriers to delivery. As identified in draft policy GESP10 we consider about 70 hectares of employment land will be needed.

6.15 The *transformational sectors*, and their anchor institutions, are likely to be particularly

'data hungry' and as such require *gigabit-capable* connectivity as standard. The *Greater Exeter Digital Connectivity Strategy* identifies that thriving digital and tech-creative business hubs have benefitted from the early delivery of *digital exchanges*, which has supported and accelerated growth in these sectors. These are neutral exchange points for digital networks (physical and electronic) to meet, offering low cost internet transit and hosting, shared space for server location and data centres and flexible office space with technical/business support. The emerging *Digital Exchange / Transformational Infrastructure Scoping Report* is considering where it would be best to accommodate digital exchanges which will be identified in the next version of the GESP.

6.16 The provision of economic development advice and support is a longstanding role of local authorities, and the Greater Exeter councils have been cooperating with a shared Exeter and the Heart of Devon (EHOD) group for many years. The recent *Exeter and Heart of Devon Shared Economic Strategy* sets out some key actions, reflected in general terms in draft policy GESP10. By ensuring that future reviews of the area's plans and economic strategies are based on up to date research into what helps and hinders the sectoral growth needed, this continued cooperation can boost the effectiveness of planning policies. A method for encouraging inward investment is via the provision of so-called *soft landing packages*, where a variety of benefits and incentives are put together, which together provide as easy a 'landing' for the firm in the area as possible.




Science Park Centre

## POLICY GESP11:
## Employment Land

To ensure the potential for growth in jobs and incomes and for improved economic prosperity are not constrained, the GESP target is to develop about 150 hectares of land for B1, B2 and B8 uses in the Greater Exeter area by 2040. Delivery to meet this target is proposed from the following sources (which allow for a headroom of approximately 200% against the overall target):

A. Approximately 130 hectares on GESP allocations, providing for transformational sectors, strategic scale employment growth or to develop self-contained new neighbourhoods within GESP allocations
B. Approximately 330 hectares on existing planning commitments, subject to further assessment and review in local plan preparation
C. Further sites allocated in future local and neighbourhood development plans which achieve an appropriate combination of the following objectives:
   a. Improve the choice of sites and buildings available for employment uses
   b. Rebalance local or sub-regional economies
   c. Maintain a flexible and competitive market in employment land and buildings
   d. Support viability and deliverability
   e. Take advantage of local economic potential
   f. Meet other local needs or objectives
   g. Take advantage of existing or proposed heat networks

6.17 Employment land means land to be developed for business, industry, manufacturing and warehousing uses (*Planning Use Classes Order B1, B2 & B8*). It has been a long term objective of planning policies in the Greater Exeter area to allocate and develop sufficient employment land. Evidence for the GESP identifies that this need continues; the *Economic Development Needs Assessment* indicates that about 20% of jobs in the Greater Exeter area are contained within these kind of buildings. Overall the *Economic Development Needs Assessment* identifies a need for 150 hectares of employment land to be developed in the Greater Exeter area by 2040. If small scale services are included as a minor element of an employment site providing support services for the companies within that site (catering and childcare for example) these could be counted as part of the B – space land area for monitoring purposes.

6.18 The delivery of employment land has not been straightforward, with the costs associated with bringing forward such sites and the riskiness of the sector acting as barriers to development at planned levels. In addition, a number of major existing employment areas within Exeter are being considered for repurposing to bring about new residential or *mixed use* neighbourhoods, and some of those existing businesses are not suitable to be retained in the same location as high quality urban residences. Therefore draft policy GESP11 incorporates and maintains significant headroom in the amount of land permitted and allocated overall. The provision of employment land within each council area in the Greater Exeter area will be reviewed through the *local plan* processes. It should take account of, but not be constrained by, this policy which gives considerable flexibility to the *local plans* reflecting their emerging economic needs.

6.19 There are three sources of potential delivery for new employment land; allocations within the GESP, existing commitments and future *local plan* allocations:

**GESP Allocations**
The GESP will aim to allocate about 130 hectares of land for employment development, sites to be identified in the next version of the GESP. Housing-led allocations are likely to include

employment development in accordance with the tenets of the draft GESP vision, and will need to contain mechanisms to ensure that such employment is delivered alongside the housing as part of *mixed use* places.

**Existing Commitments**

There is a lot of capacity for economic growth in the 330 hectares of existing commitments (sites with permissions already granted or allocations in *local plans* and *neighbourhood development plans*). However, these commitments have often been slow to come forward, some having been allocated or permitted for many years. The reasons for this are various – high infrastructure costs, poor access or lack of progress with making planning applications and land values which may encourage landowners to wait and see if other, higher value uses may be developed on the sites in future. It is important that the reasons for any non-progress are analysed in future *local plan* reviews, in order to ensure that there is a continued supply of deliverable sites, and the allocated sites continue to be appropriate and realistic. The solutions may involve replacing sites with alternative allocations, investment in infrastructure, *pump priming* or *direct delivery* by a public sector body.

**Future *Local Plan* Allocations**

Alongside reviews of existing commitments, future *local plan* reviews by the Greater Exeter councils will give the opportunity to consider further sites suitable for economic development. The focus will be on local economic needs, taking account of factors such as those listed in draft policy GESP11.

6.20 The fluid nature of local economic change means that the overall target in the GESP should not be treated as a hard and fast one, but should be subject to further consideration and review through the *local plan* process. It will also be open to *local plans* to reconsider and update the economic evidence and their own economic objectives. As part of this approach, local planning authorities may wish to undertake further economic analysis to update or supplement the *Economic Development Needs Assessment*. For this reason variations in provision made via *local plan* decisions are likely to be acceptable within the broad approach proposed for the GESP.



## POLICY GESP12:
## Economic Delivery

The Greater Exeter councils will work together with other delivery bodies to encourage new economic investment and development in the area. Planning will be one of the tools in an integrated delivery strategy to include:

A. Keeping the Exeter and Heart of Devon Shared Economic Strategy or equivalent document under review and up to date as a material consideration in the consideration of planning applications
B. Prioritising and coordinating strategic, site specific and local plan infrastructure investment to start or speed up economic development sites which contribute to the targets in this plan
C. Using planning obligations or other planning controls to ensure that the economic elements of mixed use developments occur in a timely fashion, including cross subsidy from housing and a backstop of land transfer to enable public sector direct delivery
D. Monitoring existing policies and site allocations, and if they are not delivering against GESP's economic targets contained in draft policies GESP10 and GESP11, the extent to which planning applications for economic development uses support the delivery of the targets will be given significant weight



Exeter IKEA

6.21 Traditionally land use planning has taken a controlling approach to development that has not always encouraged growth and investment. The draft vision for the GESP area suggests a more supportive and flexible approach setting the objective of development management to encourage and support those that want to invest in the area. Draft policy GESP12 proposes that the Greater Exeter councils will act corporately and in partnership to establish the locational and physical requirements of new businesses and guide them accordingly. The GESP proposals and policies will be the key starting point, but a flexible outlook will be needed to ensure continued economic success and meeting unforeseen or evolving

economic needs. The councils will monitor key economic indicators in the Greater Exeter area and the extent to which economic progress is falling short of the targets (see draft policies GESP10 and GESP11) will be weighed in the planning balance where planning applications for economic development are being considered. This means that the decision making will be rebalanced in favour of economic progress to the extent that the area is not achieving its potential as set out in the GESP. That does not mean that any job creation proposal will be granted, since there will continue to be other relevant planning factors to consider.

6.22 The policy also supports the continuation of a joint approach to supporting economic development by the councils in the Greater Exeter area, taking corporate action which goes beyond purely land use planning actions.

## POLICY GESP13:
## Strategic Economic Assets

To protect key strategic economic assets from loss to other uses or impact from new developments nearby, the following assets will be retained and proposals for enhancement supported:

A. Established, allocated and permitted strategic employment areas:
   a. Heathfield, Bovey Tracey
   b. Brunel Road, Newton Abbot
   c. Exeter Airport Business Park
   d. Heathpark, Honiton
   e. Greendale, Woodbury Salterton
   f. Hill Barton, Cat and Fiddle
   g. Matford/Matford Green, Exeter
   h. Marsh Barton , Exeter (subject to specific development proposals in this plan)
   i. Sowton, Exeter
   j. Exeter Business Park
   k. Pynes Hill, Exeter
   l. Tiverton Business Park
   m. Kingsmill/Stoneyford, Cullompton
   n. Lords Meadow, Crediton
   o. Mid Devon Business Park, Willand
   p. Hitchcocks Business Park, Willand
   q. Houghton Barton , Newton Abbot
   r. Peamore, Exeter
   s. Sands Copse, Kingsteignton
   t. Milber, Newton Abbot
   u. Intermodal interchange, Cranbrook
   v. Skypark Business Park
   w. Exeter Science Park
B. GESP employment allocations
   a. [Sites to be determined following this consultation and identified in the next version of the GESP]
C. Allocated leisure destination at Junction 27, M5 Motorway
D. Other key economic assets:
   a. Exeter Airport
   b. University of Exeter
   c. Meteorological (Met) Office

6.23 It is important that we recognise the contribution made to the local economy by our key economic assets. Draft policy GESP13 ensures these assets are not compromised by development and are protected from speculative housing or other redevelopment proposals which would undermine their strategic contribution.

6.24 Major employment areas provide a choice of sites for developers. There will always be churn (the natural turnover in employment premises) and redevelopment to improve or replace existing premises and therefore it is important that employment sites are not released on the basis of vacancies. Lack of available employment buildings is a key barrier quoted by businesses attempting to start up, expand or move into the area. Whilst it would not be appropriate to protect allocated employment sites where there is no prospect of a site being

used for that purpose, where sites are viable and *productive* they should be retained. The mere fact that a higher value can be obtained by a different use such as housing is a poor strategic reason for losing key economic assets. The areas listed in the draft policy GESP13 are considered major, where loss to another use would be a significant blow to the area's economy.

6.25 Enhancement and renewal of these employment areas is supported by the policy, including infrastructure and utility strengthening, environmental enhancement, redevelopment of out of date buildings and other investment within their boundaries. This is subject to there being no adverse effect on the integrity of *Natura 2000* sites.

6.26 There are other key economic assets within the Greater Exeter area which are drivers for improving *productivity*; they attract like-minded companies, improve the skills base and allow the area to trade internationally:

- Exeter Airport is a key economic asset that supports local jobs and contributes £150 million *gross value added* to the local economy by driving national and international visibility, investment and job creation.
- The University of Exeter is good for the city region, particularly in economic terms; in 2015/16 the activities of the University directly contributed £346 million to the local economy and provided or supported 3,490 jobs (full time equivalents). With recent expansion this figure is now higher.
- The Meteorological (Met) Office is a significant employer, with a highly educated workforce, it also provides the opportunity for spin-offs through their *high performance computing* capacity. It has strong research links with the University and a presence on the Science Park.

## POLICY GESP14:
## Exeter Airport

To support the role of Exeter Airport in the economic success of the area the Greater Exeter councils will support investment in and work with the airport and other relevant stakeholders to define an Airport Development Zone (ADZ). A masterplan for the ADZ will be prepared to promote and guide developments that deliver on the following issues while maintaining the safe operation of the airport:

A. Surface access, including:
   a. Active travel routes from nearby growth areas and Exeter
   b. Improved, dedicated, regular and high quality public transport routes from nearby growth areas, Exeter and the wider region including links to and from Cranbrook train station
   c. Improved vehicular access via a high quality gateway from the A30
   d. Improved car parking
B. Airport operation, including:
   a. Improved/expanded/new terminal building
   b. New or improved hangar and other freight services
   c. Airfield safety, security and emergency infrastructure
   d. Aviation training and back-office support development
C. Developments which support the aim to become a zero carbon airport and decarbonise aviation travel
D. Supporting ancillary development, including:
   a. New employment development (including aviation and transformational sector related development in particular)
   b. New hotel and conferencing development
   c. New ancillary passenger retail with the terminal building
   d. Redevelopment of existing employment areas to facilitate delivery of the above

6.27 Exeter Airport provides a key selling point for the region, giving access to markets and supporting high wage, high *productivity* jobs in the area. Up until March 2020 when Flybe entered administration, there had been year on year passenger growth since 2012, reaching almost 1 million passengers in 2018. Although there is significant uncertainty caused by Flybe entering administration, the opportunity that the airport provides and its importance in terms of strategic connectivity, means that its success is supported by the GESP as set out in draft policy GESP14.

6.28 A number of investments are underway or are planned – instrument landing systems and widening of the narrow Long Lane access route, for example. Further improvements have been identified across a range of issues to fulfil other objectives, including in relation to surface access, airport operation and the aim to become a zero carbon airport and decarbonise aviation travel. Inevitably, other supporting ancillary development will be necessary to facilitate and enable these improvements to take place, and hence draft policy GESP14 identifies what types of development might be acceptable. The Greater Exeter councils will work with the airport and relevant stakeholders to develop a new Airport Development Zone masterplan which will seek to address these issues.

## POLICY GESP15:
## Inclusive Employment and Skills

To promote wider access to jobs and address skills shortages:

A. Major planning applications should be accompanied by proposals to invest in construction skills. For the larger development schemes, the submission of an Employment and Skills Plan will be sought, covering their construction phase in line with the National Skills Academy for Construction client based approach or similar recognised scheme
B. Larger businesses expanding, starting up or moving into the area will be expected to sign up to an agreement to deliver links to local education providers, apprenticeships, training programmes and other measures to support people into work from the local area.

6.29 The draft GESP vision emphasises the need to nurture, attract and retain a world class workforce. It is recognised that the development of a skilled workforce is a key driver of *productivity* so we want to ensure we have the right type of skills for current jobs and also, as far as we can, for the area's future growth sectors. The skills shortage (particularly evident in the digital, construction, and health and social care sectors) is one of the Greater Exeter area's key constraints. With an economy presenting near full employment, challenges are emerging in the labour market in terms of filling vacancies, with a number of sectors reporting significant difficulties in sourcing appropriately skilled labour. 47% of data analyst jobs advertised within the *Local Enterprise Partnership* area were in Exeter, but 80% of data-intensive industries report shortages of staff.

6.30 The Greater Exeter councils are working with local educational providers including the University of Exeter, further education colleges, a number of local employers and schools. A South West Institute of Technology has recently been approved to support these activities, involving collaboration and investment between the University of Exeter and other establishments across the south west. It includes an *Exeter Digital and Data Education Hub* at Exeter College to provide a focal point to exploit opportunities to integrate data science into the primary and secondary curricula. Together with other




Exeter College Technology Centre



potential skills escalators in construction, aviation and health, the aim is to support the retention of the area's young people in higher paid and more skilled jobs.

6.31 The construction skills shortage is well documented locally and nationally. Having an appropriately skilled construction workforce of sufficient number is vital to support growth ambitions and deliver associated infrastructure. A *Centre for Excellence for Construction* is proposed for the new town of Cranbrook, and new developments can support its success to promote construction as a skilled and thriving occupation. The *National Skills Academy for Construction Industry Training Board's Client Based Approach* provides end to end guidance that aids the creation of employment and skills interventions, including apprenticeships, work placements, job creation and upskilling opportunities that are relevant and proportionate to the construction activity being procured. Draft policy GESP15 encourages *major developments* in the Greater Exeter area (which are likely to have a construction cost of over £1 million) to invest in construction skills for their workforce. The larger schemes can achieve this by taking up support from the *Building Greater Exeter* scheme which is a linked project to address the challenges facing our construction sector. This partnership offers help to people to prepare *Employment and Skills Plans* which supports people into jobs and training, promotes apprenticeships, encourages work experience and careers information for local young people. This will link construction companies with training providers, Further Education (FE) colleges and schools to provide skills and training to the existing workforce and new entrants.

6.32 Draft policy GESP15 also recognises the importance encouraging people to develop work-place skills in order to increase their likelihood of employment and career development, whilst also addressing skills shortages in the health and social care sectors. Working with partner agencies, the Greater Exeter councils will continue to focus their efforts on supporting unemployed people in taking the next steps into employment, education, skills development or training. This includes helping people benefit from the employment opportunities offered by initiatives such as work placements, apprenticeships and pre-employment training programmes. Draft policy GESP15 aims to create an environment where the larger businesses (50 or more employees) can be expected to make greater efforts in this regard.

**Regional Sports Hub**

6.33 Increasing physical activity levels to improve health and wellbeing are an element of creating greater places for people – part of the vision for the Greater Exeter area. Steps towards increasing activity levels can be seen in Cranbrook, part of the NHS England Healthy New Towns Programme, and both Exeter and Cranbrook working with Sport England to transform physical activity.

6.34 Much of this work relates to the design of places, the promotion of active and *sustainable travel* modes within and between neighbourhoods and the incorporation of well-designed accessible *green infrastructure*. There is the possibility of trying to go further, seeking to establish a regional sports hub in the Greater Exeter area, combining and integrating a range of sports facilities in one accessible place. This could benefit from coordinated and consolidated management to improve its long term viability. This would build upon the success of the area's professional and university sports offer, and the potential impact of *data analytics* on sports science. Provision of such facilities could be a driver in retaining the area's young people and graduate talent.

6.35 A regional sports hub concept and feasibility study (March 2020) has been undertaken for the Greater Exeter councils, published alongside this consultation document at www.gesp.org.uk/evidence. The report identifies challenges in creating such a facility in Greater Exeter. It suggests a community hub for sports could be provided as part of a larger development, which could then form a catalyst for such a facility. As the GESP progresses we will continue to consider the potential for such a facility in the Greater Exeter area.

# Chapter 7: Homes

**Introduction and Summary**

7.1 Fixing Our Broken Housing Market (2017) is the government's housing *white paper* setting out plans to reform the housing market and boost the supply of new homes in England. National planning policy requires that *local plans* are a major element of that fix. In particular, *local plans* must provide for sufficient new homes to meet *household projections* and to bring the housing market into a better balance between supply and demand. Further requirements are ensuring an appropriate *mix of homes* and bringing forward high quality new neighbourhoods in sustainable locations at increased pace.

7.2 Housing provision is embedded into the draft GESP vision, guiding big, cross-boundary decisions about the location and scale of new development and aiming to create great places to live prosperous and healthy lives.

7.3 The draft policies of this chapter include:

- A housing delivery target of 53,260 homes (2,663 per year) between 2020-2040 to include affordable homes (numbers to be decided), 5,000 *custom and self build* homes and 116 for the gypsy and traveller communities
- Targets for the provision of new homes in future *local plan* reviews
- A requirement for quality new places by ensuring that new homes are accessible

## POLICY GESP16: Housing Target and Distribution

The Greater Exeter councils will target the delivery of 2,663 homes per year in the Greater Exeter area (53,260 total) between 2020 and 2040. From the date of adoption of the GESP, the Housing Delivery Test and five year housing land supply calculations will be assessed against this target on a Greater Exeter area wide basis.

Delivery to meet this target is proposed from the following sources (which allow for a headroom of about 20% against the overall target):

A. Approximately 33,390 homes from existing planning commitments
B. Approximately 18,500 homes on GESP allocations [sites to be determined after this consultation and identified in the next version of the GESP]
C. Approximately 12,000 homes to be identified in future local and neighbourhood development plans [distribution between local planning authorities to be determined after this consultation and identified in the next version of the GESP]
D. Local plans should allocate additional housing sites to make up for any under-provision in planning commitments within a local planning authority against the assumptions contained in A above
E. Local plans may vary housing supply from these figures when justified by overall planning and sustainability considerations provided that any reductions are made in the context of effective duty to cooperate agreements with other local planning authorities which do not reduce the overall GESP housing delivery

7.4 The government's standard method set out in national policy gives the Greater Exeter area housing need as 2,663 homes per year. The calculation uses data from the Office for National Statistics (ONS) 2014-based *household projections* and Office for National Statistics (ONS) 2018 housing affordability statistics.

7.5 Draft policy GESP16 identifies three sources of housing supply between 2020 and 2040. Total potential supply amounts to 63,890 dwellings, allowing for a healthy headroom of about 20% above the target. This means that the GESP will be resilient against uncertainties such as delay in developing a particular site or changes in housing need or government policy. The high headroom figure reflects the risks associated with the number of *brownfield* sites considered in Section C of this consultation, which are acknowledged to be difficult to deliver. With further work on *deliverability* of potential GESP sites, this headroom should fall as the GESP progresses towards *adoption*.

**Commitments**

7.6 Existing planning consents (including permissions awaiting *Section 106 agreements*) and existing *local plan* allocations which do not yet have planning permission are referred to as 'existing planning commitments' in draft policy GESP16 criterion A. Forecast completions between 2019 and 2020 are excluded from these figures as their development will precede the GESP *plan period*. 33,380 homes are forecast from this supply, comprising approximately 11,540 homes in East Devon, 6,830 homes in Exeter, 8,240 homes in Mid Devon and 9,010 in Teignbridge.

**GESP Allocations**

7.7 Strategic sites will be identified for allocation in the draft GESP. Sites we are considering and want to hear your thoughts on are included in Section C of this consultation. We consider that delivering around 18,500 homes on strategic sites within the *plan period* is feasible and would provide a reasonable balance with smaller sites within existing and future *local plans*.

**Future Local and Neighbourhood Development Plans**

7.8 Finally, as the Greater Exeter councils review their *local plans* they will need to allocate additional sites to meet the requirements in draft policy GESP16 section C. The requirements may also be met through *brownfield registers*, *local development orders* and *neighbourhood development plan* allocations. From these types of proposals, a total of 12,000 dwellings are identified in draft policy GESP16, subject to the clarifications below, giving the potential for a range of site scales and locations, including national policy requirements for identification of *small sites*.

7.9 At this stage, the *local plan* targets for individual districts are not defined and this will need to be agreed for the next version of the GESP. *Local plans* may include targets for individual *neighbourhood development plans*. Evidence such as the Urban Capacity Study and further iterations of the Housing and Employment Land Availability Assessment will inform this process.

7.10 Draft policy GESP16 is designed to give a long term and robust housing strategy against which *local plan* reviews and allocations can be assessed, looking over the long term. However, in order to keep certain elements of housing targets up to date, a number of the elements of the policy will need to be reviewed during *local plan* preparation, and these are explained further below.

7.11 The overall target for the GESP area applies for 5 years from the plan's *adoption*, in accordance with national policy. A review of the target which finds it still to be appropriate extends its currency by a further 5 years. Pending a full review of the GESP, and depending on the review timetable, this is likely to be undertaken during individual *local plan* reviews. It will involve comparing the GESP target against the most recent GESP-wide housing need calculation



Cranbrook under construction

and setting out the results in the *Statement of Common Ground* required under the *duty to cooperate*. Where overall housing need has changed significantly, the Greater Exeter councils should consider whether a new overall GESP-wide target should be used for *five year supply* and *Housing Delivery Test* purposes and set out any agreed change within the *Statement of Common Ground*.

7.12 In order to ensure that the *local plans* will underpin the achievement of the overall target, the policy requires that the *local plans* should review the *deliverability* of the commitments which are assumed within draft policy GESP16 criterion A and use up to date information. If commitments are not going to provide as much housing as previously expected, this will need to be made up for by increasing the *local plan* housing provision.

7.13 Finally, it is likely to be necessary for the Greater Exeter councils to review the overall delivery trajectory, including in particular the progress and prospects of the GESP allocations. This review is not intended to provide a basis for reconsidering the principle of the GESP allocations, as these form a central plank of the agreed spatial development strategy over the long term.

7.14 Having undertaken this joint work, it may become necessary to amend the targets within draft policy GESP16 criterion C to take account of the various background changes set out above. Such amendments should be agreed between the Greater Exeter councils and confirmed within a *Statement of Common Ground*. This review process will ensure that the housing targets are kept up to date and can provide a basis for effective and stable strategic guidance. Where severe difficulties in achieving the contribution within a local planning authority become apparent during a *local plan* review, the *duty to cooperate* process will give an opportunity to adjust overall housing provision between the local planning authorities, to ensure that the overall GESP housing target is met.

7.15 Draft policy GESP16 commits to future *five year supply* and *Housing Delivery Test* calculations (both required by national planning policy) to be undertaken on a plan-wide basis, reflecting the *housing market area*. A detailed *housing delivery trajectory* will be included in the next version of the GESP. This will be used as the basis for monitoring progress against the annual target of 2,663 dwellings.

**Purpose Built Student Accommodation**

7.16 The housing need of students in the Greater Exeter area, whether in *purpose-built student accommodation* or shared conventional housing, is an element of the overall housing need for the Greater Exeter area. It is not in addition to this need. This is explained further in the GESP *Local Housing Needs Assessment* (2nd Edition). Therefore new student flats, houses or bedrooms in *purpose-built student accommodation* all contribute to meeting the Greater Exeter area's housing need.

7.17 In accordance with *Practice Guidance*, every 2.5 bedspaces in *purpose-built student accommodation* equates to 1 home in the Greater Exeter housing requirement. *Purpose-built student accommodation* commitments and *completions* will be counted on this basis in both the 5 year housing land supply and *Housing Delivery Test*. The ratio derives from published census data, which will be updated after the 2021 census.

## POLICY GESP17: Affordable Homes

To ensure access to housing for people whose needs are not met by the market the GESP and local plans will give a high priority to providing affordable housing. Affordable housing delivery will be from the following sources:

A. Approximately 9,970 from existing planning commitments
B. Approximately [figure to be determined after this consultation and viability assessment and identified in the Draft Plan] on Greater Exeter Strategic Plan allocations, provided in accordance with individual targets contained in each allocation policy and summarised as follows:
   a. Approximately [figure to be determined after this consultation and viability assessment and identified in the next version of the GESP] social and affordable homes for rent, to be let at no more than Local Housing Allowance levels in perpetuity
   b. Approximately [figure to be determined after this consultation and identified in the next version of the GESP] homes for affordable homeownership, sold with at least a 20% discount from market values in perpetuity
C. Affordable homes on other housing sites in accordance with the policies and allocations of local and neighbourhood development plans.

7.18 Access to housing for those on lower incomes is only likely to be achieved through the provision of defined affordable housing at below market rent or price levels. Provision proposed in draft policy GESP17 is therefore key to ensuring that the benefits of growth go to a wider section of the local community. Affordable housing policies have for many years ensured that new housing areas are of mixed tenure, including homes which are limited to occupation by, and affordable to, people on lower incomes. We suggest to continue this nationally recognised and successful approach.

7.19 Affordable housing is more fully defined in the *National Planning Policy Framework* but can be summarised as subsidised housing for people whose needs are not met by the market. Broadly it includes two forms:

- Affordable housing for rent - means housing managed by a *Registered Provider* or *Build to Rent* landlord and let at subsidised rent levels. The *Local Housing Allowance* sets a rent level which can be covered by Housing Benefit or Universal Credit and is therefore affordable to all households. It is therefore an appropriate maximum rental level for new affordable housing for rent. Social Housing is a form of rented affordable housing which gives higher subsidy and therefore lower rents.

- Affordable home ownership - products give a household the option to purchase at a subsidised price in various different ways, either immediately or after some years of living in a property. The *Local Housing Needs Assessment* (2nd Edition), undertaken to guide GESP policy, indicates potential demand from 13% of households at a 20% price discount, which is the minimum level of discount from local market prices required for affordable home ownership products by the *National Planning Policy Framework*.

7.20 The *Local Housing Needs Assessment* (2nd Edition) calculates that there is a need for about 24,300 new affordable homes for rent during the GESP *plan period*, or about 46% of the total housing need. The policy confirms that providing affordable housing remains a high priority. About 9,970 affordable homes can be expected from existing commitments. Subject to site decisions and further viability work to be carried out in the GESP process, targets will be set for the GESP allocations which will make significant additional provision. Finally, as *local plans* are prepared they will review their existing *local plan* policies and apply those to new housing developments in each district area, resulting in additional affordable housing provision. In this way, a proportion of the calculated need for affordable housing can be met.

7.21 A proportion of the affordable homes provided should be in the form of affordable home ownership, to reflect national planning policy that 10% of new homes on *major developments* should be of this type. These provide a 20% discount on market values, to be retained through re-sales of the homes. The remaining affordable homes on GESP sites are likely to be in the form of affordable rented homes, including social rented housing, reflecting the high level of need for this type of housing found in the *Local Housing Needs Assessment* (2nd Edition).



## POLICY GESP18:
## Build to Rent Homes

To help meet the need for high quality homes for private rent in the Greater Exeter area, each phase of development of the following GESP site allocations will include a percentage (to be determined after this consultation and identified in the next version of the GESP) of Build to Rent Rent homes:

[Sites to be determined after this consultation and identified here in the next version of the GESP]

Each Build to Rent scheme provided in the GESP site allocations listed above will include (and maintain in perpetuity) an amount of affordable housing that accords with targets provided in the relevant GESP site allocation policy.

Outside the GESP site allocations listed above, every Build to Rent development of 10 or more homes will provide (and maintain in perpetuity) an amount of affordable housing that accords with policies and allocations in the relevant local and/or neighbourhood development plan.

Affordable homes provided on all Build to Rent schemes must be:

A. For Affordable Private Rent, secured in perpetuity
B. Let with rents set at Local Housing Allowance level
C. Owned and managed by the same landlord as the market Build to Rent homes
D. Fully integrated into the development and built to the same standards as the market Build to Rent homes
E. Let to eligible households registered with Devon Home Choice

7.22 Increasing numbers of young people in the UK face the prospect of never owning their own home. Rising house prices, restricted access to mortgages and a decreasing supply of affordable housing mean that, at the age of 30, four in ten young people will rely on the private rented sector to meet their housing needs. This is double the rate of previous generations.

7.23 Within the Greater Exeter area the private sector's role in providing housing has increased substantially in recent years. Between 2001 and 2011 the number of privately renting households grew by 13,000 or 69%.

7.24 The Greater Exeter councils expect that growth in this sector will continue - the *Local Housing Needs Assessment* (2nd Edition) concludes that between 17% and 32% of additional homes delivered in the Greater Exeter area by 2040 should be for private rent. This equates to between around 9,180 and 17,280 of the overall housing target, or between 460 and 860 homes per year.

7.25 The Greater Exeter councils recognise the important role that *Build to Rent* can play in helping to meet the need for high quality, well-managed and secure private rented housing. The Greater Exeter councils also agree with the *Letwin Review* (2018), which recognises that, in addition to helping meet needs, the delivery of *Build to Rent* homes can help to diversify the housing market and thereby support timely build out. Consequently, the Review recommends that large housing sites above 1,500 homes include *Build to Rent* homes as part of the tenure diversity of each phase of the site's development.

7.26 Given the projected level of need for private rented homes in the Greater Exeter area and reflecting the *Letwin Review's* recommendations, draft policy GESP18 requires the provision of a percentage of *Build to Rent* homes within every development phase of the largest sites allocated in the GESP. The percentage and sites will be determined following this consultation and identified in the next version of the GESP. Other *Build to Rent* homes may come forward as a matter of course on other GESP allocations, particularly those within the urban area of Exeter.

7.27 The Greater Exeter councils may further support *Build to Rent* by:

- Allocating sites in *local plans* for *Built to Rent*; and
- Supporting institutional investment on public land, including exploring the use of joint ventures.

7.28 The Greater Exeter councils acknowledge the distinct economies associated with the *Build to Rent* sector. In recognition of this, draft policy GESP18 allows affordable housing provision on *Build to Rent* schemes to be solely in the form of Affordable Private Rent as defined in the *Practice Guidance*. In order to be considered as a *Build to Rent* scheme and therefore qualify for this approach to affordable housing provision, proposals must meet the following definition:

- All of the homes in the scheme must be owned and managed by a single landlord, secured by means of a covenant. Individual homes must not be sold and overall ownership of the scheme can only change if the scheme stays as *Build to Rent*. If any homes are sold out of the *Build to Rent* sector, an affordable housing 'clawback' mechanism will be applied. This will be set on a case-by-case basis and will state how the clawback will operate and be calculated
- The homes for Affordable Private Rent homes be secured as affordable housing in perpetuity
- All of the homes must be self-contained and let separately
- There must be on-site management to allow for prompt resolution of issues. The property manager must be part of an accredited Ombudsman Scheme and a member of a recognised professional body

- Long term tenancies must be offered to all tenants (ideally of three years of more) with defined tenancy-rent reviews
- Rent and service charge certainty must be offered for the period of the tenancy, the basis of which should be made clear to the tenant before the tenancy agreement is signed
- The *Build to Rent* landlord must produce an annual statement to the relevant local authority confirming the ongoing status of the Affordable Private Rent units and clearly identifying how the scheme is meeting the overall affordable housing level required in the planning permission.

7.29 These requirements will be secured by means of a Section 106 Agreement. *Build to Rent* schemes that do not meet all of draft Policy GESP18's criteria, and that do not do not comply with the additional requirements for *Build to Rent* schemes set out in the *Practice Guidance*, will treated as build for sale schemes for the purposes of calculating the affordable housing requirement.

## POLICY GESP19:
## Custom and Self Build Homes

As part of the housing target in draft policy GESP16, approximately 5,000 plots for custom and self build homes will be provided from the following sources:

A. Approximately 2,100 plots from small windfall sites
B. At least 900 serviced plots from GESP allocations, equating to a minimum 5% of the allocations' yields
C. At least 5% of serviced plots on all sites of 20 homes or more, including local and neighbourhood development plan allocations and windfalls. Local and neighbourhood development plans will also consider the potential for allocations to contain up to 100% custom and self build plots
D. Affordable homes, particularly affordable home ownership products, which may be suitable for provision as custom or self build housing

For criterion B and C, developers will supply at least 5% of serviced plots for sale to custom and self builders as follows:

a. Suitable adopted or adoptable road access must be delivered at an early stage in the development (prior to 25% occupation of the relevant phase in which the serviced plots are located, as agreed at planning application stage)
b. A range of plot sizes must be provided having regard to local demand. Plots for detached homes must have scaffolding margins within the plot boundary
c. Plots must be free of party wall requirements unless they are to be developed to provide apartments, or semi-detached or terraced homes
d. Prior to marketing, on-plot services must be provided and each plot must be developable by a custom or self builder, with no issues to prevent immediate purchase and development. The local authority must be satisfied that legal access and servicing will be possible for potential plot purchasers before outline or full planning permission is granted
e. Each plot must be marketed for at least 36 months from when the plot is fully serviced and developable, at a realistic plot valuation and in accordance with a marketing strategy to be approved by the local planning authority
f. Sites or clusters of 2 or more serviced plots should be delivered with the use of a design code which should provide suitable flexibility to allow for design variation, taking account of local circumstances



Broadhempston self build homes



7.30 Evidence in the *Local Housing Needs Assessment* (2nd Edition) indicates a need for 250 *custom and self build* homes per year (5,000 in total) for the Greater Exeter area. In the future, the number of *custom and self build* dwellings provided on *small site windfalls* (generally comprising developments of 1 or 2 homes) is expected to be about 105 per year, leaving an expected shortage in provision of about 145 per year. This justifies the planning policy intervention proposed in draft policy GESP19.

7.31 To help deliver the additional *custom and self build* homes needed in the Greater Exeter area, criteria B and C of draft policy GESP19 apply a similar approach to the successful *Teignbridge Rule* contained in the Teignbridge *Local Plan* (2013-2033). The criteria require at least 5% of serviced plots on GESP allocations and other sites of 20 or more homes to be made available for sale to custom and self builders, with appropriate *conditions* to ensure delivery. *Custom and self build* plots must be marketed for 3 years before an alternative delivery mechanism can be used, to maximise the potential for a willing buyer to come forward. To ensure that a serviced plot can be sold within the 3 year period and to enable development to come forward quickly, the marketing period will only be deemed to commence once the plot is in a developable state. This means that it must be clearly demarcated, be fully serviced with vehicular access (including for construction vehicles) and have connections for electricity, water and waste. Also, detailed survey and ground information must be available to the purchaser and there must be no legal or other issues to prevent immediate development such as the need for decontamination works. The masterplanning required for the GESP allocations should indicate the location of the *custom and self build* plots, which can help to meet the *small sites* requirement contained in national policy. Plots must be marketed at a realistic price derived from residual plot valuation that takes account of the form and potential end value to the home to be built.

7.32 Allowing individual design expression by custom and self builders is an important aspect of the self build process. At the same time, the design of *custom and self build* homes is a matter for planning and must take into account the character and appearance of the local area. On *custom and self build* developments or (on larger sites) clusters of 2 or more homes, *design codes* will be used to ensure design coherence whilst retaining an appropriate degree of design freedom for the self builder. It will not be appropriate for the main site developer to impose limitations based on their own preferences and approaches.

7.33 The *Local Housing Needs Assessment* (2nd Edition) recommends that a range of *custom and self build* plot sizes are provided, reflecting the different profiles of demand. It suggests that around 15% of serviced plots should provide for smaller homes of up to 100 square metres, 40% should provide for medium sized family homes of 100-250 square metres and the remaining 45% should provide for larger family homes in excess of 250 square metres.

7.34 Applying the 5% rule within draft policy GESP19 to GESP and *local plan* allocations will still leave a shortfall against the forecast demand. Increasing the requirement from 5% to 10% is unlikely to be achievable in view of other policy requirements. Therefore a number of further delivery methods are proposed. "Affordable home ownership" dwellings on major sites could include an element of *custom and self build* dwellings. Community-led housing projects could also deliver affordable housing on a *custom and self build* basis. Further, it is possible that local and *neighbourhood development plan* allocations could provide opportunities for 100% *custom and self build* delivery. This should be considered in *local plan* reviews or through negotiation with small site promoters before then.

## POLICY GESP20:
## Accessible Homes

**All housing developments must include the following proportions of accessible homes unless the applicant can demonstrate there are site specific reasons why this is not feasible:**

**A. Market homes within the development: At least 25% built to M4(3a) standard, with the remainder built to M4(2) standard**
**B. Affordable homes within the development: At least 25% built to M4(3b) standard, with the remainder built to M4(2) standard**

7.35 The *National Planning Policy Framework* requires local planning authorities to reflect the housing needs of older people and people with disabilities in their planning policies. The *Practice Guidance* expands upon this in relation to planning for accessible homes. Where there is evidence of a need for accessible housing, local planning authorities are able to set higher accessibility and adaptability standards for new homes with reference to Requirements M4(2) and M4(3) of the *Building Regulations*. These are reflected in draft policy GESP20, which would also apply equivalent iterations of future regulations. Part M of the *Building Regulations* for dwellings is summarised over page:

- M4(1) Visitable dwellings: This is the minimum standard to which all homes must comply and is often unsuitable as the home of a disabled person
- M4(2) Accessible and adaptable dwellings: This standard provides reasonable access to and around the home, meeting the requirements of occupiers with differing needs including some older or disabled people and allowing adaptation of the home to meet changing needs over time

- M4(3) Wheelchair user dwellings: This standard requires homes to be usable by residents in a wheelchair. It is split into two subsections, (a) requiring that homes are adaptable to wheelchair use and (b) requiring that they are immediately accessible



Accessible bathroom

7.36 There is currently poor provision in the Greater Exeter area of homes accessible to people with disabilities. The *Local Housing Needs Assessment* (2nd Edition) concludes that 35% of households require some form of accessible dwelling (likely to rise to 39% by 2040 due to the ageing population), whereas only 18% of the existing housing stock is accessible. This means very unequal access to homes for someone with a disability compared with the rest of the population. In order to reduce this gap (although not close it entirely) by 2040, draft policy GESP20 proposes that all new homes should meet *Building Regulations* M4(2) or M4(3) unless it can be demonstrated that this is not possible due to site specific factors. When applying the percentages in the policy, requirements will be rounded to the nearest whole house. The policy differentiates between affordable and market homes because the *Practice Guidance* only allows the M4(3b) standard to be applied to affordable dwellings, where the local authority is responsible for allocating or nominating a person to live in that dwelling.



## POLICY GESP21:
## Accommodation for the Gypsy and Traveller Communities

To provide access to appropriate accommodation for the gypsy and traveller communities, the following will be provided between 2020 and 2040:

A. 116 additional permanent gypsy and traveller pitches from the following sources:
   a. Approximately 70 pitches from existing commitments
   b. Approximately 46 pitches on the following GESP site allocations: [sites to be determined after this consultation and identified in the next version of the GESP]. Off-site provision will only be supported if the applicant can demonstrate that this will achieve a more favourable outcome for gypsy and traveller communities
B. 3 transit sites for gypsy and traveller communities totalling 20 pitches to be allocated in local plans close to key road corridors in accordance with the duty to cooperate
C. A site providing 12 plots for travelling showpeople to be allocated in a local plan in accordance with the duty to cooperate.

7.37 The *Local Housing Needs Assessment* (2nd Edition) concludes that there is a need to provide a range of new *permanent and transit sites* for gypsy and traveller communities across the Greater Exeter area between 2020 and 2040.



Gypsy and Travellor site in Teignbridge



7.38 In the next version of the plan, draft policy GESP21 will be updated to identify which GESP allocations will contain land for the provision of 46 permanent pitches, which are required to meet needs in addition to 70 existing pitch commitments. Provision of the 46 pitches elsewhere in the Greater Exeter area will only be accepted if the applicant can demonstrate to the satisfaction of the Greater Exeter councils that this would result in a more favourable outcome for gypsy and traveller communities.

7.39 In order to meet identified needs, the *local plans* of the Greater Exeter councils will allocate land for the provision of 3 transit sites and a site for travelling showpeople.

7.40 The locations of the additional permanent pitches, transit sites and site for travelling showpeople will be chosen on the basis that they:

- Are well located on the highway network
- Have (or have the potential to provide) safe and convenient vehicular and pedestrian access to local facilities
- Have minimal impact upon the environment and landscape (including no adverse effect on the integrity of *Natura 2000* sites)
- Protect the amenity of people living nearby
- Provide adequate levels of privacy, security, storage space and residential amenity
- Allow for the provision of appropriate parking, including for visitors and commercial vehicles related to business activities likely to be carried out

# Chapter 8: Movement and Communication

**Introduction and Summary**

8.1 The GESP focuses on integrating development and transport, supporting more *sustainable transport* in the Greater Exeter area. To help achieve the GESP vision of a networked city region, this chapter promotes active travel and *low carbon* and *sustainable transport* movements, alongside a major expansion in digital infrastructure.

8.2 The draft policies of this chapter include:

- A transport strategy for the Greater Exeter area, including a range of strategic transport and digital infrastructure investments which will mesh with growth decisions
- A clear *sustainable transport* hierarchy for major new developments
- The approaches to be taken for a variety of transport modes
- The strategy for travel in Exeter
- The travel enhancements needed for a series of settlements
- The strategy for improved digital connectivity and high speed digital communications

8.3 As sites are identified for inclusion in the next version of the GESP (to be determined after this consultation) this chapter will be updated with more site specific transport proposals. Evidence reports providing background to this chapter are available on www.gesp.org.uk/evidence.



## POLICY GESP22: Transport Strategy

To support the sustainable growth of the Greater Exeter area and the development of a net zero carbon efficient transport network, the following outcomes will be sought from transport investment and all relevant planning decisions:

A. Creating a healthy, active city region by delivering an integrated network of active travel routes within and between our towns and cities, providing for walking, cycling and emerging modes
B. Improving sustainable transport connectivity by achieving a reliable, low-carbon and consistent standard of sustainable travel between Exeter, selected main towns and growth locations, including half hourly rail, quarter hourly bus and strategic cycle routes as indicated on the transport strategy diagram
C. Enhancing transport choices and alternatives to car ownership by expanding shared mobility (e.g. car clubs and bike hire), requiring their provision in all suitable developments and supporting innovations including a single ticketing system combining low emission modes
D. Supporting a step-change in digital communications and digital connectivity by investing in a gigabit capable full fibre regional spine and requiring ducting in new developments
E. Protecting and enhancing the function of the area as the strategic rail, road and air gateway to the south west peninsular through investments in critical infrastructure.

8.4 The network of safe walking and cycling routes connecting our communities that is proposed in draft policy GESP22 is considered essential to providing opportunities for *low carbon* journeys. This will be supported by a 'place-based' approach to street and urban design to make places more pleasant, legible and safe for people to move through or spend time in, thus improving quality of life in these areas. Requirements to enable *sustainable travel* in new developments are included in draft policy GESP23 and long distance strategic trails are identified in draft policy GESP25.

8.5 In most of our towns, much of the existing road network is already at capacity in peak periods. Given the historic and constrained nature of the road network in most of our settlements, the solutions to urban congestion cannot be found in road widening or other car-based investment. Instead, in order to provide travel capacity for new communities and better travel choices for our existing residents, we must deliver effective sustainable alternatives and more sophisticated management of the travel network. The Transport Strategy Diagram shown in Figure 8.1 has been developed to reflect policy GESP22. It indicates the enhancements to the public transport, inter-urban cycle network and digital requirements described in the policy.

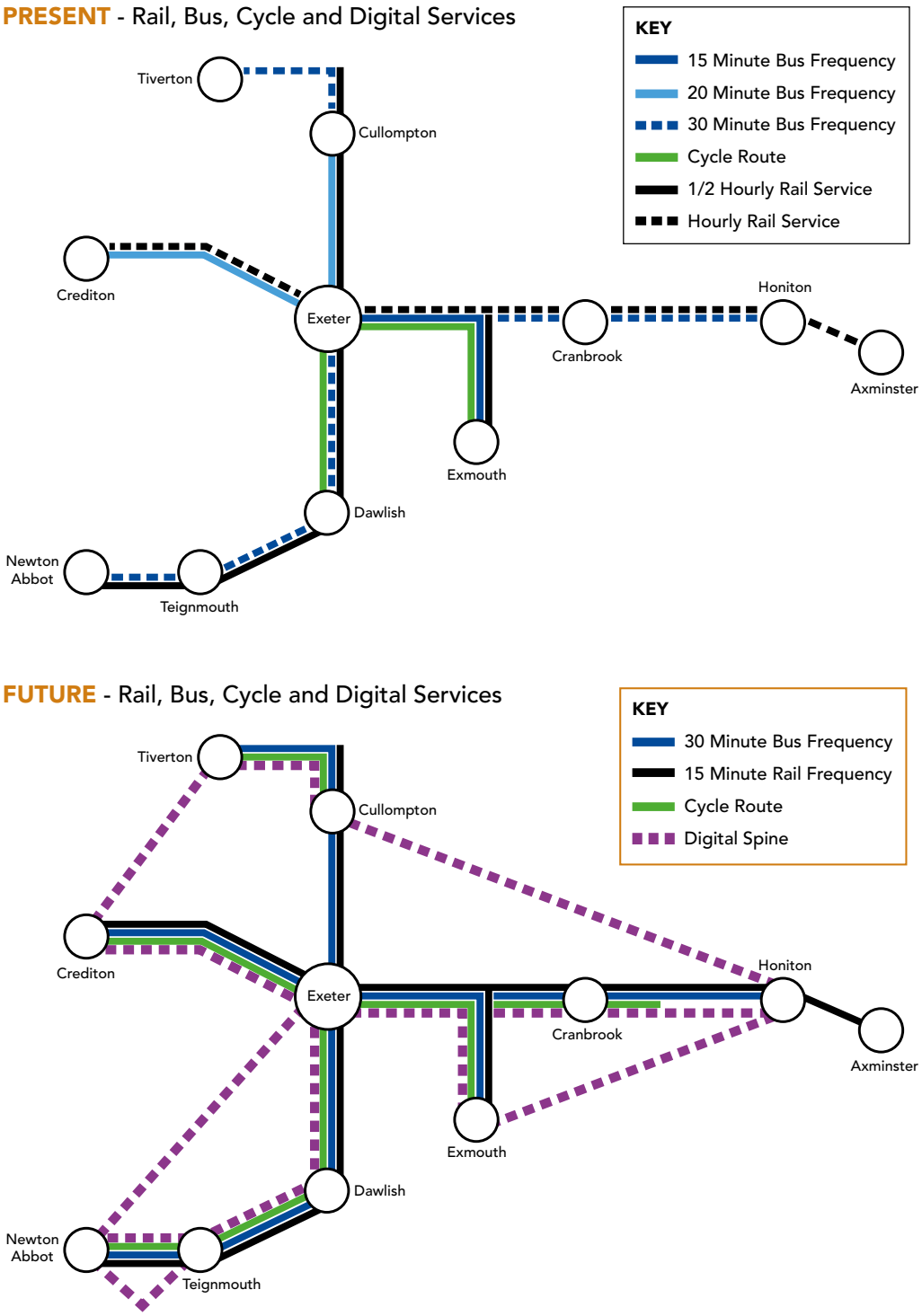



**Figure 8.1** Transport strategy diagram – Present and future transport networks

8.6 Economic growth in Exeter has led to increased travel demand into the city. The growth in jobs in Exeter has largely been filled by people living in neighbouring districts, leading to high levels of in-commuting. Some of this additional travel demand has been accommodated by a shift to *sustainable transport* modes and the majority of Exeter residents now travel to work by sustainable modes (with good levels of cycling and walking). Proposals within policy GESP22 seek to enable more *sustainable transport* choices (with improved sustainable transport mode frequency and choice) for in-commuters to Exeter, with better linkages between the towns across the Greater Exeter area. This aligns with our proposal in the draft GESP vision for a 'networked city region'. Rail and bus improvements to achieve policy GESP22's proposals are included in draft policy GESP26.

8.7 While car ownership has risen, car use has fallen. Shared ownership increasingly provides a viable alternative to car ownership. *Shared mobility services* in the Greater Exeter area are still emerging, with considerable potential to grow, including commercial lift sharing platforms and e-bike hiring. These alternative to car ownership are promoted in draft policy GESP22 and requirements are detailed for new development in draft policy GESP23. Emerging and future modes including electric vehicles, electrically assisted pedal cycles and personal light electric vehicles are likely to support these choices.

8.8 Technology, particularly digital connectivity, is also fundamentally changing the way we travel. As identified in draft policy GESP22, technology offers new opportunities for journey planning, ticketing and to use time spent whilst traveling more productively. This will make public transport trips more attractive and accessible. Each citizen now makes 15% fewer trips than they did in 1995. This trend is expected to continue. Technology will also unlock new ways to manage travel networks and understanding strategies to effectively use this will be important.

8.9 In recognition of the challenge to travel sustainably from the more remote parts of Greater Exeter and the known benefits of broadband for economic and social purposes, a key strand of the transport strategy is broadband improvement. Evidence has been developed by the Greater Exeter councils to consider the potential to achieve this aspiration, culminating in the proposal for a 'digital spine'. This is further explored in draft policy GESP33.






Car club scheme in Exeter

## POLICY GESP23:
## Sustainable Travel in New Developments

To support the transport strategy (draft policy GESP22) and carbon reduction targets (draft policy GESP3), minimise environmental harm and support health and wellbeing, more than half of trips (or higher where specified in allocation policies) from major developments will need to be made by active and sustainable travel modes. Travel planning and investments will be based on the priority order of:

A. Provision for active travel (walking and cycling) by:
   a. Providing a dense and permeable network of walking and cycling routes within developments, including avoiding cul-de-sacs where they prevent permeability, and connecting into the wider active movement network beyond the development site
   b. Creating an environment which is safe and attractive to pedestrians and cyclists by providing a network of streets which prioritise active travel, using modal filters to reduce car traffic and create quieter, slower and safer streets, or segregated cycle routes on busier streets
   c. Including secure private cycle storage for all dwellings and secure public cycle parking
B. Provision for sustainable travel (buses, rail, shared mobility and other public transport) including:
   a. Densities, design and layouts which allow provision of efficient public transport services to, and where relevant, within and through the site
   b. Appropriate well located bus stops, with raised kerbs for easy bus access and where appropriate suitable routes for bus priority
   c. Allocate spaces for shared mobility vehicles, including car clubs and e-bikes in central and accessible locations and to create new local multi-modal transport hubs and interchanges, making best use of existing bus and rail routes
   d. Providing private and public charging points for electric vehicles
C. Highway enhancements will be supported where they are necessary for safety or where they promote an overall reduction in car journeys
D. Provision of new local road capacity will be supported only where severe development impacts on the transport network cannot be avoided by the active and sustainable travel investments proposed with the development



8.10 Draft policy GESP23 supports the creation of a healthy active city region and great places for people. The Greater Exeter councils recognise and support the need to improve and encourage sustainable modes of travel. The draft policy proposes a travel hierarchy that supports and enables the most sustainable forms of travel for major new developments.

8.11 Draft policy GESP23 requires development proposals to encourage non-car modes of travel and make *sustainable transport* modes more convenient, attractive and safe. Walking, cycling and bus routes should link into wider networks and related infrastructure such as secure cycle parking and charging, and bus stops. Sites in the vicinity of the strategic trails identified in draft policy GESP25 should provide a suitable connection into these routes.

8.12 Site developers should work with planning authorities to identify the priority active travel connections and ensure the delivery of these connections as soon as reasonably possible in the development process, ensuring homes have suitable access to the wider safe active travel network from the first phase of occupations. Site promoters and developers are also required to work with the Greater Exeter councils where allocated or potential public transport infrastructure, such as a park and ride scheme, would benefit the site and wider area.




Cyclists at Exeter St Davids Station

8.13 *Modal filtering* means using highway or street designs which enable permeability for some forms of transport, such as buses, cycles and pedestrians, but limit movement for other modes such as private cars or heavy goods vehicles. This can create streets and transport corridors focussed on enabling the flow of sustainable and active travel modes, whilst limiting vehicle traffic to local residents' access only.

8.14 Opportunities to maximise *sustainable transport* solutions will vary between urban and rural areas, and this should be taken into account in decision-making.

8.15 New road capacity will only be supported and/or required where severe transport impacts are likely, such as on air quality, safety or congestion on the road network, as determined by a transport assessment.

## POLICY GESP24:
## Travel Planning

The submission of Travel Plans for approval and implementation will be required for all new purpose built student accommodation and developments incorporating at least 100 dwellings or 1000 square metres of non-housing floorspace. As a minimum Travel Plans should include:

A. Residential Travel Plans - site specific proposals including information on nearby facilities and sustainable travel modes, travel vouchers and post implementation monitoring and reporting. This could be delivered either by the developer or through financial contribution to the Local Transport Authority
B. Employee Travel Plans - site specific proposals including information on nearby sustainable travel modes, facilities and incentives to be provided for sustainable travel by staff and visitors and an agreed approach to implementation and monitoring of the Travel Plan

8.16 Travel plans are long-term management strategies for integrating proposals for *sustainable travel* into the planning process.

8.17 People's travel behaviours can be influenced by facilities at their place of work and when they move house. The provision of information, opportunities and incentives to use active and sustainable modes of travel, provided through a travel plan, can deliver significant improvements in walking, cycling and public transport use for comparatively low cost.

8.18 The *National Planning Policy Framework* says that "All developments which generate significant amounts of movement should be required to provide a Travel Plan". Historical guidance on thresholds for Transport Assessments would suggest that 100 dwellings is a sensible minimum for Greater Exeter.



Shared electric bike hire scheme

8.19 The *Devon Local Transport Plan 2026* identified a need for area wide travel planning. This is now being delivered in strategic allocations in Exeter and would be suitable to expand to the wider Greater Exeter area.

8.20 Travel plans will ordinarily be required at *outline planning application* stage by planning *condition*. The use of travel plans proposed in draft policy GESP24 will enable and allow for monitoring of an effective shift towards active and green travel options.

## POLICY GESP25:
## Long Distance Strategic Trails

The following trails will be identified and safeguarded to form part of the Strategic Walking & Cycle Network linking key towns to the existing strategic trail network, as identified on the policies map and to be detailed in the Infrastructure Delivery Plan [policies map and Infrastructure Delivery Plan to be published with the next version of the GESP]:

a. Teign Estuary Trail; Newton Abbot - Bishopsteignton - Teignmouth - Dawlish
b. Clyst Valley Trail; Killerton - Exe Estuary
c. East of Exeter Trail; Whimple - Cranbrook - Mosshayne - Exeter
d. Boniface Trail; Crediton - Exeter
e. Mid Devon Trail; Tiverton – Tiverton Parkway - Willand - Cullompton

8.21 Draft policy GESP25 suggests a number of strategic *sustainable travel* routes linking Exeter and nearby towns. This network will join with local town and city routes to create a comprehensive cycle network for the Greater Exeter area, to increase active travel provision and deliver part of the networked city region vision. These routes should be primarily segregated cycle routes, with only minor sections on-road where no alternatives exist. Route planning should consider how the Strategic Cycle Route Network and local routes link together to ensure key locations are connected, such as public transport hubs, major employment locations, new development sites and town centres.





Cycle superhighway in Exeter

## POLICY GESP26:
## Rail and Bus Projects

The following will be identified on the policies map to be allocated and/or safeguarded for the provision of public transport routes, rail stations and infrastructure [policies map and Infrastructure Delivery Plan to be published with the next version of the GESP]:

A. New rail stations at
   a. Marsh Barton
   b. Monkerton
   c. Cullompton
   d. Cranbrook East
B. Rail Frequency and Resilience Enhancements including
   a. Between Dawlish and Teignmouth – rail resilience
   b. Waterloo passing loop – additional tracks and capacity on London Waterloo Line
   c. Tarka Line passing loop – to enable half hourly services to Crediton
C. Bus reliability and priority enhancements necessary to achieve 15 minute bus frequency will be identified including;
   a. A3052 to M5 J30
   b. Heavitree Road – environmental enhancement and bus priority
   c. A379 South West Exeter
   d. Exe Bridges / Alphington Road

8.22 The Greater Exeter councils will work with bus service operators, Network Rail, rail franchise owners, the Department for Transport, relevant landowners and other stakeholders to support upgrades and improvements to the public transport networks. Depending on the outcomes of this consultation and the sites included in the next version of the GESP, further public transport projects projects may be added to the policy.

8.23 The rail infrastructure outlined above is the minimum required over the *plan period* to achieve a frequent and resilient *Devon Metro* service.



Bus services in Exeter

8.24 New railway stations and rail infrastructure improvements are required at key destinations and new communities including Marsh Barton, Cullompton and Cranbrook (land for which is proposed to be safeguarded in the Cranbrook *Development Plan Document*). These will contribute to the success of the rail network in and around Exeter, providing a large number of households with a convenient public transport option to access the city.

8.25 Works to protect the mainline along the coast near Dawlish are recognised by the government as a national priority. They will help to ensure the resilience of the mainline which is at risk from cliff erosion, rising sea levels and future storms.

## POLICY GESP27:
## Park and Ride around Exeter

Park and ride (and park and change) facilities will be allocated and delivered along the following corridors, as identified on the relevant policies map and to be detailed in the Infrastructure Delivery Plan [policies map and Infrastructure Delivery Plan to be published with the next version of the GESP]:

A. B3181 Pinhoe Road corridor
B. A30 / Heavitree Road corridor
C. A376 / A3052 Clyst St Mary corridor
D. A38 - A379 – Matford corridor
E. A30 – A377 Alphington Road corridor
F. A377 Cowley Bridge Road corridor

All facilities will include sufficient car parking, cycle storage and electric vehicle charging facilities.

8.27 Park and ride (including *park and change*) services are proposed in draft policy GESP27 because a significant proportion of Greater Exeter residents live in rural areas that are distant from a railway station, where frequent bus services cannot be sustained. Park and ride facilities give an opportunity for rural residents to switch from car to bus at the edge of the city, helping to maximise public transport travel within the more congested urban area.

8.28 Since park and ride buses can also be boarded by people along their route, they help to supplement other bus services by providing high frequency radial routes to the city centre. Running bus services between new and existing facilities will open up new cross-city travel opportunities and increase sustainable access to major employment areas on the edge of Exeter.

8.29 Exeter currently has four park and ride facilities at Matford, Digby, Sowton and Honiton Road which operate at close to full capacity. We propose to double the Exeter park and ride capacity and widen its geographic coverage by providing services from all the main routes into the city.

8.30 New facilities and services will be required to ensure a good customer experience with high quality waiting facilities. They will need to provide a quick and reliable alternative to driving into the city centre and be accompanied by investment in bus priority measures to allow bus services to be faster than travelling by private car. They should be sympathetic to their surroundings and consider the use of trees and planting, landscaping and appropriate lighting strategies. New facilities will also need to demonstrate how they will accommodate electric vehicle charging.



Honiton Road park and ride in Exeter

## POLICY GESP28:
## Electric Vehicles

Residential and commercial development proposals will include the infrastructure to be ready for electric vehicles (EV-ready), in accordance with the following:

A. Each off-highway parking space in new residential developments will be fitted with an electric vehicle charging point or ducted circuit in a suitable position to enable an electric vehicle charging point to be easily installed in the future
B. Where residential development only provides parking on highways, a plan will be required, setting out how sufficient charging infrastructure is to be provided and maintained
C. Non-residential developments with 10 or more off-highway vehicle parking spaces will include at least 30% with electric vehicle charging points or a proportion equal to electric vehicle market share (whichever is higher at time of reserved matters/full application)
D. Developers promoting strategic scale development will work with energy companies to ensure the development of relevant and appropriate and smart energy infrastructure is planned to provide current and future electric vehicle capacity (for example land for sub-stations, energy storage and renewable generation)
E. All dwellings with a likely maximum load in excess of 7.5kW will be connected to the grid with a three phase electricity connection, which will extend to electric vehicle charging points, to enable improved management of electricity supply during periods of high demand
F. The provision of fast electric vehicle charging points, particularly in highly accessible locations will be supported. New or significantly altered petrol filling stations will include provision of at least 2 fast electric vehicle chargers
G. The infrastructure is sited to integrate positively with the built environment and not affect the significance, character, setting or local distinctiveness of a heritage asset



8.31 The government has committed to end the sale of new petrol and diesel cars from 2040 (potentially 2035) and to the UK achieving *net-zero carbon emissions* by 2050. To help attain this goal, large scale take-up of electric vehicles is expected. This would align with the draft GESP vision and efforts to improve air quality. We propose that the GESP should support the proliferation of electric vehicles and their associated infrastructure.

8.32 Part A of draft policy GESP28 requires each new allocated parking space (i.e. those off a highway) to be at least electric vehicle ready. This means that a suitable electrical supply or circuit will need be installed to the parking space during construction, allowing residents to easily install the appropriate charging infrastructure suitable for their vehicle's needs. Part B requires sufficient provision of charging infrastructure to be identified as a requirement for unallocated on-street parking, to be secured via a parking plan that is agreed with the local planning authority.

8.33 Part C of draft policy GESP28 requires 30% of non-residential parking spaces to include electric vehicle charging points. This target and the associated threshold of 10 off-highway parking spaces is considered to be suitable and achievable, allowing growth of the EV market without having a disproportionate impact on development viability. Should EV market share rise to higher than 30% during the lifetime of the GESP, at least an additional proportion reflecting the latest market share should be provided.

8.34 Part D of draft policy GESP28 requires developers to engage with appropriate organisations to future-proof development for our future energy needs. This may mean planning for and putting aside appropriate parcels of land for future energy storage and sub-stations to enable future EV capacity.

8.35 Part E of draft policy GESP28 requires electricity grid connections to be "*three phase*" to enable sufficient capacity (load), flexibility and two-way flows in order to support smart energy management such as *vehicle to grid* flows at times of peak demand.

8.36 Part F of draft policy GESP28 aids longer distance travel through the Greater Exeter area by supporting the provision of fast electric vehicle charging spaces on the *major road network*. The creation of such a network will help to dispel 'range anxiety' concerns. An electric vehicle fast or rapid charger comprises any charging point which has the capacity to charge a vehicle from flat to 80% in 30 minutes or less.

8.37 The use of electric vehicles will support decarbonisation if they are primarily charged using renewable sources of electricity. However, the increase in electric vehicles may, unless accompanied by sufficient and appropriate smart energy infrastructure, result in electrical supply and capacity issues at peak times. This is recognised as a national issue and draft policies in the climate emergency chapter support the delivery of renewable energy generation as well as energy storage and management infrastructure.

## POLICY GESP29:
## Highway Links and Junction Improvements

The following projects have been identified as the principal highway improvements on the strategic and major road network. This plan will safeguard land where necessary:

A. Strategic Road Network:
   a. M5 J27 - A361 including Tiverton Parkway junction all movements junction to provide access to Parkway railway station and remove trips from the motorway junction
   b. M5 J28 and Cullompton Town Centre Relief Road to provide extra capacity and/or remove trips from the motorway junction
   c. Improved capacity and resilience between M5 J29 to M5 J31, including enhancements to local routes from Clyst Road to A376 to reduce local traffic on M5 J30
   d. Relocation of M5 J30 and J28 motorway services to one new "on-line" site
   e. A30/A303 improvements – Honiton to Devonshire Inn; Devonshire Inn to Marsh

B. Major and local Road Network:
   a. A382 (Newton Abbot to Drumbridges) – widening of highway from Jetty Marsh Road with addition of cycle routes and improved junctions including new roundabout at Forches Cross and link road to A383
   b. A30 (Clyst Honiton) to A3052 link - new main road allowing local north – south movement without the need to use the motorway junctions
   c. Junction of A379 at Peamore with A38 to create north bound onslip

8.38 *Strategic transport* infrastructure remains central to the competitiveness and success of the Greater Exeter area. The GESP needs to protect this connectivity to ensure that the area remains attractive for business.

8.39 Based on transport modelling and analysis, the projects listed above are required. These are focused on the *strategic road network*, the emerging *major road network*, and a number of local improvements in key locations to ensure that the network continues to work for those that rely on it.

8.40 Depending upon the sites chosen for proposed allocation in the next version of the GESP, this list may be reviewed and updated to include additional appropriate projects.



Tithebarn link road



## POLICY GESP30:
## Movement in Exeter

Exeter's movement and public transport networks and infrastructure will be improved by:

A. Focussing on quality of place by requiring and enabling streets and corridor improvements to reduce the dominance of cars and support city centre vitality. The public realm, including in the following corridors will be improved to create people focussed urban areas with safer cycling and walking, improved air quality and reduced dominance of cars:
   a. City Centre streets, including South Street, Fore Street, Paris Street and Queen Street
   b. Heavitree Road
   c. Cowick Street

B. Building a comprehensive pedestrian and cycle network within Exeter. This includes the following cycle routes which will be delivered as allocated or identified on the relevant policies map and to be detailed in the Infrastructure Delivery Plan [policies map and Infrastructure Delivery Plan to be published with the next version of the GESP]:
   a. St David's - University of Exeter - Redhayes Bridge
   b. City Centre - Heavitree - Redhayes Bridge
   c. City Centre - Wonford - Newcourt – Topsham
   d. Pennsylvania - Polsloe Bridge - Heavitree - Wonford - River Exe
   e. SW Exeter - Alphington - City Centre

C. Improving cross-city bus corridors and bus access to edge of city growth locations and employment areas will be achieved by developing Park and Ride sites on all key road corridors into Exeter, doubling the number of spaces serving the city. This is set out in draft policy GESP27

D. Expanding Shared Mobility provision across the City, linking with Electric charging and supporting the creation of a new zero-emission transport subscription service.

8.41 Despite the majority of Exeter residents now travelling to work by sustainable modes, their movements still account for 35% of car-based commuter trips to destinations in the city. With the widest choice of travel options and shortest journey distances, those who live and work in the city have the greatest opportunity to use non-car modes. Proposals to make alternative means of travelling to work more attractive and to achieve an even better shift to *sustainable transport* modes are identified in draft policy GESP30. Suggested improvements include:

- Removal of car dominance on some key routes to create safer walking and cycling options with improved air quality
- Expanding the already successful pedestrian and cycle network to achieve a more comprehensive network with linkages between home, work and recreational destinations
- Using the expansion of park and ride facilities in Exeter (identified in draft policy GESP27) to potentially improve cross-city bus corridors which will more effectively connect people's homes to key employment sites on the edge of the city
- Expanding *shared mobility* provision, making it easier for residents to take advantage of a range of zero-emission transport options available within the city

8.42 The content of draft policy GESP30 is based on the *Exeter Transport Strategy*, developed by Devon County Council. The purpose of the Strategy is to promote *sustainable travel* by focusing on the health and quality of place benefits and the opportunities that technology offers to engage and inform people about their travel choices. The full Strategy is available at www.gesp.org.uk/evidence/xxxx.



## POLICY GESP31:
## Settlement Specific Enhancements

Key towns, including in particular those with strategic growth proposals, will be improved by:

A. Building a comprehensive pedestrian and cycle network within identified towns, including in Newton Abbot, Cranbrook, Crediton, Cullompton, Dawlish, Exmouth, Honiton, Teignmouth, Tiverton and the GESP allocations. [Policies map and Infrastructure Delivery Plan to be published with the next version of the GESP]
B. Focussing on quality of place by requiring and enabling streets and corridor improvements to reduce the dominance of cars, support town centre vitality and create people focussed urban areas. [Locations to be determined after this consultation and identified in the next version of the GESP]
C. Achieving a modern, reliable and low carbon bus route network within and between the main settlements and growth areas. This will include through improved bus routes and services, as well as Park and ride facilities to be allocated and delivered in growth areas and main towns along the following corridors, as identified on the relevant policies map and to be detailed in the Infrastructure Delivery Plan. [Locations to be determined after this consultation and identified in the next version of the GESP]

8.43 Draft policy GESP31 identifies a range of travel improvements for the main towns and growth areas, including improved active travel networks, quality of streets and movement corridors and bus networks.

8.44 Streets which prioritise people and active travel over car traffic will be provided by new or improved routes, which will connect key destinations and form resilient primary movement corridors within settlements.

8.45 Measures to enable the delivery of a *low carbon* and low emissions bus fleet will need to be considered in partnership with bus operators.

8.46 More detailed transport infrastructure routes and requirements will be identified in the GESP allocations policies and in the *Infrastructure Delivery Plan*, both of which will be published within and alongside the next version of the GESP. Further locations, including towns, may be added depending on the outcome of this consultation and the sites proposed for allocation in the next version of the GESP.



Cycle bridge in Exeter



## POLICY GESP32:
## Gigabit Ready Developments

To ensure that residents and businesses in new buildings have access to a choice of fixed and mobile internet services with a potential for reliable and resilient gigabit per second speeds, new developments will:

A. Incorporate digital infrastructure as one of the essential utilities, with routing and phasing planned comprehensively alongside the other utilities in a Utility Network Plan
B. Provide a network of open access ducting (open to all fibre providers) suitable for and including full-fibre connections to each building. Ducting must have capacity to accommodate and enable multi-operator fibre to the premises to encourage competition and choice for consumers
C. Demonstrate that suitable arrangements have been made for the ownership, management and maintenance of the open access ducting, for instance through transfer to a "Dig Once" mutual or trust
D. Make financial contributions towards improving off-site digital infrastructure, where necessary and viable.

Sites of at least 500 dwellings or 5ha of employment should ensure resilience by seeking to provide at least two physically separate external connections points.

8.47 High quality digital connectivity underpins the draft GESP vision as one of the essential utilities. Access to high speed, reliable fixed and mobile connectivity for businesses and residents will support steady changes to the area's economy and is therefore a key plank of the draft GESP vision. Domestic broadband use continues to grow and home working and remote service access is increasingly necessary as standard. As network reach and capacity increases, there will be travel reduction benefits that support the proposed GESP transport strategy and the potential for further travel-related innovations.

8.48 Planning has a role to play in ensuring new developments are future-proofed and avoid unreasonable barriers to the delivery of infrastructure needed to achieve improved connectivity across the area. This is supported by the *National Planning Policy Framework* and wider government preference for a competitive market using "*fibre to the premises*" capable of 1 gigabit per second speeds. Allied to this is the GESP's aim to promote and accelerate investment in such networks by multiple providers so as to stimulate competition. On this basis draft policy GESP32 is underpinned by twin digital infrastructure objectives to:

1. Reduce barriers (practical and financial) to the installation of, and access to, the most advanced digital connectivity technologies that are reasonably possible for providers and users (at present, *gigabit-capable* services); and
2. Support consumer choice and effective market competition by requiring ducting sufficient to allow more than one provider to service a development.

8.49 The initial requirement is that digital infrastructure is planned out from the start and coordinated with other necessary utilities (such as water, sewerage, electricity and district heating networks). We suggest this can be achieved by the submission of a comprehensive *Utility Network Plan* for the site. The necessary ducting and fibre can then be laid alongside other utilities using a "*dig once*" approach to service the site. This will reduce costs and disruption during construction and in the future.

8.50 Ensuring that all new buildings and developments (in *use classes A, B, C and D*) have suitable duct and riser space designed-in and built-in from the start will remove unnecessary cost and delay to the telecoms industry, thereby stimulating market competition and enabling *gigabit-capable* connectivity. Draft policy GESP32 requires that *open access ducting* open to all fibre providers with capacity for multiple providers to lay sub-ducting and/or fibre is provided in all new buildings. As knowledge improves and technology matures and develops, digital infrastructure requirements will need to be updated too.

8.51 The ducting will need to be open to additional fibre provision without barriers and in perpetuity, to encourage a more competitive, open digital market. This will be secured through *planning obligations* or legal agreements. Ongoing ownership, management and maintenance of this ducting will need to be considered and demonstrated by the applicants. Draft policy GESP32 proposes that the Greater Exeter councils can work in partnership with public and private stakeholders to set up a "*dig once trust*". Once in place, this trust will be willing to take such assets on.

8.52 In some cases, it may be necessary for off-site digital infrastructure to be improved or upgraded to enable *gigabit-capable* connectivity. Where this is necessary, we propose that fairly related in scale and kind, and as viability allows, developments should make financial contributions towards these works. This may include contributions towards delivery of the digital spine proposed in draft policy GESP33.

8.53 Strategic-scale developments require additional levels of resilience in terms of their digital connectivity. For this reason, we propose that developments of at least 500 homes or 5ha

employment (gross site area) should ensure that they are served by at least two physically separate connection points arising from two separate *points of presence*.

## POLICY GESP33:
## Digital Spine

To support the digital and economic transformation of the Greater Exeter area, the Greater Exeter councils will work together with public and private sector partners to develop a regional fibre spine as indicated on the transport strategy diagram (Figure 8.1) and Key Diagram [to be published in the next version of the GESP]. The regional fibre spine will:

A. Provide gigabit-capable full-fibre connectivity across the GESP area, linking to key assets along their routes
B. Provide a network of open access ducting with capacity to accommodate multiple fibre optic cables and/or sub-ducting
C. Enable the development of carrier neutral Digital Exchanges at key nodes
D. Be owned, managed and maintained by the Greater Exeter Digital Infrastructure Cooperative

8.54 To support the digital and economic transformation of the Greater Exeter area, the Greater Exeter councils are committed to work together and with public and private partners to create a Greater Exeter Digital Infrastructure Cooperative. This will be a community organisation run on a cooperative and mutually beneficial basis by its members. It will invest in, manage and maintain infrastructure that can lead to the digital and economic transformation of the area. The Cooperative will comprise the Greater Exeter councils and any public and private sector stakeholders with an interest in furthering the digital and economic transformation of the area. The Cooperative will lay a regional spine of *open access ducting* and fibre connecting key assets along its route, using *dig once* opportunities wherever possible. Commercial operators, community groups and public sector partners will be able to lease space within this ducting through which to "blow" their own fibre optic cables, or pay to splice into the network at various points along it. This will provide opportunities for new and improved connections for anyone, including hospitals, public authorities, large businesses or entire rural villages. The digital spine will also stimulate commercial rollout of *gigabit-capable* fibre to premises across the area.

8.55 In addition to the regional spine, the development of *Digital Exchanges* are fundamental to the digital and economic transformation of the area. *Digital Exchanges* are neutral exchange points for digital networks (physical and electronic) to meet, offering low cost internet transit and hosting, shared space for server location and data centres and flexible office space with technical/ business support. They have the potential to act as a catalyst to the growth of digital and tech-creative industries and encourage clustering of such businesses.

8.56 The regional spine will be connected to the main *Digital Exchange* (DEX) which is likely to be located in Exeter city centre. Exeter *Digital Exchange* (E-DEX) will act as a main hub of digital connectivity on this regional spine, and will include the full suite of DEX features. The regional spine will have key nodes along it where branches of the network meet and where significant demand exists. These nodes will benefit from the development of local DEX points which can act as satellites to E-DEX and spread the benefits across a wider area.

# Chapter 9: Nature

**Introduction and Summary**

9.1 The quality of the natural environment is a vital asset of the Greater Exeter area. This chapter focuses on key cross boundary environmental issues that benefit from a Greater Exeter wide consistent policy approach. Many of the natural environment and other environmental protection policies are, and will continue to be, contained within national guidance and district level *local plans* and do not need to be repeated in the GESP. To achieve the "greater places for nature – rebuilding *biodiversity* and peoples' access to it" priority of our draft GESP vision, the draft policies in this chapter propose to:

- Ensure that developments provide at least a 10% overall enhancement in *biodiversity*
- Provide a strategy to protect the internationally important wildlife sites of the Exe Estuary, Dawlish Warren and East Devon Pebblebed Heaths through the funding of on-site management and off-site *Suitable Alternative Natural Greenspace (SANG)*
- Define new limits to the Clyst Valley Regional Park and provide a strategy for its protection and enhancement
- Facilitate the planting of 10,000 hectares of new woodland creation to link with existing woodland and *biodiversity* networks

9.2 Alongside the next version of the GESP a draft *Greater Exeter Green Infrastructure Strategy* will be published, setting out the locations of existing areas of high *biodiversity*, the corridors and sustainable movement networks that connect them, and the key areas of accessible open space. This context will provide a basis for environmental issues to be considered when planning for growth across the Greater Exeter area.

## POLICY GESP34: Rebuilding Biodiversity

**Major development proposals will demonstrate at least 10% net gain in biodiversity compared with the pre-development situation by including or funding biodiversity enhancements, as appropriate. Biodiversity losses, compensation and enhancements will be calculated using the most recent nationally endorsed biodiversity metric, taking into account any adopted local authority guidance. Compensation and enhancements will be delivered in accordance with the Local Nature Recovery Strategy and Network [emerging] and secured by planning conditions and/or planning obligations.**

9.3 To achieve the government's commitment to halt the overall decline in *biodiversity*, the *National Planning Policy Framework* requires the planning system to minimise impacts on, and provide *net gains* for *biodiversity*[1]. Development that adopts a *biodiversity net gain* approach seeks to make its impact on the environment positive, delivering improvements through habitat creation or enhancement after avoiding or mitigating harm as far as possible. This includes establishing coherent ecological networks that are more resilient to current and future pressures.

9.4 All development has the potential to impact both positively and negatively on local *biodiversity*, with effects on existing features and proposals for conservation or improvement. Draft policy GESP34 seeks to ensure that development within the Greater Exeter area consistently rebuilds *biodiversity* by requiring *net gains*.

1. In October 2019, the UK Government presented the Environment Bill for England, which includes a new national requirement for a 10% '*net gain*' to *biodiversity* in development projects. If enacted in its current form, this would supersede the need for GESP36.

9.5 *Net gains* would need to be demonstrated. We suggest this should be achieved through use of a *national biodiversity metric* which considers habitat types as the proxy for the *biodiversity* in a given area, supplemented with information about condition, distinctiveness and connectivity. Local Nature Recovery Strategies and Networks are being developed by local authority ecologists and Natural England, and should be used to facilitate the delivery of *net gain*. The *Greater Exeter Green Infrastructure Strategy*, which is being developed alongside the GESP, could provide information for compensation and enhancement proposals, ecological network mapping and identify potential locations to achieve *biodiversity net gain*; as this work emerges our approach will be refined.

9.6 The application of draft policy GESP34 does not override national and local policies for the protection of defined *protected* or *priority species*, *priority habitats* and *irreplaceable features*. Where there is potential for a proposed development to cause harm to internationally, nationally or locally designated sites, *protected* or *priority species*, or *priority habitats*, applicants (alongside the local authority as competent authority in HRA matters) would still need to undertake appropriate surveys and assessment to a nationally recognised standard prior to the submission of a planning proposal (see *Natural England Standing Advice*).



The River Exe flood relief channel

## POLICY GESP35:
## Woodland Creation

To accord with the advice of the Committee on Climate Change (CCC), 10,000 hectares of new woodland will be created within the GESP area by 2040.

The Councils will seek to encourage or deliver appropriate woodland creation in areas identified in Figure 9.1 as offering the highest opportunity to expand and connect existing woodland. Development proposals located within these areas of higher priority will maximise opportunities to undertake woodland creation.

9.7 Trees provide an enormous multifunctional benefit to people and wildlife, helping to improve our health, providing *biodiversity* habitats and recreational opportunities, preventing flooding and improving air and water quality.

9.8 Approximately 12.5% of the GESP area is currently covered by recognised woodland (National Woodland Inventory), which equates to approximately 27,000 hectares. This is broadly consistent with the national average for England of 13% coverage, which is three times lower than the European average of 37% and makes the UK one of the least wooded countries in the continent.

9.9 Only 1,420 hectares of trees were planted in England in the year to March 2019, 71% short of the government's target of 5,000 hectares in the period.

9.10 The Committee on Climate Change (CCC) has recommended that 30,000 hectares of woodland be created across the UK every year to take the national average from 13% land coverage to 17%– the equivalent of 1.5 billion new trees.

9.11 Should this 17% target be applied to the Greater Exeter area, this would equate to the delivery of a total of 10,000 hectares of new woodland. Given that trees are generally most efficient at capturing carbon between the years 20 - 50 following planting it would be necessary to "front-load" delivery of these into the earlier stages of the *plan period*. A new native woodland can capture 300-400 tonnes of $CO_2$ equivalent per hectare ($tCO_2e$/ha) by year 50, and 400-500$tCO_2e$/ha by year 100 (Forestry Commission).

9.12 Whilst the majority of tree planting is considered to be permitted development, given the urgency of tackling climate change reflected in each Greater Exeter council's climate emergency declarations it is considered important to provide an overarching strategy which targeted the areas in which woodland creation would be most beneficial, and to provide a target by which the scale of new treed areas can be highlighted and monitored against. The *biodiversity net gain* requirement set out in draft policy GESP35 (and included in the Environment Bill) has the potential to be an important mechanism for woodland creation.

9.13 Councils, developers and landowners alike will play an active role of the delivery of these targets through *direct delivery*, in particular the incorporation of woodland creation on agricultural land and in areas of open and recreational spaces within and outside development proposals.

9.14 However, given the scale of the task, it is improbable that existing incentives will create the environment necessary to be able to deliver the targeted scale of woodland creation and therefore the Greater Exeter councils will likely need to play an active role, considering opportunities to purchase or repurpose existing owned land for the delivery of new woodland

areas alongside partnerships with bodies such as the Woodland Trust and the Forestry Commission.

9.15 Given the high up-front costs of purchasing land, advantage will need to be taken of regular and one-off finance streams, including the Woodland Carbon Fund and Woodland Creation Grant which can provide both one-off payments and a regular funding steam into the future. As the need to decarbonise to meet climate targets becomes more acute, it is expected that further funding streams will be made available, including those expected to be introduced in the upcoming Environment Bill. The use of *biodiversity net gain* payments is another potential source of funding.

9.16 Figure 9.1 shows the woodland creation priority areas based on the existing woodland in the Greater Exeter area. Higher numbers/darker colours indicate greater opportunities to expand and connect existing woodland based on Lawton principles to deliver "more, bigger, better and joined" ecological networks to maximise *biodiversity* gain. Woodland creation opportunity mapping is a factor being incorporated into work on *biodiversity net gain* Local Nature Recovery Networks, to ensure draft policy GESP34 and GESP35 maximise opportunities to dovetail. All new areas of woodland should accord with the UK Forestry Standard (UKFS).

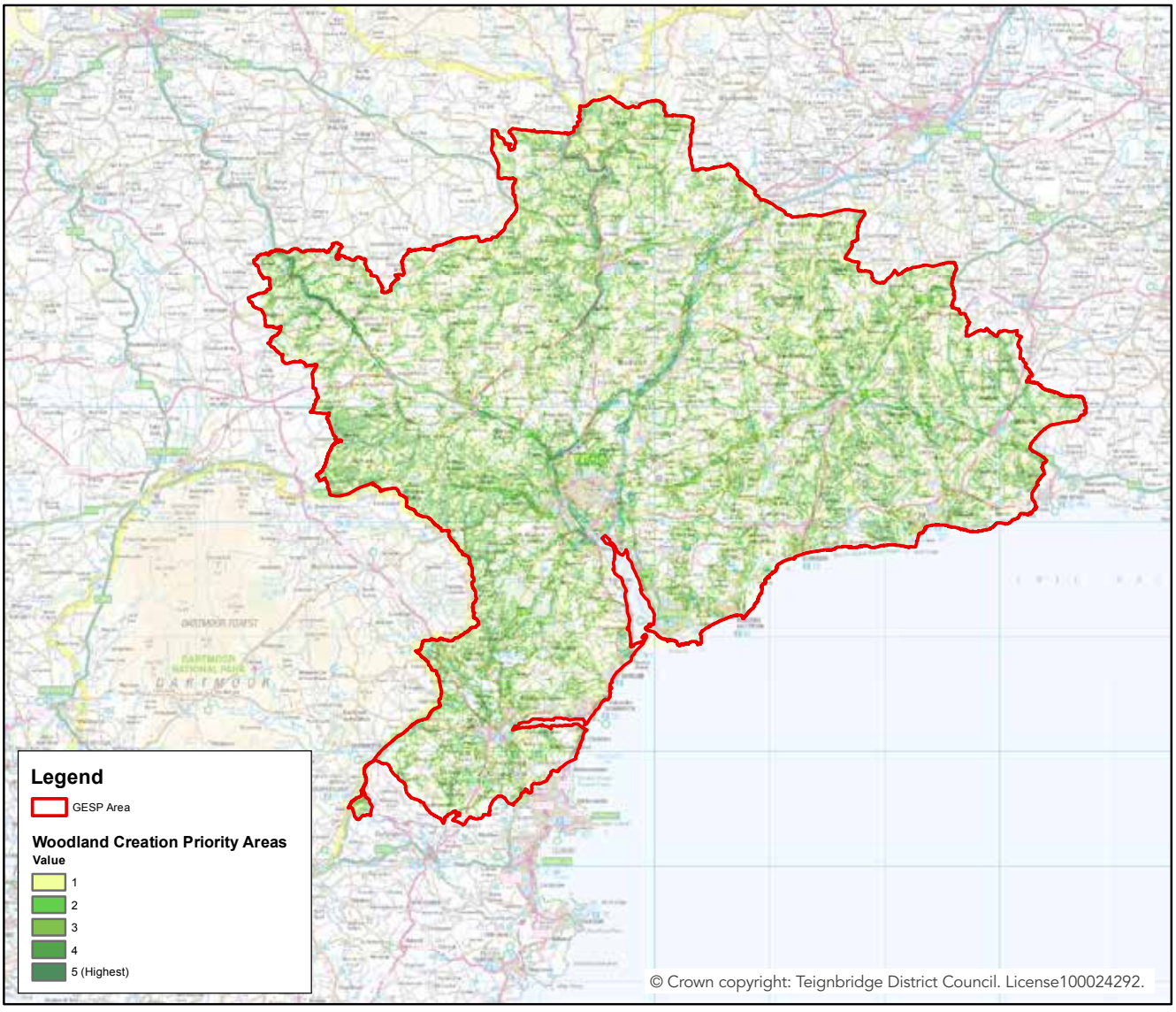



**Figure 9.1** Map showing opportunity areas for the creation of woodland

## POLICY GESP36:
## Exe Estuary, Dawlish Warren and East Devon Pebblebed Heaths

To mitigate additional pressure on the Exe Estuary Special Protection Area and Ramsar site, Dawlish Warren Special Area of Conservation and East Devon Pebblebed Heaths Special Area of Conservation and Special Protection Area (the 'protected sites'), the following limitations and requirements will apply to development:

A. Additional residential development will not be permitted within 400m of the East Devon Pebblebed Heaths Special Protection Area and Special Area of Conservation
B. Development will only be permitted within 400m of the Exe Estuary Special Protection Area and Dawlish Warren Special Area of Conservation where an Appropriate Assessment can show there will be no adverse effects to those sites, including effects arising from urbanisation impacts
C. Development of residential or holiday accommodation within 10km of one of more of the protected sites, as shown on Figure 9.2, will be required to pay a Strategic Access Management and Monitoring (SAMM) fee per additional dwelling or tourist bedspace, to be calculated annually based on the most up to date South East Devon European Site Mitigation Strategy (or equivalent) and its implementation plan
D. Development of residential or holiday accommodation within 10km of one of more of the protected sites, as shown on Figure 9.2, will be required to provide and maintain Suitable Alternative Natural Greenspace (SANG) in perpetuity, either:
    a. In accordance with SANG provision as set out in a development plan allocation, at the expense of the development and early in the delivery of the site, or
    b. Where development is without an associated SANG identified in an allocation policy, pay a financial contribution to the Local Planning Authority sufficient to provide and maintain 180 square metres of SANG per dwelling or tourist bedspace in an appropriate strategic location
E. Provide any other specific measures to avoid residual impacts identified from Appropriate Assessment



9.17 The Greater Exeter area contains and is close to a number of internationally important wildlife sites (Figure 9.3). These sites form part of *Natura 2000*, an international network of sites important for nature conservation established under the European Community Wild Birds and Habitats directives.

9.18 To ensure the GESP does not harm the *Natura 2000* sites, *Habitats Regulations Assessment* work is underway. The *Habitats Regulations Assessment* identifies which *Natura 2000* sites might be at risk of harm, considering the nature of the harm ('likely significant effects') and the mitigation required to avoid this occurring. As the specific development proposals of the GESP emerge, their impact on the *Natura 2000* sites will be considered and appropriate policy requirements will be included in the GESP.

9.19 In advance of the completion of this work, one already flagged issue requiring policy consolidation is the approach to protecting the Exe Estuary, Dawlish Warren and the East Devon Pebblebed Heaths. This builds on an on-going effort to protect the sites from development pressure and is set out in draft policy GESP36.

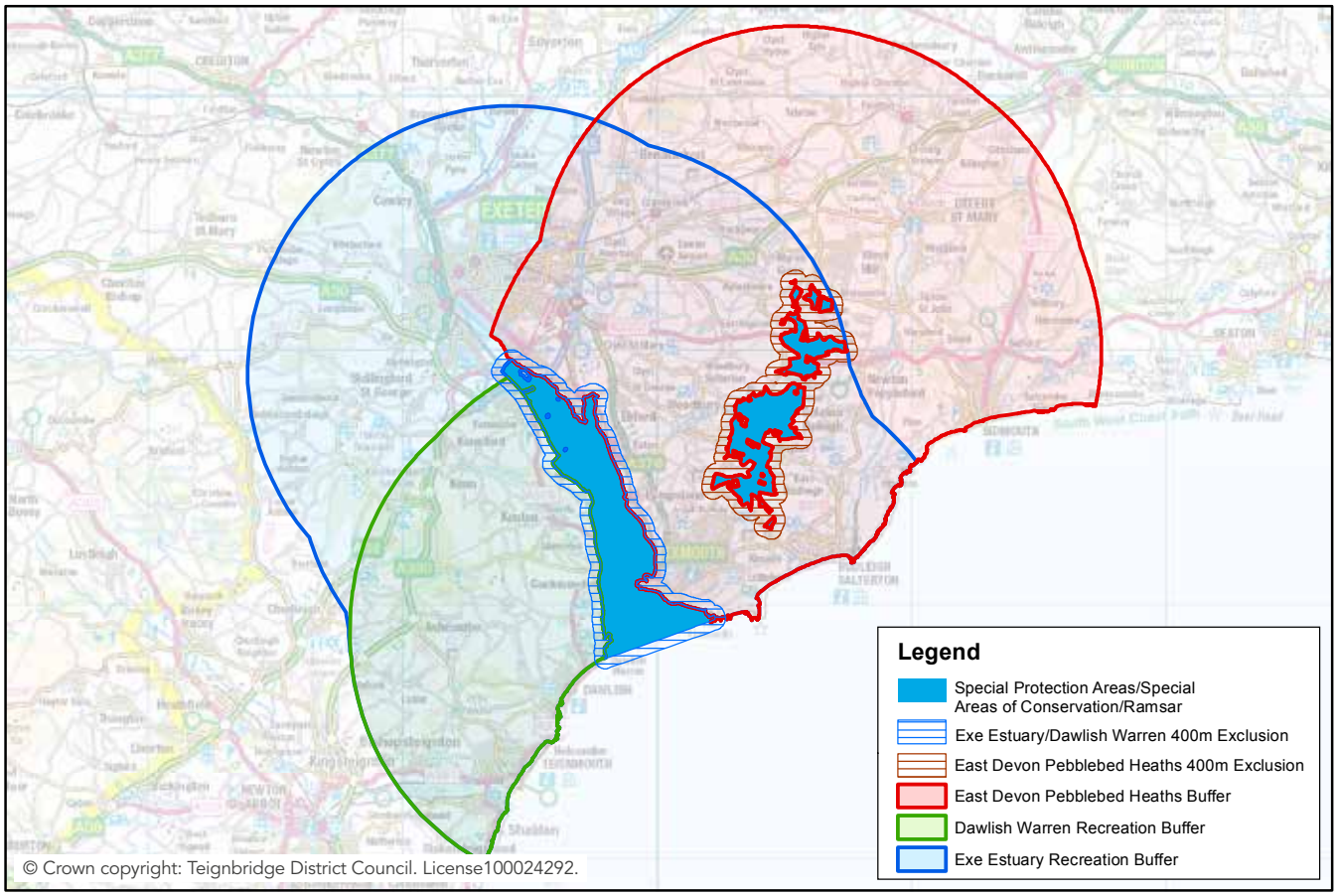



**Figure 9.2** Map showing zones referred to in draft policy GESP36

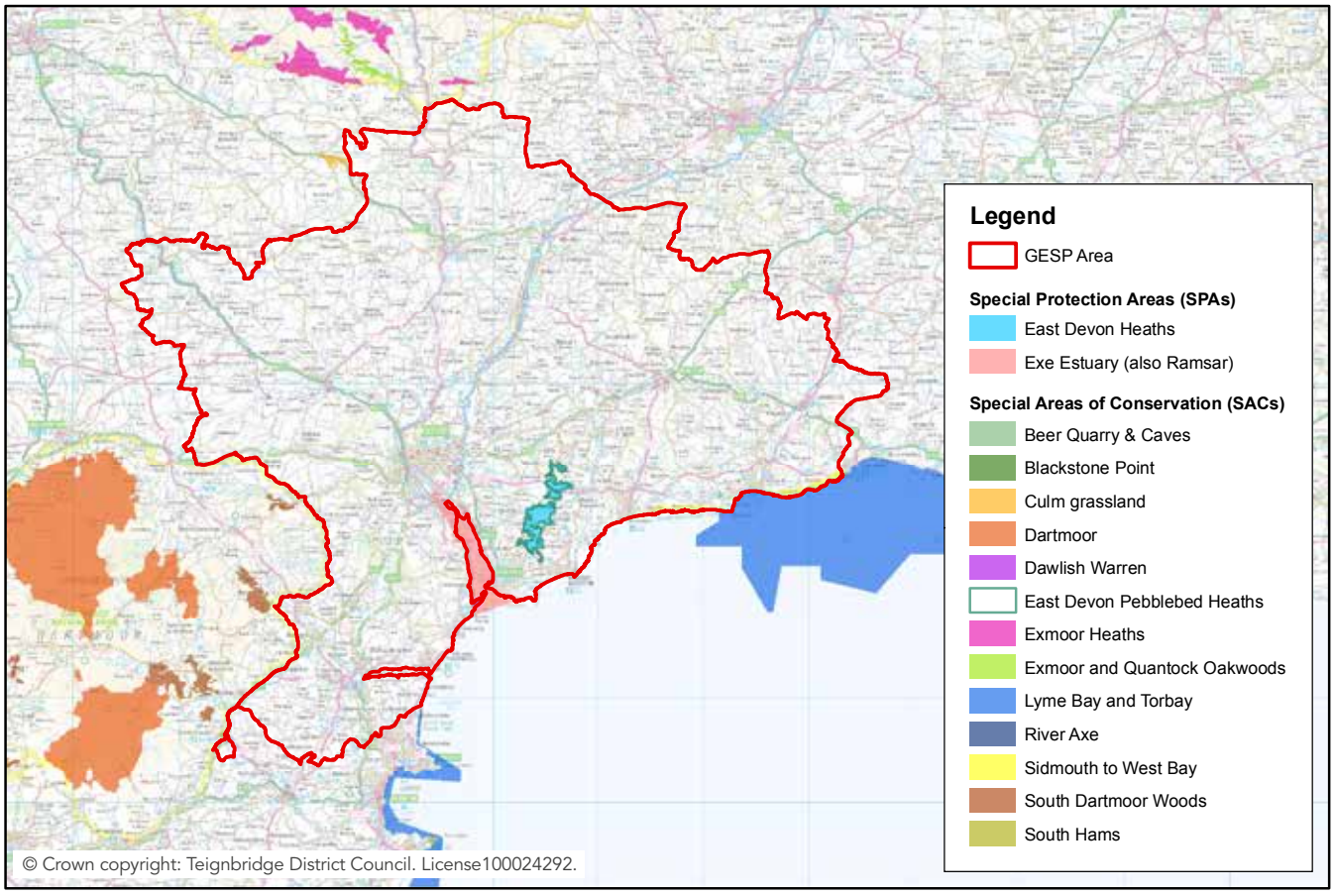



**Figure 9.3** *Natura 2000* sites in or near to the Greater Exeter area

9.20 Predation of birds by domestic cats is a pre-existing concern for the East Devon Pebblebed Heaths. To help preserve the integrity of this site, draft policy GESP36 ensures new dwellings will not be allowed on or within 400 metres of the East Devon Pebblebed Heaths *Special Protection Area* and *Special Area for Conservation*. This measure also protects the sites from additional general urban effects, recreation and fragmentation/ isolation. This is consistent with existing East Devon *Local Plan* (2016) policy. Draft policy GESP36 also seeks to protect the Exe Estuary *Special Protection Area/Ramsar* and Dawlish Warren *Special Area of Conservation* from additional general urban effects, recreation and fragmentation/isolation by nearby development (within 400m). This avoids adding to existing levels in urban areas or creating new issues in non-urban areas.

9.21 Previous and current *Habitats Regulations Assessment* work identifies recreational disturbance due to new residential and tourism development within about 10km is a potential risk of harm to the Exe Estuary *Special Protection Area* and *Ramsar* site, Dawlish Warren *Special Area of Conservation* and the East Devon Pebblebed Heaths *Special Area of Conservation* and *Special Protection Area.* These 10km zones are illustrated in Figure 9.2 and referred to in draft policy GESP36. To ensure that future development proposals are acceptable and will not lead to adverse impacts or worsening of habitat integrity an updated *South East Devon European Site Mitigation Strategy* will be prepared alongside the GESP. This will also look at district *local plan* impacts. The current *South East Devon European Site Mitigation Strategy* is implemented under a joint Habitats Mitigation Executive Committee comprising of East Devon, Exeter and Teignbridge councils.

9.22 The current *South East Devon European Site Mitigation Strategy* identifies that recreation pressure from additional development in the defined zones can be alleviated by a combination of:

- Strategic Access Management and Monitoring (SAMM) measures, for example including ranger time, zoning, car parking management, education etc.
- The provision of *Suitable Alternative Natural Greenspace (SANG)*, with around 8 hectares for every net new 1,000 residents accommodated through development. At an assumed average of 2.3 persons in each new home built this equates to around 180 square metres of *Suitable Alternative Natural Greenspace* per net extra dwelling. *Suitable Alternative Natural Greenspaces* are semi natural open space areas that should be specifically appealing to dog walkers. Unless the site is provided for the sole use of a local population living within a 400m catchment the provision of free parking is essential (with context considered). These areas should be closer to users homes that the protected site, and of a scale to supply a choice of walking routes (up to 5km desired). Sites must be provided and maintained 'in perpetuity' with unrestricted public access.

9.23 It is considered that the updated *South East Devon European Site Mitigation Strategy* will continue and expand on the existing approach. Where necessary *Suitable Alternative Natural Greenspaces* will be identified on the *policy map*, demarcated in allocation concept plans and considered critical infrastructure within the *Infrastructure Delivery Plan* (all of which will be published within and alongside the next version of the GESP). Draft policy GESP36 also proposes that for some planning proposals a financial contribution will be required to contribute to measures (including *Suitable Alternative Natural Greenspace*) offsite.

9.24 A vital part of the *South East Devon European Site Mitigation Strategy* is monitoring, to ensure the ends envisaged are achieved. In light of monitoring information, the *South East Devon European Site Mitigation Strategy* will be continue to be updated as necessary.

## POLICY GESP37:
## Clyst Valley Regional Park

Land is designated on the policies map [to be published with the next version of the GESP] as the Clyst Valley Regional Park (see Figure 9.4). The Regional Park will provide high quality, accessible natural green space and enhance biodiversity, landscape quality and the historic environment. Developer contributions, the Community Infrastructure Levy and other sources will fund its delivery. A masterplan will be prepared, setting out how the Regional Park will deliver:

A. Suitable Alternative Natural Greenspace (SANG) to mitigate the recreational impact of development on Natura 2000 sites
B. A network of multi-use trails providing recreational and commuting routes from homes to employment and recreation sites in Exeter and the West End of East Devon
C. An increase in the amount of priority habitats
D. An increase in the population of protected or priority species by ensuring that breeding, resting and feeding sites are protected and enhanced
E. An improvement in the health and wellbeing of residents in East Devon and Exeter
F. A reduction in flood risk by implementing natural flood management
G. An improvement in the water quality of the River Clyst and tributaries, thereby achieving Water Framework Directive targets
H. The conservation and enhancement of heritage assets, particularly those 'at risk'
I. Opportunities for the public to understand and enjoy the natural and cultural heritage of the Park and contribute to its conservation and enhancement

Development within the designated area will not be permitted unless it contributes to the achievement of these objectives.

Where irreconcilable conflicts exist between the conservation of priority habitats or species and public enjoyment, then conservation interest will take priority.



9.25 The valley of the river Clyst forms an extensive area containing a variety of recreational, *biodiversity* and heritage features including the key estates of Killerton, Poltimore House and the publicly accessible woodlands of Ashclyst Forest, Whitedown, Paradise Copse and Danes Wood. In acknowledgement of these important features, the Clyst Valley Regional Park was designated in the East Devon Local Plan (2016).

9.26 Since *adoption* of the East Devon Local Plan (2016), a series of new and improved greenspaces have been delivered as part of the Clyst Valley Regional Park. These include the Cranbrook Country Park, Poltimore Park, Pinn Brook Park and new areas of woodland and orchard through the ongoing *Great Trees in the Clyst Valley* project. In addition, 1km of the 13km recreational/ commuter Clyst Valley Trail has been delivered, forming the backbone of the new park.

9.27 The importance of delivering the Clyst Valley Regional Park is re-affirmed with the development pressure within the Greater Exeter area. To ensure the natural asset of the Clyst Valley Regional Park is maximised and to achieve our draft GESP vision of delivering a health promoting environment for our residents and creating great places for nature, draft policy GESP37 proposes extending the regional park boundary to incorporate the Lower Clyst with two linking corridors extending along the feeder watercourses of the Aylesbeare stream and the Grindle Brook. The extent of the Clyst Valley Regional Park is shown in Figure 9.4.

9.28 Delivery of the southern section of the Clyst Valley Regional Park will incorporate linked recreational routes and could have the potential to include areas of *Suitable Alternative Natural Greenspace*.

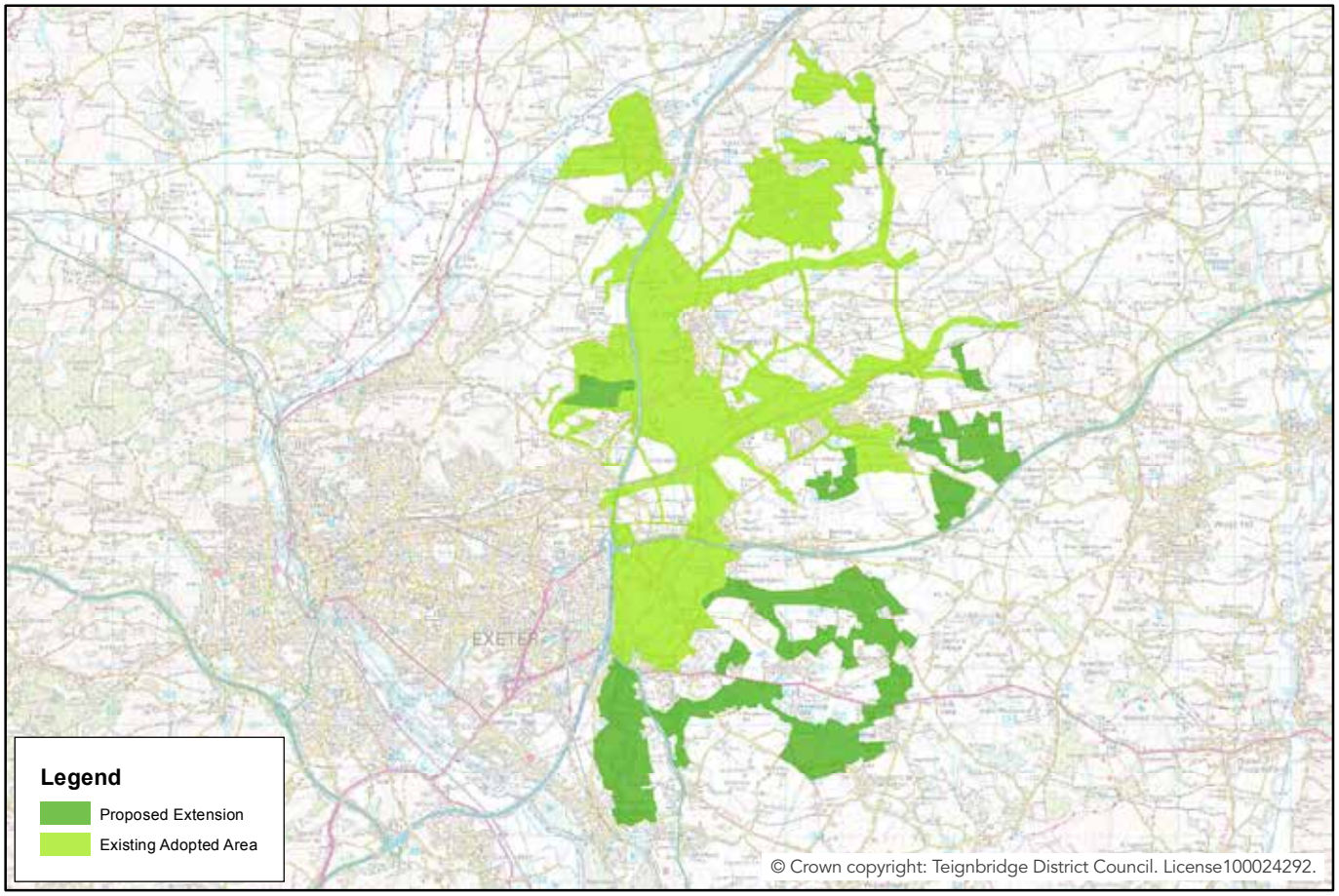



**Figure 9.4** Map showing revised boundaries of the Clyst Valley Regional Park

9.29 The Lower Clyst comprises the tidal reaches of the River Clyst extending from Clyst St Mary to the confluence with the Exe Estuary at Topsham. The area is prone to flooding which is likely to become more common and severe over time as a result of climate change-induced sea level rise. There are existing proposals to introduce flooding to create new intertidal habitat for birds to replace those lost as a result of rising sea levels in the Exe Estuary. It will be important to ensure that any development which will increase recreational activity in this area such as new open spaces or paths would not prejudice such proposals coming forward or cause disturbance to birdlife.

# Chapter 10: Quality Places and Infrastructure

**Introduction and Summary**

10.1 A key government focus is to increase the amount of housing being built. Whilst this is important, development also needs to be of a high quality in order to create successful places for our communities. This is supported by the *National Planning Policy Framework*. High quality development relies not only on good design. It requires joined-up thinking about achieving net-zero *carbon emissions*, green space, public realm, transport and the provision of buildings which are sympathetic to local character, history, nature and the landscape. High quality development also relies on the timely provision of infrastructure to ensure that the community has the facilities and services it needs to function successfully.

10.2 In addition to supporting high quality development, the government puts emphasis on delivery and sees the planning system as having a key role in securing infrastructure and ensuring no undue delay. This may require innovative new partnerships to be established with a specific delivery focus. For Greater Exeter area we consider a new joint board is required to achieve joined-up infrastructure prioritisation, agree collaborative funding and facilitate development delivery.

10.3 The provision of high quality development and a focus on delivery are two key elements of the GESP draft vision. This refers to making ambitious investment decisions whilst also highlighting the link between prosperous, healthy lives and the quality of homes.

10.4 With this in mind, this chapter includes policies which seek to direct the delivery of great places in the Greater Exeter area. The draft policies in this chapter propose:

- The strategic importance of delivering great places through masterplanning
- Innovative mechanisms to deliver the quantity of new homes needed
- The application of garden city principles for allocations and a series of potential new Garden Communities (dependent on the sites chosen following this consultation)
- An infrastructure categorisation approach for Greater Exeter area
- The strategic infrastructure proposals for Greater Exeter area
- The expectations regarding *viability appraisal*




Masterplanning diagram

## POLICY GESP38:
## Great Places

The strategic allocations contained in the GESP require a comprehensive approach to delivering high quality development with coordinated infrastructure provision. This will be managed by a series of plans supporting each allocation including illustrative concept plans which form part of each allocation policy. In addition, the following plans will be produced:

A. Masterplans for GESP allocations:
   a. Before outline or full permission is granted the local planning authority will prepare, consult on and approve the masterplan working with the site promoters
   b. The masterplan will be informed by the illustrative concept plan and will further define the requirements for the creation of a high quality new place, including the phasing of development, associated infrastructure and delivery mechanisms
   c. The masterplan will identify the detailed elements of residential, commercial, employment and community uses for the site together with the environmental, green infrastructure (including SANGs where necessary), community and design requirements
   d. For all GESP allocations the masterplan will include an allocation-wide design code commensurate with the scale of the development proposed
   e. The masterplan will identify the information and documentation which will be submitted alongside all planning applications
   f. Conditions or planning obligations imposed on outline and hybrid planning consents will ensure that future planning applications, and the resulting development, conform with the masterplan

B. Parcel plans for each phase of GESP allocations:
   a. The parcel plan will promote the highest quality design and amplify in detail the relevant development plan policies and the content of the masterplan
   b. The parcel plan will include a detailed layout plan at an appropriate scale
   c. For all GESP allocations the parcel plan will include a phase-specific design code
   d. The parcel plan will be prepared by the site promoters and the local planning authority will be actively involved in its preparation
   e. Outline planning consents will include conditions requiring that a parcel plan for each phase of development is submitted to and approved by the local planning authority
   f. Reserved matters or full planning applications will only be permitted where they accord with the parcel plan which has been approved by the local planning authority.



10.5 The sites being considered for allocation in the GESP are strategic in scale (see Section C for details). Development of such sites will involve reconciling a wide mix of uses, multiple landowners and developers and delivery will be complex involving major infrastructure investment from many providers. It is therefore essential that the sites are planned in a coordinated fashion to ensure early delivery at pace alongside high quality design and the provision of necessary infrastructure. A masterplanning process to achieve this is described in draft policy GESP38.

10.6 The masterplanning process will follow three stages, each adding a layer of detail and certainty to the outcome of achieving high quality places. This is explained in Figure 10.1.

10.7 This staged approach to preparing development proposals provides clarity over the level of detail and evidence required, enabling decisions on the relevant planning applications to be much smoother, quicker and more certain. Quality can be ensured by the clear phase by phase guidance on relevant layout and design concepts set within the overarching context of the masterplan.

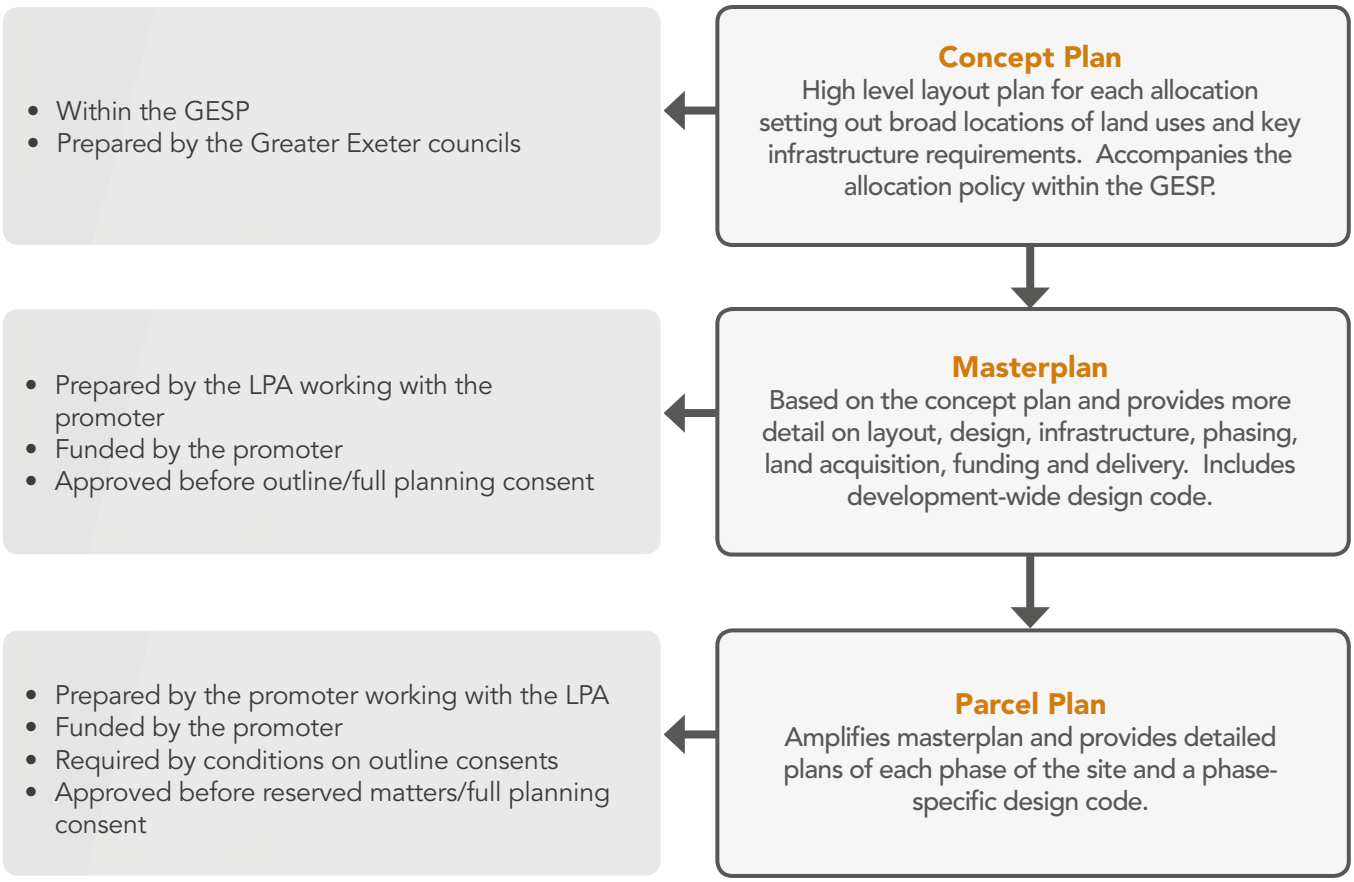



**Figure 10.1** GESP approach to the masterplanning process

10.8 Masterplans and parcel plans should be prepared in accordance with any local design policies, guidance or toolkits, such as the emerging *Liveable Exeter* toolkit for future place-making. The associated place-making approach sets a series of important considerations for delivering high quality development which should be applied in the preparation of the masterplans:

- Recognition of the profile of the local area through an understanding of function, characteristics, opportunities and constraints
- Understanding the drivers of change in the local area
- Applying place-making concepts including the garden city principles and others identified locally

10.9 Draft policy GESP38 applies to the GESP allocations (when identified in the next version of the plan) but not allocations included in *local plans*. The Greater Exeter councils have additional masterplanning and design policies within *local plans* which would apply to both GESP and *local plan* allocations.

10.10 In terms of considering planning applications, the Greater Exeter councils support the use of *planning performance agreements*, ensuring that the local planning authority have sufficient resources to carry out the work and deal with the planning applications. This also gives applicants the benefit of an agreed timetable for the work.

## POLICY GESP39:
## Delivering Homes and Communities

To deliver the homes needed at a faster pace and at a higher quality, a series of mechanisms will be put in place. The Greater Exeter councils will:

A. Establish publicly accountable, locally-led development corporations to pursue quality, certainty and pace of development delivery
B. Proactively bid for and, if appropriate, establish, joint ventures to secure further external infrastructure funding
C. Seek additional legal powers and planning freedoms where these would support delivery
D. Where abnormal development and early infrastructure costs are proven to significantly undermine development viability, consider the provision of short term, repayable financial support, in conjunction with Homes England or other bodies, to enable early starts and faster delivery
E. Where feasible, consider direct involvement in land assembly, to bring forward sites more quickly and comprehensively
F. Apply a proactive approach to preparing masterplans, infrastructure planning, development management, investment and delivery

10.11 The majority of sites being consider for the GESP are likely to be large, complex and in multiple land ownerships. They will also require significant up-front investment in infrastructure for their delivery. These factors are likely to make them challenging to bring forward quickly. It is therefore a key requirement of the GESP that development delivery is managed proactively with a more hands-on approach from local and national government. A key part of this will be the establishment of one or more locally led development corporations to bring forward development at the largest sites. In addition, the Greater Exeter councils will continue working with Homes England and other partners to bring forward development proactively and in doing so will consider providing finance and support in land assembly. This will not only increase the pace of development which comes forward on these sites but will also improve development quality. Both these objectives are critical to the achievement of the GESP draft vision.



## POLICY GESP40:
## Garden City Principles

The Greater Exeter councils will pursue the delivery of high quality development applying garden city principles to residential and *mixed use* GESP allocations:

A. Residential and *mixed use* allocations will be delivered in accordance with garden city principles to:
   a. Create distinctive, local identities through strong visions
   b. Ensure well designed, vibrant, mixed uses places including a range of local facilities
   c. Support healthy lifestyles and provide local healthcare for everyday needs
   d. Provide a variety of high quality and flexible affordable and market homes
   e. Deliver appropriately phased and designed infrastructure which plays a positive role in place-making and building communities
   f. Support a wide range of accessible, local jobs and provide the education and skills to support local employment
   g. Enhance the natural and historic environment and provide comprehensive green infrastructure, facilitating and encouraging recreational use within the site
   h. Ensure that all new residential, employment and commercial development will deliver net zero carbon emissions and is resilient to the effects of climate change
   i. Deliver high quality, integrated, multi-modal and low carbon transport options
   j. Ensure development is future proofed and resilient to change
B. The Greater Exeter councils will deliver a series of garden communities at[2]:
   a. Culm Garden Village
   b. Exeter and East Devon Garden Communities
   c. Newton Abbot
C. The garden communities will follow the garden city principles and will also:
   a. Provide an appropriate scale of development for the communities to maximise self-sufficiency
   b. Foster community engagement in the planning process and local governance
   c. Ensure a legacy of community stewardship for the ownership and maintenance of assets and infrastructure
D. The garden communities will be delivered in an innovative way through:
   a. One or more locally-led development corporations
   b. Capturing a greater proportion of land value uplift
   c. Accessing finance and private sector investment
   d. The preparation of a detailed delivery strategy provided by the site promoter

10.12 Section C of this consultation seeks your views on GESP site options which could be taken forward as allocations as the plan progresses. These allocations will be supplemented with further proposals allocated in *local plans*. Although the allocations will vary in scale, all should be delivered at a high quality applying the garden city principles set out in draft policy GESP40. Pursuing the garden city principles will ensure that the resulting development creates high quality places and strong communities which are net-zero carbon.

10.13 Some of the potential GESP site options are particularly large, and could be *mixed use*. The scale of these large scale garden community site options means that there are opportunities to deliver them comprehensively and in an innovative way, using government support where available and ensuring the ongoing involvement of the community in their delivery and operation. The suggested approach for local governance, engagement and stewardship will mean that residents and the wider community actively take responsibility

2. There is the potential for additional locations to be included depending on the distribution of development which will emerge in future versions of the plan

for their local area and how it is run. The delivery of garden communities would require an innovative delivery model. This would include at least one development corporation where local authority and wider public sector representation would oversee the provision of the garden communities, capturing more of the value from land sales than generally takes place. This value, together with additional external finance, could then be invested in the quality of building, infrastructure and facilities. Delivery strategies will be required for the garden communities to consider land acquisition and disposal, the securing of funding for infrastructure delivery and arrangements for community stewardship.



Incorporating green space in new sevelopment



## POLICY GESP41:
## Infrastructure Classification

In order to make robust decisions on infrastructure funding and delivery the Greater Exeter councils will employ a clear and consistent classification of infrastructure:

A. Strategic infrastructure: Required to deliver the vision and priorities for the Greater Exeter area/ or multiple GESP site allocations. This infrastructure is identified in draft policy GESP42 and the GESP Infrastructure Delivery Plan [Infrastructure Delivery Plan to be published with the next version of the GESP].
   It is part funded by monies administered by a joint board considering the Greater Exeter area
B. GESP site infrastructure: Required to support individual GESP allocations. This infrastructure is identified in the GESP allocations policies and the GESP Infrastructure Delivery Plan [Infrastructure Delivery Plan to be published with the next version of the GESP]. It is funded by a varied package including community infrastructure levies, planning obligations, council monies and external sources
C. Local plan infrastructure: Required to deliver the vision of local plans, support local plan allocations and community priorities. This infrastructure is identified in local plan infrastructure delivery plans. It is funded through a package identified by the local planning authority

10.14 Draft policy GESP41 reflects the approach advocated by government in the *National Planning Policy Framework* which explains that the planning system should identify and coordinate the provision of infrastructure and that strategic policies should make sufficient provision for infrastructure alongside development. It supports the GESP draft vision by clearly establishing a classification of infrastructure requirements in order that the GESP '…makes the big cross-boundary decisions about growth and infrastructure in the Greater Exeter area looking many years ahead' whilst also identifying a framework to steer '…the ambitious investment decisions taken together by the local authority partners'. This approach provides certainty for the Greater Exeter councils, infrastructure providers and the development industry. It also reflects the proactive role of the Greater Exeter councils to invest in and bring forward development.

## POLICY GESP42:
## Strategic Infrastructure

The Greater Exeter councils will secure the delivery of a series of strategic infrastructure proposals for the Greater Exeter area in order to achieve the GESP vision, its priorities and/ or multiple GESP allocations. The strategic infrastructure proposals are timetabled to be delivered in the period up to 2040. They are:

[Projects to be determined after this consultation and identified here in the next version of the GESP]

These proposals are included on the key diagram, the policies map, where applicable in GESP allocation policies, and in the GESP Infrastructure Delivery Plan [all to be published within/ alongside the next version GESP]. The GESP Infrastructure Delivery Plan includes an infrastructure investment strategy to provide more detail on the mechanisms for delivering the strategic infrastructure proposals [to be published with the next version of the GESP].

The list of strategic infrastructure proposals may be amended as part of any future GESP review process, by a GESP Infrastructure Delivery Plan update or by agreement by the joint board referred to in draft GESP41 and below.

Funding for these proposals will be provided by:
A. A joint board for the Greater Exeter area
B. Where applicable, a locally-led New Town Development Corporation
C. Planning obligations and/or CIL
D. Government/Local Enterprise Partnership
E. Local authorities
F. Infrastructure providers

Decisions over the prioritisation, funding and delivery of the strategic infrastructure proposals will be made by the joint board which will:
A. Define the strategic infrastructure proposals
B. Manage a joint strategic infrastructure budget including a joint, recyclable Strategic Infrastructure Fund and
C. Maintain the GESP Infrastructure Delivery Plan

10.15 Significant, varied and costly infrastructure will be needed in the Greater Exeter area up to 2040. This is currently being identified through a collaborative infrastructure planning process which is ongoing and will culminate in a GESP *Infrastructure Delivery Plan*, reflecting the distribution and level of development proposed in the GESP. Some of the infrastructure projects need to be delivered using funding and agreement from more than one authority because of their scale or their wide impact, and these will be defined as strategic in draft policy GESP42. The GESP *Infrastructure Delivery Plan* will provide more detailed information on these strategic infrastructure proposals and will include an infrastructure delivery strategy to explain how these projects will come forward. A first version of this document will be published alongside the draft GESP.

10.16 Funding for the strategic infrastructure proposals identified within draft policy GESP42 should be secured from a range of sources. These include *planning obligations*, *Community Infrastructure Levy*, infrastructure providers and a range of external sources including the *Local Enterprise Partnership* and government. However, these proposals could be so significant that the Greater Exeter councils should commit to establish a new, joint mechanism for ensuring their delivery.

10.17 The structure and governance for this joint mechanism is still emerging but will include a joint board comprising Member representation from all of the Greater Exeter councils. This should make the decisions necessary to deliver the strategic priority infrastructure proposals required to support the GESP vision and development strategy. It should be responsible for setting infrastructure priorities and collaboratively securing and managing funding as defined in draft policy GESP42. In this role, the board would oversee a joint budget for strategic infrastructure and the management of a recyclable *Strategic Infrastructure Fund*. This would see funding invested in strategic infrastructure on a medium term basis to unlock challenging development sites. The investment would be paid back by developers over the medium term and then reinvested in future strategic infrastructure projects.

10.18 In addition to the strategic infrastructure proposals, there are a number of key infrastructure projects which will be identified to support specific GESP sites. This GESP site infrastructure will be fundamental to delivering the strategy for the area and will be identified in the GESP allocation policies and/or the masterplans. The projects identified will ensure that high quality development can commence in a timely manner.

10.19 Funding for the GESP site infrastructure should be secured from a range of sources. These could include *planning obligations*, *Community Infrastructure Levy*, infrastructure providers, the Greater Exeter councils and a range of external sources including the *Local Enterprise Partnership* and government. Because these infrastructure projects are site specific they will not be funded by the proposed joint board unless their importance is reviewed in future and they are added to the list of strategic infrastructure proposals.

10.20 The existing *local plan* and infrastructure planning mechanism is already in place to deliver *local plan* infrastructure. This mechanism includes the *local plan* process and associated *infrastructure delivery plans*. Infrastructure provided on this more local basis is required to deliver *local plan* visions, *local plan* site allocations and community priorities. As takes place already, funding for this infrastructure will be drawn from *planning obligations*, *Community Infrastructure Levy*, councils and a range of external sources. The arrangement proposed by draft policy GESP41 provides context for this existing arrangement and shows how it fits within wider thinking on infrastructure delivery across the whole of the Greater Exeter area.

10.21 This categorisation and funding arrangement does not undermine the importance of site and local infrastructure, but in general local infrastructure projects are not considered to need the formal involvement of the joint board. Instead, they can be managed by each individual planning authority in less formal partnership with other Greater Exeter councils and bodies.




Cranbrook train station

## POLICY GESP43:
## Viability

To ensure that developments provide the necessary, planned requirements to create and maintain sustainable settlements and neighbourhoods, deviation from policy requirements on grounds of viability will only be considered appropriate where one or more of the following have occurred to a significant degree since the adoption of the GESP and/or relevant local plan(s):

A. Increases in infrastructure or abnormal development costs which could not reasonably have been foreseen at the time of the GESP's and/or local plan's adoption
B. Adverse changes in building costs relative to sales values
C. Worsening of local market conditions such as a prolonged recession or an extraordinary local event demonstrably affecting incomes and development values

A viability appraisal of the development proposal will need to be submitted by the applicants explaining the circumstances which have led to the changes in viability since the GESP and/or local plan adoption. Any variation from the proposed policy requirements, and deviation from the assumption that site-specific infrastructure will be funded by development, will need to be justified.

The Greater Exeter councils will recover from applicants their reasonable costs associated with an independent assessment of submitted viability appraisals where a deviation from policy requirements is sought. The submitted viability appraisal and the independent review will be published by the local planning authority with the planning application documentation.

Where policy requirements are not met due to an agreed viability reason the viability of the proposal will be reviewed every three years in accordance with the requirements of this policy to seek to achieve full policy compliance in later development phases.



10.22 In order to have an effective plan, it is important that its development proposals are viable. In this context, viable means that they can be constructed meeting the planning requirements and still allow a reasonable incentive to a landowner to sell, and a suitable return to a developer reflecting the risk of development.

10.23 Planning *Practice Guidance* identifies that *viability appraisal* for development proposals is an integral part of the plan-making process. Allocations for the GESP will be considered in the context of policy requirements from both the GESP and *local plans* to establish their viability. This exercise will increase the likelihood that policy compliant development will come forward delivering the infrastructure, affordable housing and build-quality required to provide great places.

10.24 The assumption contained in national policy is that viability assessment is undertaken primarily at plan-making stage, and that proposals should therefore come forward in accordance with the GESP and local policies. However, draft policy GESP43 recognises that after the *adoption* of the GESP circumstances could change so significantly that viability may be affected. The policy indicates two potential changes which could be relevant, either site-specific or the state of the local and national economy. Under these circumstances, a site developer might submit a new assessment of development viability which indicates that a revised approach to the development of the site may be warranted. This process will need to be carefully justified and comprehensive evidence of changes will need to be provided. The proposed viability review mechanism in draft policy GESP43 will help to deliver the policy requirements later in the *plan period*.

10.25 The policy content of the plan has not yet been viability tested and therefore policy requirements may need to be revised in future versions of the plan.

# Section C

# Spatial Development Strategy and Site Options

# Chapter 11: Spatial Development Strategy

## Introduction and Summary

11.1 In this chapter, we consider the quantity and distribution of development within the Greater Exeter area, drawing strongly on the work in the *Sustainability Appraisal Report* which we are also asking your views on as part of this consultation.

11.2 The chapter first discusses how many homes the GESP should provide considering:

- The government requirements for housing provision
- The need for flexibility or 'headroom' in the housing number
- The number of sites which may be required to meet this need

11.3 This revisits the contents of draft policy GESP16 included in Chapter 7 of this consultation.

11.4 The chapter then goes on to consider the potential approach for distributing growth across the Greater Exeter area, suggesting an overarching spatial development strategy (with map) and alternatives.

11.5 The suggested spatial development strategy primarily focuses strategic developments at public transport nodes and corridors and at the main settlements with strong economic roles. Development would take different forms, including significant urban intensification, urban extensions and new garden communities.

11.6 Site options which accord with the suggested spatial development strategy have been grouped into four strategic growth areas. The individual site options falling within the strategic growth areas are detailed within Chapter 12.

## Number of Homes

11.7 The government has committed to fixing the broken housing market and a major element of that is to increase the rate at which new homes are built in England to 300,000 a year. In order to achieve this they have introduced a specific and rigid formula for deciding the local Objectively Assessed Need for homes in each council area. This is considered by the government to be the minimum number of homes that *development plan documents* should plan for.

**Applying the formula to the Greater Exeter councils leads to a minimum target of 2,663 homes per year, or 53,260 homes over the 20 year period of the plan.**

11.8 Research suggests that this number of new homes could improve housing affordability by about 20% (all other things being equal), bringing many more people into potential home ownership. The average house currently costs about 9.3 times the average wage, beyond the reach of large numbers of new families, first time buyers and other non-home owners. The provision of this number of new homes is forecast to bring the affordability ratio down to 7.3 - still not ideal but a much more likely proposition for many new households.

11.9 The *Sustainability Appraisal* considers options for higher growth rates and their potential environmental, social and economic impact. It is not considered that lower rates of growth are reasonable alternatives given the requirements of the *National Planning Policy Framework*.

### Headroom in Housing Numbers

11.10 It is a legal requirement that the GESP meets various tests of soundness. Two of these can be applied specifically to thinking about housing numbers. They are that a plan is:

- Positively prepared … as a minimum, seeks to meet the area's objectively assessed needs ...
- Effective – deliverable over the *plan period*

11.11 In terms of delivering new homes, these tests mean that plans cannot just allocate sites with a capacity equal to the housing need; they have to ensure that enough homes are built. The key method for ensuring that this occurs is what we term "headroom". This built-in flexibility allows for a variety of potential uncertainties such as allocations or commitments being started late, built out slowly or even not built at all.

11.12 The inclusion of large numbers of new homes within Exeter on complex *brownfield* sites is considered within Chapter 12. These include sites published in the City Council's *Liveable Exeter* document. They have major transport and other sustainability advantages. However, a number of these major sites are in many different ownerships, have existing businesses and other uses within them and require a lot of investment to make them happen. We therefore suggest that approximately a 20% "headroom" should be applied to the GESP housing target to reflect these risks to delivery.

11.13 This does not change the homes target, but increases the number of allocations needed to meet that target. It means that we are more likely to be able to show a *five year supply* of housing land going forward (a national policy requirement) and it will also help to meet the *Housing Delivery Test* required by the *National Planning Policy Framework*.

**Therefore the overall need for development sites would include 120% of housing needs:**

**53,260 homes X 120% = 63,912 homes**

### Existing Housing Sites

11.14 Existing planning commitments (that is, unbuilt homes with planning permission and sites in *local plans*) amount to about 33,390 homes. These provide about half of the homes required to meet the need above, and reduce the need for GESP or *local plan* updates to allocate additional land.

### How Many Houses on GESP Allocations?

11.15 Taking account of housing need, headroom and planning commitments, there is a need for 30,522 homes on additional sites.

**Housing need including headroom – Commitments = Housing on GESP allocations**

**63,912 homes - 33,390 homes = 30,522 homes**

11.16 These calculations are the basis for draft policy GESP16 Housing Target and Distribution (some of the figures have been rounded). To fulfil the housing requirement set out in this chapter, we suggest that the GESP needs to allocate land to build about 30,500 homes during the period of the plan (2020 – 2040).

### Spatial Development Strategy for the GESP

11.17 Using the draft GESP vision proposed in Chapter 4, we have identified key themes that should be acknowledged in the GESP spatial development strategy:

- Protecting key environmental assets
- Recognising the carbon impact of choices over development distribution (including travel and access to *low carbon* solutions for heating and power)
- Identifying accessible and well connected development locations to create the homes and jobs we need, which reduce the need to travel, enabling healthy living and reducing our carbon impact
- Seeking increased densities in our urban areas and around transport hubs, strengthening our *sustainable transport* choice for existing and new residents with access to local facilities, service and infrastructure
- Connecting settlements by IT and other infrastructure, reducing the need to travel and minimising grey infrastructure requirements
- Ensuring growth has a clear purpose leading to individual character

11.18 Much work has been done looking at the opportunities in the Greater Exeter area to achieve the above points. Alternative 'distribution scenarios' have also been considered which have informed our suggested approach, detailed later in this chapter.

11.19 To achieve growth that brings the success factors needed to create great places of the future, we consider that the GESP spatial development strategy should focus:

- On *brownfield* and greenfield land in Exeter and other main towns where there is an easily accessible range of jobs, services, transport facilities and the potential to enhance these factors
- In new or expanded settlements of scale on key transport corridors, particularly the rail corridors which extend out from Exeter, ideally where cycling is also a feasible option to key jobs and services

11.20 To achieve the draft GESP vision and to bring benefits to our new and existing communities it is fundamental we have the right transport strategy embedded within our spatial development strategy. Our emerging transport strategy is detailed in Section B, Chapter 8, Movement and Communication. Following this consultation, strategic sites will be identified in the next version of the GESP and at this point the GESP transport strategy will be further refined and more detail provided.



**Spatial Development Strategy Map**

11.21 Figure 12.1 has been prepared to show conceptually the spatial development strategy, identifying four strategic growth areas. These areas provide potential to achieve the draft GESP vision of 'an accessible and networked city region of linked and distinct communities'. The four growth areas are 'Central', 'North', 'South' and 'East', discussed in more detail below. Each area has a possible role to play in the spatial development strategy for the area, although the scale of development and the level of infrastructure investment necessary in each will vary. Site options are identified in chapter 12 within the growth areas. The site options accord with the suggested GESP spatial development strategy, each one offering different individual strengths and weaknesses.

**Strategic Growth Areas**

Central

11.22 This large area includes Exeter and its immediate surrounding land, the "West End of East Devon" and the Tarka Line railway corridor as far as Crediton. This is the immediate economic hinterland of Exeter, providing the economic hub of the Greater Exeter area's economy at the focal point of the area's transport corridor. Much of this central area has seen very substantial planned growth and investment. It contains the growing new town of Cranbrook, the Science Park and Sky Park economic hotspots (designated as an *Enterprise Zone*) and a number of major

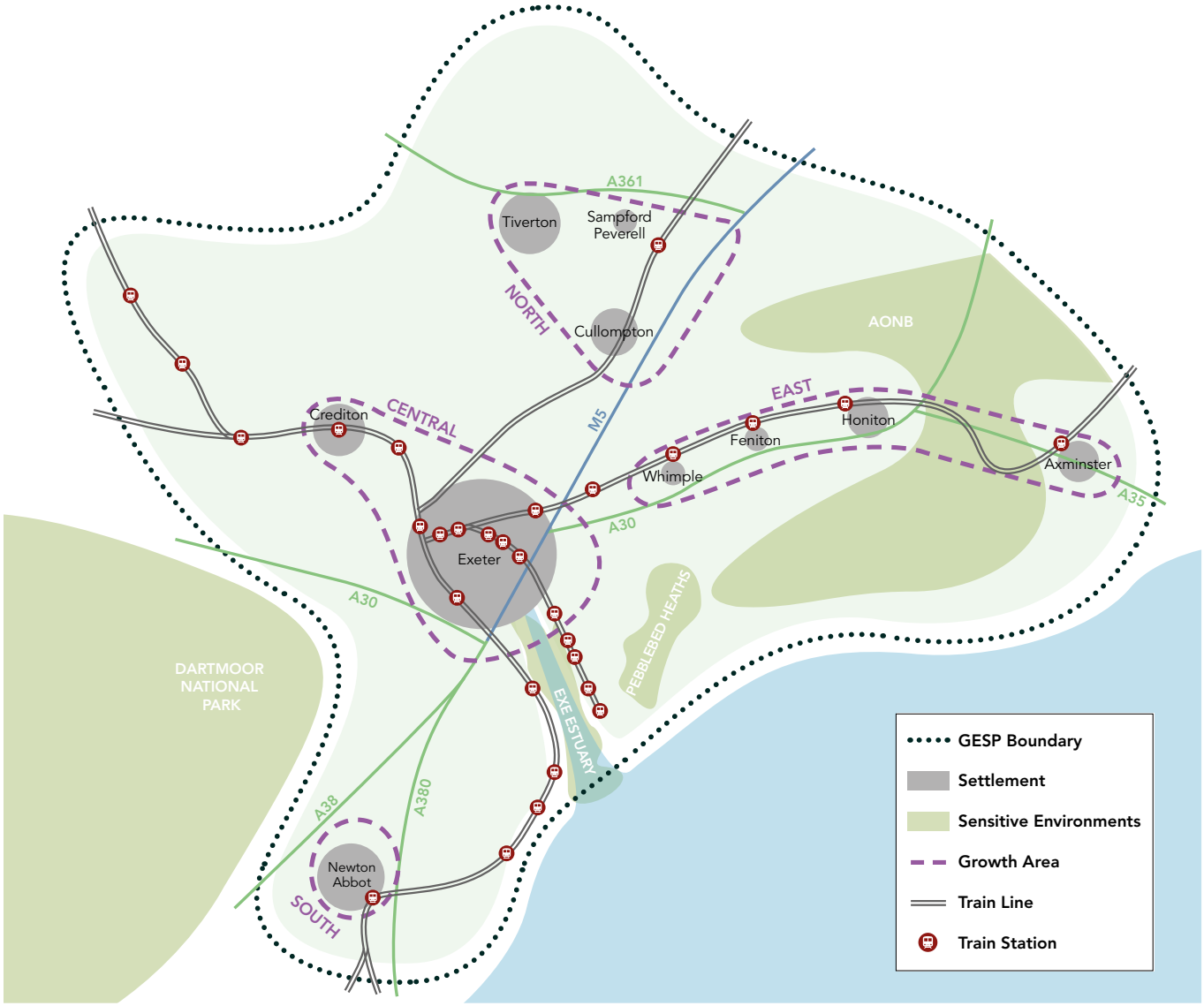



**Figure 11.1** Conceptual spatial development strategy map

urban extensions to the city. It is a sustainable transport hotspot with 11 existing railway stations and 3 new ones planned, excellent bus and cycle provision and an emerging cycle and car club infrastructure. Major institutions like the University of Exeter, the Meteorological (Met) Office and Exeter Airport provide continued economic impetus and the demand for new homes and economic investment in the area is high. There is significant *brownfield* regeneration potential for high quality *sustainable development* and locations for further urban extensions and new settlements with good sustainability credentials. However, there are environmental sensitivities to consider, including the high quality historic environment and the internationally important Exe Estuary, Dawlish Warren and Pebblebed Heaths, which are potentially vulnerable to visitor pressure. High quality development, *green infrastructure* and habitat management will be key mitigation requirements.

11.23 There are 26 potential site options to consider in this area, identified in Chapter 12. We consider this area has real opportunity for new homes and jobs and is likely to be the focus for new transport investment. It has the potential for high levels of *sustainable transport* use given the density of development and existing rail and other provision in the area. Many of the site options in Exeter are *brownfield* and their redevelopment would act to enhance the city's economy and attractiveness. A number of urban extensions are also considered. To the west, the Tarka Railway Line provides some rail-based development opportunities while there is the potential for new settlement opportunities to the east of the city beyond the Clyst valley.

### North

11.24 Towards the northern boundary of the Greater Exeter area, the two market towns of Tiverton and Cullompton provide the potential for growth in areas with existing employment. The existing mainline station at Tiverton Parkway combines with two motorway junctions to give excellent access and there are fewer national or international environmental sensitivities than in many other locations around the Greater Exeter area. Proposals within the Mid Devon Local Plan Review include significant economic and housing expansion, with a new tourist and leisure hub at Junction 27 and the initial phases of the Culm Garden Village, to the east of Cullompton. Improvements to the motorway junctions and a new railway station at Cullompton are key infrastructure requirements.

11.25 In the following chapter there are 3 options for *major development* within this growth area.

### South

11.26 Near the southern extent of the Greater Exeter areas, the wider Newton Abbot, Kingsteignton and Kingskerswell area is a significant employment and housing location with good transport connectivity and there is potential to continue to develop its role with additional homes and employment. This will support continued growth in the southern part of the Exeter *travel to work area*, which is well-connected by rail to Exeter and various market towns. There are also good rail and road links with the adjoining urban area of Torbay which have been enhanced by the recent completion of the South Devon Highway.

11.27 4 potential strategic options within this area are described in chapter 12.

### East

11.28 The Waterloo Line provides a mainline rail service from Exeter to London, linking to a number of towns and villages within the eastern part of the Greater Exeter area. The market towns of Honiton and Axminster have economic and housing potential, while settlements with existing stations may provide the opportunity for strategic expansion. Plans to improve speed and frequency along the Waterloo Line would enhance the sustainability of proposals in this area. There are 6 potential site options consulted upon within the east area.

## Smaller Sites and Local Plans

11.29 The earlier section on numbers of new homes explained how there is a need to ensure that a minimum of 53,260 new homes are built to meet our defined housing need. Taking account of the need for headroom (explained earlier) and allowing for existing planning commitments, the allocations in plans will need to have a capacity to deliver about 30,500 homes.

11.30 Within that overall number, there is a role for both GESP and future *local plan* reviews to allocate sites for the development of new homes. We have to decide how many should be allocated in the GESP and how many should be left to the *local plans*. Essentially, this is a choice between the development of large strategic sites that can provide much of their own infrastructure and development of a large number of smaller sites, within and next to towns and villages.

11.31 In Chapter 7 Homes, draft policy GESP16: Housing Target and Distribution, we propose that about 18,500 of the homes are provided on strategic scale GESP allocations, with 12,000 to be allocated on smaller sites via *local plan* reviews and also potentially in *neighbourhood development plans*. These plans can consider in more detail the housing needs and potential of the towns and villages in the Greater Exeter area, taking into account the overall strategy of the GESP. We consider this to be a fair distribution between the two kinds of sites, allowing for choice in type and scale of site to come forward in *local plans*, including

the national requirement that 10% of homes are on *small sites*. Towns and villages without allocations identified through the GESP may be considered for development through the *local plan* process.

**Alternative Development Distribution Scenarios considered**

11.32 The *Sustainability Appraisal* has considered seven potential development distribution scenarios for the delivery of growth in the area. These are:

- **Scenario 1:** Proportionate growth of all settlements in the settlement hierarchy
- **Scenario 2:** Exeter and major town urban intensification
- **Scenario 3:** Mainly rural distribution
- **Scenario 4:** Public transport infrastructure corridors and hubs
- **Scenario 5:** Concentrate on areas with the least affordable housing
- **Scenario 6:** Locate development away from protected international wildlife sites
- **Scenario 7:** Market-led

11.33 Full details of the scenarios are included in the *Sustainability Appraisal Report*, however brief descriptions are provided here. Note that, apart from the market–led approach scenario, as a general rule the scenarios do not propose strategic development in *Areas of Outstanding Natural Beauty*. National policy recommends to avoid *major development* within these areas.

11.34 **Scenario 1:** Proportionate growth of all settlements in the settlement hierarchy

Existing plans contain a settlement hierarchy, which is a broad analysis of the relative size of each settlement, together with their economic and service role. In this way, a broad understanding of the extent to which each settlement is appropriate for development can be understood. There are 75 places defined within that hierarchy within existing *local plans*. One option would be for the GESP to recognise the historic and market basis for this existing pattern, and to follow it closely in distributing growth. This would guide new growth to those 75 defined settlements, roughly proportionate to their scale and function, effectively a continuation of the existing *local plan* strategies. At the end of the plan, the settlement pattern would be largely unchanged, with most of the growth being located at the larger settlements but the smaller rural settlements also receiving new development – each settlement would roughly grow by a similar proportion (25% – 30% depending on the overall level of growth).

11.35 **Scenario 2:** Exeter and major town urban intensification

At the larger end of the settlement hierarchy are a number of main places, with a range of facilities, services and jobs, and generally good public transport provision. They comprise 13 settlements including Exeter and the larger towns like Newton Abbot, Exmouth and Tiverton. By concentrating growth at these places, new homes and jobs would be closely related and concentrations of services like city and town centres would be supported. Under this approach the potential for *previously developed land* would be maximised. The population would become more urban-focused over time, with significant expansion of all the main settlements, and much lower growth in the smaller towns and villages.

11.36 **Scenario 3:** Mainly rural distribution

At the opposite end of the distribution spectrum from Scenario 2, a rural focus would place the majority of the growth in the smaller settlements (villages and small towns) but limit growth in the main towns and Exeter. This would require very significant growth in each of these smaller settlements (in the order of 200-300 homes at each, depending on the overall level of growth). There would also be the potential for a number of new villages

of approximately 1500 homes depending on local circumstances. Impacts on *Areas of Outstanding Natural Beauty* would need to be avoided. This scenarios would be likely to cause a significant increase in car travel due to the challenges of serving rural communities with public transport.

11.37 **Scenario 4:** Public transport infrastructure corridors and hubs

Through the GESP there is the opportunity to move beyond the previous hierarchy-based approach to development distribution, and to consider a more radical approach to locating new growth. A key opportunity is the existing public transport network, in particular the extensive rail system. Public transport is focused at the main settlements (particularly Exeter) and on rail and bus service extending out from the city which link a number of existing towns and villages. This scenario would provide for growth on or close to these locations, reflecting the benefits of *sustainable travel* modes. It would maximise opportunities to encourage more sustainable forms of travel by giving the highest proportion of residents a choice of transport mode to the key service and job locations. The potential to enhance these corridors further through investment such as new rail stations or increased rail service frequency would enhance this potential. Development may be in the form of new *brownfield* sites, new settlements or major urban extensions.

11.38 **Scenario 5:** Concentrate on areas with the least affordable housing

Reflecting the objective that new homes are intended to improve affordability, this scenario examines the potential for concentrating the new homes in those places with the worst affordability/highest house prices. In accordance with national policy and the approach to the other scenarios, this alternative avoids significant development in the *Areas of Outstanding Natural Beauty*. It should be noted that this is a significant constraint on the ability of the strategy to achieve its objective, since the *Areas of Outstanding Natural Beauty* are among the highest priced areas. The strategy which emerges from this would guide development to locations around Exeter and a secondary area between Newton Abbot and the Teignbridge coast. Given the generally higher values in rural areas, some expansion of villages across the plan area would also be expected.

11.39 **Scenario 6:** Locate development away from protected international wildlife sites

The *Natura 2000* wildlife sites are highly protected by law. There are a number in and around the Greater Exeter area, with four of them covered by a mitigation strategy to stop impact from current housing growth. The Exe Estuary SPA, Dawlish Warren SAC and East Devon Pebblebed Heaths (both a SPA and SAC), grouped around an area south and south east of Exeter, are vulnerable to recreational pressure from new homes within 10 km (including the whole city of Exeter). The South Hams bat complex, based around a number of colonies south west of Exeter, with Newton Abbot towards the core, can be affected by urbanisation, particularly the bat feeding and flying areas. Avoiding these areas could maximise the protection of these important habitats. However, by avoiding impacts on these specific internationally important sites this distribution strategy may result in pressures on other international wildlife sites, which are more peripheral such as the Culm Grasslands SAC, Dartmoor SAC, South Dartmoor Woods SAC, Sidmouth to West Bay SAC, River Axe SAC, and Beer Quarry and Caves SAC.

11.40 Growth would mainly be located north of Exeter, within the least populated part of the plan area, and involve major expansion of existing towns and villages and potentially a number of new settlements. It would be challenging to provide attractive public transport to some of these areas and therefore it is likely that the traffic and climate change impacts of this approach would be significant, particularly in Exeter. It would also provide little development in Exeter itself which is an area of high demand.



Zero carbon homes in Exeter

11.41 **Scenario 7:** Market-led

Using the GESP *call for sites* undertaken in 2017, this distribution strategy would take a market-driven approach only, targeting those areas where there is already a known interest in delivering development. It is considered that this scenario would meet the *National Planning Policy Framework* requirements for housing sites to be available and deliverable and would likely require the minimum level of planning policy intervention of any of the considered scenarios. For it to be considered a true market-led approach, it was deemed appropriate to consider sites within areas excluded in other scenarios such as the *Areas of Outstanding Natural Beauty*.

11.42 The majority of growth in this scenario would be reasonably well-located to existing jobs, services and public transport in Exeter and the larger towns, thereby minimising the need for those residents to travel by the private car. However there could be significant impacts on key environmental site including *Areas of Outstanding Natural Beauty* and protected international wildlife sites.

**Analysis of development distribution scenarios and how they have informed the suggested spatial development strategy for the GESP**

11.43 Each distribution scenario examined has potential positives and negatives. The spatial development strategy pursued in the GESP needs to accord with the draft GESP vision and seek to deliver the best possible outcomes for the provision of new homes, jobs and infrastructure for existing and future generations, while also protecting and enhancing the environment.

11.44 The full analysis of the alternative distribution scenarios is contained in the *Sustainability Appraisal Report*.

11.45 The scenarios that predominantly propose development in smaller, rural settlements strongly correlate with more car-use, due to longer travel distances and limited public transport provision (i.e. scenarios 3 and 6 and to a lesser extent 5 and 7). The climate change impacts and traffic generated by these scenarios is undesirable. The more dispersed scenarios are also subject to more expensive social and physical infrastructure and uncertain economic potential, making balanced and *sustainable development* in these areas much more difficult to achieve. Protection of our internationally protected sites (part of scenario 6) will need to occur whatever development strategy is pursued, ensured through our *Habitats Regulations Assessment*.

11.46 The remaining scenarios have more to commend them strategically as the basis for a Greater Exeter spatial development strategy. However, scenarios 1 and 2 (concentrating only on expanding the existing main settlements) are limited in their ability to deliver the housing growth required in the Greater Exeter area, due to local environmental and infrastructure constraints. Therefore, contributions from well-located new settlements are considered necessary. Proximity to jobs and services and links into existing transport corridors, as identified in scenario 4, are fundamental to the success of such proposals and have the potential to bring many sustainability benefits. Across these scenarios there are considerable benefits in making major efforts to recycle urban land for new housing, alongside focusing on well-located sites where there is known interest from the landowners.

# Chapter 12: Site Options

### Introduction and Summary

12.1 This chapter contains the 39 strategic site options which are considered to have potential for allocation in the GESP. They will not all be needed. We are asking for your views on the site options, as this will help inform decisions about those we take forward for further work and potential inclusion in the next version of the GESP. The GESP will be subject to further consultation in future.

12.2 Each of the sites is described and analysed, outlining the opportunities and sensitivities associated with it and setting out potential planning requirements including infrastructure, transport and other measures.

12.3 Please send your comments on the site options via the online portal at: www.gesp.org.uk/

### Site Options

12.4 The four strategic growth areas (discussed in chapter 11 of this document) contain a number of site options. These are listed below.

### Central Strategic Growth Area Site Options


| Site Name | Site Reference | Page Number |
|---|---|---|
| Attwells Farm | SA-EX-1 | 102 |
| Cowley | SA-ED-26 | 104 |
| Crediton South | SA-MD-3 | 106 |
| East Gate | SA-EX-19 | 108 |
| Exeter St Davids Station | SA-EX-5 | 110 |
| Exminster West | SA-T-16 | 112 |
| Higher Greendale | SA-ED-7 | 114 |
| Hill Barton | SA-ED-3 | 116 |
| Howell Road Car Park | SA-EX-9 | 118 |
| Markham Lane | SA-T-17 | 120 |
| Marsh Barton | SA-EX-10 | 122 |
| Newton St Cyres and Sweetham | SA-MD-4 | 124 |
| North Gate | SA-EX-7 | 126 |
| Oil Mill Lane | SA-ED-2 | 128 |
| Peamore | SA-T-18 | 130 |
| Pinhoe Trading Estate | SA-EX-18 | 132 |
| Poltimore East | SA-ED-27 | 134 |
| Sandy Gate | SA-EX-26 | 136 |
| South Gate | SA-EX-8 | 138 |
| South Street, Fore Street, Market Street | SA-EX-23 | 140 |
| Sowton | SA-ED-1 | 142 |
| Stoke Hill | SA-EX-4 | 144 |
| Topsham and M5 | SA-EX-3 | 146 |
| Water Lane | SA-EX-6 | 148 |
| West Gate | SA-EX-22 | 150 |
| Westclyst and Mosshayne | SA-ED-25 | 152 |

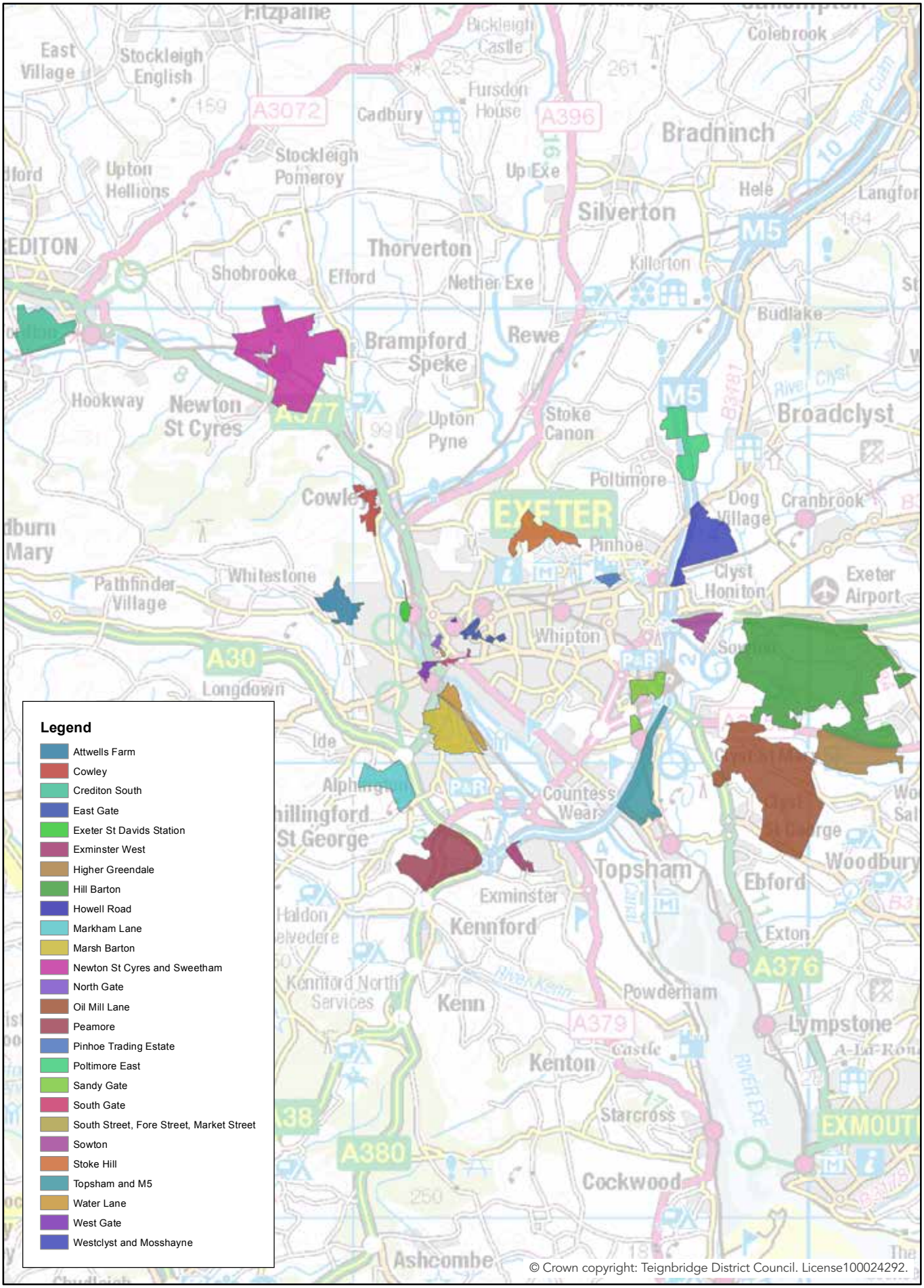



**Figure 12.1** Site options in the central strategic growth area

## North Strategic Growth Area Site Options

| Site Name | Site Reference | Page Number |
|---|---|---|
| Culm Garden Village | SA-MD-9 | 156 |
| Hartnoll Farm | SA-MD-10 | 158 |
| Sampford Peverell South | SA-MD-12 | 160 |

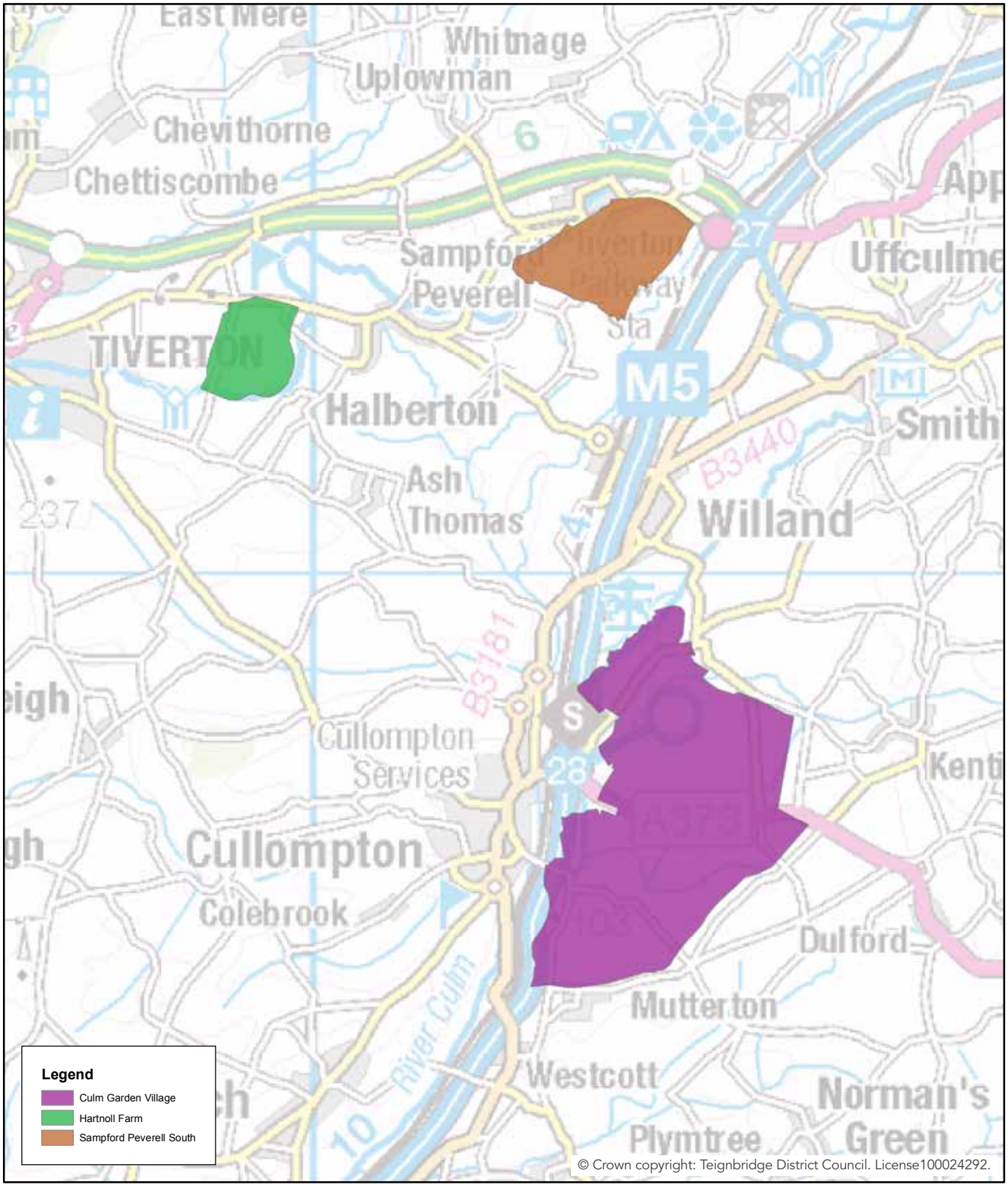
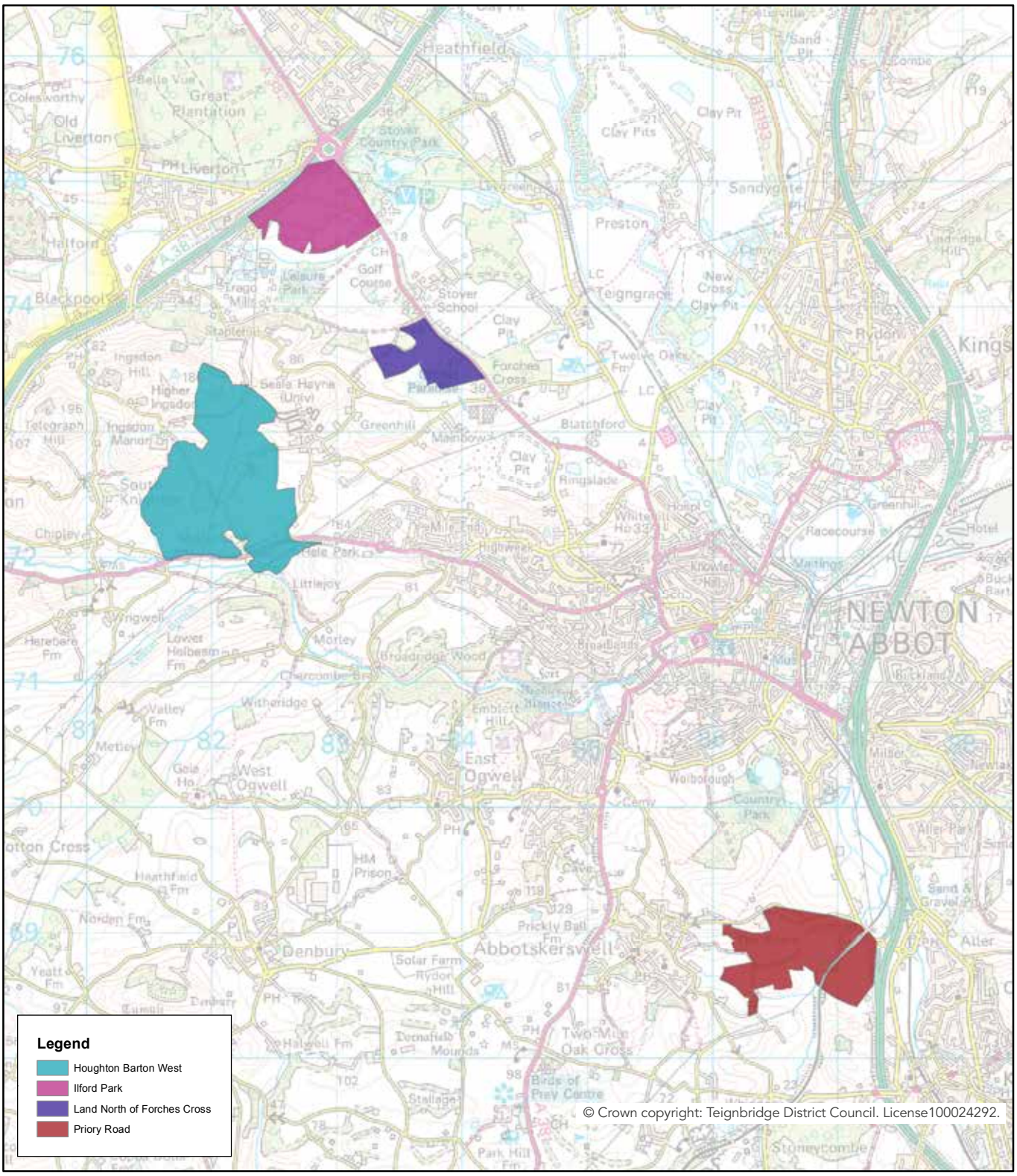



**Figure 12.2** Site options in the south strategic growth area

## South Strategic Growth Area Site Options

| Site Name | Site Reference | Page Number |
|---|---|---|
| Land north of Forches Cross | SA-T-8 | 164 |
| Houghton Barton West | SA-T-3 | 166 |
| Ilford Park | SA-T-22 | 168 |
| South of Priory Road | SA-T-5 | 170 |



## East Strategic Growth Area Site Options

| Site Name | Site Reference | Page Number |
|---|---|---|
| Airport Business Park | SA-ED-8 | 174 |
| Airport North | SA-ED-5 | 176 |
| Axminster South | SA-ED-19 | 178 |
| Feniton | SA-ED-15 | 180 |
| Honiton East | SA-ED-18 | 182 |
| Whimple | SA-ED-12 | 184 |

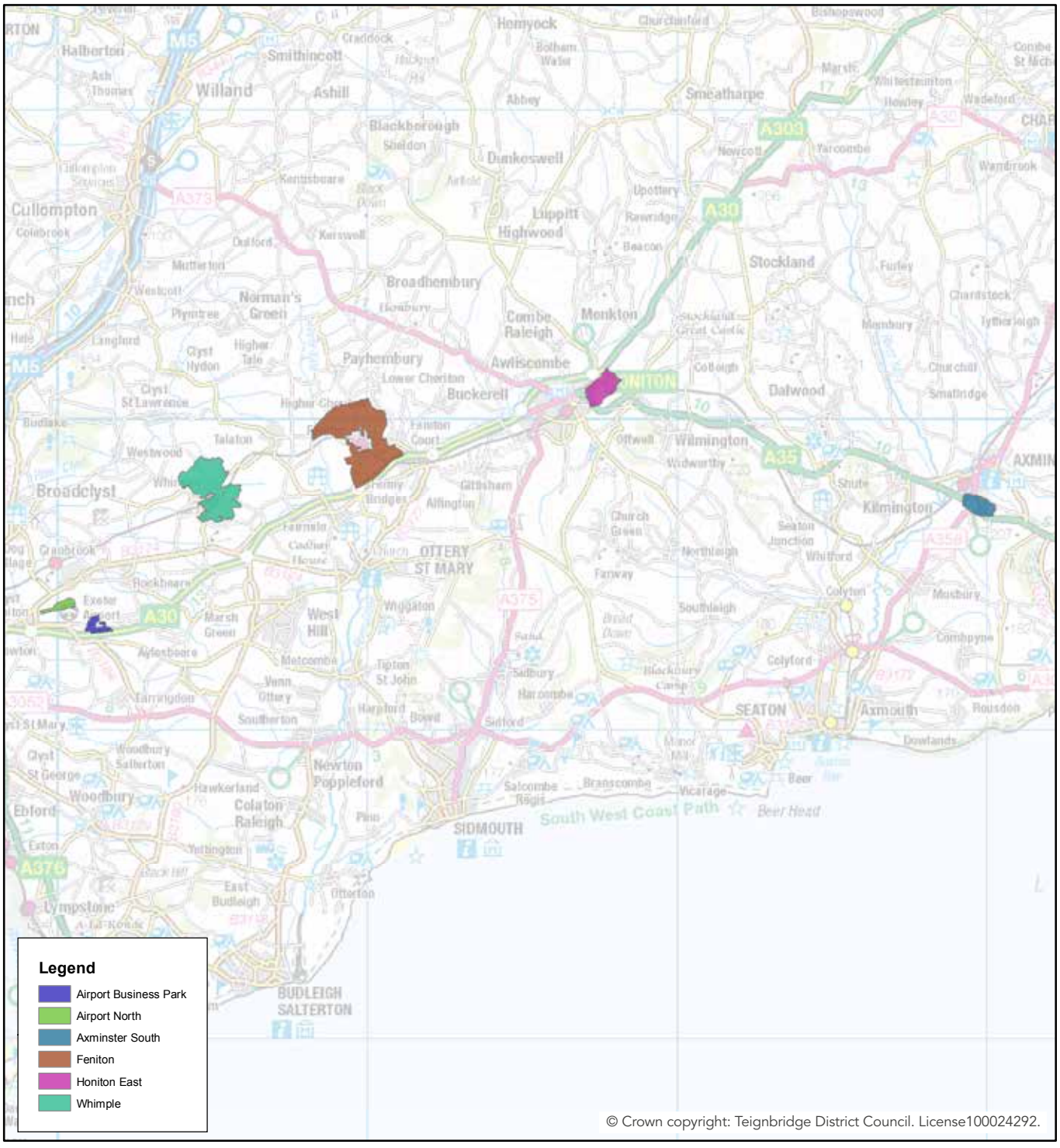
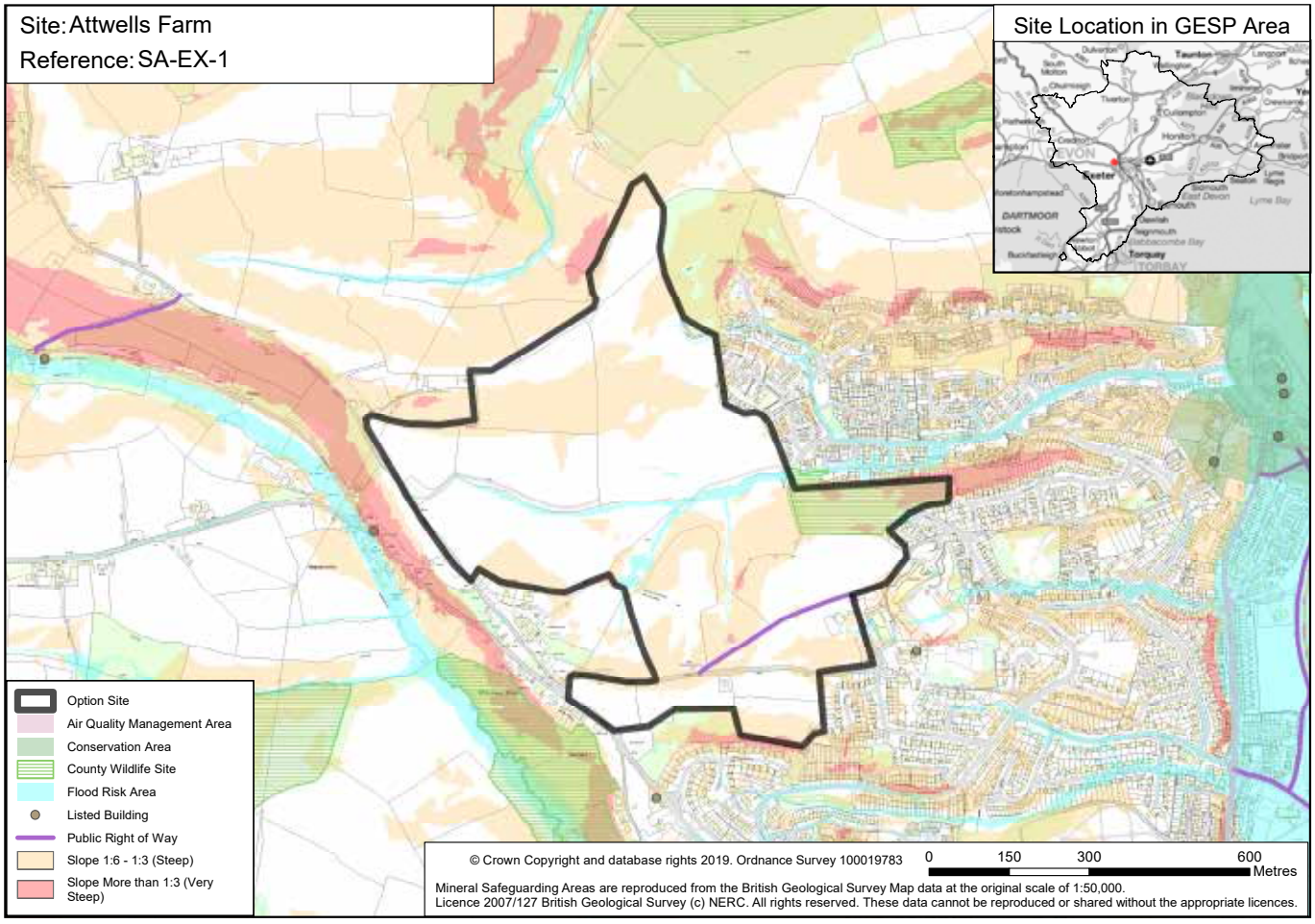



**Figure 12.4** Site options in the east strategic growth area

# Central Strategic Growth Area: Site Options




| Site Name: Attwells Farm | |
|---|---|
| **Site Reference** | SA-EX-1 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | 3v1377v, bw13rm1, pe15y61 |
| **Parish(es)** | Whitestone / Exwick |
| **District(s)** | Teignbridge District Council / Exeter City Council |
| **Site size** | 44 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | 483 – 624 homes |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | 400 homes |
| **Potential for employment use** | No |
| **Relationship with existing allocations and other potential GESP sites** | None |
| **Planning status** | None |
| **Summary description of the site** | The area consists of a bowl of mainly steep agricultural land on the north west fringe of Exeter, beyond the built-up area of Exwick. The area is bounded by Rowthorn Road and Redhills to the west. Exwick Lane crosses the site east to west. The land form is complex. The southern part of the site is within Exeter, but the majority of the site is within Teignbridge. |

## Opportunities

This site is identified for consideration in the GESP because:

- A large proportion of the site has been put forward by landowners for development
- Homes would be 3km from the centre of Exeter, within cycling distance and with potential for improvements
- Local facilities are nearby
- There is potential to provide significant *green infrastructure* opportunities for Exwick
- A potential southern road connection to Redhills would address highway constraints

## Sensitivities

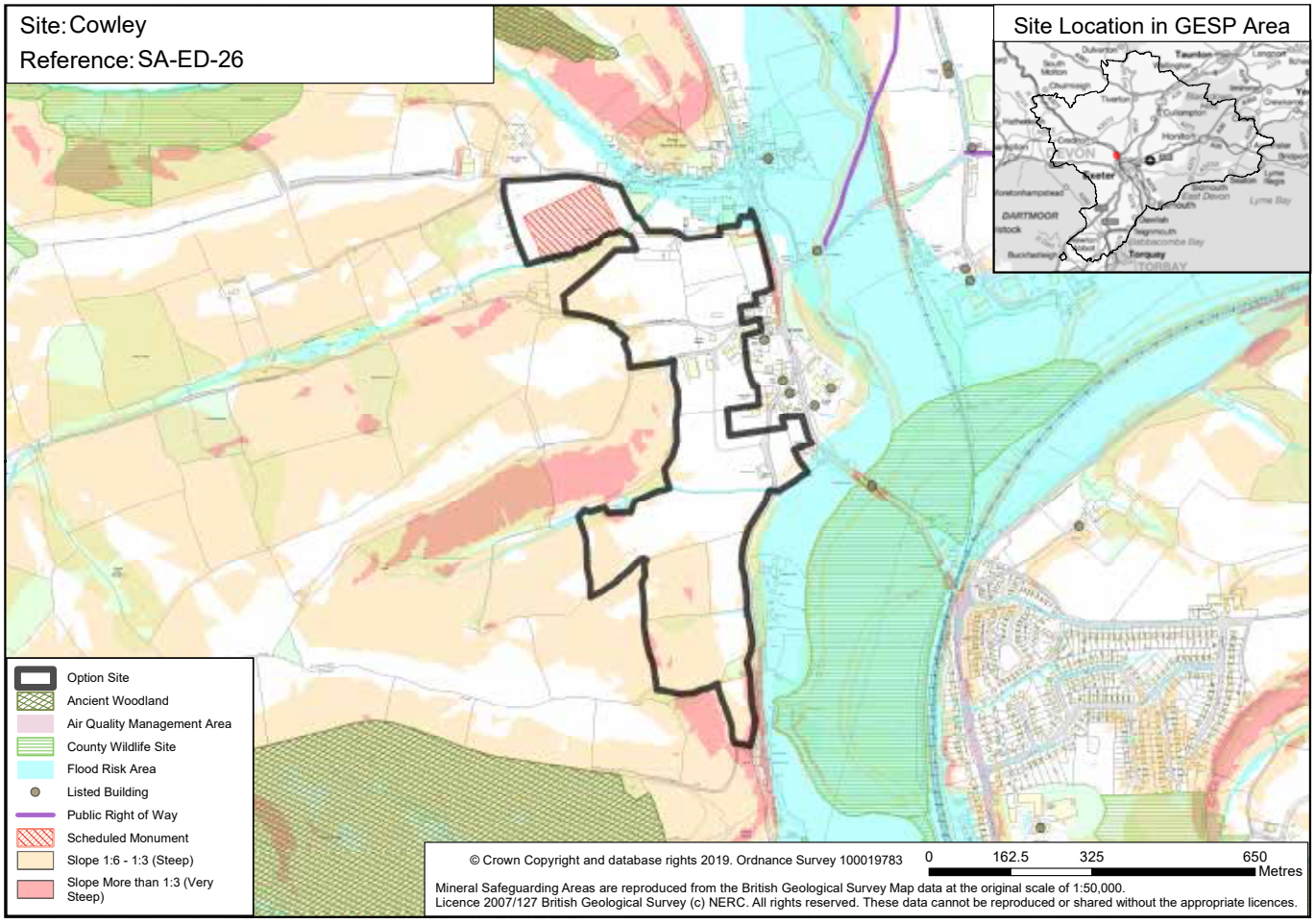
The site has a number of sensitivities which development would need to take into account, including:

- Development may impact upon the Exe Estuary which is a *Natura 2000* protected wildlife site sensitive to an increase in the number of visitors
- The site may contain Great Crested Newts, Cirl Buntings and other *protected species*
- The local road network and road access is poor and there is limited scope for upgrading
- A large proportion of the site is high grade agricultural land (although steep)
- The site is likely to be too small for a new primary school or GP services, so will rely on off-site provision
- The site is within a locally designated 'Area of Great Landscape Value'
- Large parts of the site are steeply sloping (1:10 – 1:4) with subsequent negative impacts on build costs, place-making, permeability, engineering costs, site viability and surface water drainage

## Requirements

Planning requirements for the site will aim to create a great place to live and work, providing well designed new neighbourhoods with appropriate and well managed public open space and safe walking/cycling routes. All sites will need to provide a *mix of homes* (including affordable and custom build), investment in *low carbon* energy and transport, high speed internet and wildlife enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include:

- Funding of measures to reduce the impact on the Exe Estuary including provision/contribution towards *Suitable Alternative Natural Greenspace (SANG)*
- Improved foot, cycle and bus routes into the city
- Contributions to additional local primary school capacity
- Contributions towards secondary school and GP provision off site
- Measures to ensure surface water run-off does not cause issues downstream
- Improved road access, particularly to Redhills




| Site Name: Cowley | |
|---|---|
| **Site Reference** | SA-ED-26 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | ou15y54 |
| **Parish(es)** | Upton Pyne |
| **District(s)** | East Devon District Council |
| **Site size** | 27 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | 359 - 463 homes |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | 500 homes |
| **Potential for employment use** | No |
| **Relationship with existing allocations and other potential GESP sites** | Possible relationship with other site options along the Tarka line/A377 including SA-MD-4 (Newton St Cyres and Sweetham) and SA-MD-3 (Crediton South) to collectively deliver transport infrastructure, including rail, bus and cycle improvements. |
| **Planning status** | None |
| **Summary description of the site** | 27ha of predominantly agricultural land surrounding the hamlet of Cowley. |

## Opportunities

This site is identified for consideration in the GESP because:

- A large proportion of the site has been put forward by landowners for development
- It is close to significant job opportunities in Exeter city centre and the University
- It has the potential to accommodate a Park and Ride/Change
- It could potentially deliver part of the Boniface Trail cycle route

## Sensitivities

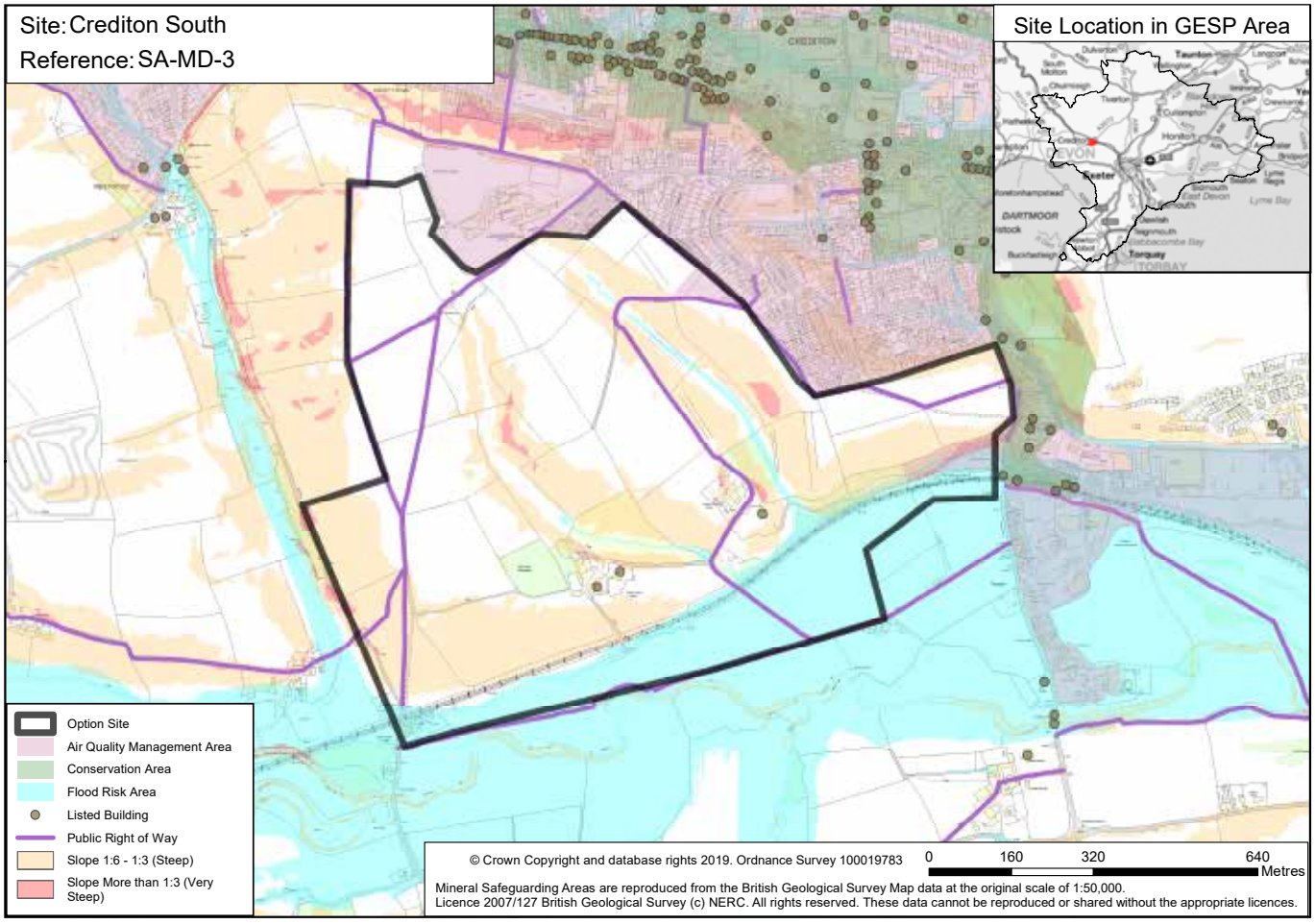
The site has a number of sensitivities which development would need to take into account, including:

- It may impact upon the Exe Estuary which is a *Natura 2000* protected wildlife site sensitive to an increase in the number of visitors
- A small area of the site is affected by flooding
- St. Andrew's Road and the existing junction with A377 would be an unsuitable access
- Cowley Bridge and roundabout junction with Stoke Road/Wreford's Drive are at capacity
- There are no schools within safe walking distance of the site and the capacity of the site will not be sufficient to merit on-site provision
- A number of Listed Buildings exist nearby. The site contains a Scheduled Monument. Cowley Bridge is also a Scheduled Monument and Grade II* Listed
- Steep topography and visual prominence in the west of the site could reduce capacity
- A large proportion of the site is high grade agricultural land
- The River Exe and railway could act as a barrier to movement causing severance
- The site is close to a number of County Wildlife Sites and may contain Great Crested Newts and other *protected species*

## Requirements

Planning requirements for the site will aim to create a great place to live and work, providing well designed new neighbourhoods with appropriate and well managed public open space and safe walking/cycling routes. All sites will need to provide a *mix of homes* (including affordable and custom build), investment in *low carbon* energy and transport, high speed internet and wildlife enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include:

- Funding of measures to reduce the impact on the Exe Estuary including provision/contribution towards *Suitable Alternative Natural Greenspace (SANG)*
- Measures to address the risk of flooding on site
- Preservation of archaeological features including the Scheduled Monument
- Pedestrian and cycle connectivity to jobs and services in Exeter including delivery of part of the Boniface Trail
- Delivery of a Park & Ride/Change within the site fronting the A377
- Diversion of St. Andrew's Road through the site to a new access point between Upton Pyne Cross and Duryardwood Lane
- High quality design and layout to reduce the impact upon heritage assets
- Financial contribution to off-site primary, early years and secondary school places
- A variety of amenities and services including a small amount of convenience retail, local employment, sports, recreation and healthcare provision
- Development will need to respect the privacy of existing dwellings located nearby




| Site Name: Crediton South | |
|---|---|
| **Site Reference** | SA-MD-3 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | j3137fv |
| **Parish(es)** | Crediton |
| **District(s)** | Mid Devon District Council |
| **Site size** | 90 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | 1,473 - 1,900 homes |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | 750 homes |
| **Potential for employment use** | No |
| **Relationship with existing allocations and other potential GESP sites** | Possible relationship with site options SA-MD-4 (Newton St Cyres and Sweetham) and SA-ED-26 (Cowley) to collectively deliver transport infrastructure, including rail, bus and cycle improvements. |
| **Planning status** | None |
| **Summary description of the site** | This agricultural site adjoins the southern boundary of the historic market town of Crediton, about 11km northwest of Exeter, served by the Tarka Line Railway and also linked by the A377. The topography is irregular with steeper slopes along small marked valleys by Great Parks Farm, Lower Parks Farm and the western edge of the site. Farms and residential properties are dispersed throughout the site. |

## Opportunities

This site is identified for consideration in the GESP because:

- A large proportion of the site has been put forward by landowners for development
- It is within walking distance of the services and facilities within Crediton
- The nearby train station offers the potential for residents to travel by rail, with a 10 minute journey time, into Exeter (with also the potential to travel north)
- With provision of an appropriate route, residents could cycle to Crediton centre or towards Exeter
- In combination with the other potential GESP sites Newton St Cyres and Sweetham (SA-MD-10) and Cowley (SA-ED-26) there is potential to bring investment in improved rail services and cycle links e.g. the proposed cycle route (the Boniface Trail) from Crediton to Exeter. The potential Cowley site option also considers provision of a Park and Ride, which would be an alternative means of accessing Exeter

## Sensitivities

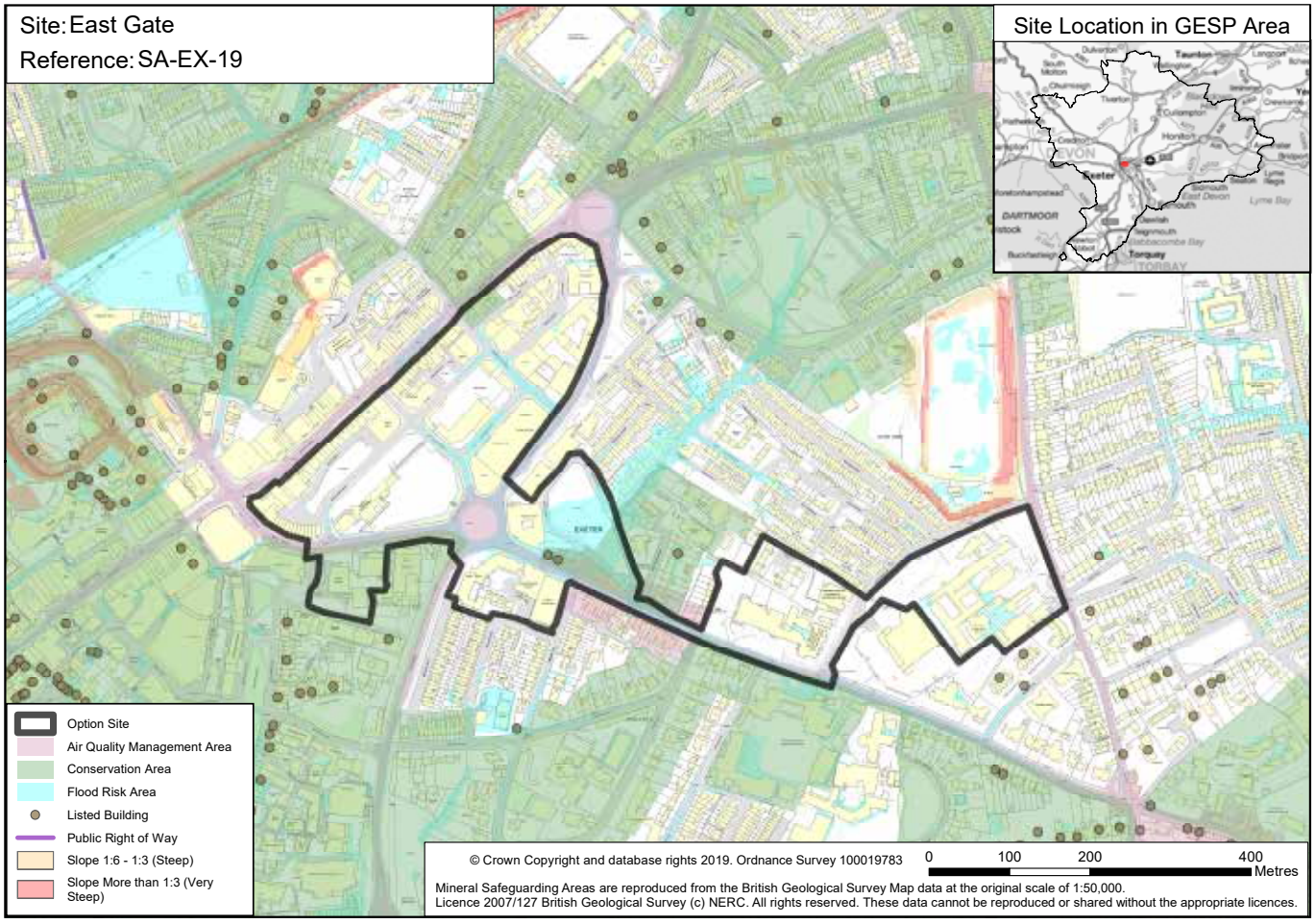
The site has a number of sensitivities which development would need to take into account, including:

- Listed buildings at Great Parks Farm, Henley House, Crediton Station and Crediton Conservation Area nearby
- A large proportion of the site is identified as a monument of local importance – 'Manor of Crediton Parks' (an undesignated medieval deer park)
- A number of public rights of way
- Crediton and Exeter Air Quality Management Areas could be impacted from increased travel movements.
- Flooding affects land south of the railway and along Mill Leat, with associated potential *biodiversity* assets (grazing marsh habitat)
- A 'main river' watercourse (Mill Leat) is identified following the railway line from Henley House to south of Taw Vale Terrace
- The site may contain bats, otters and other *protected species*
- A large proportion of the site is high grade agricultural land
- Steeper slope areas within the site
- Air quality impacts in this area need to be considered collectively for the Culm Grasslands

## Requirements

Planning requirements for the site will aim to create a great place to live and work, providing well designed new neighbourhoods with appropriate and well managed public open space and safe walking/cycling routes. All sites will need to provide a *mix of homes* (including affordable and custom build), investment in *low carbon* energy and transport, high speed internet and wildlife enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include:

- Contribution to the strategic cycle link from Crediton to Exeter (the Boniface Trail)
- Enhancements to public transport infrastructure to enable increased frequency of rail and bus services between Crediton and Exeter
- A package of improvements to upgrade highway access (either A377/Station Road junction or alternative route to connect to Tesco roundabout) and level crossing upgrade, to include signals. This will also need to consider flooding associated with Mill Leat
- A community building, flexible in design to host local services as required
- Safeguarding of land for secondary school provision and provision of a primary school
- Contribution towards secondary school places and GP provision
- Measures to address the risk of flooding on site
- Potential gas, electricity and waste water utilities improvements
- Safeguarding of a potential route for an A377 Crediton town centre bypass
- Potential contributions to a recycling centre expansion
- Development will need to respect the privacy of existing dwellings located nearby




| Site Name: East Gate | |
|---|---|
| **Site Reference** | SA-EX-19 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | sd12vdm, 5w15y7x |
| **Parish(es)** | Not applicable |
| **District(s)** | Exeter City Council |
| **Site size** | 16.4 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | 854-1,015 |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | 1,160 homes |
| **Potential for employment use** | Yes. |
| **Relationship with existing allocations and other potential GESP sites** | Part of the site is identified for mixed-use redevelopment in Policy CP3 of the Exeter Core Strategy (2006-2026). The site is identified for future redevelopment in Exeter City Council's *Liveable Exeter* Programme. |
| **Planning status** | Consents for various uses across the area, recently including student accommodation, a new bus station and a leisure centre. |
| **Summary description of the site** | *Mixed use* area on the eastern side of Exeter city centre. Includes homes, business, leisure and institutional uses, a bus station and public car parks. |

## Opportunities

This site is identified for consideration in the GESP because:

- It provides an opportunity to make more efficient use of a *brownfield* site
- It has excellent access to public transport and is close to a wide range of job opportunities and facilities, giving the potential for car-free residential development
- It gives an opportunity to significantly enhance the appearance of the area
- A proportion of the site is in public sector ownership, enabling additional influence over design and delivery and the opportunity to reinvest proceeds into city improvements
- Part of the site has been put forward landowners for development

## Sensitivities

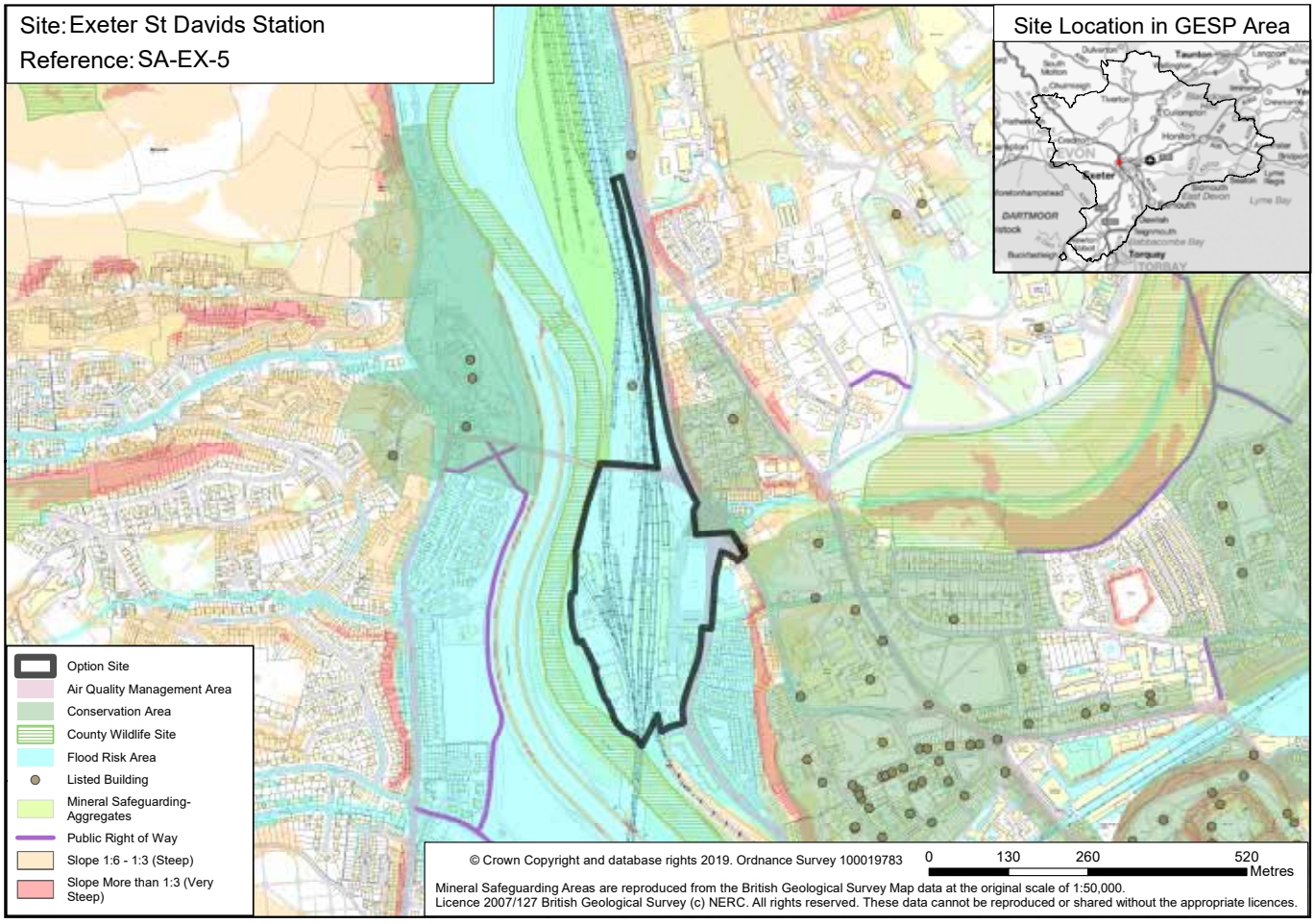
The site has a number of sensitivities which development would need to take into account, including:

- It includes homes, businesses, institutional uses, public car parks and transport infrastructure
- It may impact upon the Exe Estuary, which is a *Natura 2000* protected wildlife site sensitive to an increase in the number of visitors
- It contains a number of mature trees
- A small area of the site is affected by flooding
- It is affected by air and noise pollution from nearby roads and city-centre uses and may be contaminated
- It may contain archaeological remains, is close to a number of listed and locally listed buildings and is partly within a Conservation Area

## Requirements

Planning requirements for the site will aim to create a great place to live and work, providing well designed new neighbourhoods with appropriate and well managed public open space and safe walking/cycling routes serving. All sites will need to provide a *mix of homes* (including affordable and custom build), investment in *low carbon* energy and transport, high speed internet and wildlife enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include:

- A range of other uses including shops, leisure, community space and employment (including a relocated Civic Centre)
- High quality, high density design that provides a healthy living environment for new residents and protects heritage assets
- Development that respects the privacy of existing dwellings located nearby
- Measures to address the risk of flooding on site
- Car-free residential development supported by more sustainable transport measures including car clubs and e-bikes
- Significant enhancement of pedestrian/cycle routes and financial contributions to Heavitree Road public transport improvement corridor and city centre highways enhancements
- Funding of measures to reduce the impact on the Exe Estuary, including provision/contribution towards *Suitable Alternative Natural Greenspace (SANG)*
- Financial contributions towards the expansion of primary and secondary schools, medical facilities and utilities provision in Exeter




| Site Name: Exeter St Davids Station | |
|---|---|
| **Site Reference** | SA-EX-5 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | 3915yq2 |
| **Parish(es)** | Not applicable |
| **District(s)** | Exeter City Council |
| **Site size** | 5.3 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | 151 – 180 homes |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | 660 homes |
| **Potential for employment use** | Yes |
| **Relationship with existing allocations and other potential GESP sites** | Policy KP5 of the Exeter *Local Plan* First Review (1995-2011) allocates surface car parks within the site for office development, student housing and local retail units. The site is identified for future redevelopment in Exeter City Council's *Liveable Exeter* Programme. |
| **Planning status** | None |
| **Summary description of the site** | Mixed-use site in Exeter, including surface car parks, storage and industrial uses, student accommodation and retail. Cowley Bridge Road and Bonhay Road run along the eastern boundary, beyond which are a hotel, student accommodation and residential areas. Exeter St David's Station lies to the west. |

## Opportunities

The site is identified for consideration in the GESP because:

- It provides an opportunity to make more efficient use of a *brownfield* site
- It has excellent access to public transport and is close to a wide range of job opportunities and facilities, giving the potential for car-free residential development
- It gives an opportunity to create an attractive gateway to Exeter
- A proportion of the site is in public sector ownership, enabling additional influence over design and delivery and the opportunity to reinvest proceeds into city improvements
- A large proportion of the site has been put forward by the landowner for development
- Additional residents in this area could boost city centre viability

## Sensitivities

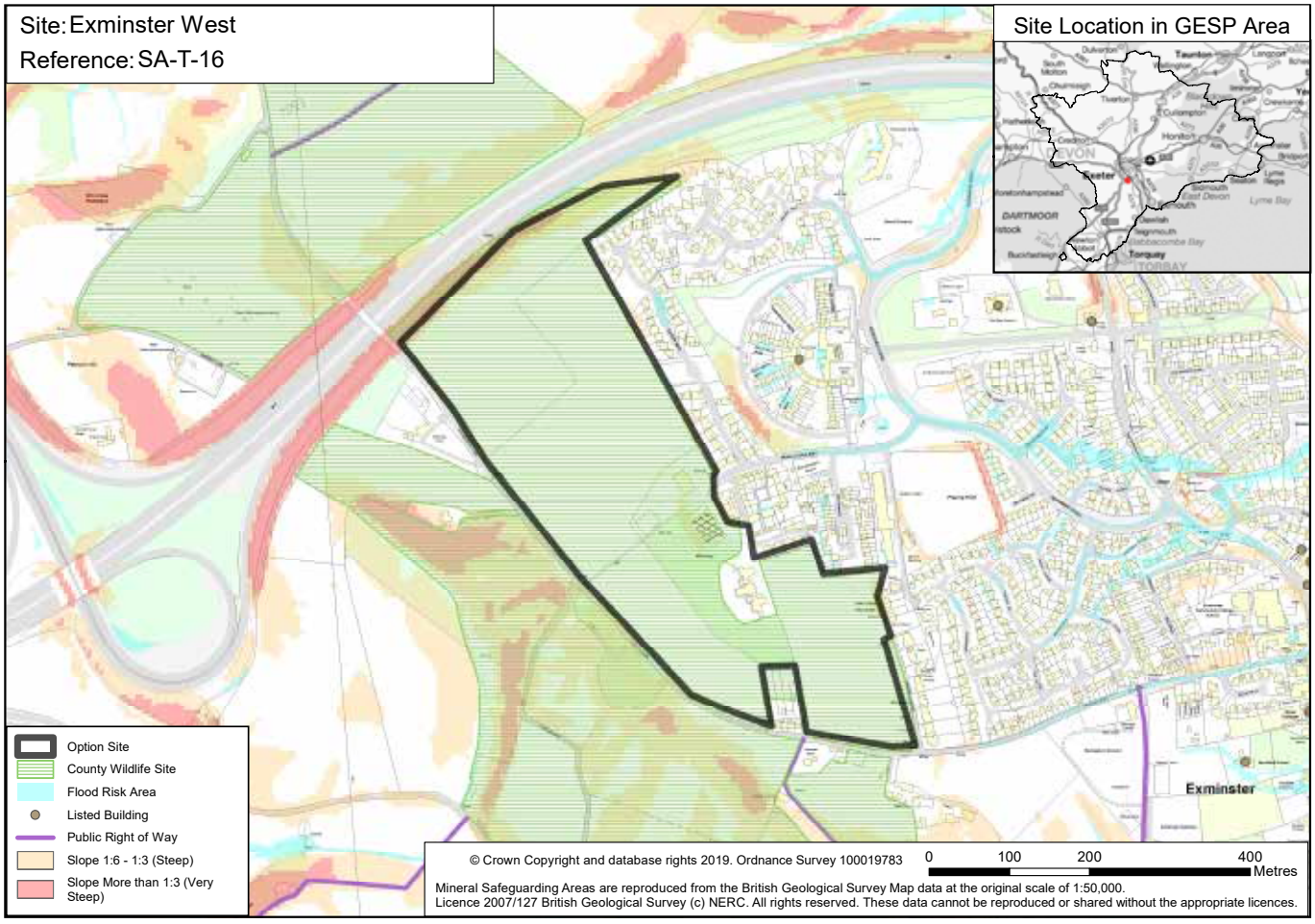
The site has a number of sensitivities which redevelopment would need to take into account, including:

- It includes a number of existing student homes, businesses and public car parking
- A large area of the site is affected by flooding (flood zone 3)
- It may impact upon the Exe Estuary, which is a *Natura 2000* protected wildlife site sensitive to an increase in the number of visitors
- It is affected by dust, air and noise pollution from the nearby railway and busy roads and is likely to be contaminated
- It is close to listed and locally listed buildings and within St David's Conservation Area
- It is affected by the operational requirements of Network Rail

## Requirements

Planning requirements for the site will aim to create a great place to live and work, providing well designed new neighbourhoods with appropriate and well managed public open space and safe walking/cycling routes. All sites will need to provide a *mix of homes* (including affordable and custom build), investment in *low carbon* energy and transport, high speed internet and wildlife enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include:

- High quality, high density design that addresses the risk of flooding, respects heritage assets and ensures a healthy living environment for residents
- A new local centre to the front of the station incorporating public open space, work spaces, shops, leisure uses and a new transport interchange that includes bus stops, taxi and cycle facilities
- Funding of measures to reduce the impact on the Exe Estuary, including provision/contribution towards *Suitable Alternative Natural Greenspace (SANG)*
- Car-free residential development supported by more sustainable transport measures including car clubs and e-bikes
- Financial contributions towards park and ride facilities and significantly improved pedestrian and cycle links to the city centre, urban periphery and Riverside Valley Park
- Retention of some on-site car parking for the station.
- Highways improvements to Station Road and the St David's double roundabout
- Financial contributions towards the expansion of primary and secondary schools, medical facilities and utilities provision in Exeter
- Development that respects the privacy of nearby dwellings




| Site Name: Exminster West | |
|---|---|
| **Site Reference** | SA-T-16 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | kg140jo |
| **Parish(es)** | Exminster |
| **District(s)** | Teignbridge District Council |
| **Site size** | 16 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | 297 – 384 homes |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | 200 homes |
| **Potential for employment use** | No |
| **Relationship with existing allocations and other potential GESP sites** | Site is less than 1km from South West Exeter (SWE1) urban extension in the Teignbridge *Local Plan* and 1.3km from the site option SA-T-18 (Peamore). |
| **Planning status** | None |
| **Summary description of the site** | 16 ha on western edge of Exminster with the M5 to north and Old Matford lane providing a direct link to development at SWE1. Site is 600m from the village centre with access to the A379. Land is mainly gently sloping, rising up a hillside to the west of the Exe, with potential for landscape impacts. Site is approximately 4.8km from Exeter City Centre and is therefore considered as being within the Exeter urban fringe. |

## Opportunities

This site is identified for consideration in the GESP because:

- A large proportion of the site has been put forward by landowners for development
- The site is adjacent to Exminster which has a range of shops, services and facilities
- Exminster has an existing regular bus service into Exeter
- The site is marginally within cycling distance of Exeter

## Sensitivities

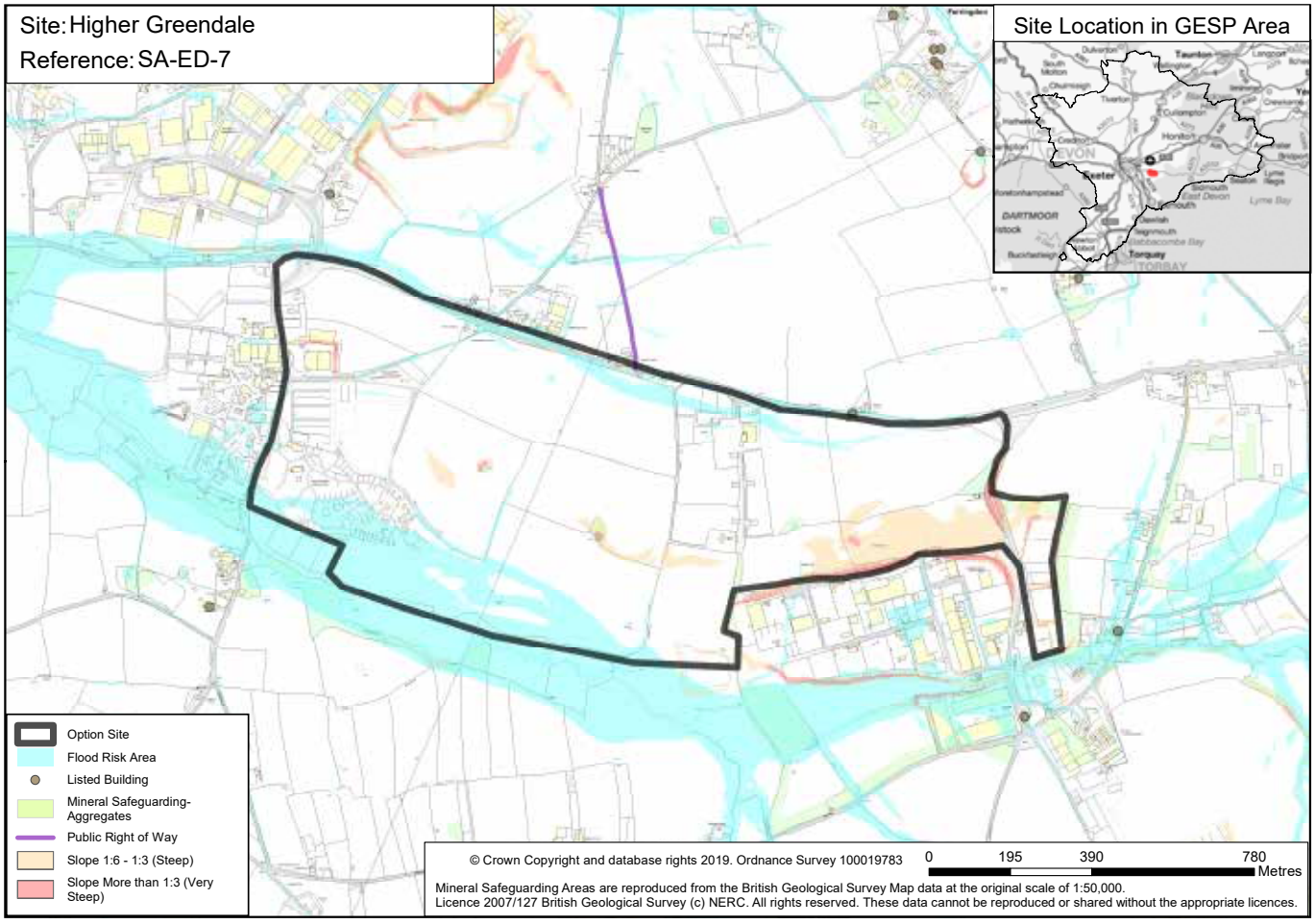
The site has a number of sensitivities which development would need to take into account, including:

- It may impact upon the Exe Estuary and Dawlish Warren, which are *Natura 2000* protected wildlife sites sensitive to an increase in the number of visitors
- There is no potential to increase existing primary school capacity as the existing site is significantly undersized and the school has already been expanded. The development would not support viable new primary school provision
- It may contain Great Crested Newts, Cirl Buntings and other *protected species*
- It will be necessary to have regard to the setting of listed buildings including the Grade II* listed converted Exe Vale Hospital and associated outbuildings
- A large proportion of the site is high grade agricultural land
- There may be noise from the M5 Motorway

## Requirements

Planning requirements for the site will aim to create a great place to live, providing a well designed new neighbourhood with appropriate and well managed public open space and safe walking/cycling routes. All sites will need to provide a *mix of homes* (including affordable and custom build), investment in *low carbon* energy and transport, high speed internet and wildlife enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include:

- Funding of measures to reduce the impact on the Exe Estuary/Dawlish Warren, including provision/ contribution towards *Suitable Alternative Natural Greenspace (SANG)*
- Additional primary school provision. This would require a new school including site and buildings as part of consolidated primary provision in the village. This would need to be wholly funded by development
- Ensure protection of *protected species* and their supporting habitats such as mature hedgerows
- Significant *green infrastructure* to provide amenities such as play space and allotments, as well as green space around sensitive features (e.g. listed buildings) and movement corridors
- Maintain any existing NHS services located within the Sanatorium building, or if these no longer exist explore potential for conversion of space into suitable alternative uses (e.g. offices / work space hub)
- Contribution towards Secondary School and GP provision
- Improved cycle link to Exeter
- Improving foot and cycle safety along local lanes, particularly Deepway Lane, Old Matford Lane and if possible lanes to and including Days Pottles Lane
- Measures to address any risk of flooding including to neighbouring property
- Development will need to respect the privacy of existing dwellings located nearby




| Site Name: Higher Greendale | |
|---|---|
| **Site Reference** | SA-ED-7 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | ks137av, dl15yzt |
| **Parish(es)** | Farringdon, Woodbury |
| **District(s)** | East Devon District Council |
| **Site size** | 107 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | 1,776 - 2,292 homes |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | 1,300 homes |
| **Potential for employment use** | It could deliver a significant amount of employment as an extension to Greendale Business Park and/or smaller scale employment uses to support housing development. |
| **Relationship with existing allocations and other potential GESP sites** | There is a relationship with site options SA-ED-3 (Hill Barton) and SA-ED-2 (Oil Mill Lane) due to their close proximity and potential for the joint delivery of infrastructure, services and facilities. An adjacent site at Greendale Barton is allocated as a strategic energy recovery location in the Devon Waste Plan. |
| **Planning status** | None |
| **Summary description of the site** | An area of land adjacent to the A3052 sloping gently upwards from west to east to its highest point at the top of Windmill Hill. Adjoins Crealy Adventure Park to the west and Greendale Business Park to the south. |

## Opportunities

This site is identified for consideration in the GESP because:

- A large proportion of the site has been put forward by landowners for development.
- There are approximately 30,000 jobs located within 5km of the site including at Skypark, Science Park, Greendale and Hill Barton Business Parks
- It could utilise nearby Clyst Valley Regional Park and proposed Clyst Valley Trail.
- It could utilise existing bus services that run along the A3052
- It could deliver a mix of uses and local employment
- It could utilise *waste heat* from nearby projects including the strategic energy recovery locations at Hill Barton and Greendale Barton which are allocated in the Devon Waste Plan, if these came forward

## Sensitivities

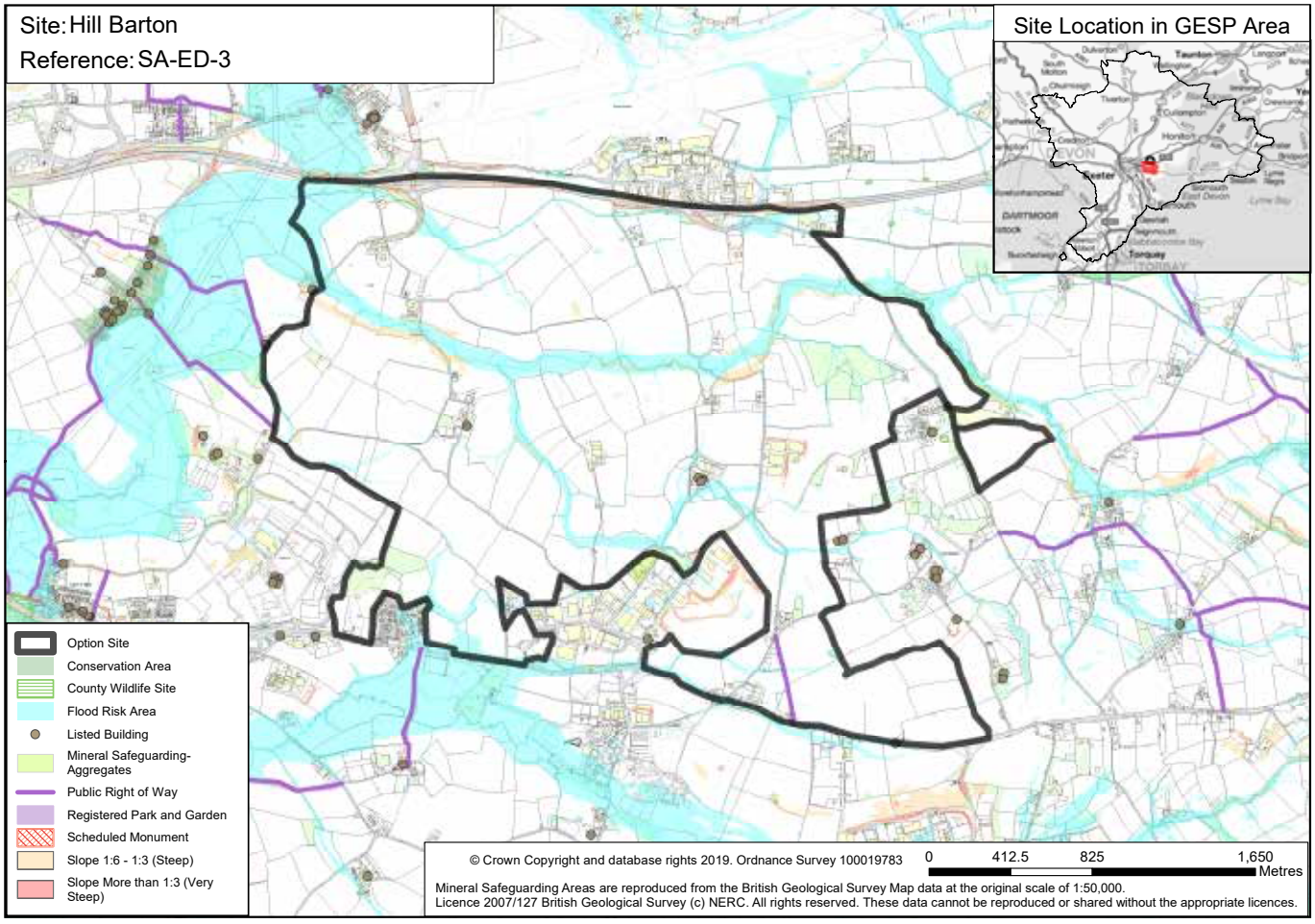
The site has a number of sensitivities which development would need to take into account, including:

- It may impact upon the Pebblebed Heaths and Exe Estuary which are *Natura 2000* protected wildlife sites sensitive to an increase in the number of visitors
- It may contain Great Crested Newts and other *protected species*
- Windmill Hill is the likely location of a major battle during the 16th century Prayerbook Rebellion and has far reaching views
- It is a long distance from existing services and facilities and on its own may not be large enough to deliver a wide range of services and facilities
- Development could increase traffic on the Clyst St Mary roundabout and Junction 30 of the M5 which is at or nearing capacity
- It is near to some grade II listed buildings and the historic settlement of Woodbury Salterton
- A large proportion of the site is high grade agricultural land
- A small area of the site is affected by flooding along the Grindle Brook
- It may be visible from the East Devon Area of Outstanding Natural Beauty
- It is adjacent to the Greendale Barton energy recovery site allocated in the Devon Waste Plan and existing waste uses and is partially within the associated Waste Consultation Zone

## Requirements

Planning requirements for the site will aim to create a great place to live and work, providing well designed new neighbourhoods with appropriate and well managed public open space and safe walking/cycling routes. All sites will need to provide a *mix of homes* (including affordable and custom build), investment in *low carbon* energy and transport, high speed internet and wildlife enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include:

- Funding of measures to reduce the impact on the Pebblebed Heaths and Exe Estuary including provision of *Suitable Alternative Natural Greenspaces* (SANG)
- Improvements to the bus network along the A3052 including park and ride and bus priority
- A new primary school
- A variety of amenities and services including a local centre, employment and healthcare provision.
- Measures to address the risk of flooding on site
- Development will need to respect the privacy of existing dwellings located nearby




| Site Name: Hill Barton | |
|---|---|
| **Site Reference** | SA-ED-3 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | o613766, ip137o4, m1137zj, a91379k, m31378s, gw141y6, 7d15y6f, my145c4, sl15yam, uc15yv7, g715yay, 6c15yu6, v9137vw, ol15yxw, c7141v0, s914y0p, 1n13rl1 |
| **Parish(es)** | Clyst Honiton, Sowton, Farringdon, Aylesbeare |
| **District(s)** | East Devon District Council |
| **Site size** | 660 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | 11,320 – 14,606 homes |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | 10,000 homes |
| **Potential for employment use** | It would need to provide a mix of employment uses alongside housing. |
| **Relationship with existing allocations and other potential GESP sites** | There is a relationship with site options SA-ED-2 (Oil Mill Lane) and SA-ED-7 (Higher Greendale) due to their close proximity and potential for the joint delivery of infrastructure, services and facilities. An adjacent site at Hill Barton is allocated as a strategic energy recovery location in the Devon Waste Plan. |
| **Planning status** | None |
| **Summary description of the site** | A large area largely comprised of rolling farmland extending from the A30 to the A3052. Adjoins Hill Barton industrial area to the south. |

## Opportunities

This site is identified for consideration in the GESP because:

- A large proportion of the site has been put forward by landowners for development
- It comprises predominantly level land with limited landscape or historic sensitivity
- There are approximately 30,000 jobs located within 5km of the site including at Skypark, Science Park, Greendale and Hill Barton Business Parks
- It could deliver a new route connecting the A30 to the A3052
- Size and location would enable high frequency bus services to serve the development
- It could link into the existing *heat networks* and could use *waste heat* from nearby projects including the strategic energy recovery locations at Hill Barton and Greendale Barton which are allocated in the Devon Waste Plan, if these came forward. It could also link to the FAB Link
- It could utilise proximity of Clyst Valley Regional Park and proposed Clyst Valley Trail
- It has the capacity to deliver a self-sufficient, mixed-use garden community
- It could deliver a regional hub for sports

## Sensitivities

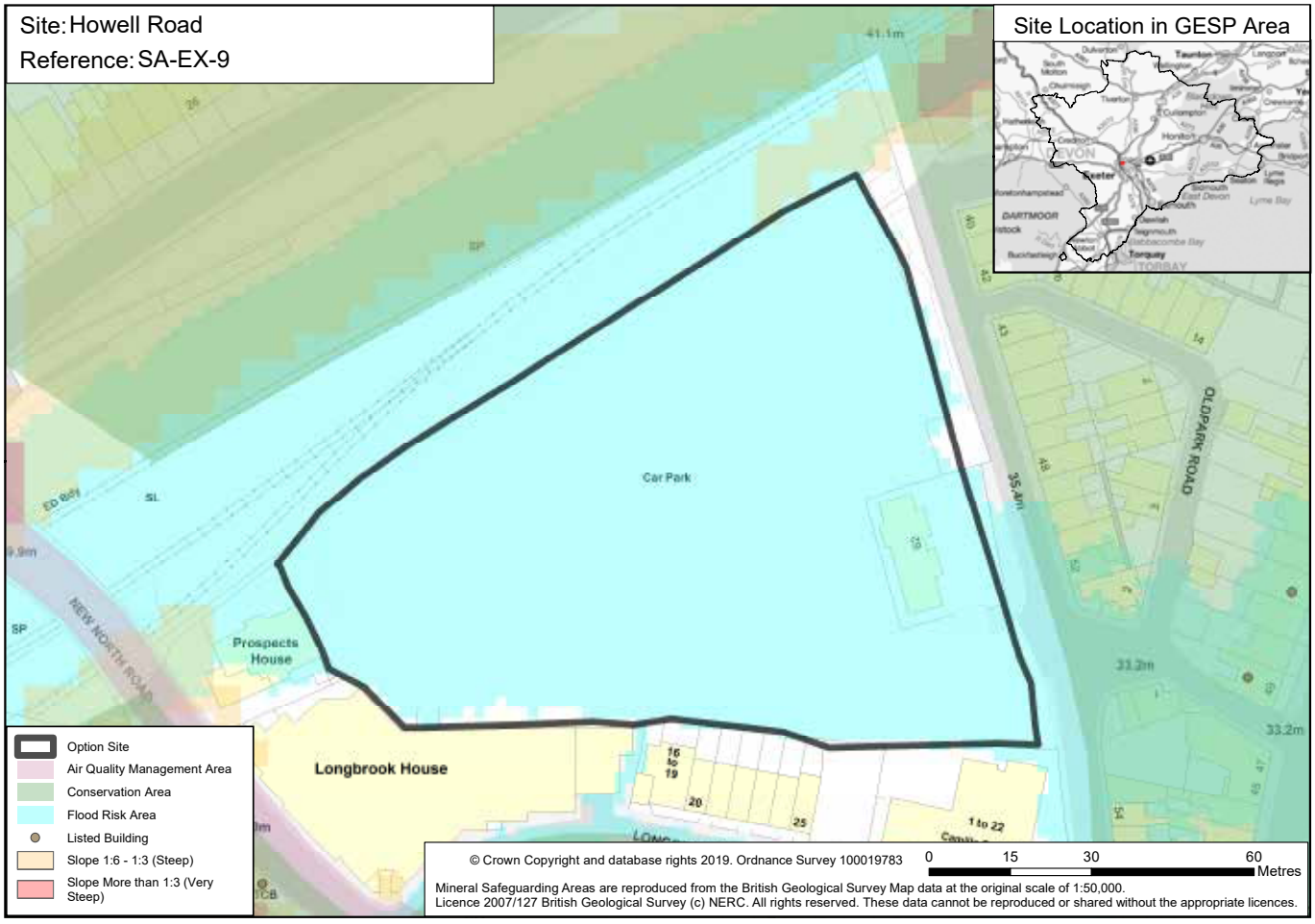
The site has a number of sensitivities which development would need to take into account, including:

- It may impact upon the Pebblebed Heaths and Exe Estuary which are *Natura 2000* protected wildlife sites sensitive to an increase in the number of visitors
- It may contain Great Crested Newts and other *protected species*
- It is not located in close proximity to an existing Railway route
- Development here could increase traffic on the Clyst St Mary Roundabout and Junctions 29 and 30 of the M5 which are at or nearing capacity
- Grade II listed buildings are present and the Grade I listed Bishops Court is nearby
- A large proportion of the site is high grade agricultural land
- A small area of the site is affected by flooding along the Aylesbeare stream / Holbrook
- Part of the site experiences aircraft noise due to its proximity to Exeter airport
- It is adjacent to the Hill Barton energy recovery site allocated in the Devon Waste Plan, the existing waste uses on site and is partially within the associated Waste Consultation Zone

## Requirements

Planning requirements for the site will aim to create a great place to live and work, providing well designed new neighbourhoods with appropriate and well managed public open space and safe walking/cycling routes. All sites will need to provide a *mix of homes* (including affordable and custom build), investment in *low carbon* energy and transport, high speed internet and wildlife enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include:

- Funding of measures to reduce the impact on the Pebblebed Heaths and Exe Estuary including provision of *Suitable Alternative Natural Greenspace (SANG)*
- Extend and improve the Clyst Valley Regional Park including significant woodland planting
- Attractive and legible pedestrian and cycle routes across the A30 and A3052 and into Exeter and contributions towards the delivery of the Clyst Valley Trail
- Considerable improvements to the bus network including provision of new park and ride facilities along both the A30 and A3052 corridors and bus priority on the A3052
- Delivery of an avenue link between the A30 and the A3052
- Delivery of a district heating network utilising *low carbon* heat opportunities and linking to the existing Cranbrook network
- New primary schools including early years plus potentially a new learning and skills campus including early years, primary and secondary provision
- A variety of amenities and services including a town centre, employment, sports facilities, youth, library provision, healthcare provision and a recreation and *biodiversity* corridor along the Aylesbeare Stream
- Development will need to respect the privacy of existing dwellings located nearby
- Measures to address the risk of flooding on site




| Site Name: Howell Road | |
|---|---|
| **Site Reference** | SA-EX-9 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | 7i15yuh |
| **Parish(es)** | Not applicable |
| **District(s)** | Exeter City Council |
| **Site size** | 0.9 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | 72 – 86 homes |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | 106 homes |
| **Potential for employment use** | No |
| **Relationship with existing allocations and other potential GESP sites** | None |
| **Planning status** | None |
| **Summary description of the site** | Large public surface car park and a housing association hostel, located just north of the city centre in a *mixed use* area including homes and businesses. The Exeter-London mainline railway runs along the northern site boundary. |

## Opportunities

This site is identified for consideration in the GESP because:

- It provides an opportunity to make more efficient use of a *brownfield* site
- It has excellent access to public transport and is close to a wide range of job opportunities and facilities, giving the potential for car-free residential development
- It gives an opportunity to significantly enhance the appearance of the area
- A proportion of the site is in public sector ownership, enabling additional influence over design and delivery and the opportunity to reinvest proceeds into city improvements
- Most of the site has been put forward by the landowner for development

## Sensitivities

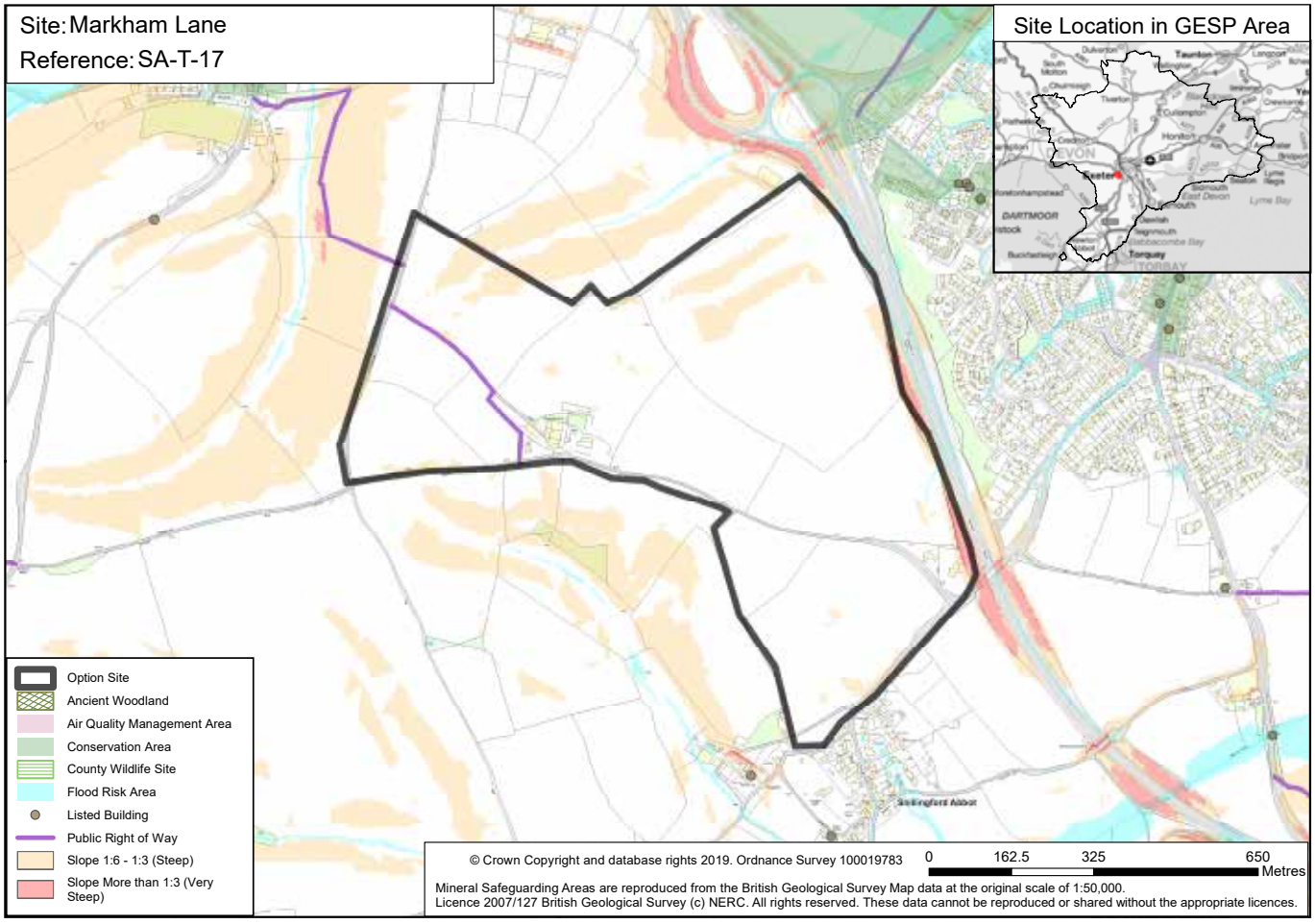
The site has a number of sensitivities which development would need to take into account, including:

- It includes a public car park, a hostel, substantial sewer pipes and an attenuation tank below ground
- It may impact upon the Exe Estuary, which is a *Natura 2000* protected wildlife site sensitive to an increase in the number of visitors
- It is affected by air and noise pollution from nearby roads and the railway and may be contaminated
- It is affected by flood risk

## Requirements

Planning requirements for the site will aim to create a great place to live and work, providing well designed new neighbourhoods with appropriate and well managed public open space and safe walking/cycling routes. All sites will need to provide a *mix of homes* (including affordable and custom build), investment in *low carbon* energy and transport, high speed internet and wildlife enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include:

- High quality and high density design that provides a healthy living environment for new residents and respects the privacy of existing dwellings located nearby
- A new public park at the western end of the site, above the attenuation tank
- Relocation of sewer pipes along the southern and northern boundaries
- Car-free residential development supported by more sustainable transport measures including a car club and e-bikes, plus significant enhancement of pedestrian/cycle routes (potentially including a new pedestrian link between the site and New North Road)
- Funding of measures to reduce the impact on the Exe Estuary, including provision/contribution towards *Suitable Alternative Natural Greenspace (SANG)*
- Financial contributions towards expanded primary and secondary school provision, medical facilities and utilities provision in Exeter




| Site Name: Markham Lane | |
|---|---|
| **Site Reference** | SA-T-17 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | Wt14xs7, u01290n, pn137xi |
| **Parish(es)** | Ide / Shillingford St George |
| **District(s)** | Teignbridge District Council |
| **Site size** | 62 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | 1,004 – 1,280 homes |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | 1100 homes |
| **Potential for employment use** | No |
| **Relationship with existing allocations and other potential GESP sites** | Site is about 2km from South West Exeter (SWE1) urban extension in the Teignbridge *Local Plan* and the site option SA-T-18 (Peamore). |
| **Planning status** | None |
| **Summary description of the site** | This site is a series of agricultural fields on a steep hill on the south-western fringe of Exeter, within the landscape setting of the city. The site is just 3.5km from the city centre, making it potentially accessible by non-car means. The site is currently served by minor single track lanes. |

## Opportunities

This site is identified for consideration in the GESP because:

- A large proportion of the site has been put forward by landowners for development
- The site is close to the city and 1km from Alphington which has a good bus service
- Site is within cycling distance of Exeter including the city centre and Matford
- A proportion is in public sector ownership, providing potential influence over delivery and the opportunity to reinvest proceeds into infrastructure

## Sensitivities

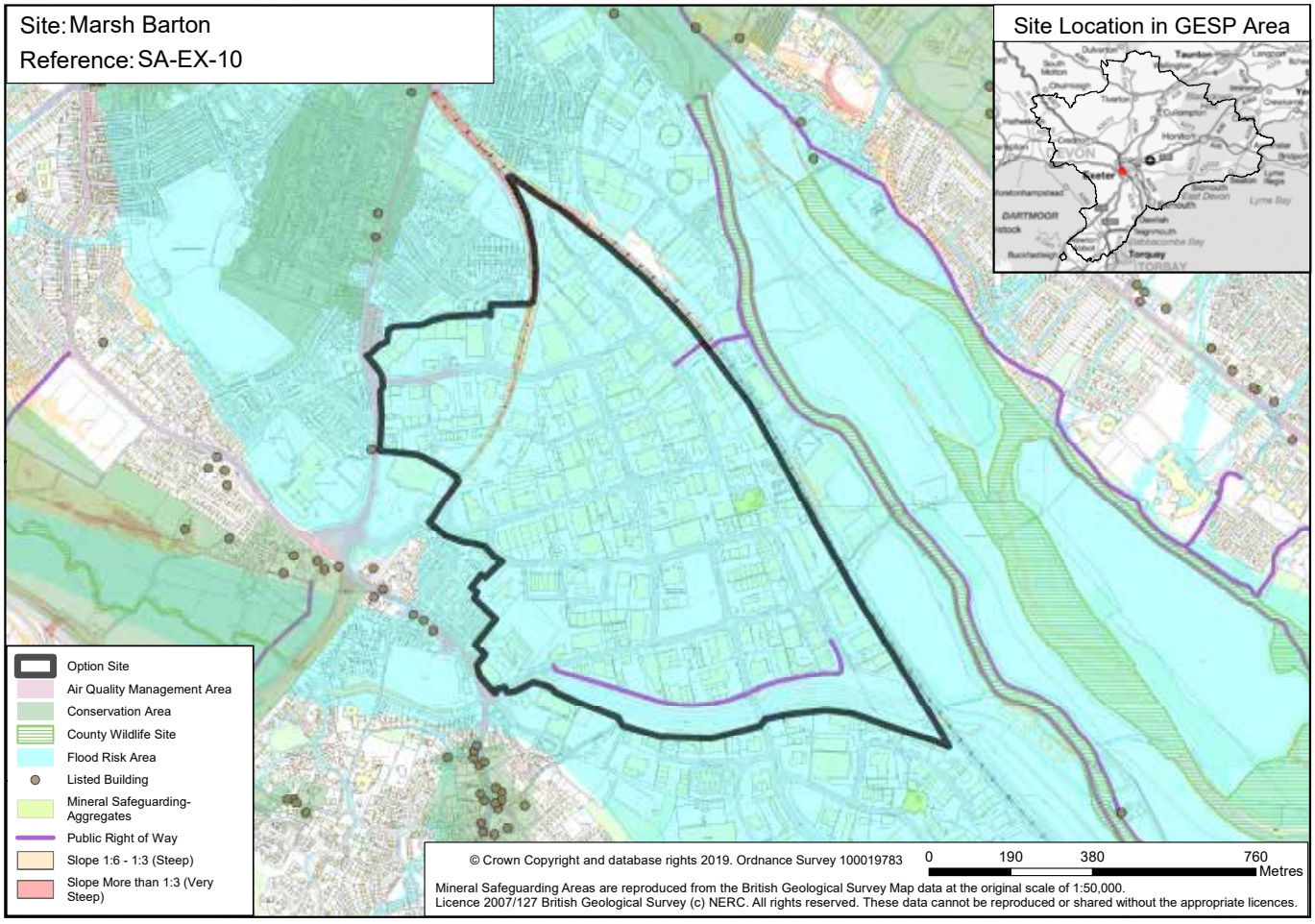
The site has a number of sensitivities which development would need to take into account, including:

- It may impact upon the Exe Estuary, which is a *Natura 2000* protected wildlife site sensitive to an increase in the number of visitors
- It may contain Great Crested Newts and other *protected species*
- Impacts on existing villages of Ide and Shillingford Abbot
- Landscape impact, particularly on the green setting of Exeter. The site is within the locally designated 'Area of Great Landscape Value'
- A large proportion of the site is high grade agricultural land
- Possible noise from A30 and impact on A30 Ide Junction
- Potential for relatively high development costs and infrastructure costs
- Creating a suitable access to the Ide A30 Junction may be unfeasible and requires further investigation

## Requirements

Planning requirements for the site will aim to create a great place to live and work, providing well designed new neighbourhoods with appropriate and well managed public open space and safe walking/cycling routes. All sites will need to provide a *mix of homes* (including affordable and custom build), investment in *low carbon* energy and transport, high speed internet and wildlife enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include:

- Funding of measures to reduce the impact on the Exe Estuary including provision/contribution towards *Suitable Alternative Natural Greenspace (SANG)*
- Ensure protection of *protected species* including Greater Crested Newts and their supporting habitats
- Significant *green infrastructure* designed to minimise the impact of development on the landscape and to provide amenities such as play space and allotments
- Junction and local road network upgrades. Further evidence on the cost and feasibility of improving vehicle accessibility from A30 Ide Junction and Alphington A30 bridge is required, including whether bus services would be capable of serving the site
- Improved foot and cycle routes into Alphington, Shillingford Abbot and Ide
- A new primary school or increased primary school capacity in the local area
- Contribution towards Secondary School and GP provision off site
- A multi-use community building with potential to accommodate a range of community uses
- Measures to address the risk of flooding on site
- Development will need to respect the privacy of existing dwellings located nearby




| Site Name: Marsh Barton | |
|---|---|
| **Site Reference** | SA-EX-10 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | None |
| **Parish(es)** | Not applicable |
| **District(s)** | Exeter City Council |
| **Site size** | 85 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | 4,545 – 5,400 homes |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | 5,544 homes |
| **Potential for employment use** | Would need to incorporate employment floorspace. |
| **Relationship with existing allocations and other potential GESP sites** | Adjoins site option SA-EX-6 (Water Lane) to its east. Policy CP2 of the Exeter Core Strategy protects the employment status of the site. The site is identified for future redevelopment in Exeter City Council's *Liveable Exeter* Programme. |
| **Planning status** | Various employment and commercial permissions across the trading estate area. Planning consent has been granted for a new train station off Alphin Brook Road. |
| **Summary description of the site** | A large area of older employment, retail, quasi retail and car showroom uses in the south of the city, largely bounded by the mainline railway, Alphington Road, residential areas and the Alphin Brook. Generally low rise, lower quality buildings on level ground with main access from south and west. Contains an energy from waste plant in the south east corner, a recycling centre and an emerging retail/leisure quarter near Exeter Retail Park. |

## Opportunities

This site is identified for consideration in the GESP because:

- It provides a substantial, flat *brownfield* redevelopment opportunity
- It is within cycling distance of the city centre and within walking distance of Exeter St Thomas and the proposed Marsh Barton railway stations, the Alphington Road bus route and St Thomas local shops. It therefore has the potential to provide largely car-free residential development
- Redevelopment could significantly enhance the appearance of this key gateway to Exeter City Centre
- A proportion of the site is in public sector ownership, providing additional influence over design and delivery and the opportunity to reinvest proceeds into city improvements
- Additional residents in this area would boost city and local centre viability and create the demand for additional commercial and retail facilities in the area
- It could utilise *waste heat* from the energy from waste facility on site

## Sensitivities

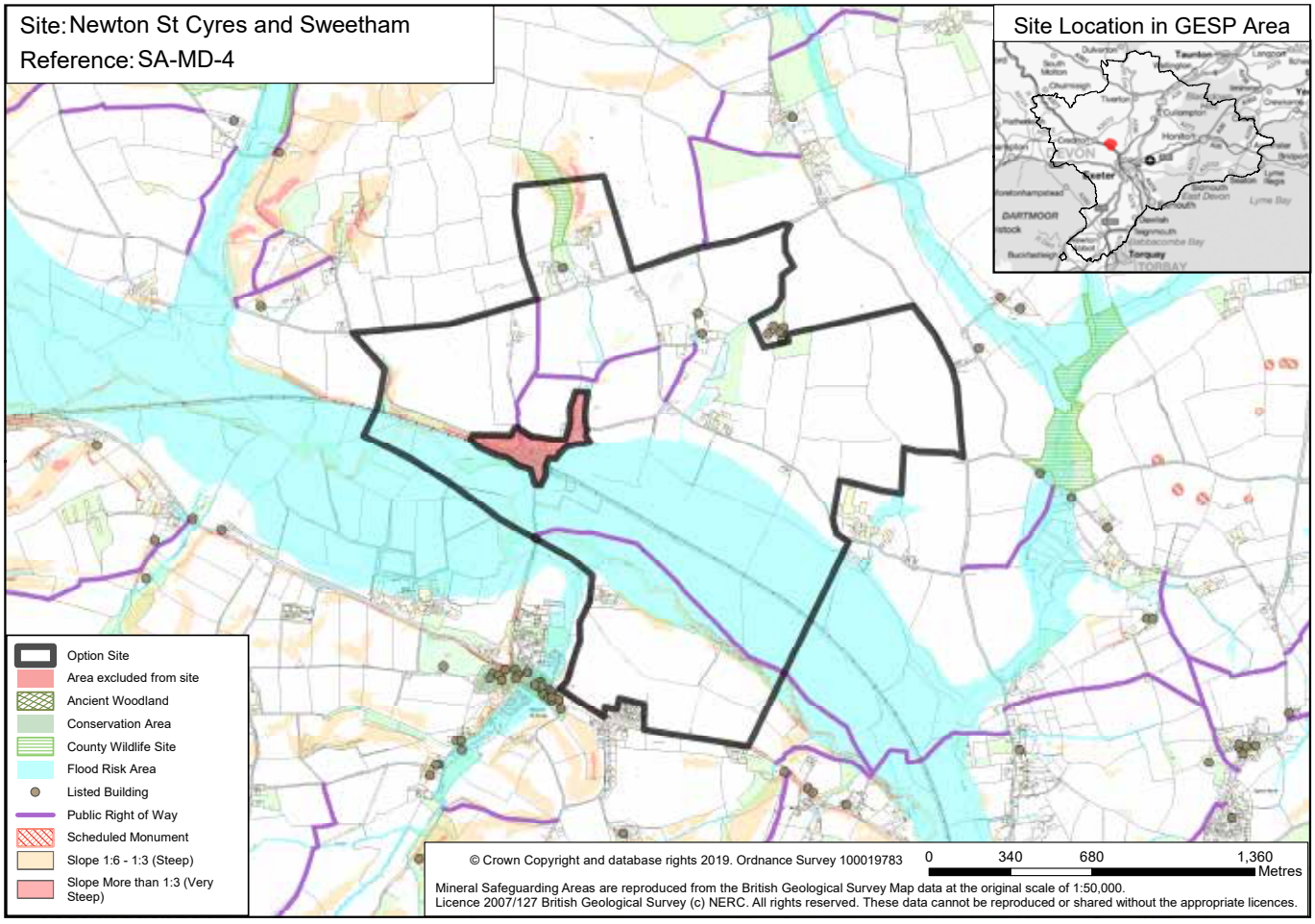
The site has a number of sensitivities which redevelopment would need to take into account, including:

- It may impact upon the Exe Estuary, which is a *Natura 2000* protected wildlife sites sensitive to an increase in the number of visitors
- Loss of, or disturbance to, many local businesses providing about 4,000 – 5,000 jobs
- Existing uses including the energy from waste plant and various recycling and waste management facilities
- All of the site is affected by flooding (flood zone 3)

## Requirements

Planning requirements for the site will aim to create a great place to live and work, providing well designed new neighbourhoods with appropriate and well managed public open space and safe walking/cycling routes. All sites will need to provide a *mix of homes* (including affordable and custom build), investment in *low carbon* energy and transport, high speed internet and wildlife enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include::

- High quality, high density design that provides a healthy living environment for new residents
- A phased release of land for employment use, to allow for consideration of supply and demand
- A local centre at the heart of the site
- A new all-through school comprising a primary school, a secondary school and SEN provision, plus a children's centre service delivery base
- Potential youth and library provision as part of wider community facilities
- Funding of measures to reduce the impact on the Exe Estuary including provision/contribution towards *Suitable Alternative Natural Greenspace (SANG)*
- Largely car-free residential development supported by more sustainable transport measures including car clubs, e-bikes, bus services and some focused junction improvements
- East-west and north-south *green infrastructure*/cycling/walking routes linking to the wider city, including crossings over the railway line into the Water Lane area
- Financial contributions towards the Exeter cycle network and park and ride expansion at Peamore and Alphington
- Flood defence and resilience analysis and infrastructure
- The need for development to take account of the energy from waste plant which would need to be retained. Consideration of the other existing waste management uses on site
- Development will need to respect the privacy of nearby dwellings




| Site Name: Newton St Cyres and Sweetham | |
|---|---|
| **Site Reference** | SA-MD-4 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | mh15yzj, wm15y5z |
| **Parish(es)** | Newton St Cyres, Shobrooke, Upton Pyne |
| **District(s)** | Mid Devon District Council, East Devon District Council |
| **Site size** | 303 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | 3,787 – 4,886 homes |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | 1,200 homes |
| **Potential for employment use** | It would need to provide a mix of employment uses alongside housing. |
| **Relationship with existing allocations and other potential GESP sites** | Possible relationship with site options SA-MD-3 (Crediton South) and SA-ED-26 (Cowley) to collectively deliver transport infrastructure, including rail, bus and cycle improvements. |
| **Planning status** | None |
| **Summary description of the site** | The site is around 8km from Exeter and comprises predominantly gently undulating agricultural land. The hamlet of Sweetham is located in the centre of the site with the larger village of Newton St Cyres on the south-west boundary. The site includes farms and isolated dwellings, with a golf course near Higher Rewe. The Tarka Line railway segregates the site with a small station at Sweetham. |

## Opportunities

This site is identified for consideration in the GESP because:

- The site is reasonably close to Exeter, with the potential to access high quality jobs in the city
- The train station offers the potential for residents to travel by rail, with less than 10 minute journey time, into Exeter (or beyond)
- With provision of an appropriate route residents could cycle to Exeter or Crediton
- The characteristics of the site provides the opportunity to deliver a new sensitively designed rural settlement based on garden village principles
- In combination with the other potential GESP sites (Crediton and Cowley) there is potential to bring investment in improved rail services and cycle links e.g. the proposed cycle route (the Boniface Trail) from Crediton to Exeter

## Sensitivities

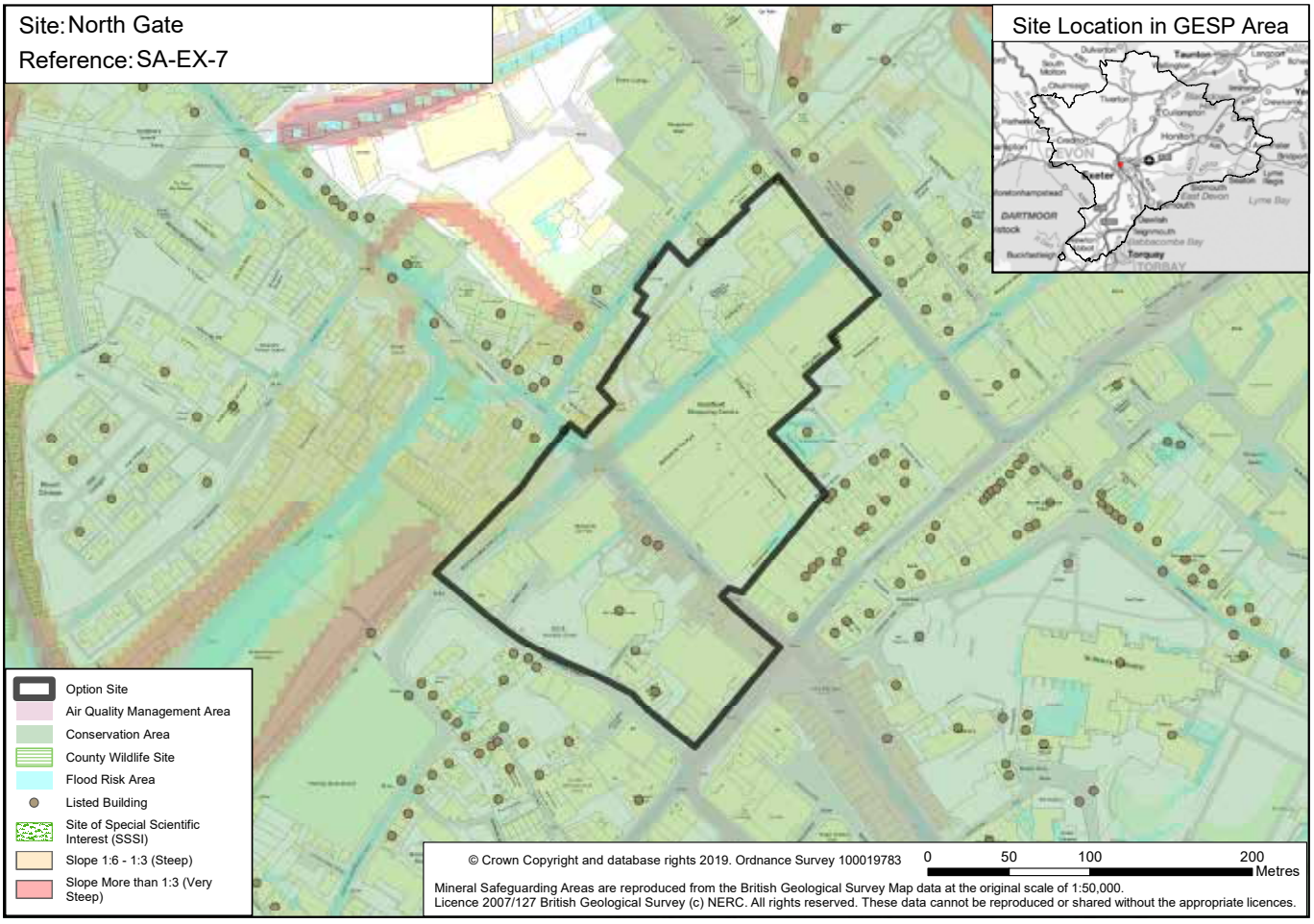
The site has a number of sensitivities which development would need to take into account, including:

- A number of designated heritage assets are within or the edge of the site including Grade II listed buildings and the Newton St Cyres Conservation Area
- A large area of the site is affected by flooding along the River Creedy and includes sections of Langford Road and Station Road
- The highway network in the area is restricted and is likely to require significant investment to provide increased capacity and flood resilient access to the site
- The site is segregated by the Tarka Line railway, with access points to Sweetham over railway bridges on Langford Road and Station Road
- Crediton and Exeter Air Quality Management Areas could be impacted from increased travel movements.
- A large proportion of the site is high grade agricultural land

## Requirements

Planning requirements for the site will aim to create a great place to live and work, providing well designed new neighbourhoods with appropriate and well managed public open space and safe walking/cycling routes. All sites will need to provide a *mix of homes* (including affordable and custom build), investment in *low carbon* energy and transport, high speed internet and wildlife enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include:

- Contribution to the strategic cycle link from Crediton to Exeter (the Boniface Trail)
- Enhancements to public transport infrastructure to enable increased frequency of rail and bus services between Crediton and Exeter, with more frequent stops at Newton St Cyres station
- Improved cycle facilities at Newton St Cyres railway station
- A package of improvements to upgrade Langford Road to address increased capacity and enable flood resilient access to the site
- A primary school
- Financial contributions towards secondary school provision and transport, and GP services
- A village centre to include local services, a multi-functional community building, and employment space such as a work hub
- Measures to address the risk of flooding on site
- Development will need to respect the privacy of existing dwellings located nearby




| Site Name: North Gate | |
|---|---|
| **Site Reference** | SA-EX-7 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | ca15y7f |
| **Parish(es)** | Not applicable |
| **District(s)** | Exeter City Council |
| **Site size** | 3.9 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | 181 - 216 homes |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | 310 homes |
| **Potential for employment use** | Yes |
| **Relationship with existing allocations and other potential GESP sites** | The Guildhall and Harlequins Shopping Centres are identified as part of Exeter's primary shopping area in the Exeter *Local Plan* First Review. The site is close to site option SA-EX-23 (South St, Market St and Fore St). The site is identified for future redevelopment in Exeter City Council's *Liveable Exeter* Programme. |
| **Planning status** | Site has been the subject of numerous planning consents. The Harlequins Shopping Centre is currently the subject of a planning application for redevelopment including co-living apartments and a hotel. |
| **Summary description of the site** | Mixed-use site within Exeter's urban area, including part of the Guildhall and all of the Harlequins Shopping Centres (developed in the 1980/90s), alongside the Guildhall and Mary Arches public car parks, a large listed Bingo Hall, smaller scale commercial uses and homes. |

## Opportunities

This site is identified for consideration in the GESP because:

- It provides an opportunity to make more efficient use of a *brownfield* site
- It has excellent access to public transport and is close to a wide range of job opportunities and facilities, giving the potential for car-free residential development
- It gives an opportunity to significantly enhance the appearance of the area and to improve the setting of the City Wall and listed buildings
- A proportion of the site in public sector ownership, enabling additional influence over design and delivery and the opportunity to reinvest proceeds into city improvements
- Part of the site has been put forward by landowners for redevelopment
- There are on-going structural changes in the retail sector
- Additional residents in this area could boost city centre viability

## Sensitivities

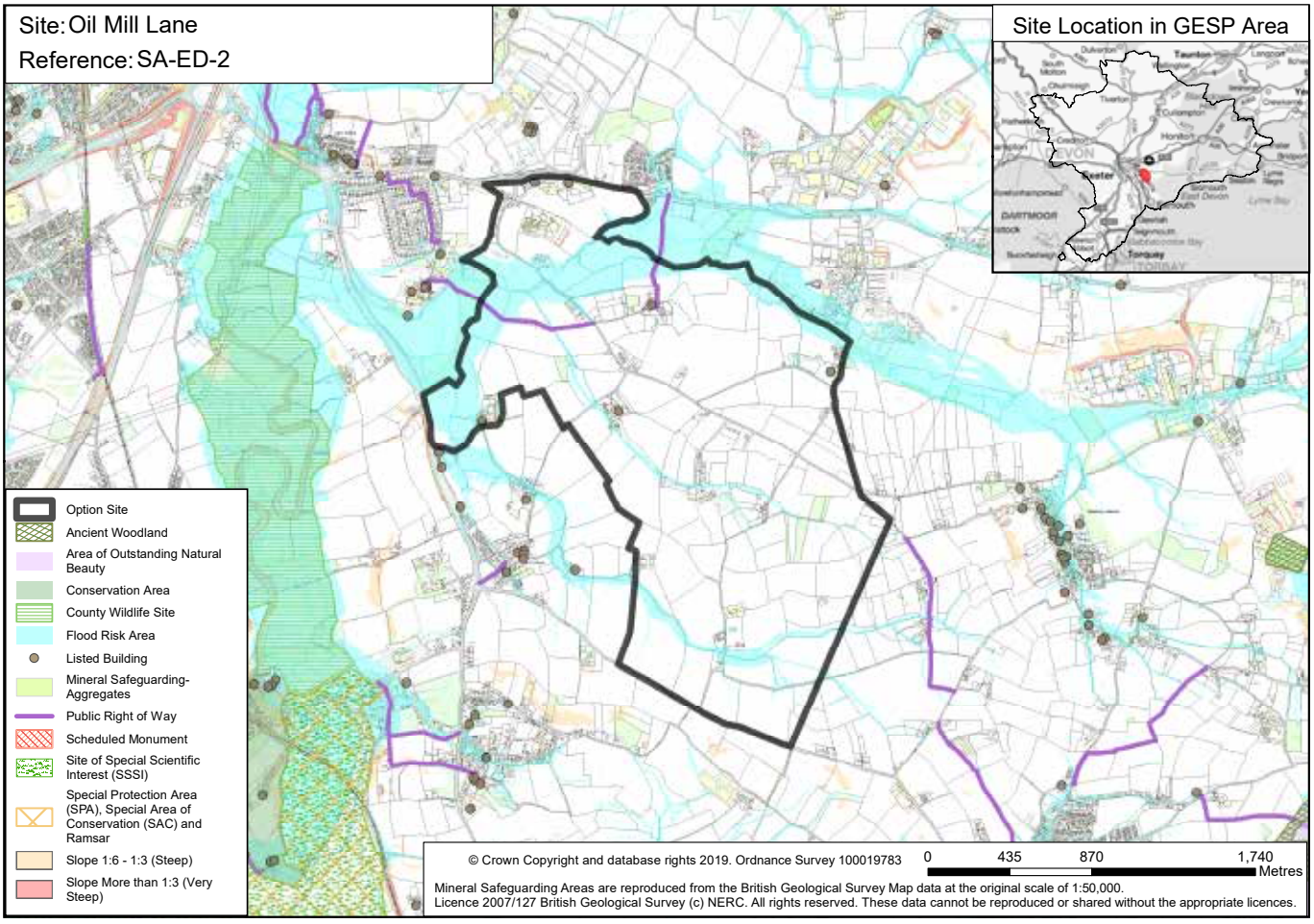
The site has a number of sensitivities which development would need to take into account, including:

- It includes existing businesses, homes and public car parks
- It may contain important archaeological remains
- It is in the City Centre Conservation Area and contains or lies close to the City Wall (a Scheduled Ancient Monument) and numerous listed and locally listed buildings
- It may impact upon the Exe Estuary, which is a *Natura 2000* protected wildlife site sensitive to an increase in the number of visitors
- It may be contaminated and is affected by dust, air and noise pollution from existing businesses and the transport network

## Requirements

Planning requirements for the site will aim to create a great place to live and work, providing well designed new neighbourhoods with appropriate and well managed public open space and safe walking/cycling routes. All sites will need to provide a *mix of homes* (including affordable and custom build), investment in *low carbon* energy and transport, high speed internet and wildlife enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include:

- Redevelopment for homes of the Harlequins Shopping Centre and for shops/offices/homes of suitable parts of the Guildhall Shopping Centre
- The need to respect the privacy of existing dwellings located nearby
- High quality, high density design that celebrates and preserves the site's heritage assets
- Significant enhancement of public realm and walking/cycling routes through the site, linked to the wider city
- Measures to minimise car use, including car-free residential development supported by mores sustainable transport measures including car clubs and e-bikes and financial contributions towards highways junction improvements
- Funding of measures to reduce the impact on the Exe Estuary, including provision/contribution towards *Suitable Alternative Natural Greenspace (SANG)*
- Financial contributions towards the expansion of primary and secondary schools in Exeter




| Site Name: Oil Mill Lane | |
|---|---|
| **Site Reference** | SA-ED-2 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | 4e14yea, r614ymq, lc15xij, fm12vyh |
| **Parish(es)** | Sowton, Clyst St Mary, Clyst St George, Woodbury |
| **District(s)** | East Devon District Council |
| **Site size** | 380 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | 6,696 - 8,640 homes |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | 4,000 homes |
| **Potential for employment use** | It would need to provide a mix of employment uses alongside housing. |
| **Relationship with existing allocations and other potential GESP sites** | There is a relationship with site options SA-ED-3 (Hill Barton) and SA-ED-7 (Higher Greendale) due to their close proximity and potential for the joint delivery of infrastructure, services and facilities. |
| **Planning status** | None |
| **Summary description of the site** | A large area largely comprising rolling farmland extending from the A3052 to Woodbury Road. Adjoins Crealy Adventure Park to the north-east. |

## Opportunities

This site is identified for consideration in the GESP because:

- It comprises predominantly level land with limited landscape or historic sensitivity
- There are approximately 30,000 jobs located within 5km of the site including at Skypark, Science Park, Greendale and Hill Barton Business Parks
- It could deliver a link road connecting the A376 and A3052 which could relieve pressure from local traffic on the Clyst St Mary Roundabout
- It could help to deliver of Clyst Valley Regional Park and proposed Clyst Valley Trail
- It has the capacity to deliver a self-sufficient, mixed-use garden community
- It could utilise *waste heat* from nearby projects including the strategic energy recovery locations at Hill Barton and Greendale Barton which are allocated in the Devon Waste Plan if these came forward

## Sensitivities

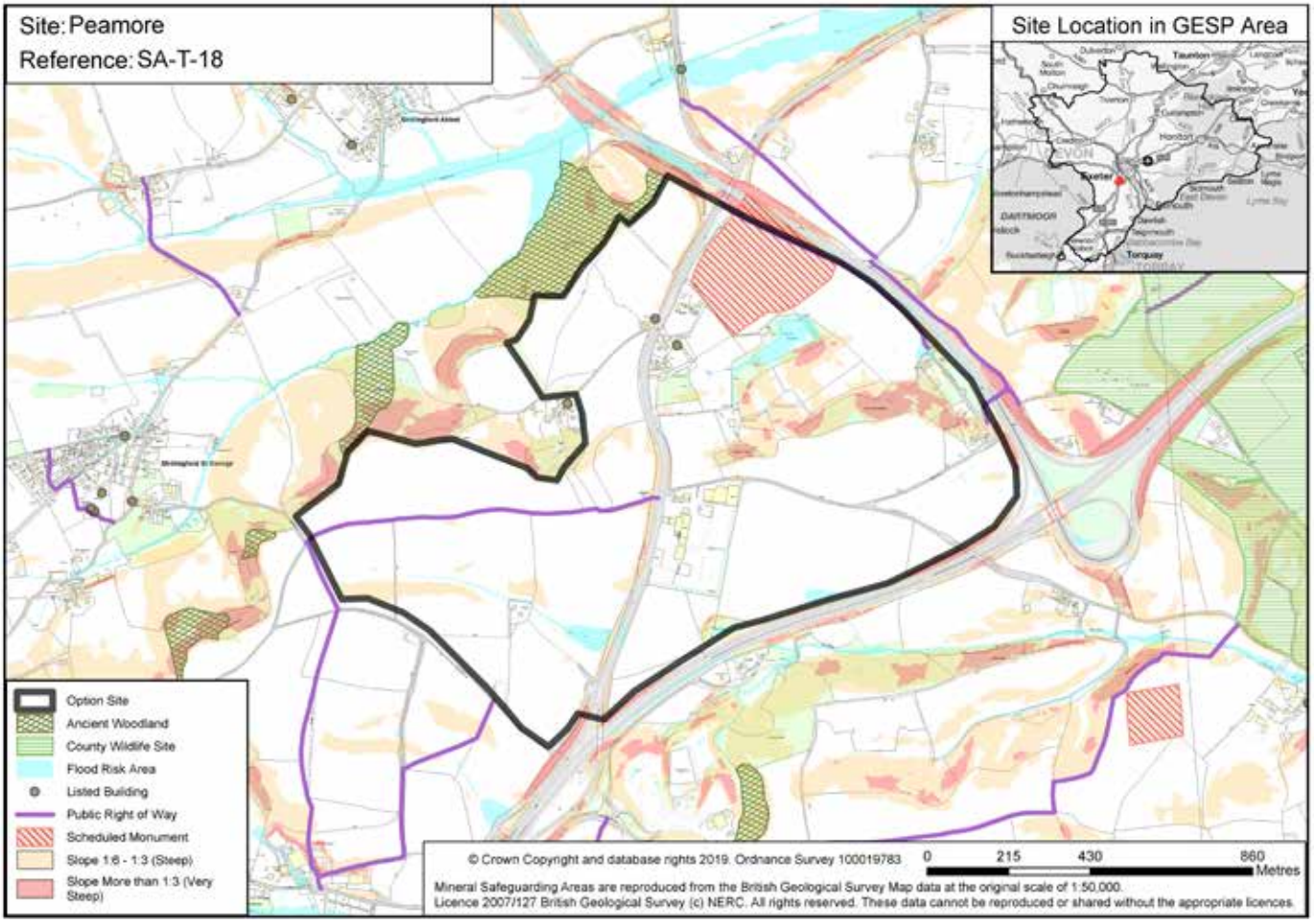
The site has a number of sensitivities which development would need to take into account, including:

- It may impact upon the Pebblebed Heaths and Exe Estuary which are *Natura 2000* protected wildlife sites sensitive to an increase in the number of visitors
- It may contain Great Crested Newts and other *protected species*
- It is not located in close proximity to an existing railway line
- Development could increase traffic on the Clyst St Mary roundabout and Junction 30 of the M5 which is at or nearing capacity. Potential traffic impact on Topsham
- Grade II listed buildings are present and the Grade II* listed Bishops Court is nearby
- It is located near to historic settlements of Clyst St George, Clyst St Mary and Woodbury Salterton
- Grade 2 and 3a agricultural land is present on the site
- An area of the site is affected by flooding along the Grindle Brook
- Possible difficulty in accessing the site over a floodplain
- Possible difficulty in the availability of land for development
- It may be visible from the East Devon Area of Outstanding Natural Beauty

## Requirements

Planning requirements for the site will aim to create a great place to live and work, providing well designed new neighbourhoods with appropriate and well managed public open space and safe walking/cycling routes. All sites will need to provide a *mix of homes* (including affordable and custom build), investment in *low carbon* energy and transport, high speed internet and wildlife enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include:

- Funding of measures to reduce the impact on the Pebblebed Heaths and Exe Estuary including provision of *Suitable Alternative Natural Greenspace (SANG)*
- Extending and improving the Clyst Valley Regional Park
- Attractive and legible pedestrian and cycle routes towards the Exe Estuary Trail, Topsham Train station and into Exeter
- The delivery of a section of the Clyst Valley Trail
- Considerable improvements to the bus network including provision of new park and ride facilities and bus priority along the A3052 corridor
- The delivery of an avenue link between the A376 and A3052
- New primary schools including early years plus potential provision of a new learning and skills campus including early years, primary and secondary provision
- A variety of amenities and services including a town centre, employment, sports facilities, healthcare, youth, library provision and a recreation and *biodiversity* corridor along the Grindle Brook
- Measures to address the risk of flooding on site
- Development will need to respect the privacy of existing dwellings located nearby




| Site Name: Peamore | |
|---|---|
| **Site Reference** | SA-T-18 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | 7e137me, wx1372u |
| **Parish(es)** | Exminster Parish & Shillingford St George Parish |
| **District(s)** | Teignbridge District Council |
| **Site size** | 146 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | 1,612 – 2,080 homes |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | 1500 homes |
| **Potential for employment use** | The site includes a permission for approximately 16 hectares of employment land and would need to provide a mix of employment uses alongside housing. |
| **Relationship with existing allocations and other potential GESP sites** | Adjacent to existing Teignbridge *Local Plan* & Exeter Core Strategy allocations in South West Exeter. |
| **Planning status** | Part of site includes *outline planning consent* to extend industrial estate with 16 hectares of employment land granted in 2018 |
| **Summary description of the site** | The site is south west of Exeter, 4-5km from the centre. A significant proportion of the site is defined by the Grade II listed Peamore House and its estate, including listed buildings, features and parkland trees. This area is agricultural in use. Residential properties scatter the site, with a concentration at Little Silver. Towards the south of the site is an industrial estate, which has planning permission for an extension. The site is undulating, with areas of steep slope. Around the site edges is the A38 and A30 with the A379 bisecting. |

## Opportunities

This site is identified for consideration in the GESP because:

- A large proportion of the site has been put forward by landowners for development
- The site contains an existing substantial employment planning permission, which would enable jobs within walking distance for residents
- Devon County Council has agreed to pursue a park and ride site in this location to provide a link to Exeter
- The site is adjacent to the existing South West Exeter allocation with opportunities for shared infrastructure
- The site is within cycling distance of Exeter
- Appropriate site layout and public realm enhancements could enhance the setting of Peamore House and estate, and the Scheduled Monument
- The A379 bisecting the site largely has sufficient width to construct segregated cycle lanes

## Sensitivities

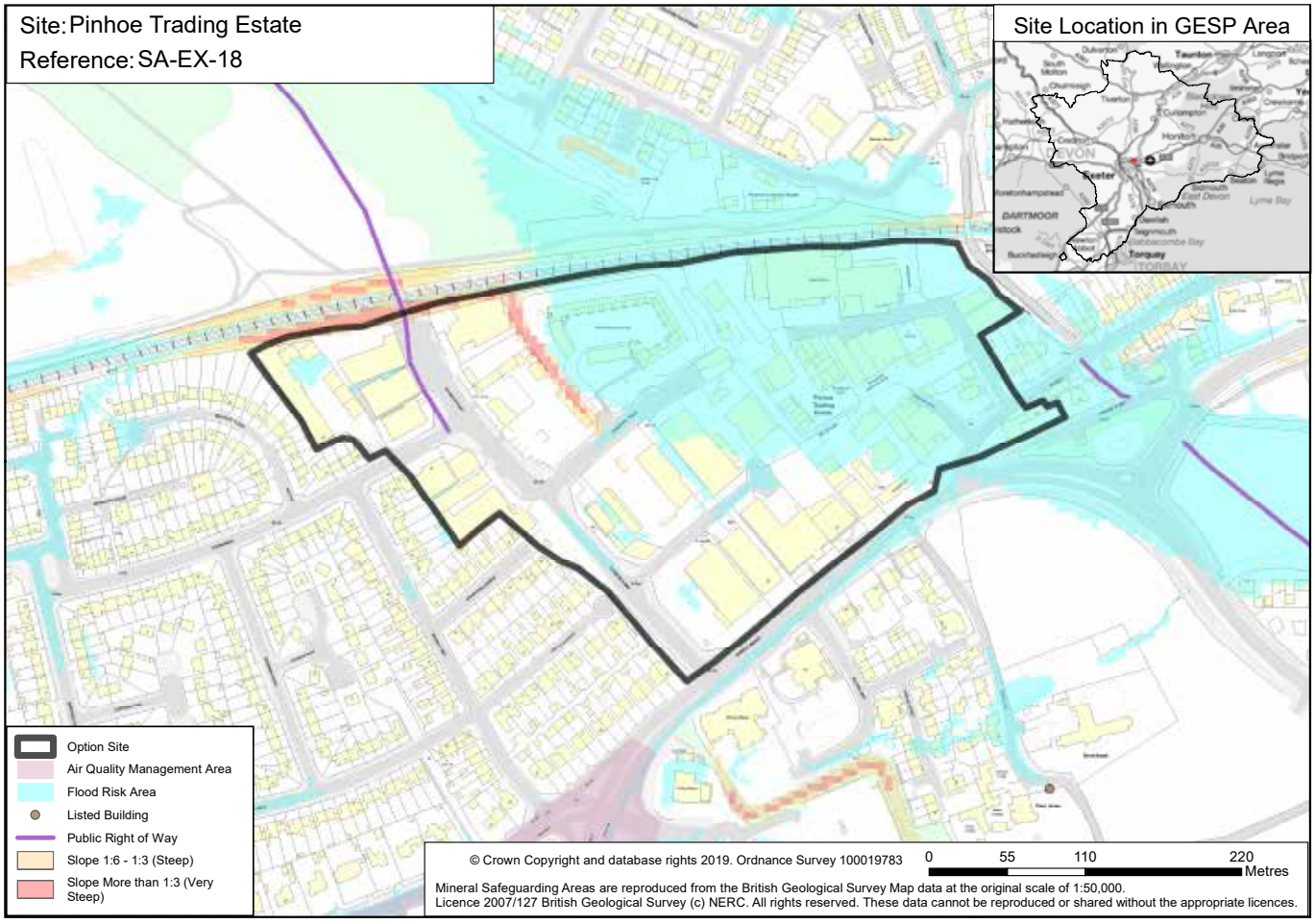
The site has a number of sensitivities which development would need to take into account, including:

- Peamore House and other listed buildings and features which form part of the historic house estate
- The Scheduled Monument
- It may impact on the Exe Estuary and Dawlish Warren which are *Natura 2000* protected wildlife sites sensitive to an increase in the number of visitors
- Wooded areas, including Little Silver Plantation and with Ancient Woodland next to the site
- The site may contain Great Crested Newts, Cirl Buntings and other *protected species*
- Within Area of Great Landscape Value designation (identified in Teignbridge *Local Plan*)
- A large proportion of the site is high grade agricultural land
- Steeper slope areas within the site
- The impact of the surrounding and bisecting trunk and major roads on the site

## Requirements

Planning requirements for the site will aim to create a great place to live and work, providing well designed new neighbourhoods with appropriate and well managed public open space and safe walking/cycling routes. All sites will need to provide a *mix of homes* (including affordable and custom build), investment in *low carbon* energy and transport, high speed internet and wildlife enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include:

- A Park and Ride site and safeguarding of a potential new north bound sliproad onto the A38. These would bring local benefit to the site, and also wider region with the delivery of strategic transport infrastructure
- Improved cycle and walking links towards Exeter including bridge points over the A30
- Various highway and access improvements, including public realm enhancement of the A379
- A primary school
- A community building, flexible in design to host local services as required
- Contribution towards secondary school and GP provision off site
- Funding of measures to reduce the impact on the Exe Estuary and Dawlish Warren, including provision/contribution towards *Suitable Alternative Natural Greenspace (SANG)*
- Potential connection to South West Exeter district heating network
- Development will need to respect the privacy of existing dwellings within and nearby the site
- Significant employment land delivery reflecting the existing planning permission




| Site Name: Pinhoe Trading Estate | |
|---|---|
| **Site Reference** | SA-EX-18 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | None |
| **Parish(es)** | Not applicable |
| **District(s)** | Exeter City Council |
| **Site size** | 9.4 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | 351 – 417 homes |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | 278 homes |
| **Potential for employment use** | Would need to incorporate employment floorspace. |
| **Relationship with existing allocations and other potential GESP sites** | Monkerton / Hill Barton strategic allocation, made in the Exeter Core Strategy, is to the south. |
| **Planning status** | The site has been the subject of numerous planning consents. The trading estate is protected for employment use by Policy CP4 of the Exeter Core Strategy and is also covered by the waste consultation zone for Pinbrook recycling centre |
| **Summary description of the site** | Suburban trading estate comprising a range of unit sizes, together Pinbrook Recycling Centre, one home and a supermarket. |

## Opportunities

This site is identified for consideration in the GESP because:

- It provides an opportunity to make more efficient use of a *brownfield* site
- It has good access to public transport, is on a strategic cycle route, and is close to a wide range of job opportunities and facilities, giving the potential for car-free residential development
- It gives an opportunity to significantly enhance the appearance of the area
- A proportion of the site is in public sector ownership, enabling additional influence over design and delivery and the opportunity to reinvest proceeds into city improvements

## Sensitivities

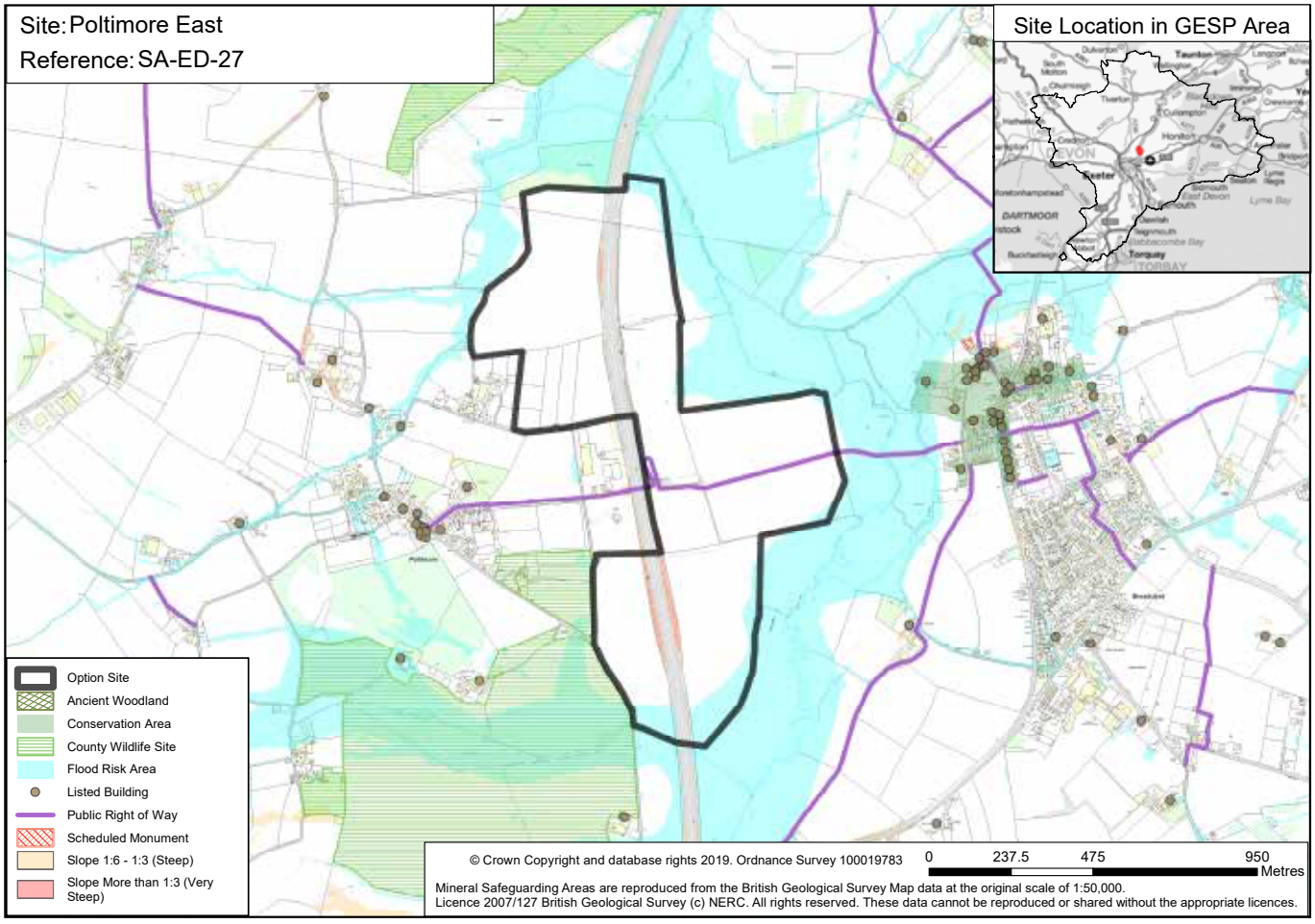
The site has a number of sensitivities which redevelopment would need to take into account, including:

- It includes a number of employment and retail premises and a home
- Part of the site is affected by the Pin Brook floodplain
- The site includes Pinbrook Recycling Centre and its Waste Consultation Zone
- It is likely to be contaminated and is affected by air and noise pollution from existing businesses, vehicles and the railway line
- It may impact upon the Exe Estuary and Pebblebed Heaths, which are *Natura 2000* protected wildlife site sensitive to an increase in the number of visitors

## Requirements

Planning requirements for the site will aim to create a great place to live and work, providing well designed new neighbourhoods with appropriate and well managed public open space and safe walking/cycling routes. All sites will need to provide a *mix of homes* (including affordable and custom build), investment in *low carbon* energy and transport, high speed internet and wildlife enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include:

- A phased release of land for employment use, to allow for consideration of supply and demand Consideration of the recycling centre to enable continued operation
- High quality, high density design that creates a healthy living environment for residents and includes a new wetland park around the Pin Brook to address the risk of flooding
- Funding of measures to reduce the impact on the Exe Estuary and Pebblebed Heaths, including provision/contribution towards *Suitable Alternative Natural Greenspace (SANG)*
- Measures to minimise car use, including potential car-free residential development, motor vehicular access restrictions and financial contributions towards highways junction improvements, park and ride facilities and enhancement of pedestrian/cycle routes including linking to strategic cycle route
- Financial contributions towards the expansion of primary and secondary schools, medical facilities and utilities provision in Exeter
- The need to respect the privacy of nearby dwellings




| Site Name: Poltimore East | |
|---|---|
| **Site Reference** | SA-ED-27 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | u715y6r |
| **Parish(es)** | Poltimore |
| **District(s)** | East Devon District Council |
| **Site size** | 44.3 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | Motorway Services Area only |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | Motorway Services Area only |
| **Potential for employment use** | No |
| **Relationship with existing allocations and other potential GESP sites** | Falls largely within the Clyst Valley Regional park allocation in the East Devon *Local Plan*. |
| **Planning status** | None |
| **Summary description of the site** | A series of agricultural fields on a shallow ridge which slopes gently down eastwards towards the River Clyst. The M5 passes north-south through its centre and the historic villages of Poltimore and Broadclyst are situated 400m to the west and east respectively. The grade II* listed Poltimore house is situated some 400m to the south-west. |

## Opportunities

This site is identified for consideration in the GESP because:

- A large proportion of the site has been put forward by landowners for development
- It provides an opportunity to reconsider the existing motorway service station provision at Exeter which could free up the existing site for alternative uses and relieve pressure on Junction 30 of the M5
- There are limited feasible locations for the proposed use between Junctions 28 and 30
- It could deliver part of the proposed Clyst Valley Trail with the potential for co-location of new educational and visitor facilities related to the Clyst Valley Regional Park
- It could deliver *biodiversity* and recreational enhancements to the Clyst Valley Regional Park
- It could provide a link to Poltimore House which is on the Historic England heritage at risk register, increasing the number of potential visitors which may aid in restoration efforts

## Sensitivities

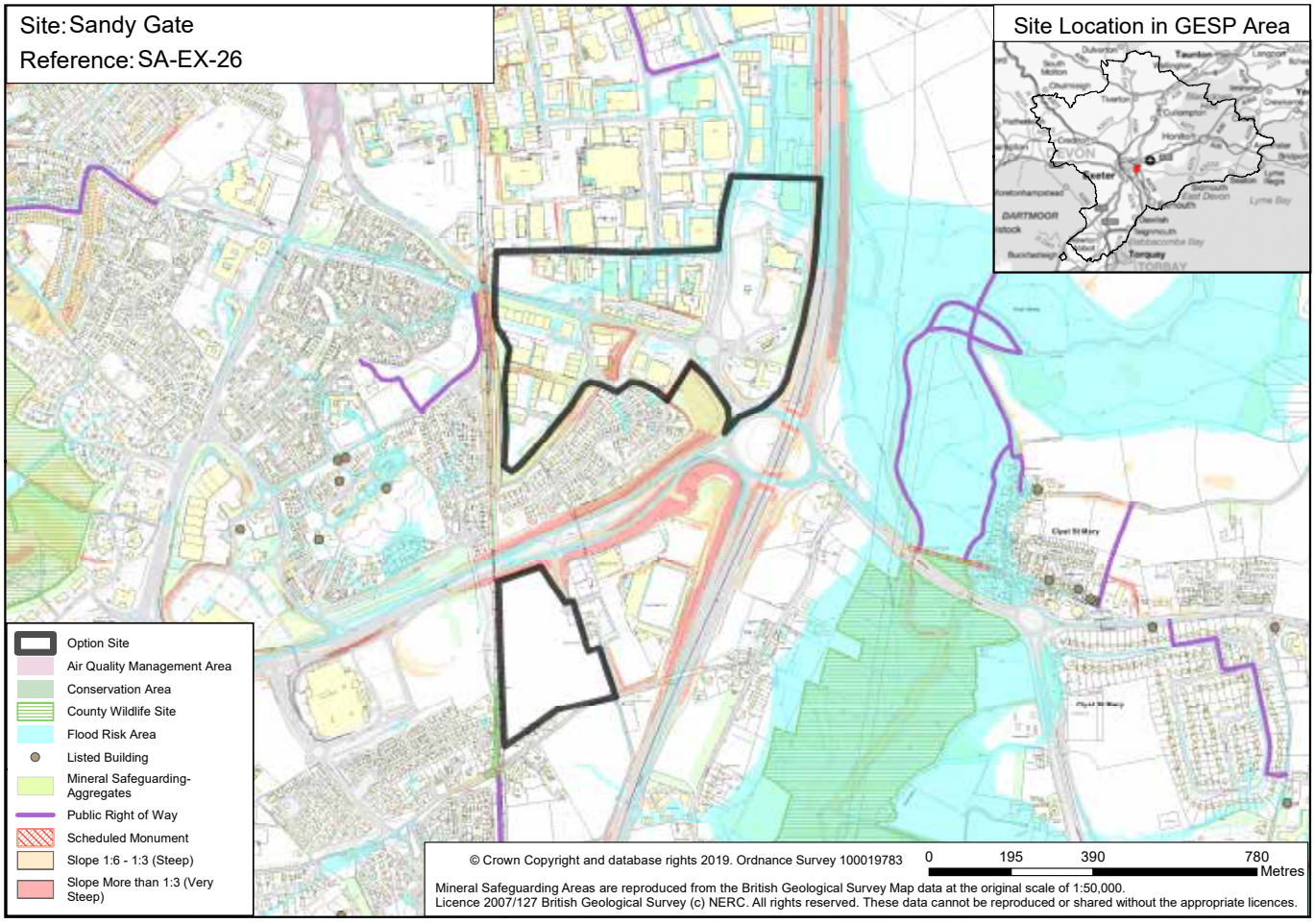
The site has a number of sensitivities which development would need to take into account, including:

- Site is largely within the East Devon *Local Plan* designated Clyst Valley Regional Park
- It could impact on views from Killerton Estate, Poltimore House and Broadclyst Village, which are important heritage assets in the area
- A public footpath runs east-west through the site, crossing over the motorway at this point – this is used by the Two Counties Way regional walking route and is also proposed for inclusion in the Clyst Valley Trail
- It contains Grade 2 and 3a agricultural land
- It may contain Great Crested Newts and other *protected species*

## Requirements

Planning requirements for the site will aim to create a high quality visitor experience for motorway users in both directions with direct access from the M5 as an "on-line" facility. It will need to be future-proofed to serve a high proportion of electric vehicles with capacity to increase this to 100%. Other emerging requirements include:

- The site would be considered in the context of potential relocation of the existing Motorway Service Area at Junction 30
- Bespoke, high quality design, open spaces and landscaping to reflect its visibility and sensitive countryside location close to heritage assets
- Appropriate financial and/or land in lieu contributions towards the creation and enhancement of the Clyst Valley Regional Park and Clyst Valley Trail
- Retention of the public right of way/long distance footpath running through the site with access to the on-site food, comfort and other facilities
- Contribution towards the enhancement of Poltimore House as a potential key visitor attraction in the area




| Site Name: Sandy Gate | |
|---|---|
| **Site Reference** | SA-EX-26 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | fe13bki |
| **Parish(es)** | Not applicable |
| **District(s)** | Exeter City Council |
| **Site size** | 36 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | 625 - 806 homes |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | 1,050 homes |
| **Potential for employment use** | Yes |
| **Relationship with existing allocations and other potential GESP sites** | A potential alternative motorway service station is identified at site SA-ED-27 (Poltimore East). The site is identified for future redevelopment in Exeter City Council's *Liveable Exeter* Programme. |
| **Planning status** | The southern section of the site is allocated in the Newcourt Strategic allocation of the Exeter Core Strategy |
| **Summary description of the site** | A split site lying to the west of Junction 30 of the M5 motorway. The site contains a motorway services, fuel station, retail, surface car parking/park & ride, industrial/ employment units, hotel, restaurants and cafés, and agricultural land. |

## Opportunities

This site is identified for consideration in the GESP because:

- It would support the relocation of the Motorway Service Area with potential to relieve congestion at Junction 30
- It provides an opportunity to make more efficient use of a *brownfield* site
- It is within cycling distance of Exeter city centre and has excellent access to public transport (bus services and Digby & Sowton Railway Station) giving the potential for car-free residential development
- It has good proximity to existing key employment areas and job opportunities, including Sowton and Exeter city centre, with potential for improved active travel connections.

## Sensitivities

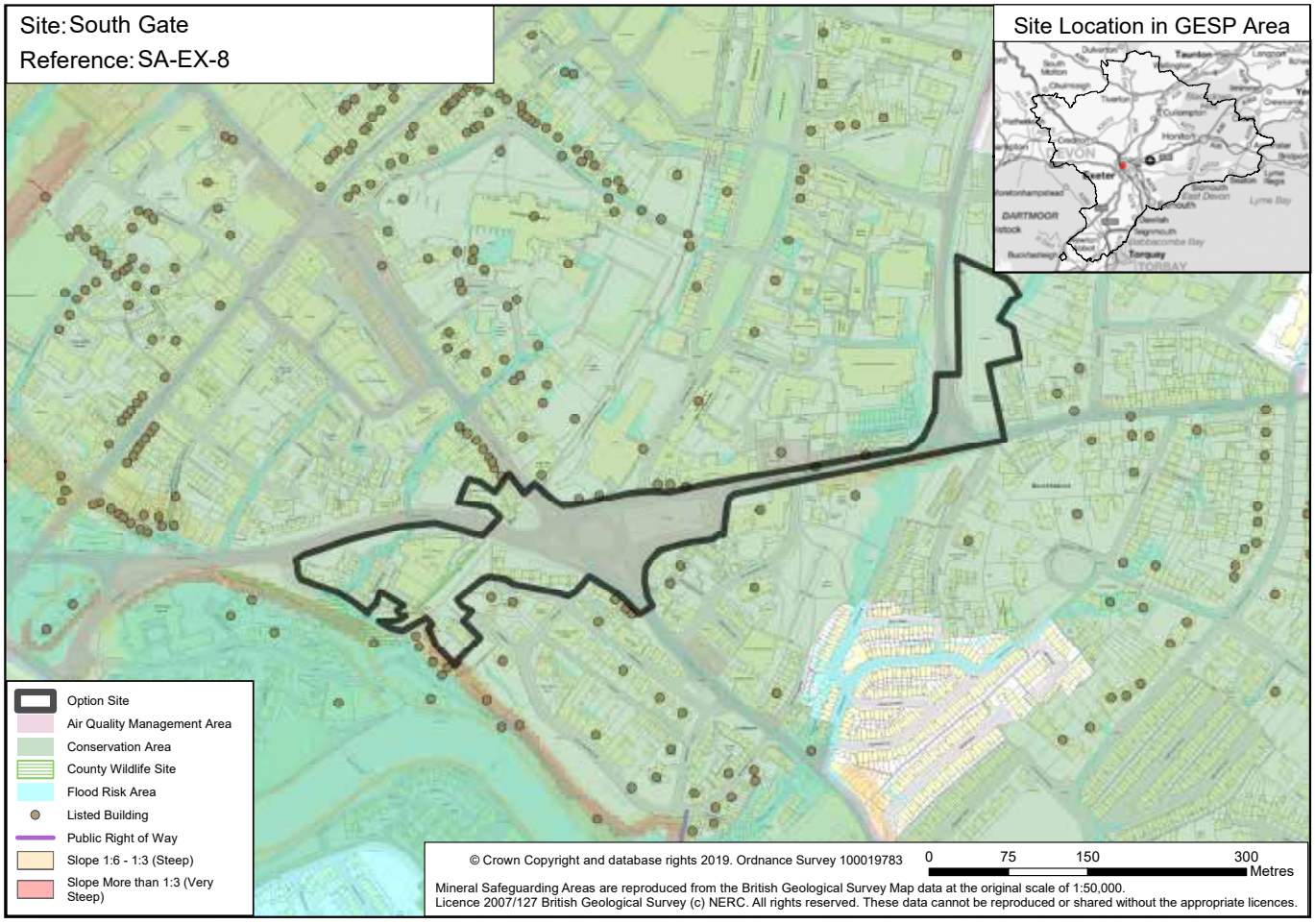
The site has a number of sensitivities which development would need to take into account, including:

- Existing homes, businesses, park and ride site and motorway service station
- Feasibility and potential high cost of altering the local highway and junctions
- It may impact upon the Pebblebed Heaths and Exe Estuary which are *Natura 2000* protected wildlife sites sensitive to an increase in the number of visitors
- It contains trees with Tree Protection Orders
- Possible air and noise pollution from M5 motorway and the railway
- A small area of the site is affected by flooding

## Requirements

Planning requirements for the site will aim to create a great place to live and work, providing well designed new neighbourhoods with appropriate and well managed public open space and safe walking/cycling routes. All sites will need to provide a *mix of homes* (including affordable and custom build), investment in *low carbon* energy and transport, high speed internet and wildlife enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include:

- High quality, moderate to high density design that provides a healthy living environment for new residents and respects the privacy of existing dwellings nearby
- Financial contributions towards improved medical facilities and provision, schools and other social infrastructure to serve the development
- Retention of park and ride capacity on site or potential off-site relocation to A376 or A3052
- Car-free residential development supported by more sustainable transport measures including car clubs and e-bikes
- Measures to minimise car use and promote sustainable and active travel, including a financial contribution to enhance bus routes and provision of pedestrian/cycle routes that improve links to Digby & Sowton railway station and city centre
- Highway enhancements to Junction 30, Sandygate roundabout and the A3052, including a financial contribution to secure an attractive travel interchange point
- Funding of measures to reduce the impact on the Pebblebed Heaths and Exe Estuary including provision/contribution towards *Suitable Alternative Natural Greenspace (SANG)*
- A variety of amenities and services including employment, recreational, leisure and retail spaces
- Mitigation of noise from M5 and railway (e.g. orientation, triple glazing, planting, sound buffers, and acoustic panelling)
- Measures to address the risk of flooding on site




| Site Name: South Gate | |
|---|---|
| **Site Reference** | SA-EX-8 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | wx15ywf, os12v7n, 0v15yoa |
| **Parish(es)** | Not applicable |
| **District(s)** | Exeter City Council |
| **Site size** | 4.2 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | 202 - 240 homes |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | 300 homes |
| **Potential for employment use** | A potential for a mix of employment uses alongside housing. |
| **Relationship with existing allocations and other potential GESP sites** | Close to site options SA-EX-22 (West Gate) and SA-EX-23 (South St, Market St and Fore St). The site is identified for future redevelopment in Exeter City Council's *Liveable Exeter* Programme. |
| **Planning status** | None |
| **Summary description of the site** | Reconfiguration of the Holloway Street/Western Way/South Street/Magdalen Street junction together with land around it, including surface car parking and blocks of flats, plus the redevelopment of Magdalen Road Car Park. |

## Opportunities

This site is identified for consideration in the GESP because:

- It provides a substantial *brownfield* redevelopment opportunity
- A proportion of the site has been put forward by landowners for redevelopment
- It is within walking distance of the city centre, railway and bus stations, giving the potential for car-free residential development
- Redevelopment could significantly enhance the appearance of this key gateway to Exeter City Centre within and close to a Conservation Area
- A proportion is in public sector ownership, providing additional influence over design and delivery and the opportunity to reinvest proceeds into city improvements
- Additional residents in this area could boost city centre viability

## Sensitivities

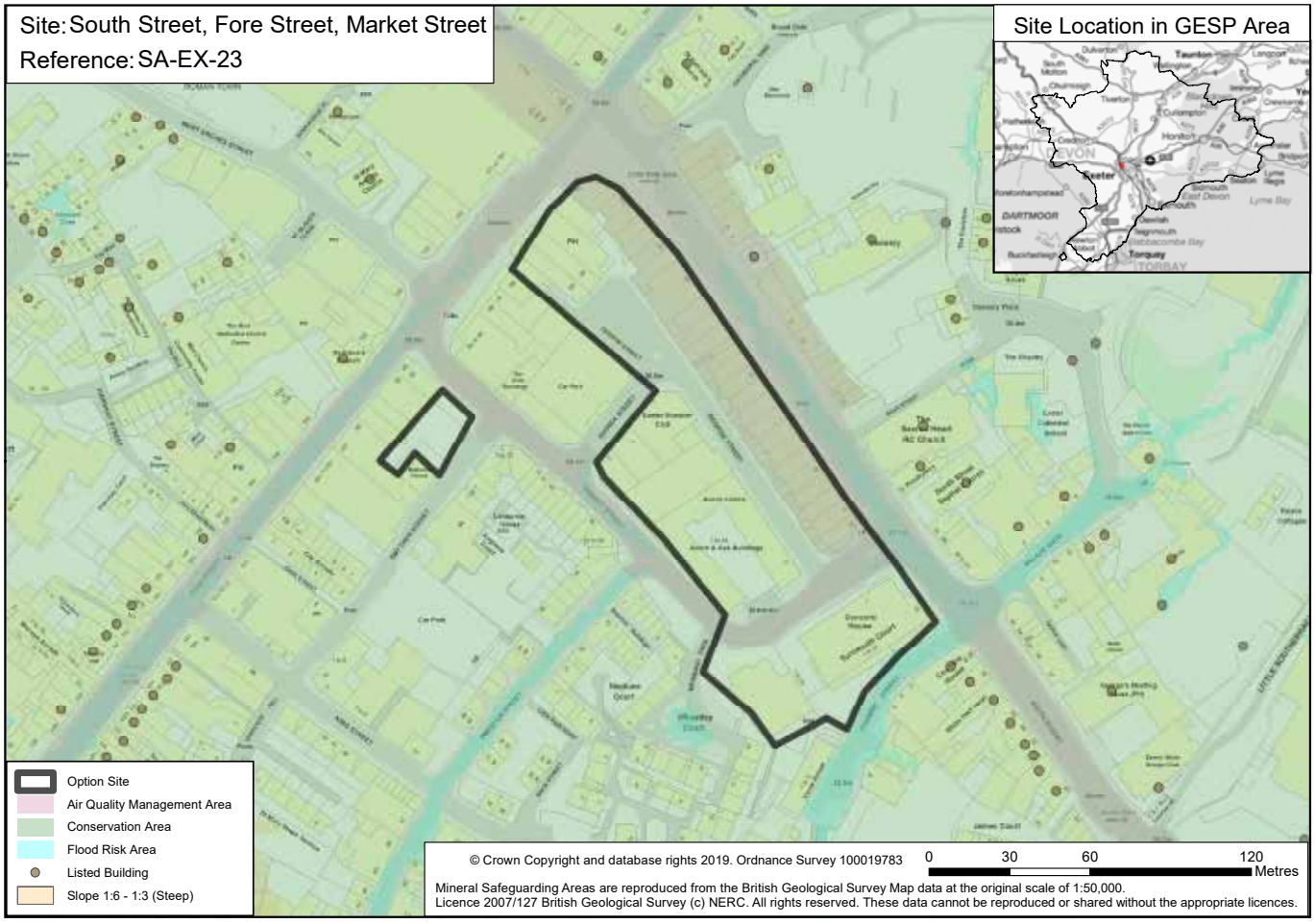
The site has a number of sensitivities which redevelopment would need to take into account, including:

- It is within two Conservation Areas and close to an array of Listed Buildings that provide the site's setting and context
- The scheduled Exeter City Walls run through the western end of the site and it contains other significant buried archaeological remains
- It may impact upon the Exe Estuary, which is a *Natura 2000* protected wildlife site sensitive to an increase in the number of visitors
- The impact of the bisecting urban roads on the site and the need to retain sufficient highway capacity
- It is affected by dust, air and noise pollution from vehicles and may be contaminated
- Potential nuisance to new residents from night time economy
- Development could result in a reduction in city centre parking

## Requirements

Planning requirements for the site will aim to create a great place to live and work, providing well designed new neighbourhoods with appropriate and well managed public open space and safe walking/cycling routes. All sites will need to provide a *mix of homes* (including affordable and custom build), investment in *low carbon* energy and transport, high speed internet and wildlife enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include:

- Meeting the housing needs of existing residents
- The provision of new shops/leisure facilities and workspaces
- A design and layout that carefully respects and enhances the Conservation Areas, Listed Buildings and Scheduled Monument and significantly improves the appearance of this key gateway to the city centre
- Funding of measures to reduce the impact on the Exe Estuary including provision/contribution towards *Suitable Alternative Natural Greenspace (SANG)*
- Car-free residential development supported by more sustainable transport measures including car-clubs and e-bikes
- Highways junction amendments that improve pedestrian and cycle access between the Quay and city centre
- Financial contributions towards the Exeter cycle network and public transport
- Contributions to expanded primary and secondary school provision and other social infrastructure to serve the development
- Respect the privacy of nearby dwellings




| Site Name: South Street, Market Street And Fore Street | |
|---|---|
| **Site Reference** | SA-EX-23 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | 4d13784 |
| **Parish(es)** | Not applicable |
| **District(s)** | Exeter City Council |
| **Site size** | 1.3 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | 88 – 105 homes |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | 175 homes |
| **Potential for employment use** | Yes |
| **Relationship with existing allocations and other potential GESP sites** | Close to the site options SA-EX-7 (North Gate) and SA-EX-8 (South Gate). Premises fronting South Street and Fore Street are identified as part of Exeter's secondary shopping area in the Exeter *Local Plan* First Review. |
| **Planning status** | The car park off Smythen Street is the subject of a current planning application for 9 apartments. |
| **Summary description of the site** | *Mixed use* area of post-war redevelopment within Exeter city centre next to the Corn Exchange, currently including shops, offices, homes and two small public car parks. |

## Opportunities

This site is identified for consideration in the GESP because:

- It provides an opportunity to make more efficient use of a *brownfield* site
- It has excellent access to public transport and is close to a wide range of job opportunities and facilities, giving the potential for car-free residential development
- It gives an opportunity to significantly enhance the appearance of the area
- A large proportion is in public sector ownership, enabling additional influence over design and delivery and the opportunity to reinvest proceeds into city improvements
- Part of the site has been put forward by landowners for development

## Sensitivities

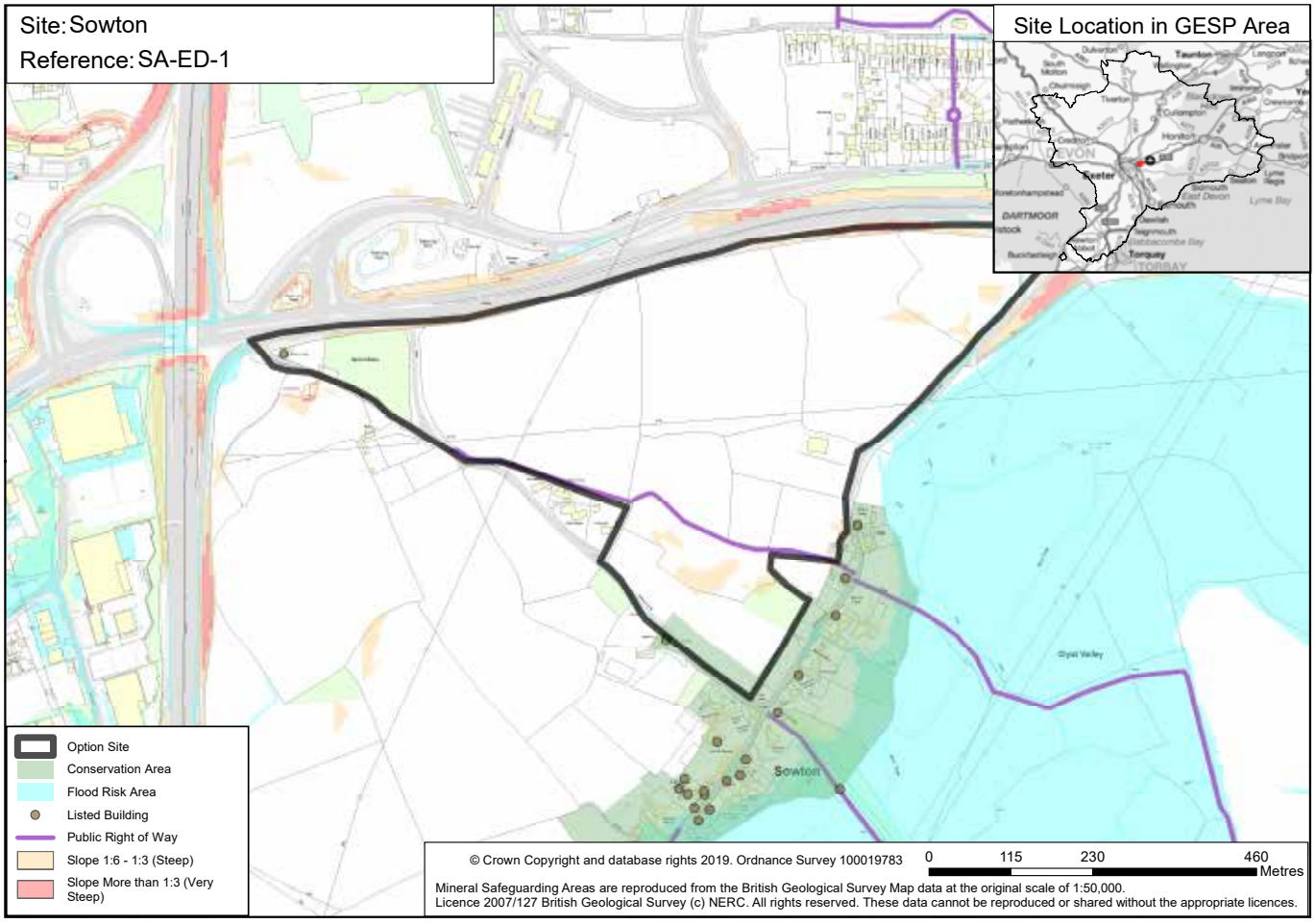
The site has a number of sensitivities which development would need to take into account, including:

- It includes a number of existing homes and businesses
- It is part of an Area of Archaeological Importance, with the potential to contain significant remains
- It is also in the Central Conservation Area and close to a Scheduled Ancient Monument (Hall of the Vicars Choral) and numerous listed buildings
- It may impact upon the Exe Estuary, which is a *Natura 2000* protected wildlife site sensitive to an increase in the number of visitors
- It is affected by air pollution from nearby roads and noise pollution from other city-centre uses and may be contaminated

## Requirements

Planning requirements for the site will aim to create a great place to live and work, providing a well-designed new neighbourhood with appropriate and well managed public open space and safe walking/cycling routes. All sites will need to provide a *mix of homes* (including affordable and custom build), investment in *low carbon* energy and transport, high speed internet and wildlife enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include:

- Redevelopment of premises fronting Fore Street and South Street to provide new shops, offices and community facilities, with homes above
- Redevelopment of much of the rest of the site, to provide new homes
- High quality, high density design that celebrates and preserves the site's important heritage assets, creates a healthy living environment for new residents and respects the privacy of existing residents
- Car-free residential development supported by mores sustainable transport measures including car-clubs and e-bikes
- Removal of on-street parking in George Street, significant enhancement of pedestrian/cycle routes and financial contributions to traffic calming measures on South Street
- Funding of measures to reduce the impact on the Exe Estuary, including provision/contribution towards *Suitable Alternative Natural Greenspace (SANG)*
- Financial contributions towards the expansion of primary and secondary schools, medical facilities and utilities provision in Exeter




| Site Name: Sowton | |
|---|---|
| **Site Reference** | SA-ED-1 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | ks137av, dl15yzt |
| **Parish(es)** | Sowton |
| **District(s)** | East Devon District Council |
| **Site size** | 30 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | Employment only |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | Employment only |
| **Potential for employment use** | Yes |
| **Relationship with existing allocations and other potential GESP sites** | The site would form an extension to the existing Science Park on the opposite side of the A30 which is an allocation in the adopted East Devon *Local Plan* and in the process of being delivered. The majority of the site is also allocated as the Clyst Valley Regional Park. |
| **Planning status** | None |
| **Summary description of the site** | An area of land adjoining the A30 and close to Junction 29 of the M5. The site slopes gently down from east to west towards the River Clyst. The village of Sowton is situated adjacent to the south. |

## Opportunities

This site is identified for consideration in the GESP because:

- A large proportion of the site has been put forward by landowners for development
- It could form an extension to the Exeter Science Park and encourage the provision of high-tech, well paid jobs in a landscaped environment
- It could link into existing bus and cycle routes into Exeter and Cranbrook at the Science Park
- It could link into the existing district heat network serving the Science Park

## Sensitivities

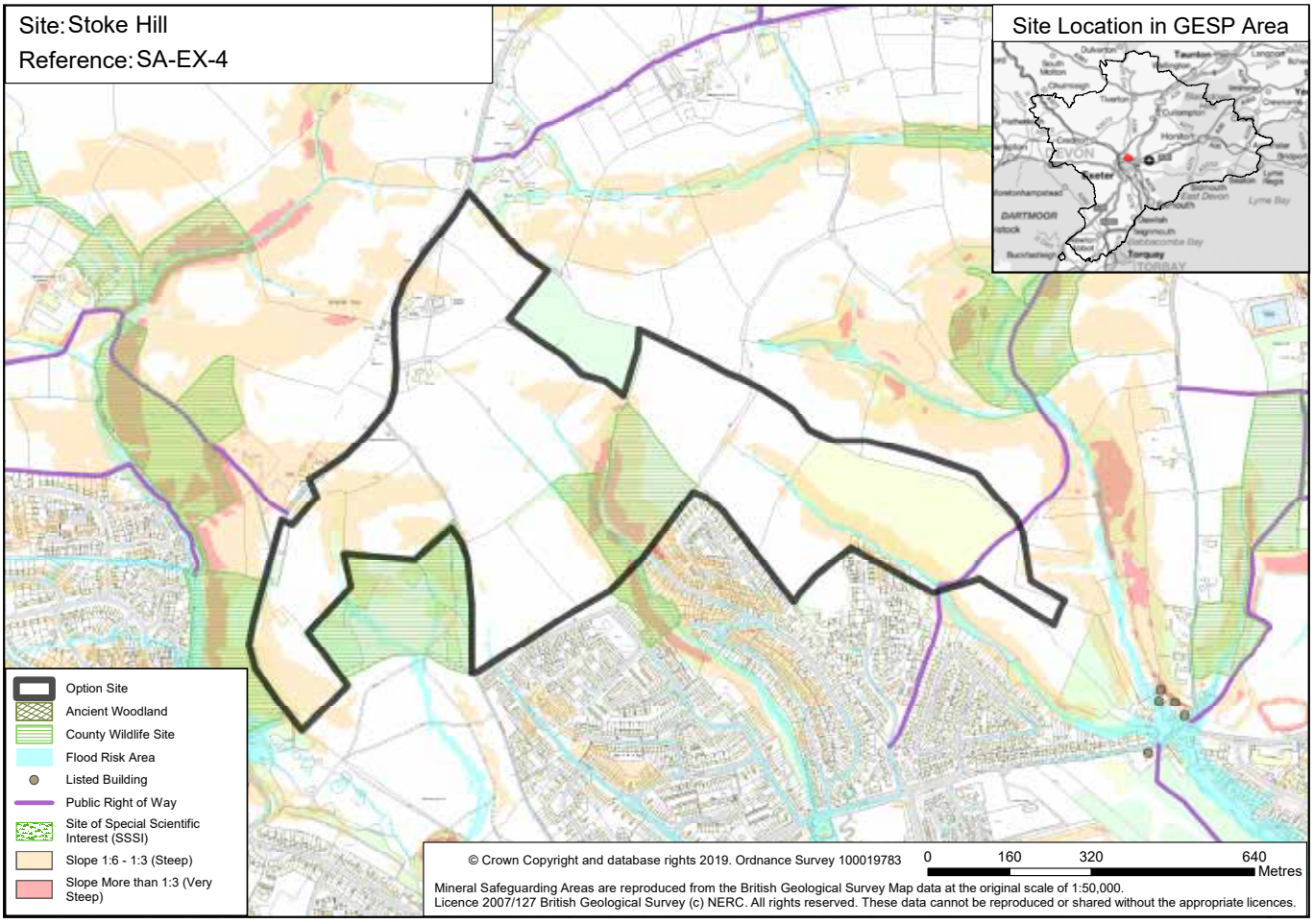
The site has a number of sensitivities which development would need to take into account, including:

- Site is within the East Devon *Local Plan* designated Clyst Valley Regional Park
- Areas of the site are visually prominent in the landscape
- It is currently separated from Exeter by the M5 and the existing Science Park by the A30
- Development could increase pressure on Junction 29 of the M5 which is at or nearing capacity
- It is adjacent to the historic settlement of Sowton which has a conservation area and includes a number of listed buildings including the Grade I listed church
- It contains Grade 2 and 3a agricultural land
- It may contain Great Crested Newts and other *protected species*
- It experiences aircraft noise due to its proximity to Exeter Airport
- High voltage lines currently run through the site

## Requirements

Planning requirements for the site will aim to create a successful place to work, providing well designed new development with appropriate and well managed public open space and safe walking/cycling routes. All sites will need to provide investment in *low carbon* energy and transport, high speed internet and wildlife mitigation and enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include:

- A new landmark pedestrian and cycle bridge over the A30 connecting into existing routes at Redhayes
- Incorporation of large areas of green, open parkland with planting to reflect its location in the Clyst Valley Regional Park
- Junction improvements at London Road / Sowton Lane
- Provision of a small amount of facilities to serve workers of the site
- A wide landscaped buffer on the southern edge of the site to help mitigate the visual impact on the historic village of Sowton and its approach along Sowton Lane
- Retention of the public right of way running along the southern edge of the site
- Investigate potential undergrounding of high voltage lines




| Site Name: Stoke Hill | |
|---|---|
| **Site Reference** | SA-EX-4 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | d913byh, z714yxa, qp15ywr, p613cg7, 8g13b3q |
| **Parish(es)** | Not applicable |
| **District(s)** | Exeter City Council |
| **Site size** | 58 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | 736 - 948 homes |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | 768 homes |
| **Potential for employment use** | No |
| **Relationship with existing allocations and other potential GESP sites** | Allocated as Valley Park and/or landscape setting in the Exeter Core Strategy and Exeter *Local Plan* First Review. |
| **Planning status** | None |
| **Summary description of the site** | Located to the north of Exeter's built-up area. Comprises agricultural fields bound by hedgerows and belts of mature trees, interspersed with areas of rough vegetation and woodland. Topography is complex and steep in places. Crossed by Mile Lane bridleway. |

## Opportunities

This site is identified for consideration in the GESP because:

- A large proportion of the site has been put forward by landowners for development
- Homes would be 3km from the City centre, with potential for improved walking and cycling routes and bus services
- It could include new opportunities for publicly accessible *green infrastructure*

## Sensitivities

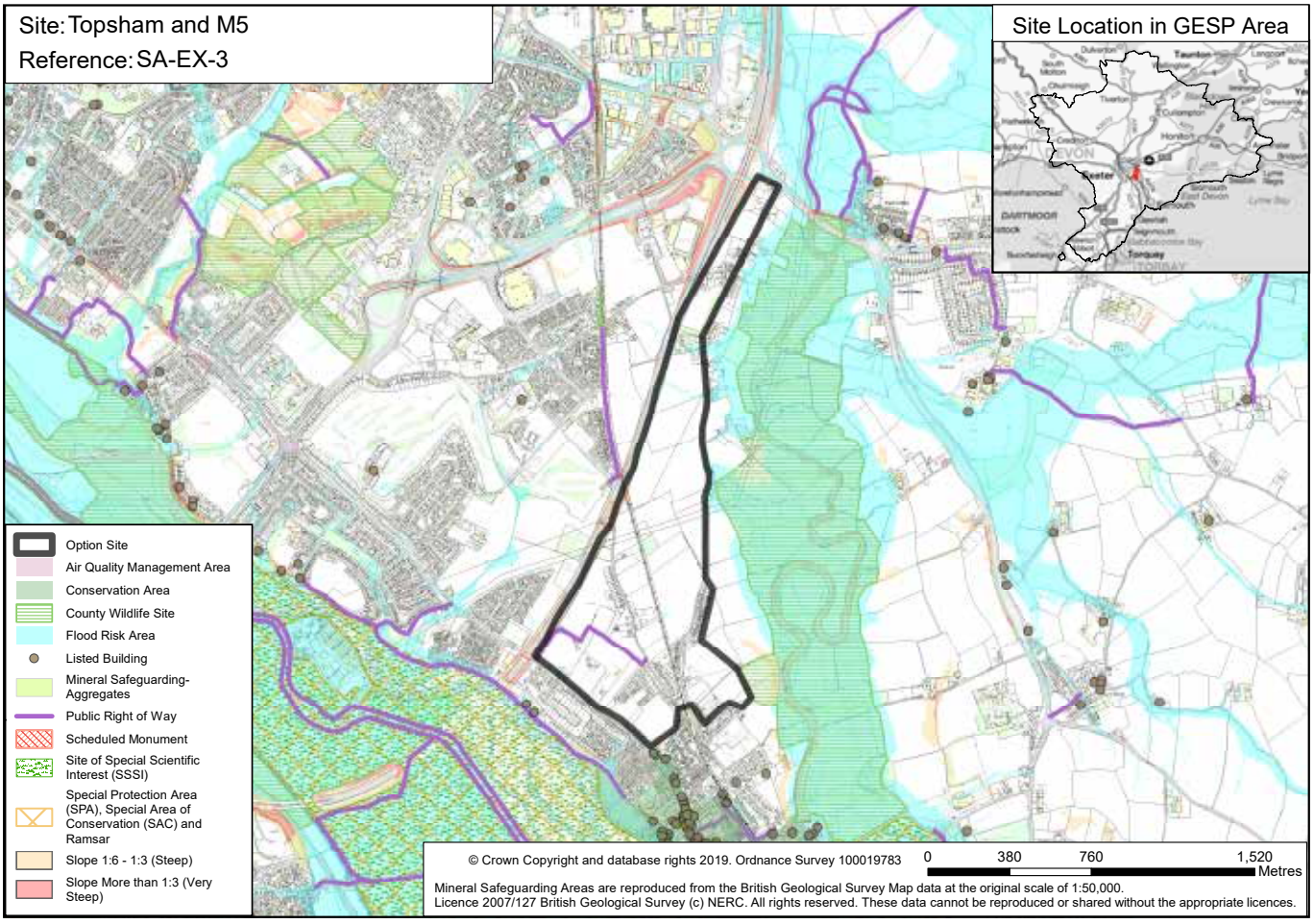
The site has a number of sensitivities which development would need to take into account, including:

- It may impact upon the Exe Estuary, which is a *Natura 2000* protected wildlife site sensitive to an increase in the number of visitors
- It contains a County Wildlife Site and may also contain Great Crested Newts/Cirl Buntings and other *protected species*
- It includes part of Savoy Hill Valley Park and is of high landscape value, with a number of steep slopes that are unsuited to residential development
- Parts are affected by flooding
- It is close to a landfill site and therefore may be contaminated
- It is close to existing homes in Beacon Heath
- Road access is constrained

## Requirements

Planning requirements for the site will aim to create a great place to live and work, providing well designed new neighbourhoods with appropriate and well managed public open space and safe walking/cycling routes. All sites will need to provide a *mix of homes* (including affordable and custom build), investment in *low carbon* energy and transport, high speed internet and wildlife enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include:

- Funding of measures to reduce the impact on the Exe Estuary, including provision/contribution towards *Suitable Alternative Natural Greenspace (SANG)*
- The need to safeguard *protected species* and their supporting habitats
- No development within Savoy Hill Valley Park
- Measures to address the risk of flooding, including ensuring that surface water run-off does not cause issues downstream
- Improved foot, cycle and bus routes into the City, including an extension of the Chancellors Way bus loop.
- Decontamination to ensure a healthy living environment for residents
- Development will need to respect the privacy of existing dwellings
- Financial contributions towards the expansion of primary and secondary schools, medical facilities and utilities provision in Exeter




| Site Name: Topsham and M5 | |
|---|---|
| **Site Reference** | SA-EX-3 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | fo141jb, h015yge, p815y97, 9613bzo, zd15kp3, vg15yhq, vr141et, g315x0y, dk15x1x, cq15y3m, l715yim, |
| **Parish(es)** | Topsham / Clyst St George |
| **District(s)** | Exeter City / East Devon District Council |
| **Site size** | 95 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | 1,316 – 1,700 homes |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | 1,500 homes |
| **Potential for employment use** | Yes |
| **Relationship with existing allocations and other potential GESP sites** | Site is near site option SA-ED-2 (Oil Mill Lane). |
| **Planning status** | Multiple applications for piecemeal residential development within the site are at various stages, from submitted to approval granted at appeal. Permissions have been granted for 286 dwellings (54 under construction); two care homes and 47 assisted living apartments. |
| **Summary description of the site** | Between the M5 and Topsham and approximately 5 km from Exeter city centre. Contains a range of existing uses including residential, sports facilities and agriculture. |

## Opportunities

This site is identified for consideration in the GESP because:

- A large proportion has been put forward by landowners for development
- It provides a sustainable location for development, being close to Topsham and Topsham Road which host a range of facilities and services including schools and public transport. It is also within cycling distance of Exeter
- It is well located in relation to existing employment areas including Sowton and Exeter city centre, with potential for improved active travel connections
- It has excellent access to public transport, both bus services and proximity to Newcourt and Topsham Railway Stations

## Sensitivities

The site has a number of sensitivities which development would need to take into account, including:

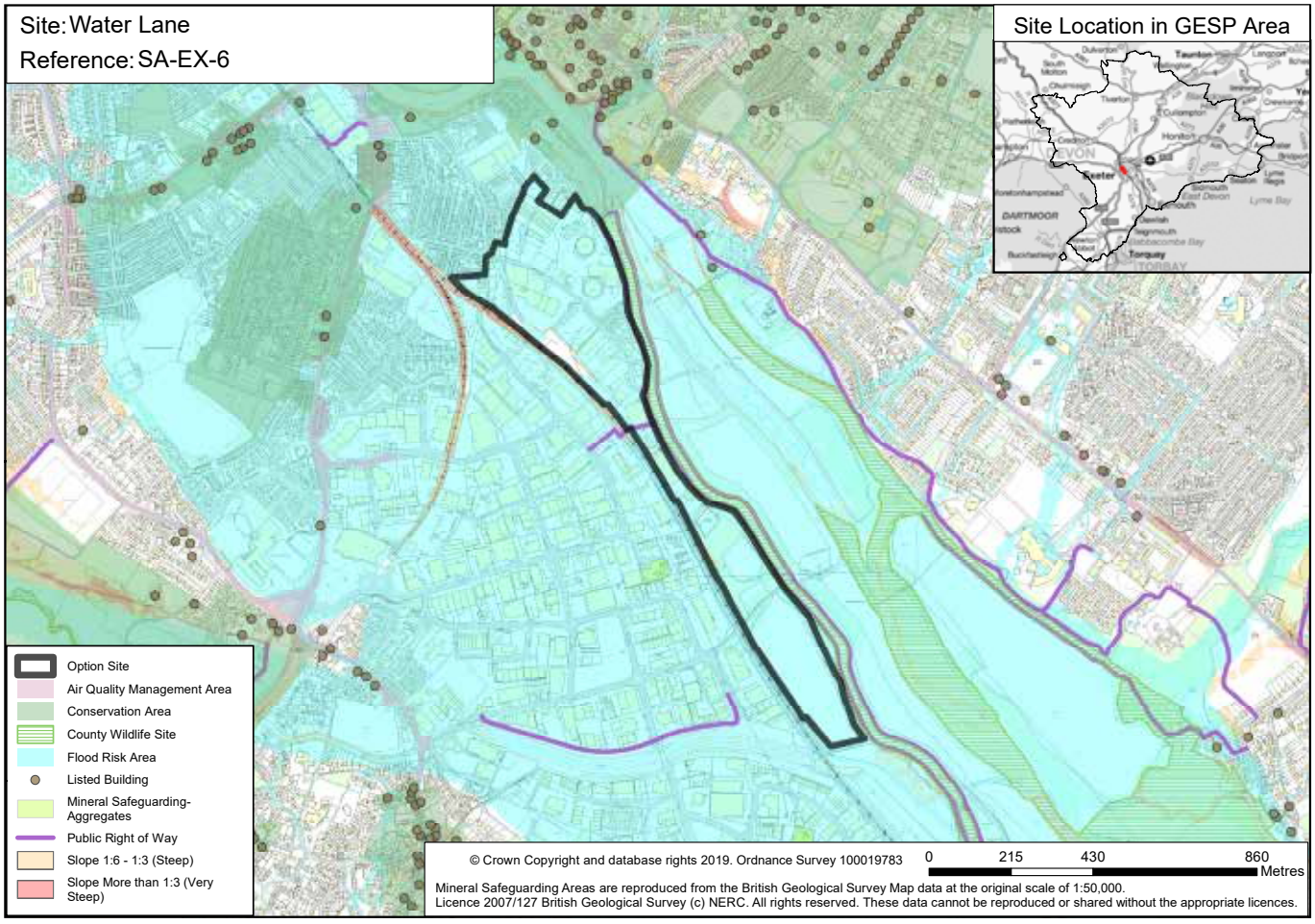
- Cost and feasibility of improving the local highway and junctions, particularly Old Rydon Lane and the Clyst Road junction with the A379
- Development may impact upon the Pebblebed Heaths and Exe Estuary which are *Natura 2000* protected wildlife sites sensitive to an increase in the number of visitors
- It may contain *protected species*
- A large proportion of the site is high grade agricultural land
- Possible noise from M5 Motorway and railway
- It is close to a variety of listed buildings and Topsham Conservation Area

## Requirements

Planning requirements for the site will aim to create a great place to live and work, providing well designed new neighbourhoods with appropriate and well managed public open space and safe walking/cycling routes. All sites will need to provide a *mix of homes* (including affordable and custom build), investment in *low carbon* energy and transport, high speed internet and wildlife enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include:

High quality, moderate to high density design that provides a healthy living environment for new residents and respects the privacy of nearby existing dwellings

- A new primary school with early years to serve the site and contributions to additional secondary school provision
- A multi-purpose community facility and neighbourhood hub to host local events and work space for small businesses etc
- Financial contributions towards improved medical facilities and provision at Topsham and/or Glasshouse Medical Centres
- Measures to minimise car use and promote sustainable and active travel, including minimal car parking for new residents, financial contributions to significantly improve e pedestrian/cycle links to Newcourt and Topsham railway stations a new pedestrian/cycle bridge over the Avocet Line and enhanced bus services between Topsham and Exeter
- Highway improvements including along Sidmouth Road, Clyst Road and Rydon Lane
- The potential safeguarding of land for a new railway spur (to be confirmed)
- Funding of measures to reduce the impact on the Pebblebed Heaths and Exe Estuary including provision/contribution towards *Suitable Alternative Natural Greenspace (SANG)*
- Mitigation of noise from M5 and railway (e.g. orientation, triple glazing, planting, sound buffers, and acoustic panelling)
- Measures to address the risk of flooding on site, including ensuring that surface water run-off does not cause issues downstream
- A financial contribution towards the upgrading of electricity infrastructure




| Site Name: Water Lane | |
|---|---|
| **Site Reference** | SA-EX-6 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | gq15yle, t313u6v, t416ya3 |
| **Parish(es)** | Not applicable |
| **District(s)** | Exeter City Council |
| **Site size** | 26 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | 1,363 – 1,620 homes |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | 1,570 homes |
| **Potential for employment use** | Yes |
| **Relationship with existing allocations and other potential GESP sites** | Site is identified for mixed-use redevelopment in Policy KP6 of the Exeter *Local Plan* First Review and Policy CP3 of the Exeter Core Strategy (2006-2026. It is to the north of site option SA-EX-10 (Marsh Barton) and is identified for future redevelopment in Exeter City Council's *Liveable Exeter* Programme. |
| **Planning status** | Previous planning applications for piecemeal residential development within the site have been refused, because the infrastructure and environment needed to create *sustainable development* will only be delivered if the site is redeveloped comprehensively. 800 homes are already committed in the Exeter Core Strategy. |
| **Summary description of the site** | Predominantly industrial site between the Exe Canal and a mainline railway. Also includes a large electricity sub-station, a vacant gas works, a biogas power station, existing homes, a social club and the disused Grace Road Playing Fields. |

## Opportunities

This site is identified for consideration in the GESP because:

- It provides an opportunity to make more efficient use of a *brownfield* site
- It has excellent access to public transport and is close to a wide range of job opportunities and facilities, giving the potential for car-free residential development
- It gives an opportunity to significantly enhance the appearance of the area
- A proportion is in public sector ownership, enabling additional influence over design and delivery and the opportunity to reinvest proceeds into city improvements
- A proportion of the site has been put forward by landowners for development
- Additional residents in this area could boost city centre viability

## Sensitivities

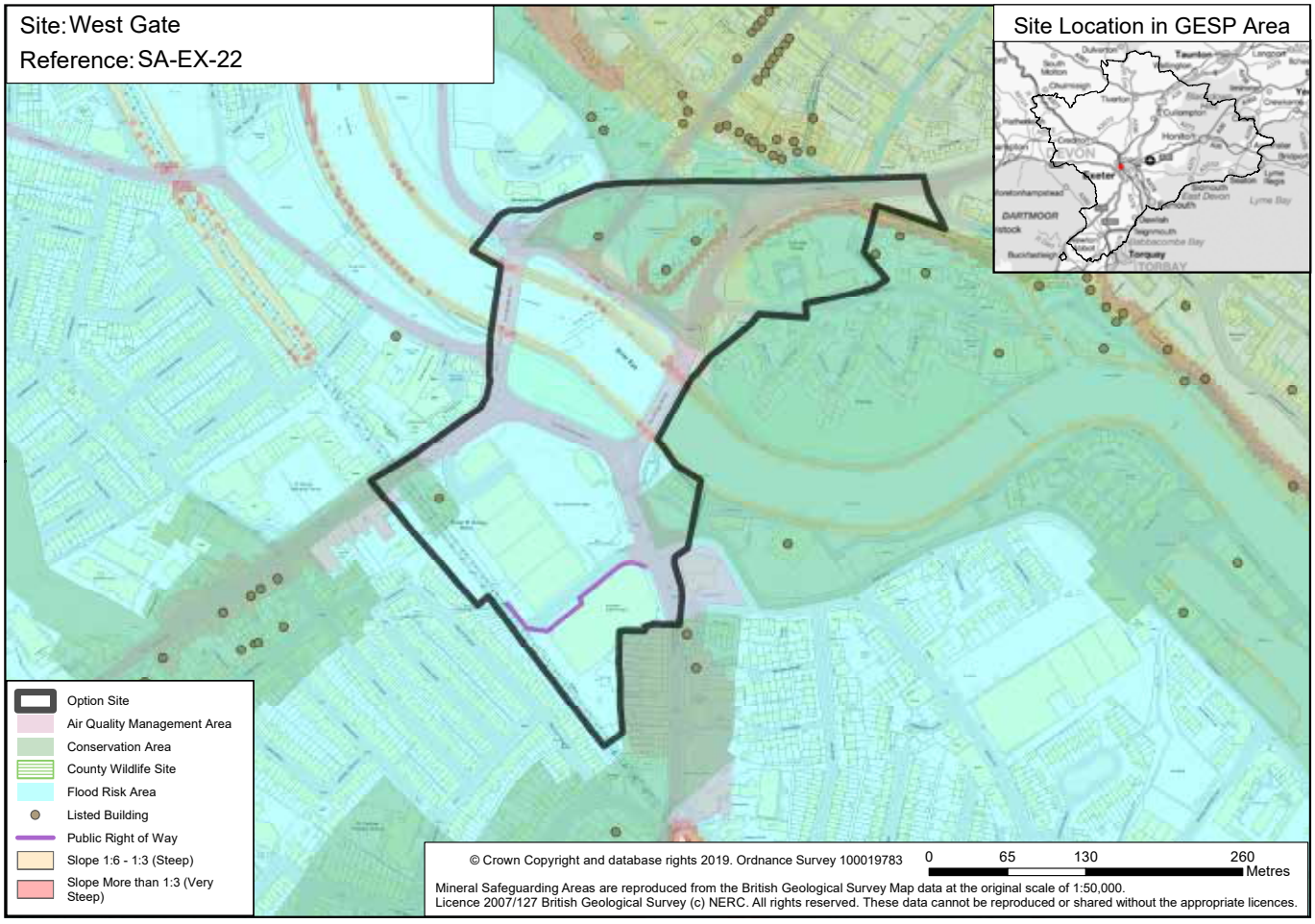
The site has a number of sensitivities which redevelopment would need to take into account, including:

- It includes a number of existing business and utilities, plus public car, coach and boat parking
- Most of the site is affected by flooding (flood zone 3)
- Parts of the site are within the Waste Consultation Zones of the Marsh Barton energy from waste plant and the Exton Road recycling facility
- It may impact upon the Exe Estuary, which is a *Natura 2000* protected wildlife site sensitive to an increase in the number of visitors
- It adjoins a County Wildlife Site (the Canal) and may contain Great Crested Newts and other *protected species*
- It is likely to be contaminated and is affected by dust, air and noise pollution from existing businesses, vehicles and the railway
- It may contain archaeological remains and includes some locally listed buildings

## Requirements

Planning requirements for the site will aim to create a great place to live and work, providing well designed new neighbourhoods with appropriate and well managed public open space and safe walking/cycling routes. All sites will need to provide a *mix of homes* (including affordable and custom build), investment in *low carbon* energy and transport, high speed internet and wildlife enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include:

- High quality and high density design that takes a strategic approach to flood risk mitigation
- Provision of new workspaces, shops/leisure uses and community facilities including a primary school with early years
- Potential off-site relocation of the electricity sub-station
- Phased development that takes account of the Marsh Barton energy from waste plant ensuring its operation, and biogas power station. Development that respects the privacy of existing residents
- Car-free residential development supported by more sustainable transport measures including car-clubs and e-bikes
- Other measures to minimise car use including vehicular access restrictions and financial contributions towards pedestrian/cycle routes including a new crossing of the Exe Canal
- Funding of measures to reduce the impact on the Exe Estuary, including provision/contribution towards *Suitable Alternative Natural Greenspace (SANG)*
- Financial contributions towards improved medical facilities and utilities provision in Exeter




| Site Name: West Gate | |
|---|---|
| **Site Reference** | SA-EX-22 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | None |
| **Parish(es)** | Not applicable |
| **District(s)** | Exeter City Council |
| **Site size** | 9 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | 224-266 homes |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | 620 homes |
| **Potential for employment use** | Yes |
| **Relationship with existing allocations and other potential GESP sites** | Close to the site options SA-EX-8 (South Gate) and SA-EX-23 (South St, Market St and Fore St). Policy S3 of the Exeter *Local Plan* 1st Review protects ground floor retail use at Riverside Retail Park. Policy CP10 of the Exeter Core Strategy protects facilities that meet the city's community, social, health, leisure and recreational needs. |
| **Planning status** | The site is identified for future redevelopment in Exeter City Council's *Liveable Exeter* Programme. |
| **Summary description of the site** | Predominantly *brownfield*. The site contains a retail park with car parking, offices and some residential properties. It also includes Riverside Leisure Centre, the remains of the Medieval Exe Bridge and a section of the City Wall. |

## Opportunities

This site is identified for consideration in the GESP because:

- It provides a *brownfield* redevelopment opportunity
- It is within walking distance of the city centre and has excellent access to public transport, jobs and services with potential for car-free residential development
- A significant proportion is in public sector ownership, providing additional influence over design and delivery and the opportunity to reinvest proceeds into city improvements
- It could incorporate a mix of uses including residential, employment, commercial and public realm.
- There are on-going structural changes in the retail sector
- It could deliver sustainable transport improvements including improved pedestrian and cycle connectivity across the river

## Sensitivities

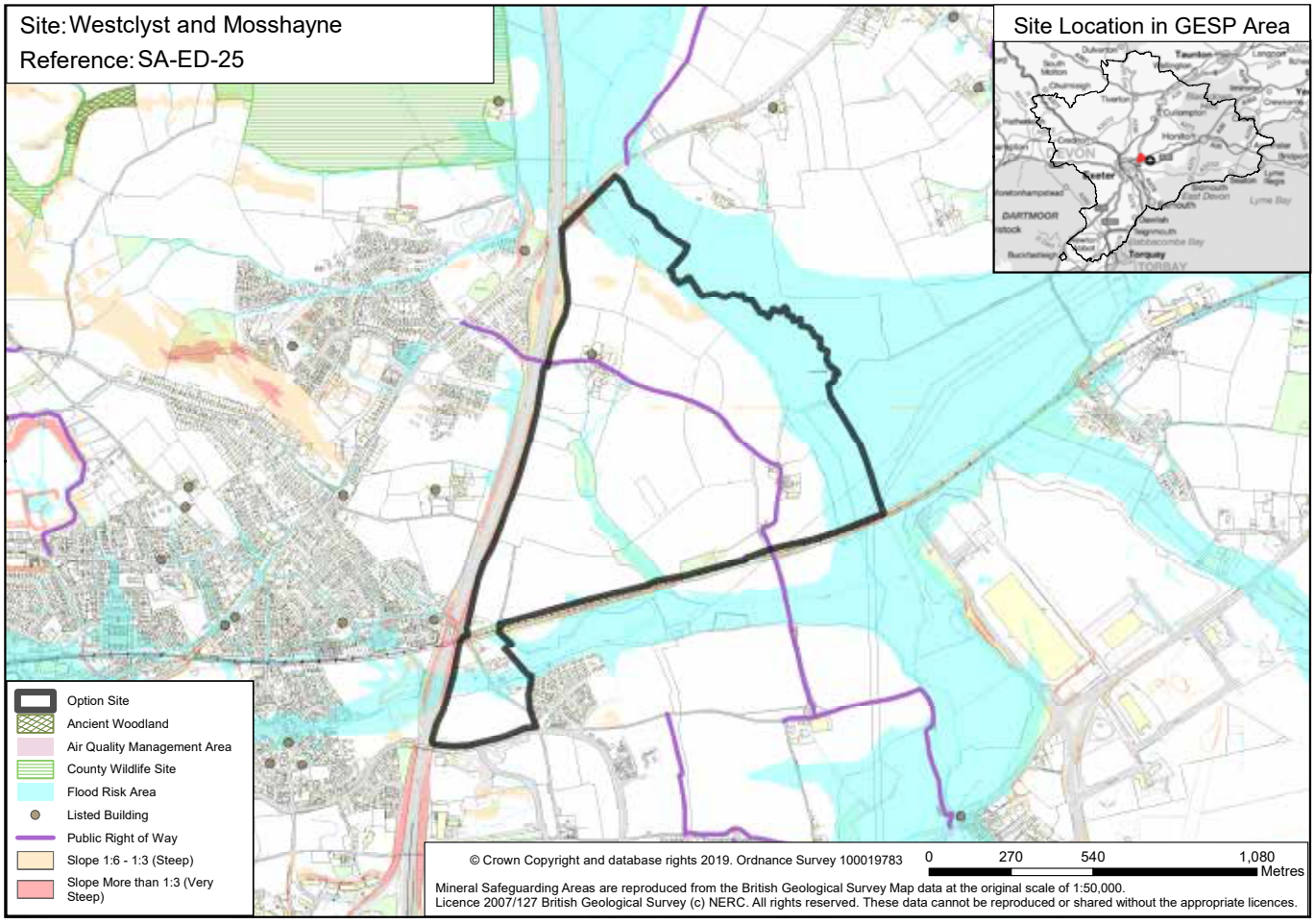
The site has a number of sensitivities which development would need to take into account, including:

- It includes a leisure centre, homes, businesses, public car parks and transport infrastructure A large area of the site is affected by flooding (flood zone 3)
- It contains (and is adjacent to) historically important features including the medieval Exe Bridge and City Wall scheduled monuments and the Grade II listed St Thomas Station and Cricklepit Mill. The northern half of the site is within Riverside Conservation Area
- It may impact upon the Exe Estuary, which is a *Natura 2000* protected wildlife site sensitive to an increase in the number of visitors
- *Biodiversity* interests are identified within the City Wall and *protected species* may use the River Exe
- It may be contaminated and is affected by dust, air and noise pollution from existing businesses and vehicles
- The site includes key river crossings and roads, which are key features of the city's highway network and bus corridors

## Requirements

Planning requirements for the site will aim to create a great place to live and work, providing well designed new neighbourhoods with appropriate and well managed public open space and safe walking/cycling routes. All sites will need to provide a *mix of homes* (including affordable and custom build), investment in *low carbon* energy and transport, high speed internet and wildlife enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include:

- High quality, high density development that takes a strategic approach to flood risk and carefully respects and enhances the setting and character of heritage assets
- New shops and workspaces, alongside a retained and potentially enhanced Riverside Leisure Centre
- An expanded and enhanced public park around the medieval bridge, connected to the River Exe
- Funding of measures to reduce the impact on the Exe Estuary, including provision/contribution towards *Suitable Alternative Natural Greenspace (SANG)*
- Designated cycle and pedestrian capacity, improving connections to the city centre
- Wider highway changes including junction improvements and bus only provision
- Contributions to expanded primary and secondary school provision and other social infrastructure to serve the development
- Development will need to respect the privacy of existing dwellings




| Site Name: Westclyst and Mosshayne | |
|---|---|
| **Site Reference** | SA-ED-25 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | ro14yot, 9515y3t, eu15yro |
| **Parish(es)** | Broadclyst |
| **District(s)** | East Devon District Council |
| **Site size** | 117 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | 1,656 - 2,136 homes |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | 1,600 homes |
| **Potential for employment use** | It could potentially accommodate employment uses in the part of the site fronting Tithebarn Lane |
| **Relationship with existing allocations and other potential GESP sites** | Sites immediately to the west of the site and the M5 and south of the site and the railway have been allocated by the East Devon *Local Plan* and Exeter Core Strategy and are now under construction. The site is in close proximity to significant numbers of jobs proposed on allocated sites in East Devon's West End. Part of the site is allocated as Clyst Valley Regional Park. |
| **Planning status** | None |
| **Summary description of the site** | 117ha of predominantly agricultural land and marshland surrounded by the M5 motorway, railway and the River Clyst. |

## Opportunities

This site is identified for consideration in the GESP because:

- It is close to Pinhoe train station
- It is close to significant job opportunities in Exeter and the West End
- It is well located to attract strategic employment development as part of a mix of uses
- It could easily link in to the Monkerton/Tithebarn heat network
- Pinhoe and the allocated urban extensions in the vicinity include a number of essential services already which could be enhanced

## Sensitivities

The site has a number of sensitivities which development would need to take into account, including:

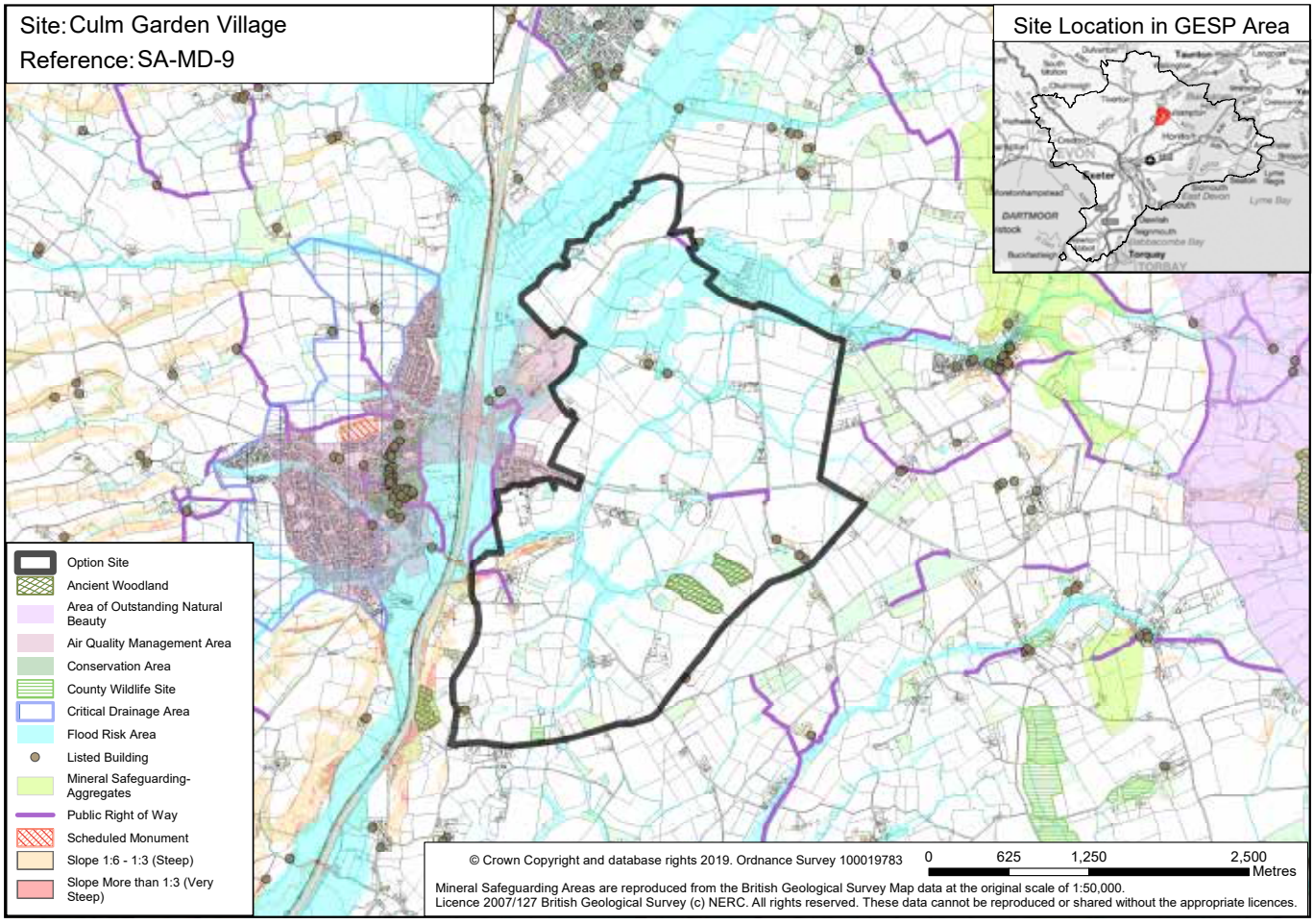
- It may impact upon the Pebblebed Heaths and Exe Estuary which are *Natura 2000* protected wildlife sites sensitive to an increase in the number of visitors
- A large area of the site is affected by flooding
- Topography and visual prominence in the north/east of the site could reduce capacity
- Langaton Lane would currently be unsuitable and lacks resilience as sole point of access
- The M5 and railway could act as barriers to movement causing issues of severance
- Highway constraints in Pinhoe Village
- The southern-most part of the site contains potentially important archaeological assets
- A number of listed features exist within and nearby including the Broadclyst Conservation Area and associated Grade I Listed Buildings alongside Poltimore House, Killerton House and the Registered Park and Gardens
- It contains part of the allocated Clyst Valley Regional Park
- Local primary schools in Pinhoe are at/approaching capacity and the potential for Clyst Vale Community College to expand would need consideration
- A large proportion of the site is high grade agricultural land
- The noise from the M5 and railway could reduce capacity and need mitigation
- It may contain Great Crested Newts and other *protected species*

## Requirements

Planning requirements for the site will aim to create a high quality visitor experience for motorway users in both directions with direct access from the M5 as an "on-line" facility. It will need to be future-proofed to serve a high proportion of electric vehicles with capacity to increase this to 100%. Other emerging requirements include:

- Funding of measures to reduce the impact on the Pebblebed Heaths and Exe Estuary including provision of *Suitable Alternative Natural Greenspace (SANG)*
- Measures to address the risk of flooding on site
- Rail infrastructure improvements to enable half-hourly train service frequency
- Potential local highway improvements
- Pedestrian and cycle connectivity to jobs and services in Pinhoe, Exeter and West End of East Devon.
- Measures to reduce noise impacts from the M5
- On-site primary school provision including early years plus additional secondary places
- High quality, accessible employment uses allowing for expansion of the Science Park
- A variety of amenities and services including a small amount of convenience retail, sports, recreation and healthcare provision
- Development will need to respect the privacy of existing dwellings located nearby

# North Strategic Growth Area: Site Options




| Site Name: Culm Garden Village | |
|---|---|
| **Site Reference** | SA-MD-9 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | c7140zo, e415yyo, ws137ym, k015y7d, f0137bk, dj15y49 |
| **Parish(es)** | Cullompton, Kentisbeare, Uffculme |
| **District(s)** | Mid Devon District Council |
| **Site size** | 802 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | 12,493 - 16,120 homes |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | 5,000 homes (reflects scale of Garden Village proposal) |
| **Potential for employment use** | It would need to provide a mix of employment uses alongside housing. |
| **Relationship with existing allocations and other potential GESP sites** | East of Cullompton has been designated as a Garden Village by the Government. The emerging Mid Devon *Local Plan* Review proposes to allocate 2,600 dwellings and 32,000m2 of employment at East Cullompton CU7. The emerging *Local Plan* also proposes to allocate employment space at Week Farm CU17 and CU18 Venn Farm. |
| **Planning status** | None (see above) |
| **Summary description of the site** | A large area of predominantly flat agricultural land east of the M5 at Cullompton. The site includes the emerging East Cullompton allocation within the Mid Devon *Local Plan* Review and includes the Culm Garden Village area. It includes dispersed farms and isolated dwellings. |

## Opportunities

This site is identified for consideration in the GESP because:

- A first phase of the site is an allocation in the Mid Devon *Local Plan* Review
- The area has been designated by Government as a Garden Village, a new community that will focus on high quality housing, jobs and facilities in an attractive, green environment
- The draft Cullompton *Neighbourhood Development Plan* supports the principle of development here
- A large proportion of the site has been put forward by landowners for development
- The site generally has level topography
- It is close to the M5 and the Great Western Mainline providing good links to Exeter and beyond
- Its large scale would enable comprehensive masterplanning, significant infrastructure provision and high quality design
- It offers the potential for a mixture of uses including residential, employment and community infrastructure, helping to reduce the need to travel
- There are opportunities for district heating on site and renewable energy generation
- It could deliver a regional hub for sports

## Sensitivities

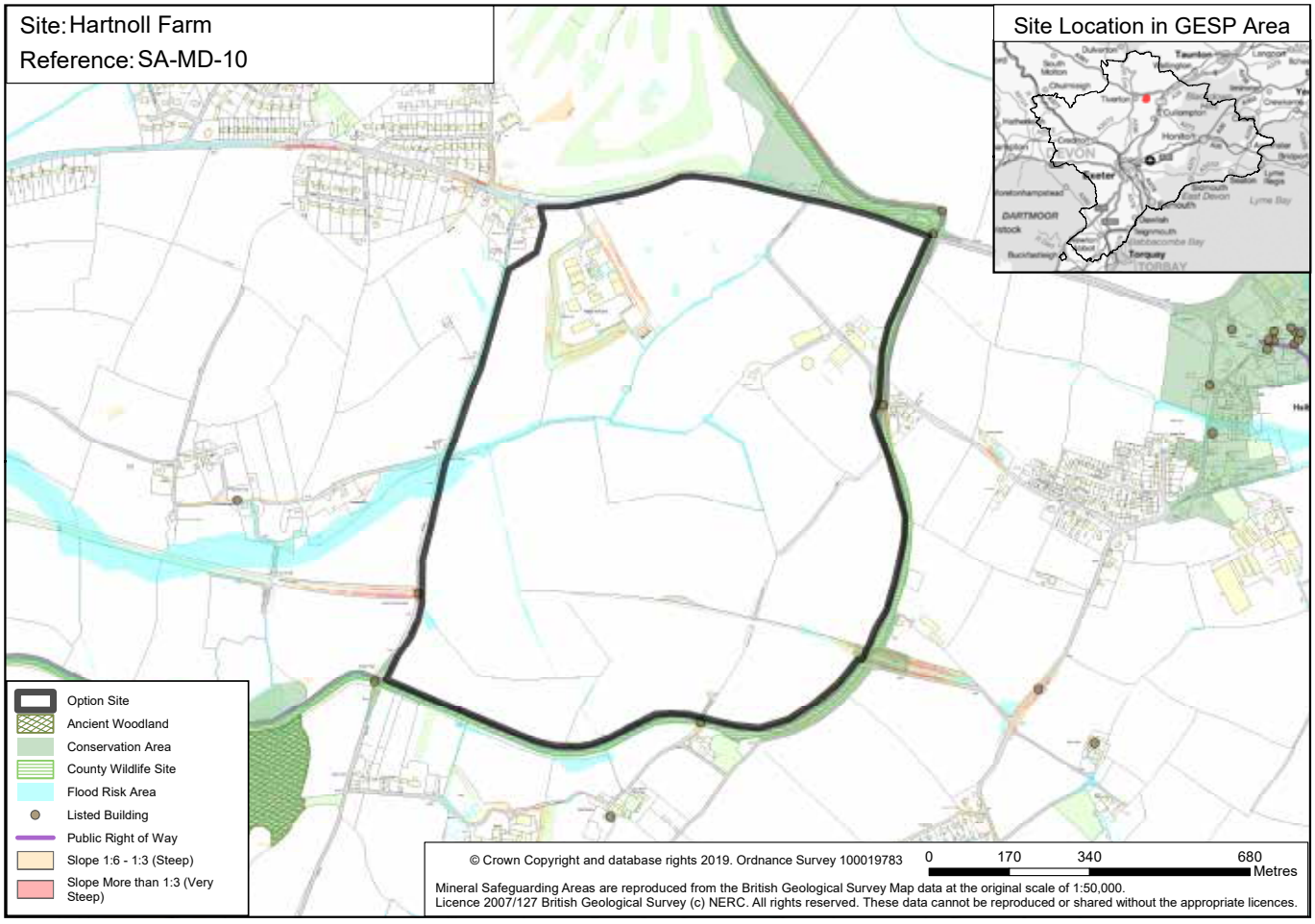
The site has a number of sensitivities which development would need to take into account, including:

- A large area of the site is affected by flooding
- There are areas of ancient woodland in the southeast of the site
- There is potential for significant commuting to Exeter by car
- There are a number of listed buildings associated with farms
- Two lines of pylons run across the site
- The wish to maintain physical and visual separation from Kentisbeare
- It may be visible from the Blackdown Hills Area of Outstanding Natural Beauty
- It may contain Great Crested Newts and other *protected species*
- A large proportion of the site is high grade agricultural land

## Requirements

Planning requirements for the site will aim to create a great place to live and work, providing well designed, high quality new neighbourhoods with appropriate and well managed public open space and safe walking/cycling routes. All sites will need to provide a *mix of homes* (including affordable and custom build), investment in *low carbon* energy and transport, high speed internet and wildlife enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include:

- A town centre relief road and capacity improvements at junction 28 M5 to deliver a strategic highway improvement
- A new railway station at Cullompton and improvements to bus services
- Attractive pedestrian and cycle routes through the site, to Cullompton, Willand and Tiverton
- Primary schools and an education campus including early years, primary, secondary, special educational needs and skills
- Significant areas of multifunctional open space, such as a country park, allotments, orchards, landscaping and sports facilities
- Measures to address the risk of flooding on site
- A variety of amenities and services including retail, employment, sports, recreation, youth, healthcare provision, library provision, community building and outdoor play space
- Development will need to respect the privacy of existing dwellings located nearby
- Contributions to or provision of a site for a new recycling centre
- Consideration of how to minimise the impact of the pylons across the site including potential re-routing of the lower voltage power lines




| Site Name: Hartnoll Farm | |
|---|---|
| **Site Reference** | SA-MD-10 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | wl140eq |
| **Parish(es)** | Halberton |
| **District(s)** | Mid Devon District Council |
| **Site size** | 101 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | 1,683 - 2,172 homes |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | 950 homes |
| **Potential for employment use** | Site includes 5ha of existing employment uses at Hartnoll Business Centre, limited potential for further employment. |
| **Relationship with existing allocations and other potential GESP sites** | The emerging Mid Devon *Local Plan* Review allocates 1,580-1,830 dwellings and 30,000m2 of commercial floorspace at the Tiverton Eastern Urban Extension (EUE) TIV1 (and considered in the Allocations and Infrastructure DPD). The majority of the EUE is covered by a masterplan. Possible link with the site SA-MD-12 (Sampford Peverell South) to deliver transport infrastructure. |
| **Planning status** | A *condition* attached to Anaerobic Digestor at Red Linhay, stipulates that feedstock for the plant is sourced from specific sources, including Hartnoll Farm (17/01142/FULL). |
| **Summary description of the site** | A site east of Tiverton and west of Halberton. Relatively level and predominately agricultural with Hartnoll Business Centre occupying 5ha of the northern part of the site. The site is bounded to the south and east by the Grand Western Canal. |

## Opportunities

This site is identified for consideration in the GESP because:

- A large proportion of the site has been put forward by landowners for development
- It would provide a logical extension to Tiverton linked to an existing allocation and planned facilities
- There is the potential to provide residential development linked to existing employment, reducing the need to travel
- The site has level topography which would enable fairly significant levels of development
- The site will have good strategic highway access from a new junction on the A361
- Its large scale would enable comprehensive masterplanning and high quality design
- The site provides the potential to improve National Cycle Network Route 3 along the disused railway line
- The Grand Western Canal would provide significant walking/cycle access and leisure potential
- There are opportunities for district heating linked to the anaerobic digester and Red Linhay

## Sensitivities

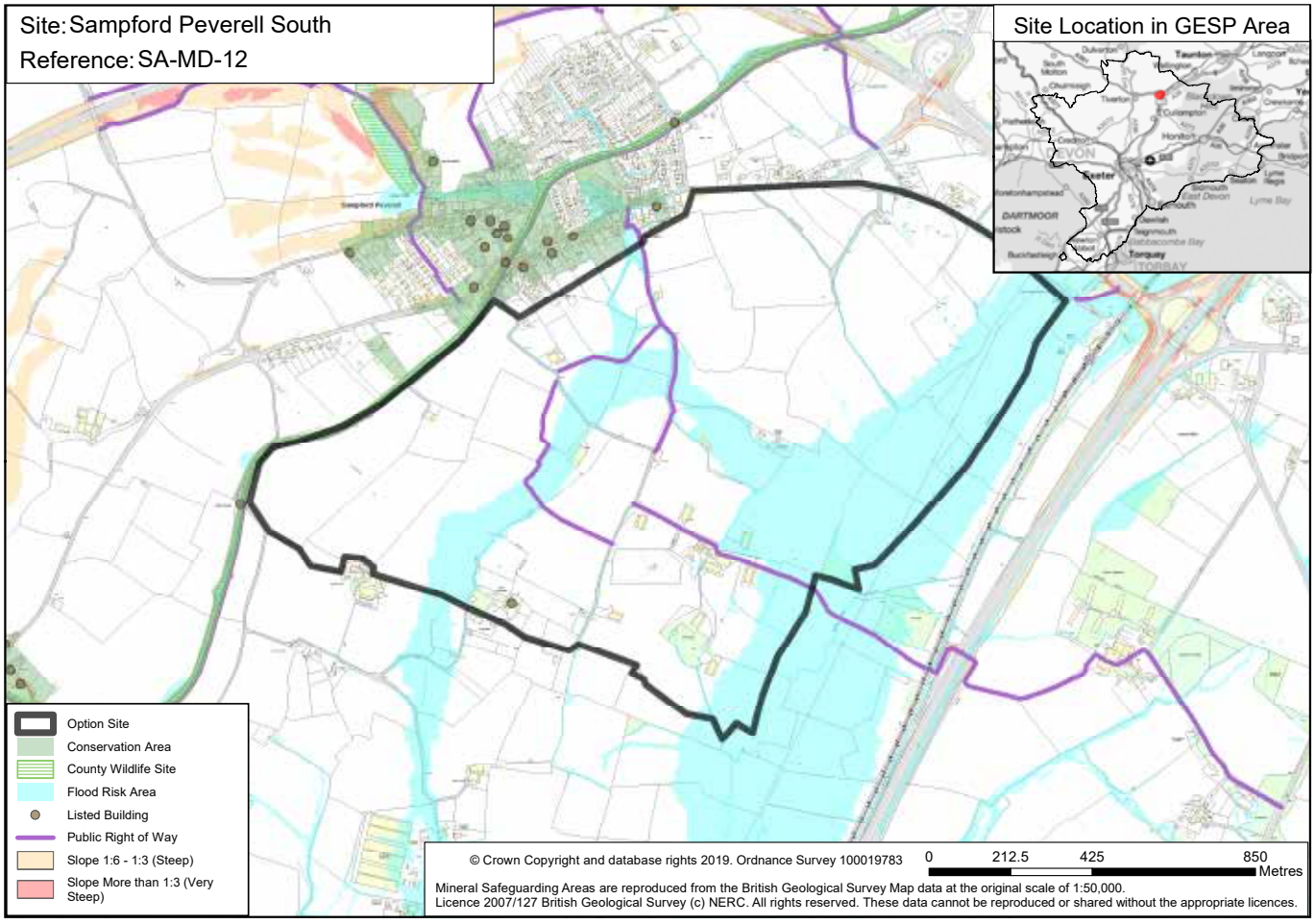
The site has a number of sensitivities which development would need to take into account, including:

- The Grand Western Canal (Conservation Area, Local Nature Reserve, and County Wildlife Site) which would need careful treatment and landscaping
- It may impact upon the Culm Grasslands SAC which is a *Natura 2000* protected wildlife site sensitive to deterioration in air quality (related to traffic on the A361)
- Potential for car-borne out-commuting to Exeter
- A small area of the site is affected by flooding
- A small number of listed structures adjacent to the site associated with the Grand Western Canal and the dismantled railway
- The wish to maintain physical and visual separation from Halberton
- A large proportion of the site is high grade agricultural land

## Requirements

Planning requirements for the site will aim to create a great place to live and work, providing well designed new neighbourhoods with appropriate and well managed public open space and safe walking/cycling routes. All sites will need to provide a *mix of homes* (including affordable and custom build), investment in *low carbon* energy and transport, high speed internet and wildlife enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include:

- Completion of planned new junction on A361 to mitigate impacts on M5 Junction 27
- Improvements to bus services and to vehicle and pedestrian/cycle access to Post Hill and Crown Hill
- Attractive pedestrian and cycle routes through the site making use of the disused railway including contribution to strategic cycle links to Tiverton Parkway and Cullompton
- Additional primary and early years provision in the local area with contributions to additional secondary provision
- Measures to address the risk of flooding on site
- A variety of amenity and community facilities including community building, outdoor play space, small local shop and potential contributions to healthcare improvements
- Contributions to a new recycling centre
- Development will need to respect the privacy of existing dwellings located nearby
- Respecting the character of the area set out in the Eastern Urban Extension masterplans




| Site Name: Sampford Peverell South | |
|---|---|
| **Site Reference** | SA-MD-12 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | 6o14ya5 |
| **Parish(es)** | Sampford Peverell, Halberton |
| **District(s)** | Mid Devon District Council |
| **Site size** | 167 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | 2,148 - 2,772 homes |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | 2200 homes |
| **Potential for employment use** | It would need to provide a mix of employment uses alongside housing. |
| **Relationship with existing allocations and other potential GESP sites** | Possible relationship with site option SA-MD-10 (Hartnoll Farm) to collectively deliver transport infrastructure, including bus, cycle and highway improvements. |
| **Planning status** | None |
| **Summary description of the site** | The site is predominantly relatively flat agricultural land to the south of Sampford Peverell. There are small farmsteads and fields bounded by mature hedgerows and trees. The site adjoins the Great Western Canal and Sampford Peverell to the west, with the Great Western Mainline and M5 motorway in close proximity to the eastern boundary. The northern area of the site is within walking distance of Tiverton Parkway railway station. It is approximately 1.5km from Junction 27 of the M5 and 8km from the centre of Tiverton. |

## Opportunities

This site is identified for consideration in the GESP because:

- A large proportion of the site has been put forward by landowners for development
- The site is generally relatively level
- The site is close to the M5 motorway and Great Western Mainline strategic transport corridor providing access to Exeter and other towns/cities along the corridor
- The train station at Tiverton Parkway (adjacent to the site) offers the potential for residents to travel by rail, with an average 15 minute journey time to Exeter
- The characteristics of the site provides the opportunity to deliver a sensitively designed rural settlement that complements the existing character of Sampford Peverell
- In combination with the potential GESP site at Tiverton there is potential for investment in strategic cycle routes and highway improvements to the A361 Tiverton Parkway junction and Junction 27 of the M5

## Sensitivities

The site has a number of sensitivities which development would need to take into account, including:

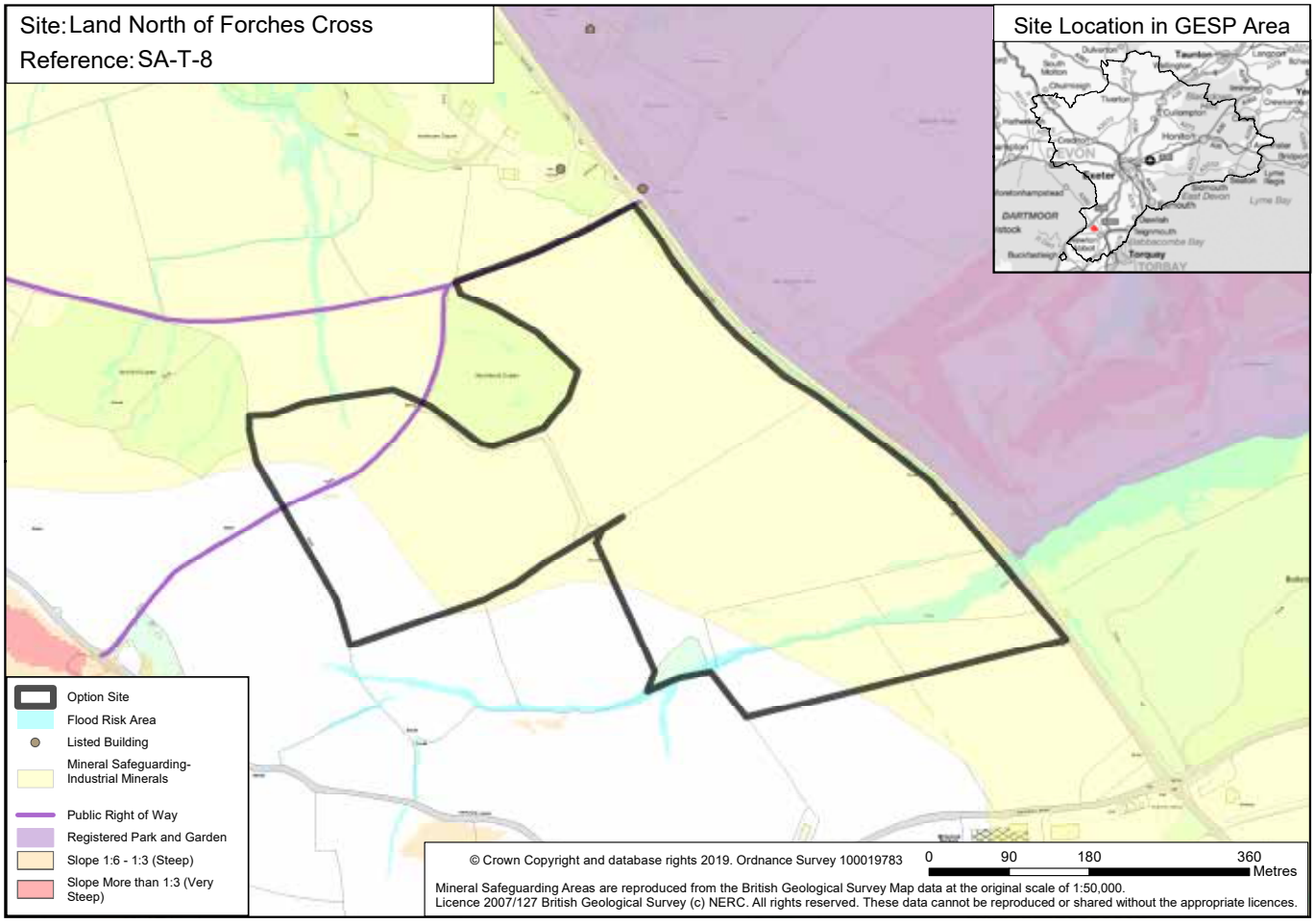
- Part of the eastern boundary is next to the Grand Western Canal county wildlife site and local nature reserve
- It may contain Great Crested Newts and other *protected species*
- Landscape sensitivity is high around the setting of heritage assets – Great Western Canal and Sampford Peverell conservation areas and associated listed buildings
- Large areas of the site are affected by flooding associated with the River Lyner along the eastern boundary and with streams/sluices running across the site that may constrain access through the site – there is also a sewage works in the centre of the site
- Potential for traffic impacts on B3181 to Tiverton, A361 Tiverton Parkway junction, and congestion at Junction 27 of the M5
- Possible impact on Air Quality Management Area at Cullompton from increased travel movements – with uncertain impacts on Culm Grasslands Special Area of Conservation arising from increased journeys west along A361
- Noise from the M5 to the eastern edge of the site would require a suitable buffer zone
- A large proportion of the site is high grade agricultural land

## Requirements

Planning requirements for the site will aim to create a great place to live and work, providing well designed new neighbourhoods with appropriate and well managed public open space and safe walking/cycling routes. All sites will need to provide a *mix of homes* (including affordable and custom build), investment in *low carbon* energy and transport, high speed internet and wildlife enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include:

- Mitigation of impacts on M5 J27 and at Halberton, including potential for a new slip road at Tiverton Parkway junction
- Contribution towards strategic cycle links from Tiverton to Tiverton Parkway station and Tiverton to Willand/Cullompton
- Additional primary school capacity with financial contributions towards expansion of existing secondary school provision
- A multi-functional community building, to host local services that complement existing services in Sampford Peverell and opportunities to provide employment space
- Provision of appropriate healthcare facilities
- Measures to address the risk of flooding on site
- Development will need to respect the privacy of existing dwellings located nearby
- Provision of a landscape buffer to the Grand Western Canal

# South Strategic Growth Area: Site Options




| Site Name: Land north of Forches Cross | |
|---|---|
| **Site Reference** | SA-T-8 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | iz137wn |
| **Parish(es)** | Newton Abbot |
| **District(s)** | Teignbridge District Council |
| **Site size** | 23 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | Employment only |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | Employment only |
| **Potential for employment use** | Yes |
| **Relationship with existing allocations and other potential GESP sites** | Close to existing allocation NA1 in the Teignbridge *Local Plan* |
| **Planning status** | None |
| **Summary description of the site** | 23 ha of gently undulating fields west of the A382, approximately2.5 km north of Newton Abbot and 1.5 km south of Drumbridges (A38). |

## Opportunities

This site is identified for consideration as an employment site in the GESP because:

- A large proportion of the site has been put forward by landowners for development
- The adjacent A382 is planned to be improved, widened and a cycle path added
- The site is close to the A38 Drumbridges junction
- The site's topography is suitable for employment uses
- It is adjacent to an existing Teignbridge *Local Plan* employment allocation at Forches Cross
- Land safeguarded for ball clay may not be allocated for permanent development

## Sensitivities

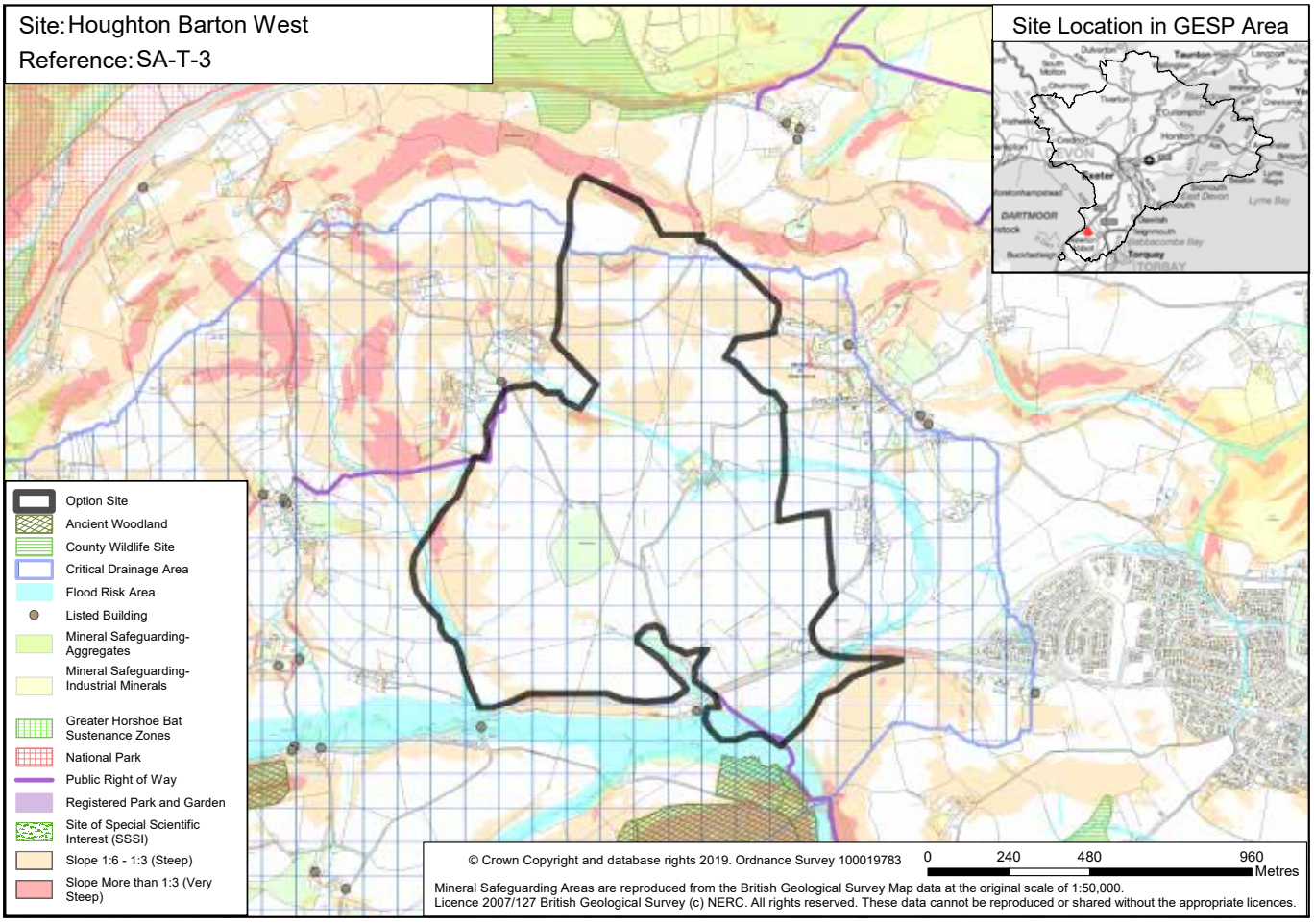
The site has a number of sensitivities which development would need to take into account, including:

- It may contain Greater Horseshoe Bats, Great Crested Newts, Cirl Buntings and other *protected species*
- It is close to Stover House (Grade II) and Stover Registered Park and Garden and other listed buildings and features which form part of the historic house estate
- It is largely within the Bovey Basin Minerals Safeguarding area for Ball Clayidentified in the Devon Minerals Plan
- Landscape impact –the site is currently separated from the built up area of Newton Abbot and development will alter the character of this location
- A large proportion of the site may be high grade agricultural land
- Wooded areas, particularly Moorlands Copse

## Requirements

Planning requirements for the site will aim to create a great place to work, providing well designed new development with appropriate and well managed public open space and safe walking/cycling routes. All sites will need to provide investment in *low carbon*energy and transport, high speed internet and wildlife enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include:

- Ensure protection of *protected species* including Greater Horseshoe Bats and their supporting habitats such as mature hedgerows and dark corridors
- Carefully considered design, use of materials, planting and landscaping to ensure minimal impact on the heritage, landscape and *biodiversity*of the area
- Development to have limited lifespan to enable minerals to be extracted in the longerterm
- Appropriate junction upgrade to allow safe access to and from the site
- Improved cycle and walking links towards Newton Abbot and NA1, including crossing or bridge points over main roads where necessary
- Contributions to a new recycling centre
- Land safeguarded for electricity infrastructure (e.g.sub-station)
- Bus stop and improved bus services




| Site Name: Houghton Barton West | |
|---|---|
| **Site Reference** | SA-T-3 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | fk15yeu |
| **Parish(es)** | Newton Abbot / Ilsington |
| **District(s)** | Teignbridge District Council |
| **Site size** | 120 hectares (of which 50 – 60 ha is developable) |
| **Number of homes considered in Sustainability Appraisal Report** | 1,550 – 2,000 homes |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | 1750 homes |
| **Potential for employment use** | Potential for small to medium scale employment uses designed into development. |
| **Relationship with existing allocations and other potential GESP sites** | Next to the existing Teignbridge *Local Plan* Houghton Barton NA1 allocation. |
| **Planning status** | No allocations or significant permissions. |
| **Summary description of the site** | 120 hectare site currently in agricultural use, adjacent to Seale Hayne and Teignbridge NA1 allocation. Site lies approximately 3.5km from Newton Abbot town centre. Site lies on the A383, with rolling countryside, rising up Ingsdon Hill and Seale Hayne ridgeline to the north. |

## Opportunities

This site is identified for consideration in the GESP because:

- A large proportion of the site has been put forward by landowners for development
- The site is adjacent to the existing NA1 allocation with opportunities for shared infrastructure, including neighbourhood hub, community building with GP services, *green infrastructure* and the planned new main road to the A382
- The site is within cycling distance of Newton Abbot
- The site (combined with NA1) could support a regular bus service into Newton Abbot
- Appropriate site layout, use of material, planting and supporting infrastructure could potentially support and enhance the role of Seale Hayne as a community facility
- Potential for creating public hilltop park and east-west walks along ridgeline

## Sensitivities

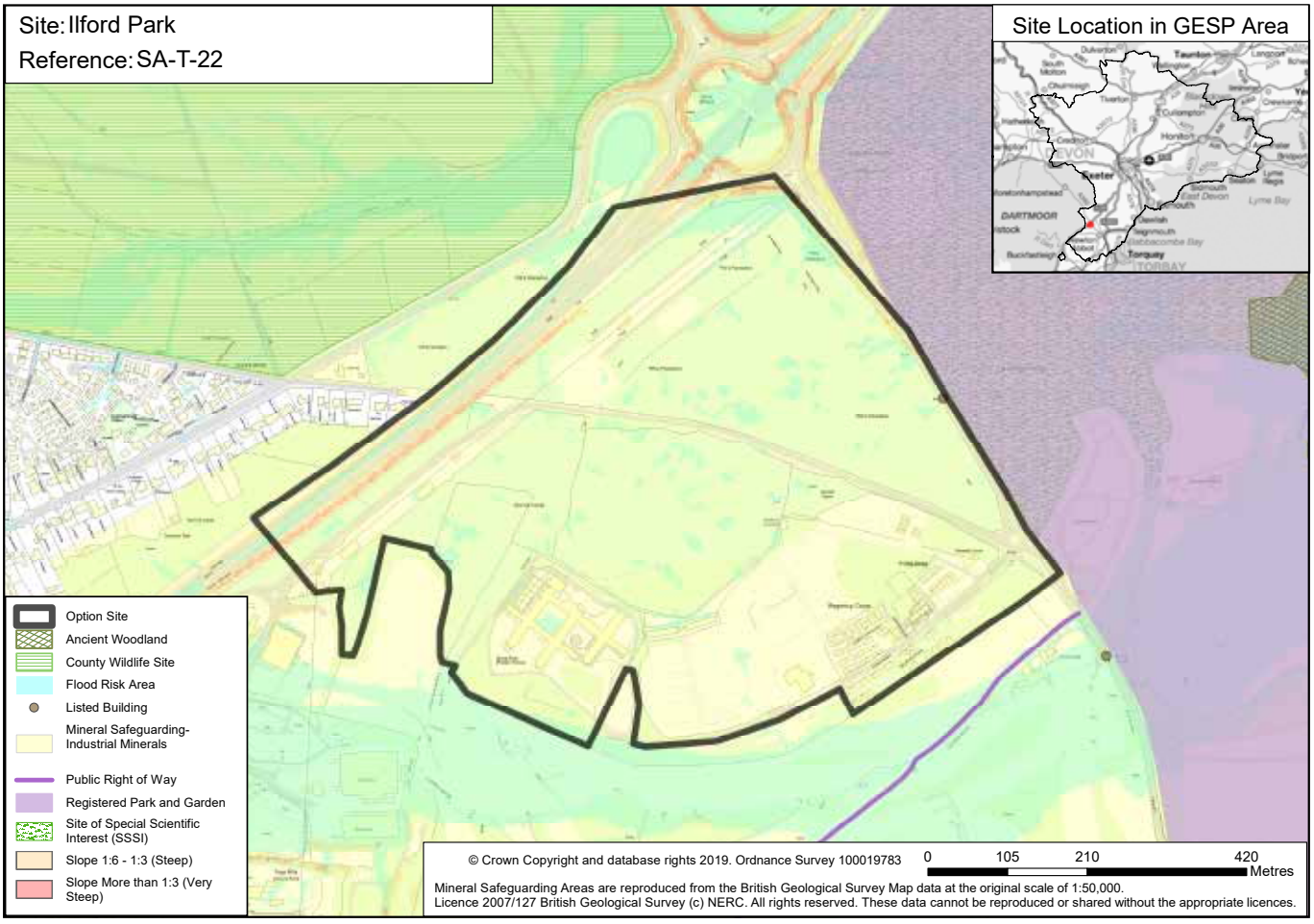
The site has a number of sensitivities which development would need to take into account, including:

- It may contain Greater Horseshoe Bats, Great Crested Newts, Cirl Buntings, Dormouse and other *protected species*
- Seale Hayne and other listed buildings which form part of the historic setting
- There is only westbound access from the A383 onto the A38. However, the new link road to Forches Cross has planning permission
- The impact of the elongation of the town on the ability of residents to make active and sustainable travel choices
- A large proportion of the site is high grade agricultural land
- There are steeper sloped areas in north of the site with higher landscape sensitivity. However, this is also a *green infrastructure* opportunity
- A small area of the site is affected by flooding, but any development would drain into the River Lemon which could increase flood risk in Newton Abbot town centre. In 2019 the area was identified by the EA as a critical drainage area, which is likely to increase water management requirements and cost

## Requirements

Planning requirements for the site will aim to create a great place to live and work, providing well designed new neighbourhoods with appropriate and well managed public open space and safe walking/cycling routes. All sites will need to provide a *mix of homes* (including affordable and custom build), investment in *low carbon* energy and transport, high speed internet and wildlife enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include:

- Ensure protection of *protected species* including Greater Horseshoe Bats and their supporting habitats such as mature hedgerows and dark corridors
- Strategic *green infrastructure* to provide movement corridors, compensatory habitat and a Country Park centred on the Seale Hayne and Ingsdon hilltops
- New main road linking the A383 to the A382 serving this site and the allocated NA1 site
- A multi-use community building to host local services as required including primary health care within a community hub area designed to provide a range of shops, services and employment opportunities for the residents of this site and the NA1 allocation
- Sports hall – a 3 court indoor sports hall facility for hire to the wider community
- One or two new primary schools to provide sufficient capacity to serve the existing NA1 and this site
- Improved bus services into Newton Abbot, serving this allocation and a *park and change* facility near Forches Cross
- Contributions towards Secondary Education and/or provision of new secondary school campus
- Development will need to respect the privacy of existing dwellings located nearby
- Measures to address the risk of flooding including contributions to increase the capacity of flood defence infrastructure at Holbeam dam




| Site Name: Ilford Park | |
|---|---|
| **Site Reference** | SA-T-22 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | None |
| **Parish(es)** | Newton Abbot / Ilsington / Teigngrace |
| **District(s)** | Teignbridge District Council |
| **Site size** | 46 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | Employment only |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | Employment only |
| **Potential for employment use** | Yes |
| **Relationship with existing allocations and other potential GESP sites** | Less than 1km from site option SA-T-8 (Land north of Forches Cross). |
| **Planning status** | Permission granted in 2014 for *mixed use development* comprising B2 and B8 employment development (with ancillary B1 office); restaurant/public house; and residential development (including demolition of existing dwellings at Gaverick Court) together with associated landscaping, play space, drainage, car parking and access. |
| **Summary description of the site** | 46 ha of flat land in use as forestry, with some commercial and residential (C2) uses. The site is adjacent to the A38 Drumbridges junction and Trago Mills. Site topography and location are well suited for providing employment development possibly including a service station. The site includes an extant planning permission for employment uses. |

## Opportunities

This site is identified for consideration as employment land in the GESP because:

- Part of the site has an existing planning permission for B2 and B8 employment uses
- The site is adjacent to the existing A38 Drumbridges junction
- The topography is suitable for employment uses
- Potential for a service station to serve the Devon Expressway dual carriageway
- Some significant areas of hardstanding and *brownfield* land

## Sensitivities

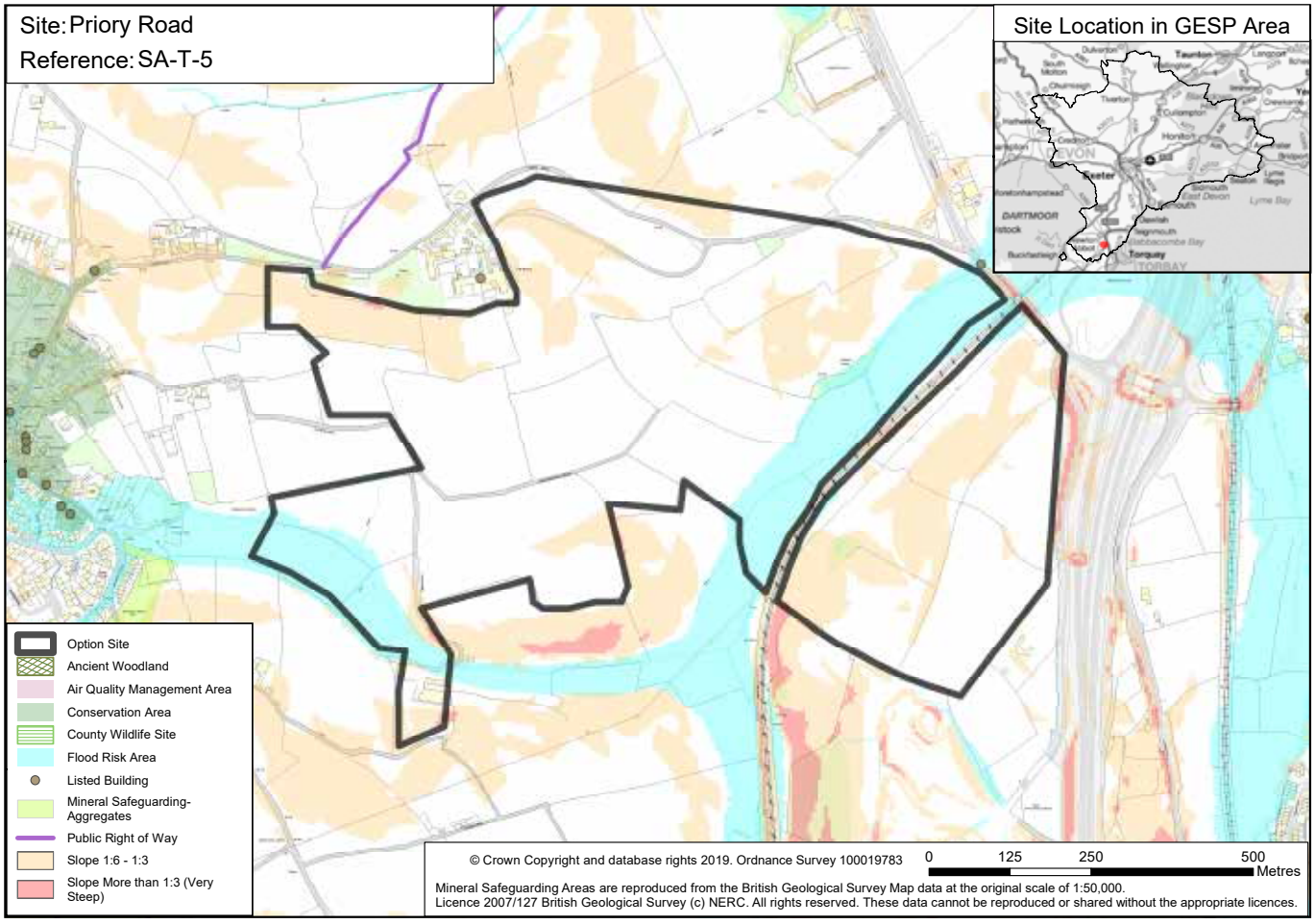
The site has a number of sensitivities which development would need to take into account, including:

- It includes large wooded areas which might host Greater Horseshoe bats, Great Crested Newts, Cirl Buntings and other *protected species*
- Close to Stover Country Park SSSI (freshwater lake)
- Close to Stover Registered Park and Garden and other listed buildings and features which form part of the historic Stover House estate
- Within the Bovey Basin Minerals Safeguarding area for Ball Clay identified in the Devon Minerals Plan
- Existing Gaverick Court provides accommodation and specialist care for up to 95 vulnerable elderly World War Two veterans
- Existing permissions have not been delivered due to significant investment needed in infrastructure including electricity sub-stations and highways

## Requirements

Planning requirements for the site will aim to create a great place to work, providing well designed new development with appropriate and well managed public open space and safe walking/cycling routes. All sites will need to provide investment in *low carbon* energy and transport, high speed internet and wildlife enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include:

- Ensure protection of *protected species* including Greater Horseshoe Bats and their supporting habitats such as trees, mature hedgerows and dark corridors
- Carefully considered design, materials and planting to ensure minimal impact on the heritage, landscape and *biodiversity* of the area including water quality management
- The planned widening of the A382 and appropriate junction upgrades to allow safe vehicular access to and from the site
- Improved cycle links towards the Templar way, including crossing or bridge points over main roads where necessary
- Provision of *green infrastructure* routes and connecting movement corridors for leisure or active travel commuting purposes
- Land safeguarded for electricity sub-station (area to be determined)
- Development to have limited lifespan to enable minerals to be extracted in long term
- Bus stop and improved bus services




| Site Name: Priory Road | |
|---|---|
| **Site Reference** | SA-T-5 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | uj137p9, if13b9q, hv13be8 |
| **Parish(es)** | Kingskerswell / Abbotskerswell |
| **District(s)** | Teignbridge District Council |
| **Site size** | 59 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | 706 - 912 homes |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | 500 homes |
| **Potential for employment use** | No |
| **Relationship with existing allocations and other potential GESP sites** | Site is south of the NA3 allocation in the Teignbridge *Local Plan*. |
| **Planning status** | None |
| **Summary description of the site** | 3km south of Newton Abbot, adjacent to the A380 and close to existing allocation NA3, the area is primarily in agricultural use. |

## Opportunities

This site is identified for consideration in the GESP because:

- A large proportion of the site has been put forward by landowners for development
- The site is adjacent to the existing NA3 allocation which offers some opportunities for shared infrastructure, in particular primary education
- The site is within cycling distance of Newton Abbot

## Sensitivities

The site has a number of sensitivities which development would need to take into account, including:

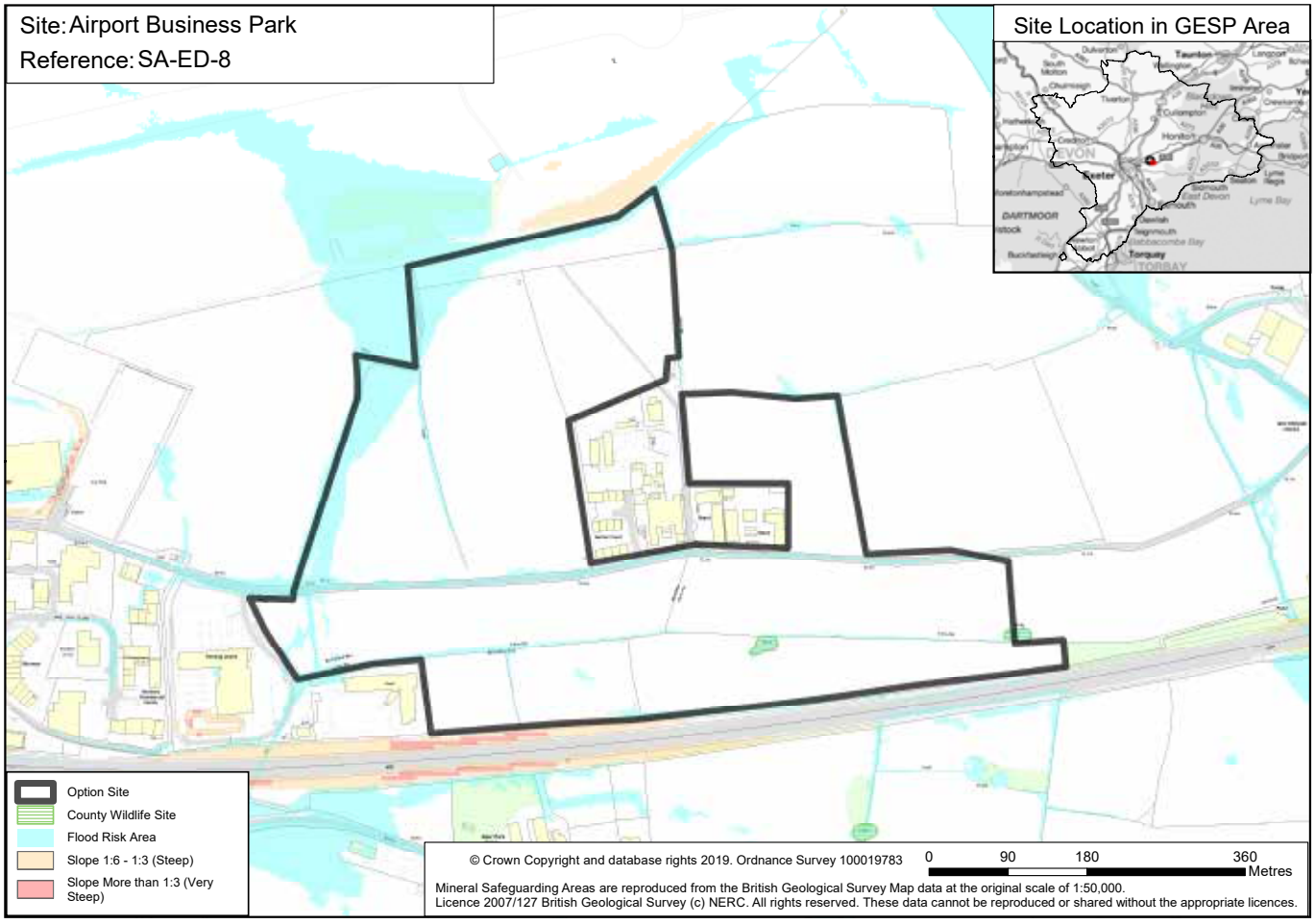
- It may contain Greater Horseshoe Bats, Cirl Buntings, Great Crested Newts, Dormouse, Otter and other *protected species*
- Existing residential properties including those in Grade II* listed St Augustine's Priory
- Steep topography within the site affecting 12 ha, with mature trees and hedgerows
- A large proportion of the site is high grade agricultural land
- Cost of improving access into the site from Kingskerswell Road including widening of the road bridge over the railway and potential impact on the Grade 2 listed bridge
- A large area of the site is affected by flooding
- The severing impact of the bisecting railway line on the permeability and walkability of any development
- Landscape and visual impact

## Requirements

Planning requirements for the site will aim to create a great place to live and work, providing well designed new neighbourhoods with appropriate and well managed public open space and safe walking/cycling routes. All sites will need to provide a *mix of homes* (including affordable and custom build), investment in *low carbon* energy and transport, high speed internet and wildlife enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include:

- Ensure protection of *protected species* including Greater Horseshoe Bats and their supporting habitats such as mature hedgerows, waterways and dark corridors
- Design must have regard to the setting of the listed Priory and Langford Bridge
- Significant *green infrastructure* to provide benefits such as play space, allotments and green spaces, which can also be designed to buffer sensitive features
- Improved access and junction works including the potential widening of the road bridge over the railway line
- Improved cycle and walking links to provide safe routes including to Abbotskerswell and Kingskerswell with potential for bridge over railway line to minimise severance
- A primary school or increased capacity of nearby primary schools
- A flexible multi-use community building to host local services and events as required
- Contribution towards secondary school capacity and GP provision off site
- On-site measures to address the risk of flooding
- Development will need to respect the privacy of existing dwellings located nearby

# East Strategic Growth Area: Site Options




| Site Name: Airport Business Park | |
|---|---|
| **Site Reference** | SA-ED-8 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | 8915ymr, st14y0w, 0115yrm |
| **Parish(es)** | Clyst Honiton, Rockbeare and Aylesbeare |
| **District(s)** | East Devon District Council |
| **Site size** | 27 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | Employment only |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | Employment only |
| **Potential for employment use** | Yes |
| **Relationship with existing allocations and other potential GESP sites** | An existing East Devon *Local Plan* allocation of business park expansion is immediately to the west of this site. The site is close to jobs and homes being delivered on other sites across the West End, allocated in the East Devon *Local Plan*. The site is close to other GESP site options including SA-ED-1 (Sowton), SA-ED-3 (Hill Barton), SA-ED-5 (North of Airport) and SA-ED-25 (Westclyst). |
| **Planning status** | Not Applicable |
| **Summary description of the site** | 27ha of primarily agricultural land sandwiched between the airport and the A30. Bounded by the existing airport business park and allocated expansion immediately to the west, and the site of the proposed France-Alderney-Britain Connector (FAB Link) Converter Station to the east. |

## Opportunities

This site is identified for consideration in the GESP because:

- A large proportion of the site has been put forward by landowners for development
- It is close to homes, jobs and services on sites allocated in the East Devon *Local Plan*
- It is well located to attract strategic employment development
- It has the potential to link in to existing *heat networks* and benefit from private wire opportunities from the Skypark Energy Centre as well as harness *waste heat* from the adjacent proposed FAB Link development
- Could make use of and further enhance planned improvements to Long Lane and wider airport access

## Sensitivities

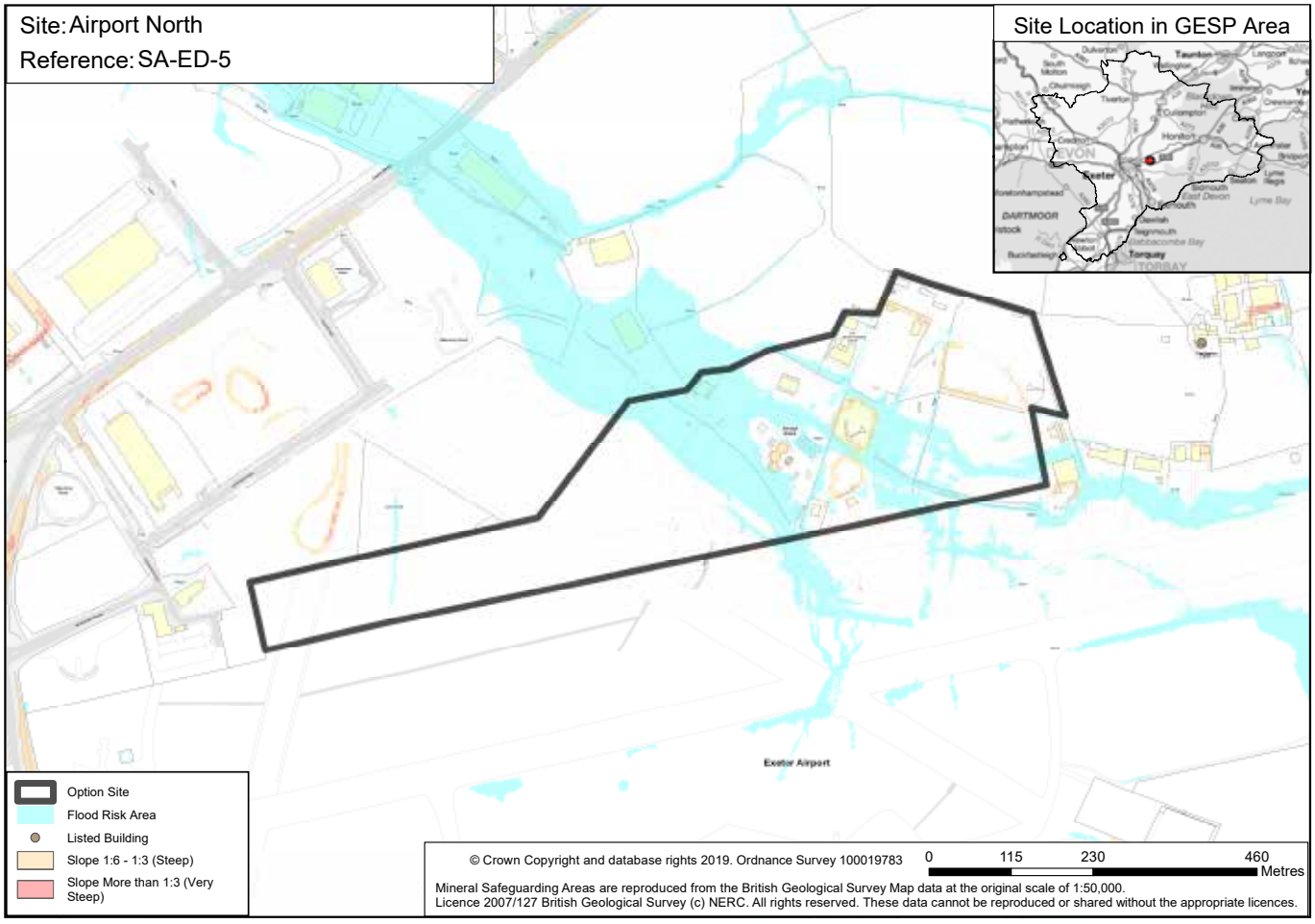
The site has a number of sensitivities which development would need to take into account, including:

- Access along Long Lane needs significant improvement (plans in progress)
- Airport junction on the A30 is nearing capacity
- A small area of the site is affected by flooding
- A number of Listed Buildings exist nearby the site including the Grade I Listed Rockbeare Manor and associated Listed Buildings and Registered Park & Gardens
- The site may contain Great Crested Newts and other *protected species* and contains the Beautiport County Wildlife Site
- Noise from airport (take-off and landing of aircraft and engine testing)
- A large proportion of the site is high grade agricultural land
- Airport related development could be required on this site and there is the potential for impact upon safe operation of the airport without appropriate safeguarding
- It may be visible from the East Devon Area of Outstanding Natural Beauty

## Requirements

Planning requirements for the site will aim to create a great place to work, providing well designed new development with appropriate and well managed public open space and safe walking/cycling routes. All sites will need to provide investment in *low carbon* energy and transport, high speed internet and wildlife enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include:

- Delivery of access improvements to Long Lane
- Measures to address the risk of flooding on site
- High quality, accessible employment uses allowing for further expansion of the Airport Business Park.
- Safeguarding of land for expansion of airport facilities if necessary
- Delivery of a district heating network harnessing *waste heat* from FAB Link and exploring links to the Cranbrook/Skypark network
- Provision of a small amount of facilities to serve workers of the site
- Measures to reduce noise impacts




| Site Name: Airport North | |
|---|---|
| **Site Reference** | SA-ED-5 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | wz15y87 |
| **Parish(es)** | Clyst Honiton |
| **District(s)** | East Devon District Council |
| **Site size** | 22 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | Employment only |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | Employment only |
| **Potential for employment use** | Yes |
| **Relationship with existing allocations and other potential GESP sites** | Skypark, immediately to the north of the site, is allocated in the existing East Devon *Local Plan* and is now under construction. The site is close to jobs and homes allocated on other sites across the West End in the East Devon *Local Plan*. Part of the site is allocated as Clyst Valley Regional Park. The site is close to other potential GESP site options including sites SA-ED-1 (Sowton), SA-ED-3 (Hill Barton), SA-ED-8 (Airport Business Park) and SA-ED-25 (Westclyst). |
| **Planning status** | The site was previously allocated in the 1995-2011 East Devon *Local Plan* for airport terminal development. |
| **Summary description of the site** | 22ha of land within active airfield uses and hosting supporting infrastructure on the north side of the runway at Exeter Airport, south of Skypark and Cranbrook's proposed southern expansion area. |

## Opportunities

This site is identified for consideration in the GESP because:

- A large proportion of the site has been put forward by landowners for development
- A large amount of land within the site could be considered as *brownfield* land
- It is close to homes, jobs and services on sites allocated in the East Devon *Local Plan*
- It is well located to attract strategic employment development
- It has the potential to link in to existing *heat networks* and benefit from private wire opportunities from the Skypark Energy Centre
- Development could rely upon and enhance facilities planned on Skypark

## Sensitivities

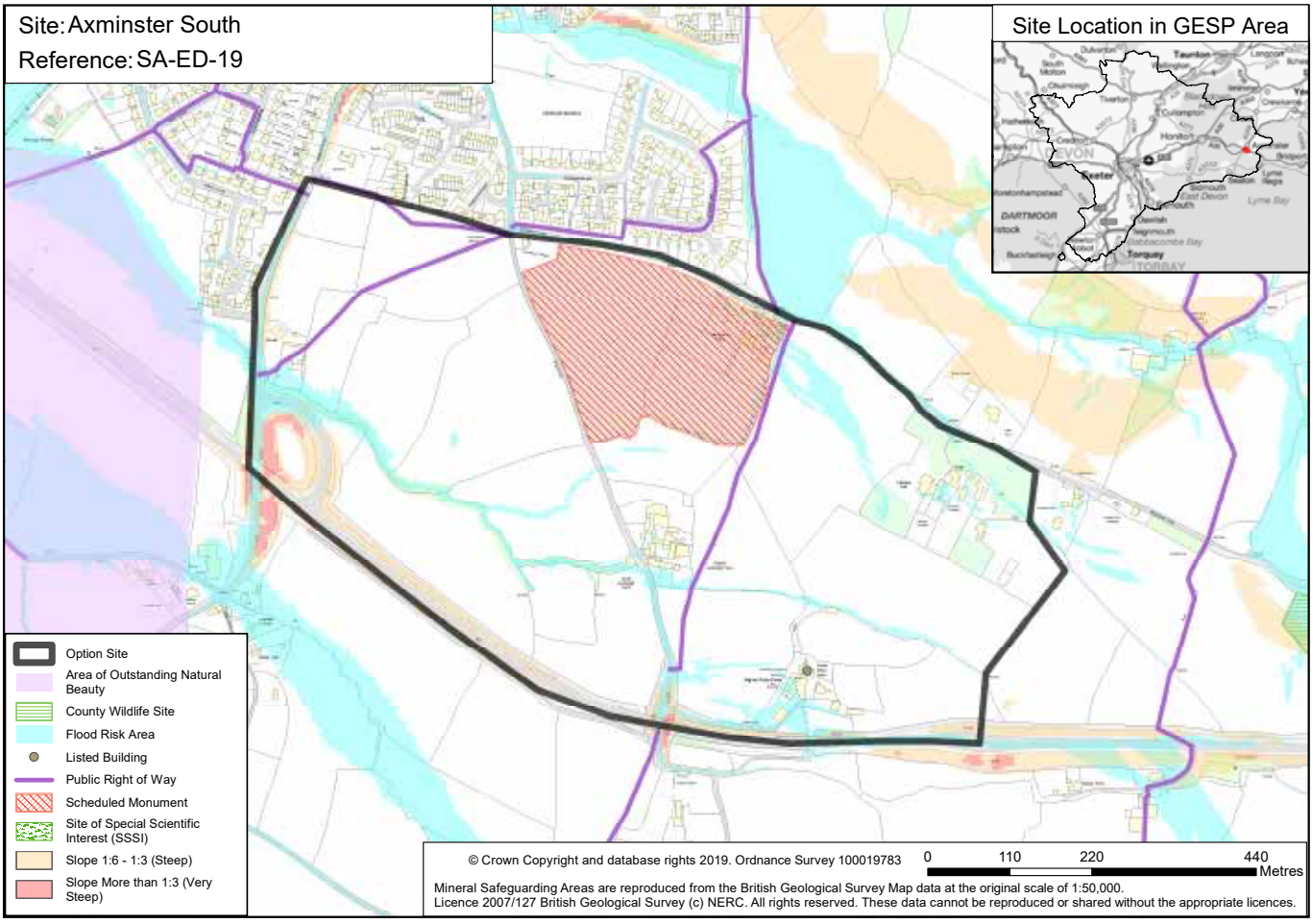
The site has a number of sensitivities which development would need to take into account, including:

- It is dependent upon access through adjacent development sites
- The airport junction on the A30 is nearing capacity
- A small area of the site is affected by flooding
- Noise from the airport (take-off and landing of aircraft and engine testing)
- Airport related development could be required on this site and there is potential for impact upon safe operation of the airport without appropriate safeguarding
- The airport's private sewage works, engine testing pen and the newly constructed fire service training centre are all contained within the site
- A number of Listed Buildings exist nearby the site
- It may be visible from the East Devon Area of Outstanding Natural Beauty
- The site may contain Great Crested Newts and other *protected species*
- A small part of the site is allocated as the Clyst Valley Regional Park

## Requirements

Planning requirements for the site will aim to create a great place to work, providing well designed new development with appropriate and well managed public open space and safe walking/cycling routes. All sites will need to provide investment in *low carbon* energy and transport, high speed internet and wildlife enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include:

- Safe and suitable access to the site through Skypark and potentially Cranbrook's proposed southern expansion area and secure emergency access to the airfield
- Financial contribution towards improvement of the airport junction on the A30
- Measures to address the risk of flooding on site
- Safeguarding of land for expansion of airport facilities if necessary
- High quality, accessible employment uses allowing for the expansion of Skypark
- Retention of the engine testing pen and fire service training centre
- Connection to the existing heat network and private wire from the Energy Centre
- Measures to reduce noise impacts
- Relocation of the private sewage works
- Off-site contribution towards enhancement of facilities on Skypark




| Site Name: Axminster South | |
|---|---|
| **Site Reference** | SA-ED-19 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | 5r1379x |
| **Parish(es)** | Axminster |
| **District(s)** | East Devon District Council |
| **Site size** | 54 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | 831 - 1,072 homes |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | 540 homes |
| **Potential for employment use** | It would need to provide some small scale employment alongside housing. |
| **Relationship with existing allocations and other potential GESP sites** | The adopted East Devon *Local Plan* allocates a site (E105) for around 650 dwellings and 8ha employment space as a north east urban extension of the town. The area is being masterplanned. |
| **Planning status** | None |
| **Summary description of the site** | A rectangular shaped site adjacent to the southeast of the existing built-up area of Axminster. The site is fairly level with undulating areas. It is currently in agricultural use and includes farm buildings and a small number of houses. The site is bounded to the south by the A35, the west by the A358 and the north by Woodbury Lane. |

## Opportunities

This site is identified for consideration in the GESP because:

- Part of the site has been put forward by landowners for development
- It would provide a logical extension to Axminster
- It has fairly level topography which would enable development
- It is located close to the A35 which provides good strategic road access
- The site could provide land for a junction improvement on the A35
- It is located within walking distance of Axminster station which provides sustainable travel options
- It is within walking distance of services and facilities in Axminster town centre
- It provides the potential to link to the National Cycle Network Route 2 along Woodbury Lane
- It links to a good network of existing public rights of way and open space to the south

## Sensitivities

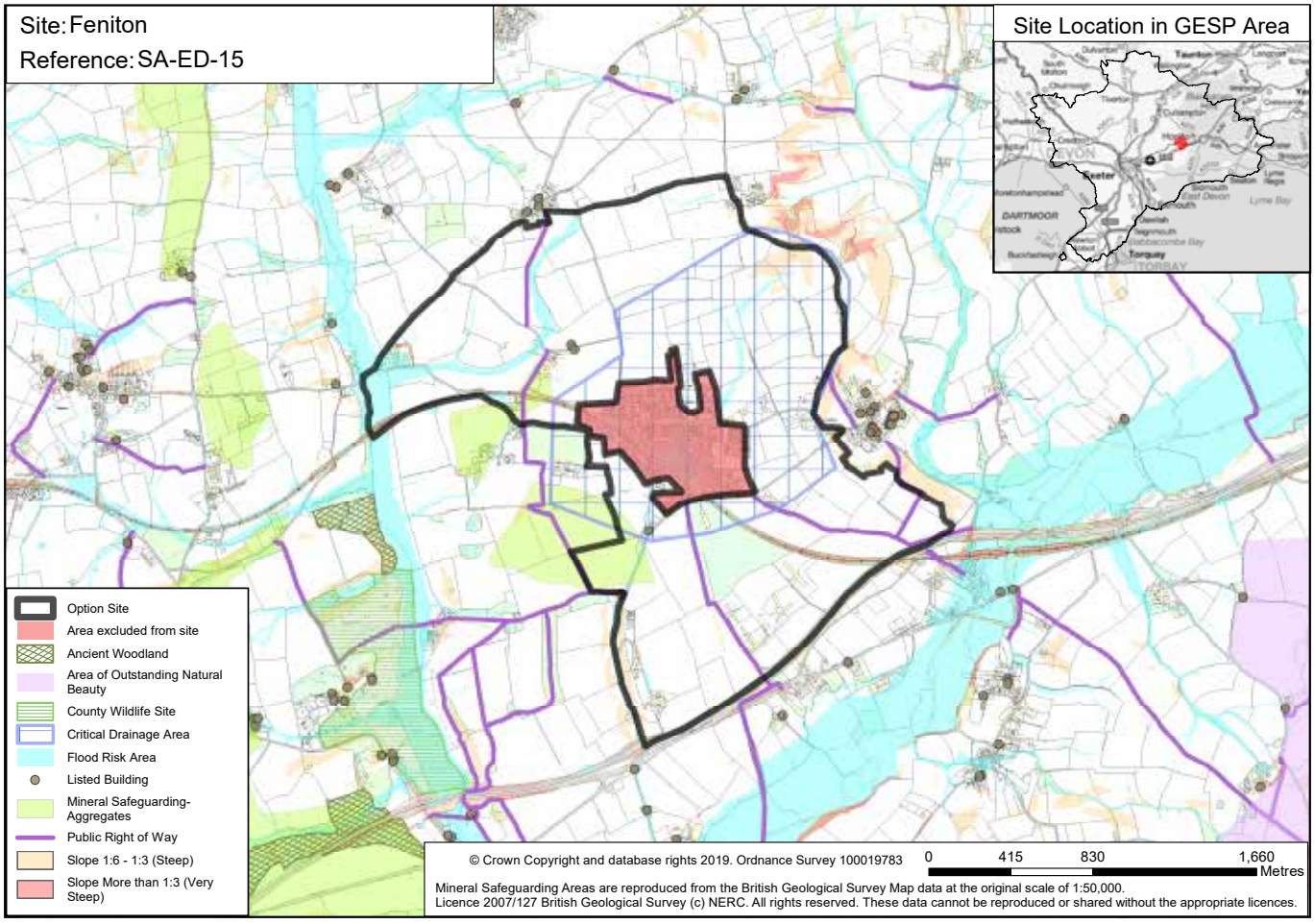
The site has a number of sensitivities which development would need to take into account, including:

- A Scheduled Monument sits within the site at Woodbury Farm, together with the considerable likelihood of significant related, Roman archaeology beyond the Monument boundary
- It may impact upon the level of nutrients discharged into the River Axe, which is a *Natura 2000* protected wildlife site
- The former route of the Taunton Stop Line anti-tank ditch would need careful consideration
- It may be visible from the Blackdown Hills and East Devon *Areas of Outstanding Natural Beauty*
- There is the potential for an increase in car-borne out-commuting to Exeter
- A small area of the site is affected by flooding
- One listed building within the site at Higher Wyke Farm
- It may contain Great Crested Newts and other *protected species*
- A large proportion of the site is likely to be high grade agricultural land

## Requirements

Planning requirements for the site will aim to create a great place to live and work, providing well designed new neighbourhoods with appropriate and well managed public open space and safe walking/cycling routes. All sites will need to provide a *mix of homes* (including affordable and custom build), investment in *low carbon* energy and transport, high speed internet and wildlife enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include:

- Significant areas of multifunctional open space and landscaping associated with preserving the scheduled monument and other archaeology
- Funding of measures to mitigate any nutrient management impacts on the River Axe
- Contributions to early years, primary, secondary and special educational needs provision
- Attractive pedestrian and cycle routes through the site, to the station and town centre
- Safeguarding of land and contributions to a junction improvement on the A35
- Safeguarding of the National Cycle Network Route 2 on Woodbury Road
- Measures to address the risk of flooding on site
- Improvements to bus services
- A variety of amenity and community facilities including community building, outdoor play space, small local shop and potential contributions to healthcare improvements
- Development will need to respect the privacy of existing dwellings located nearby




| Site Name: Feniton | |
|---|---|
| **Site Reference** | SA-ED-15 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | 9x14yv0, ag14yy0, ab12sf9, l7140gh, rn15ypr, 7s127ma, t413aex, uq1400m |
| **Parish(es)** | Feniton and Ottery St Mary |
| **District(s)** | East Devon District Council |
| **Site size** | 352 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | 6,012 - 7,757 homes |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | 2,800 homes |
| **Potential for employment use** | It would need to provide a mix of employment uses alongside housing. |
| **Relationship with existing allocations and other potential GESP sites** | None |
| **Planning status** | Multiple planning applications refused and dismissed on appeal for development within this site option. |
| **Summary description of the site** | 352ha of predominantly agricultural land surrounding the village of Feniton, on both sides of the railway. |

## Opportunities

This site is identified for consideration in the GESP because:

- It is close to Feniton train station and the A30
- Feniton includes a number of essential services already which could be enhanced
- It could potentially help to address existing issues of flood risk

## Sensitivities

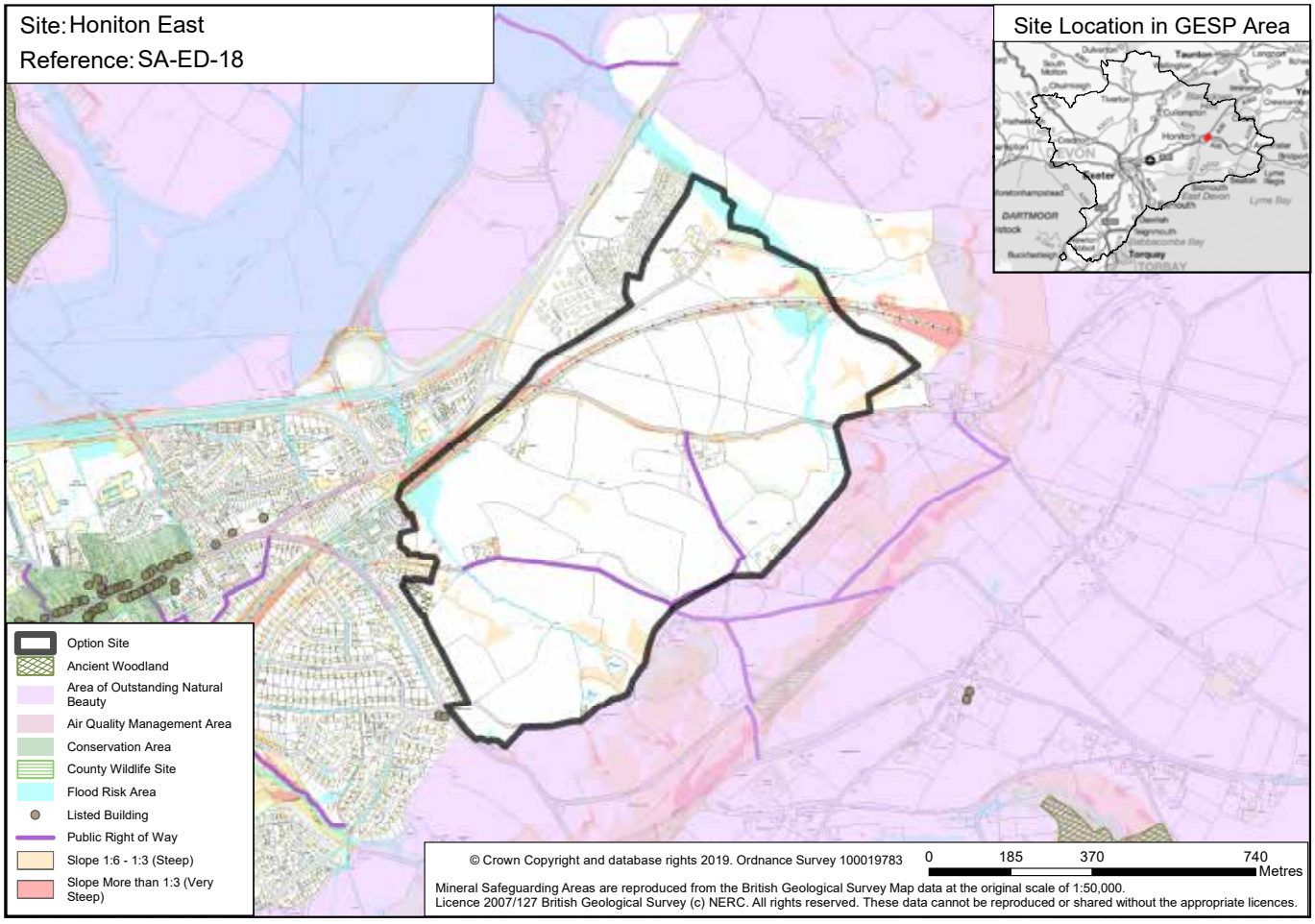
The site has a number of sensitivities which development would need to take into account including:

- It may impact upon the Pebblebed Heaths which are *Natura 2000* protected wildlife sites sensitive to an increase in the number of visitors
- Parts of the site are affected by flooding
- It may be visible from the Blackdown Hills and East Devon *Areas of Outstanding Natural Beauty* and development of higher slopes and southern parts likely to be particularly visible
- The site is partially within a mineral consultation area identified in the adopted Devon Minerals Plan
- Access from the A30 and across the railway insufficient for strategic scale development
- Frequency of train and bus services in Feniton is poor. Some distance from Exeter and could increase pressure on the already at capacity Junction 29 of the M5
- A number of Listed Buildings exist within and nearby including Grade I Listed Buildings at the Church of St Mary and Cadhay House as well as the Ottery St Mary Conservation Area
- Limited employment opportunities in close proximity
- Local primary provision at/approaching capacity. The Kings School lies a significant distance away.
- A large proportion of the site is high grade agricultural land
- Topography could reduce capacity in some parts of the site
- Reasonably close to Escot Park County Wildlife Site and may contain Great Crested Newts and other *protected species*
- South-east corner of the site contains an historic battlefield and site of a former castle

## Requirements

Planning requirements for the site will aim to create a great place to live and work, providing well designed new neighbourhoods with appropriate and well managed public open space and safe walking/cycling routes. All sites will need to provide a *mix of homes* (including affordable and custom build), investment in *low carbon* energy and transport, high speed internet and wildlife enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include:

- Funding of measures to reduce the impact on the Pebblebed Heaths, including provision of *Suitable Alternative Natural Greenspace (SANG)*
- Measures to address the risk of flooding on site
- Rail infrastructure improvements to enable half-hourly train service frequency
- Significant improvements to vehicular access from the A30 plus railway crossings
- On-site primary school provision including early years plus additional secondary places
- A variety of amenities and services including a small amount of convenience retail, local employment, sports, recreation and healthcare provision
- Retention and enhancement of provision at Feniton playing fields
- Development will need to respect the privacy of existing dwellings located nearby




| Site Name: Honiton East | |
|---|---|
| **Site Reference** | SA-ED-18 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | f415yom, hv15vpa |
| **Parish(es)** | Honiton |
| **District(s)** | East Devon District Council |
| **Site size** | 73 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | 1,234-1,593 homes |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | 1,100 homes |
| **Potential for employment use** | It would need to provide some small scale employment alongside housing. |
| **Relationship with existing allocations and other potential GESP sites** | The East Devon *Local Plan* allocates a significant amount of employment land at Honiton's western end (at the opposite end of town to this site option). |
| **Planning status** | None |
| **Summary description of the site** | 72ha of agricultural land to the east of Honiton situated primarily on land rising towards and surrounded by the Blackdown Hills and East Devon *Areas of Outstanding Natural Beauty*. Site is sandwiched between the A35, Exeter-Waterloo railway line and the A30. |

## Opportunities

This site is identified for consideration in the GESP because:

- A large proportion of the site has been put forward by landowners for development or was promoted during the previous East Devon *Local Plan* process
- It is close to Honiton train station and both the A30 and A35
- Honiton is an important centre with good levels of employment provision as well as allocations to provide additional employment
- Honiton Community College has some limited scope for expansion

## Sensitivities

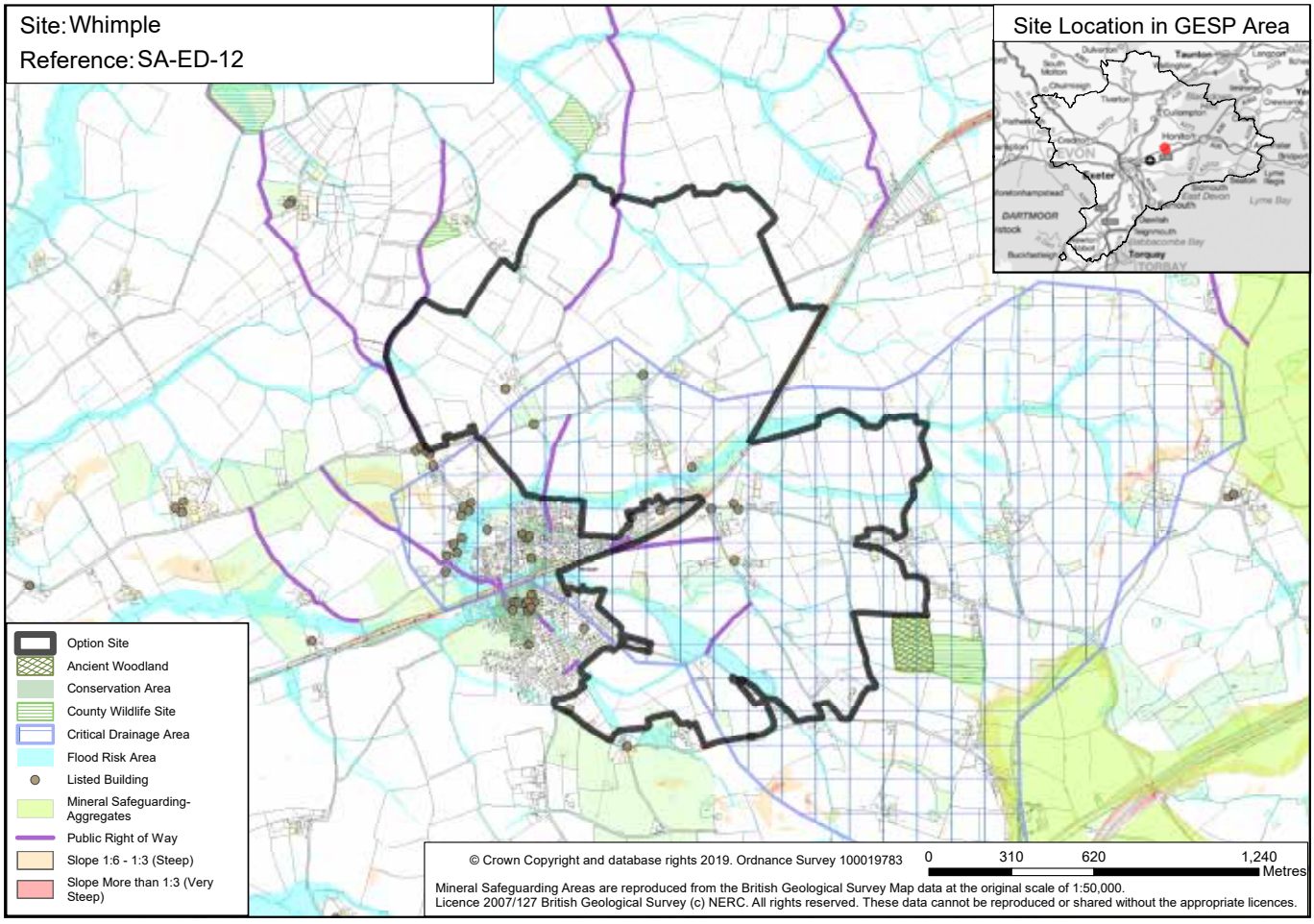
The site has a number of sensitivities which development would need to take into account including:

- The site is surrounded by the Blackdown Hills and East Devon *Areas of Outstanding Natural Beauty* and would be visible from both
- A small area of the site is affected by flooding
- Existing rail infrastructure limits the frequency of train services in Honiton
- It is some distance from Exeter and could increase traffic on Junction 29 of the M5 which is at capacity
- Potential for the achievement of safe site access from the A35 Kings Road to cause detrimental impacts on traffic flow along the *strategic road network*
- Potential severance issues caused by difficulty gaining safe pedestrian and cycle access across the A35 Kings Road
- Primary education facilities in the town are already at/approaching capacity
- The Honiton Conservation Area and multiple other Listed Buildings are nearby the site
- The steep topography could reduce capacity in some parts of the site
- The area is known for prehistoric activity and contains a section of Roman Road
- A large proportion of the site is high grade agricultural land
- Collin's Field County Wildlife Site (CWS) is close by and may contain *protected species*

## Requirements

Planning requirements for the site will aim to create a great place to live and work, providing well designed new neighbourhoods with appropriate and well managed public open space and safe walking/cycling routes. All sites will need to provide a *mix of homes* (including affordable and custom build), investment in *low carbon* energy and transport, high speed internet and wildlife enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include:

- High quality design and layout to reduce the impact upon landscape / heritage assets
- Measures to address the risk of flooding on site
- Rail infrastructure improvements to enable half-hourly train service frequency
- Potential alternative vehicular route from Kings Road to A35 junction and safe pedestrian/cycle access across Kings Road
- On-site primary school provision including early years plus a financial contribution towards expansion of facilities secondary provision
- Contributions to a new recycling centre
- A variety of amenities and services including a small amount of convenience retail, local employment, sports, recreation and healthcare provision
- Development will need to respect the privacy of existing dwellings located nearby




| Site Name: Whimple | |
|---|---|
| **Site Reference** | SA-ED-12 |
| **Housing and Employment Land Availability Assessment (HELAA) sites included** | 3m137yy, o814040, 2j13ay8 |
| **Parish(es)** | Whimple |
| **District(s)** | East Devon District Council |
| **Site size** | 242 hectares |
| **Number of homes considered in Sustainability Appraisal Report** | 4,360 – 5,813 homes |
| **Indicative number of homes factoring in sensitivities and requirements (see below)** | 2,500 homes |
| **Potential for employment use** | It would need to provide a mix of employment uses alongside housing. |
| **Relationship with existing allocations and other potential GESP sites** | Fairly close to Cranbrook. |
| **Planning status** | None |
| **Summary description of the site** | 337ha of predominantly agricultural land to the north and east of the village of Whimple, located on both sides of the railway. |

## Opportunities

This site is identified for consideration in the GESP because:

- It is close to Whimple train station
- Whimple includes a number of essential services already which could be enhanced
- Planned jobs growth at the West End is reasonably nearby
- It could potentially help to address existing issues of flood risk

## Sensitivities

The site has a number of sensitivities which development would need to take into account, including:

- It may impact upon the Pebblebed Heaths which are *Natura 2000* protected wildlife sites sensitive to an increase in the number of visitors
- Parts of the site is affected by flooding
- Access from the A30 and across the railway insufficient for strategic scale development
- Frequency of train and bus services in Whimple is poor. Some distance from Exeter and could increase pressure on the already at capacity Junction 29 of the M5
- A number of Listed Buildings exist within and nearby the site. Development could have the potential to impact upon the setting of Whimple Conservation Area
- Local primary school provision at/approaching capacity. Clyst Vale Community College lies a significant distance away and the school has limited scope for expansion
- Topography and landscape sensitivity/visual prominence in some parts of the site
- A large proportion of the site is high grade agricultural land
- Site includes and borders multiple County Wildlife Sites and may contain Great Crested Newts and other *protected species*
- It may be visible from the East Devon Area of Outstanding Natural Beauty

## Requirements

Planning requirements for the site will aim to create a great place to live and work, providing well designed new neighbourhoods with appropriate and well managed public open space and safe walking/cycling routes. All sites will need to provide a *mix of homes* (including affordable and custom build), investment in *low carbon* energy and transport, high speed internet and wildlife enhancements. More detail on these can be found in the policies within Section B of this document. Other emerging requirements include:

- Funding of measures to reduce the impact on the Pebblebed Heaths including provision of *Suitable Alternative Natural Greenspace (SANG)*
- Measures to address the risk of flooding on site
- Rail infrastructure improvements to enable half-hourly train service frequency
- Significant improvements to vehicular access from the B3174 plus railway crossings
- Pedestrian and cycle connectivity to jobs and services at Cranbrook and the West End
- On-site primary school provision including early years and on-site secondary school provision
- High quality design and layout to reduce the impact upon heritage assets
- A variety of amenities and services including a small amount of convenience retail, local employment, sports, recreation and healthcare provision
- Development will need to respect the privacy of existing dwellings located nearby

# Glossary

## Definition of terms

| Term | Definition |
|---|---|
| *Adoption* | The final confirmation of a *development plan* status by a local planning authority. |
| *Areas of Outstanding Natural Beauty* | An area with statutory national landscape designation, the primary purpose of which is to conserve and enhance natural beauty. Together with National Parks, Areas of Outstanding Natural Beauty represent the nation's finest landscapes. Areas are designated by Natural England (statutory body). |
| *Biodiversity* | The whole variety of life encompassing all genetics, species and ecosystem variations, including plants and animals. |
| *Brownfield (or previously developed land)* | Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape. |
| *Brownfield registers* | Registers of previously developed land that local planning authorities consider to be appropriate for residential development, having regard to criteria in the Town and Country Planning (Brownfield Land Registers) Regulations 2017. Local planning authorities will be able to trigger a grant of permission in principle for residential development on suitable sites in their registers where they follow the required procedures. |
| *Build to Rent* | Purpose built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control. |
| *Building Greater Exeter* | Building Greater Exeter is a project focussed on supporting the construction sector across Exeter and East Devon to address the skills and recruitment challenges it faces it light of predicted growth. Further information about the project can be found online. |
| *Building Regulations* | Building Regulations are minimum standards for design, construction and alterations to virtually every building. The regulations are developed by the UK government and approved by parliament. |
| *Call for sites* | A call for sites for the Greater Exeter area ran from 27 February to 10 April 2017. This call for sites provided an opportunity for agents, developers and landowners to promote land for housing or economic development within the Greater Exeter area through the planning process. Further information is available at: www.gesp.org.uk/consultations/call-for-sites . A second call for sites is taking place alongside the GESP Options Consultation. |
| *Carbon emissions* | Carbon dioxide equivalent ($CO_2e$) is used as a proxy for all greenhouse gases in accordance with Section 93 of the Climate Change Act 2008. The generic term carbon emissions is used to describe the release into the atmosphere of these gases attributable to human activity. |

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| *Carbon offsetting fund* | Where *carbon emissions* cannot be reduced in line with policy targets on site funds will be collected from developers that will aim to deliver equivalent carbon savings through projects elsewhere in the Greater Exeter area. |
| *Carbon Statement* | A document setting out how development proposed is designed, constructed and will perform to deliver *net zero carbon emissions*, taking account of emissions from primary energy and transport. |
| *Centre for Excellence for Construction* | A project to create state of the art facilities and provide access to cutting edge construction technology within Cranbrook in East Devon, promoted by Exeter College. |
| *Combined Heat and Power (CHP)* | This is an efficient process that captures and utilises heat and generates electricity at the same time. By generating heat and power simultaneously, CHP plants can significantly reduce *carbon emissions* in comparison with separate means of conventional heat and power via an individual boiler and power station. |
| *Community Infrastructure Levy* | A planning charge applied to new development (exemptions apply) that local authorities can use to fund a range of infrastructure. |
| *Completions (in housing terms)* | A dwellings is regarded as complete when it becomes ready for occupation or when a completion certificate is issued. Counts of these dwellings are termed completions. |
| *Condition* | Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions. The *National Planning Policy Framework* sets out that planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. Agreeing conditions early is beneficial to all parties involved in the process and can speed up decision making. Conditions that are required to be discharged before development commences should be avoided, unless there is a clear justification. |
| *Custom and self build* | Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing. A legal definition, for the purpose of applying the Self-build and Custom Housebuilding Act 2015 (as amended), is contained in section 1(A1) and (A2) of that Act. |
| *Data analytics* | Data analytics is the science of drawing insights from raw information sources. Many of the techniques and processes of data analytics have been automated into mechanical processes and algorithms that work over raw data for human consumption. |
| *Decentralised energy networks* | Local networks where energy (heat and/or power) is generated and distributed close to where it will be used rather than the conventional approach of large power plants providing energy (electricity and gas) through the national grid. |
| *Deliverability* (in housing terms) | A measure of how 'deliverable' a site is for housing development. The *National Planning Policy Framework* requires local planning authorities to assess deliverability in terms of a site's suitability, availability and achievability for housing development. A definition of a 'deliverable' site is provided in the glossary to the *National Planning Policy Framework*. |

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| *Design code* | A set of illustrated design requirements that provide specific, detailed parameters for the physical development of a site or area. The graphic and written components of the code should build upon a design vision, such as a masterplan or other design and development framework for a site or area. |
| *Development plan* | A document setting out the local planning authority's policies and proposals for the development and use of land and buildings in the authority's area. This includes adopted *local plans*, *neighbourhood development plans* and the London Plan, and is defined in section 38 of the Planning and Compulsory Purchase Act 2004. |
| *Development plan document* | Local development documents that have development plan status. Once a development plan document has been adopted by the local planning authority, planning application decisions must be made in accordance with them unless material considerations indicate otherwise.<br><br>Development plan documents require community involvement, consultation procedures and independent assessment. They are officially adopted after a binding report is produced by an independent planning inspector following an independent examination of the plan and any representations made in respect of it. |
| *Devon Local Transport Plan 2026* | The Devon and Torbay Local Transport Plan 3, 2011-2026 sets a strategy for transport with a supporting implementation plan. The report is available to view at: www.devon.gov.uk/roadsandtransport/traffic-information/transport-planning/devon-and-torbay-local-transport-plan-3-2011-2026/ |
| *Devon Metro* | Devon Metro is a scheme for the integration and enhancement of rail services in the Exeter *travel to work area*, being progressed by Devon County Council. |
| *DEXTCO* | DEXTCO is a joint venture designed to deliver more efficient heat and power in Devon through ground-breaking sustainable energy projects providing environmentally-friendly energy to homes and businesses. Partners in DEXTCO are the Royal Devon and Exeter NHS Foundation Trust, Devon County Council, Exeter City Council, University of Exeter and Teignbridge District Council. |
| *Dig Once approach and trust* | The co-ordination of works to ensure that minimal disruption is caused and costs are shared during development and construction work. For instance, in terms of digital connectivity infrastructure, it is possible to install full fibre networks at low cost by installing ducting at the same time as other utilities, or whilst ground is already 'open' for other construction purposes. By creating a neutral body that can hold the ducting in trust, and make it available to stakeholders for rent, it is possible to overcome some of the obstacles that have prevented progress on the delivery of full-fibre networks in the UK. |

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| *Digital Exchange* | A place for internet supply and demand to meet. As a concept it combines the following:<br>- A neutral place where networks can meet, close to an existing or potential cluster of digital and tech businesses<br>- A shared space for local digital and tech businesses to locate servers to support applications and services<br>- A mutual ownership and governance model to guarantee neutrality and support collaboration<br><br>Delivery of a Digital Exchange is critical to the recommendations of the Digital Exchange / Transformational Infrastructure Scoping Report. |
| *Digital Exchange / Transformational Infrastructure Scoping Report* | A report produced for the Greater Exeter councils by consultancy CBN which details proposals for delivery of a Digital Exchange, and regional spine fibre and ducting network. Published on the GESP website alongside the draft GESP, available at: www.gesp.org.uk/evidence |
| *Digital futures businesses* | Businesses which work in the fields of computing, information technology, communications and data. |
| *Direct delivery* | A process whereby the public sector delivers a development itself. This contrasts with the regular approach where development is delivered by the private sector (e.g. by a developer). Direct delivery requires the public sector to take responsibility and the risk for delivering the development but provides greater control and sees revenues retained. |
| *Duty to cooperate* | The duty to cooperate was introduced by the Localism Act 2011, and is set out in section 33A of the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities and county councils in England, and prescribed public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of *local plan* and marine plan preparation in the context of strategic cross boundary matters. |
| *Dynamic Simulation Model (DSM)* | A way of modelling detailed compliance with *Part L of the 2013 Building Regulations*, particularly for non-residential buildings. |
| *Economic Development Needs Assessment (EDNA)* | A study of the need/demand for economic development in an area. This report is available on the GESP website at: www.gesp.org.uk/evidence |
| *Employment and Skills Plans* | A document setting out how an employer will support people into jobs and training. |
| *Energy centres* | In the context of this plan, energy centres are the central source of district *heat networks* from where the heat and/or power is generated and distributed to homes and/or commercial premises. Examples include the energy centres at Skypark/Cranbrook and Monkerton. |
| *Enterprise Zone* | Enterprise Zones are designated areas across England that provide tax breaks and Government support. |
| *Environmental futures* | Technology and data-driven research into environmental problems and their solutions. |
| *Exeter and Heart of Devon Shared Economic Strategy* | This strategy, titled 'A collaborative approach to growth and *productivity*' was published in November 2016. The report is available online at: www.eastdevon.gov.uk/media/1986797/ehod-shared-economic-strategy-2017-20.pdf |
| *Exeter City Futures* | Exeter City Futures is an independent Community Interest Company that is working to help Exeter solve its urbanisation challenges in a way that reduces social inequality and contributes to economic growth. |

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| *Exeter Digital and Data Education Hub* | A project to bring educators, employers and education innovators to research, implement and promote innovative ways to deliver education in *data analytics* and digital futures. |
| *Exeter Transport Strategy* | An Exeter focussed transport strategy which will seek to enhance public transport, create more opportunities for healthier active travel and encourage innovative travel management and ticketing. The Transport Strategy is being prepared by Devon County Council and its partners. Progress and emerging content is available here: www.devon.gov.uk/roadsandtransport/traffic-information/transport-planning/innovasump/ |
| *Fibre to the premises* | The installation of end-to-end fibre optic connection the full distance from the exchange to the building. Fibre to the premises can deliver faster speeds, greater resilience and reliability. |
| *Five year supply* | A calculation undertaken by the local planning authority to assess whether or not there is a sufficient supply of deliverable sites to meet the number of homes required over the next five years. Where there is no five year supply the "presumption in favour of *sustainable development*" applies to housing applications. |
| *Full planning application/consent* | Full consent is the approval of a full planning application. An application for full planning permission results in a decision on the detailed proposals of how a site can be developed. If planning permission is granted, and subject to compliance with any planning conditions that are imposed, no further engagement with the local planning authority is required to proceed with the development granted permission, although other consents may be required. |
| *Gigabit-capable* | Digital connectivity achieving bandwidths in excess of 1,000 megabit per second. |
| *Great Trees in the Clyst Valley* | This is a partnership project that is encouraging the public to explore, record and restore the heritage of trees in fields, hedges, parks and orchards across parishes in the Clyst Valley of East Devon. Further information about the project can be found online. |
| *Greater Exeter Digital Connectivity Strategy* | A report produced for the Greater Exeter councils by Adroit Economics which identifies the digital connectivity baseline for the Greater Exeter area, evidences the economic benefits of improving digital connectivity, and identifies a number of potential options for the delivery of improved digital connectivity across the area. The report is available online at: www.gesp.org.uk/evidence |
| *Greater Exeter Green Infrastructure Strategy* | A report produced considering the Greater Exeter area's existing areas of high biodiversity, their corridors, and sustainable movement networks that connect them, and the key areas of accessible open space. It also will identify green infrastructure assets within the GESP allocations. This report will be published on the GESP website alongside the next version of the GESP, available at: www.gesp.org.uk/evidence |
| *Green infrastructure* | A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. |
| *Gross Value Added (GVA)* | Measurement of how much money is generated through goods produced and services delivered. |

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| *Habitats Regulations Assessment* | The European Union Habitats Directive protects certain species of plants and animals which are particularly vulnerable. The Directive specifically relates to *Special Protection Areas* (SPAs), *Special Areas of Conservation* (SACs) and *Ramsar* sites known as *Natura 2000* sites. The UK Habitats Regulations are used to implement the EU Directive and require a *Habitats Regulations Assessment* (HRA). The process of HRA involves an initial 'Screening' stage followed by an Appropriate Assessment (AA) if proposals are likely to have a significant (adverse) impact on a *Natura 2000* site.<br><br>The need for *Habitats Regulations Assessment* is set out within Article 6 of the EC Habitats Directive 1992, and interpreted into British law by the Conservation of Habitats & Species (Amendment) Regulations 2011. |
| *Health Innovation* | Clinical research and trials, particularly including the role of digital innovation in health. |
| *Heat networks* | *Heat networks* allow heat generated remotely to be used to provide heating and hot water to buildings connected to the network, which provides greater efficiency of space and energy use than individual conventional boilers. *Heat networks* also provide an opportunity for whole network decarbonisation, rather than house-by-house measures. |
| *High performance computing* | The use of supercomputers for solving complex and advanced problems through modelling, simulation and analysis. |
| *High performance computing* | Projections made by the Office for National Statistics of the number of additional households that will form in future years if recent demographic trends continue. The projections are updated every two years. |
| *Housing Delivery Test* | Measures net additional dwellings provided in a local authority area against the homes required, using national statistics and local authority data. The Secretary of State will publish the *Housing Delivery Test* results for each local authority in England every year. |
| *Housing delivery trajectory* | A graph illustrating the expected rate of housing delivery over a particular period of time, usually the *plan period*. |
| *Housing market area* | A geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work. The Greater Exeter area broadly functions as a single *housing market area*. |
| *Infrastructure Delivery Plan (IDP)* | A plan which identifies the infrastructure that is required to support development and the key aims of a *development plan document*. It provides clarity for councils, landowners, developers, infrastructure providers and the community about the infrastructure required, when it is needed, how much it will cost and how it will be funded. The Greater Exeter version of this report will be published on the GESP website alongside the next version of the GESP, available at: www.gesp.org.uk/evidence |
| *Irreplaceable features* | Features which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. They include ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen. |

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| *Letwin Review* | An independent review commissioned by the Chancellor of the Exchequer at the time of the Budget in Autumn 2017 and undertaken by the Rt Hon Sir Oliver Letwin MP on how to close the significant gap between housing completions and the amount of land allocated or permissioned for housing. The review was published in October 2018. |
| *Liveable Exeter* | A document published by Exeter City Council in 2019 that sets out a vision for housing growth in the City, focussing upon urban renewal and densification and with the aim of improving the wellbeing of residents. |
| *Local development orders* | An Order made by a *local plan*ning authority (under the Town and Country Planning Act 1990) that grants planning permission for a specific development proposal or classes of development. |
| *Local Enterprise Partnership (LEP)* | A body, designated by the Secretary of State for Housing, Communities and Local Government, established for the purpose of creating or improving the conditions for economic growth in an area. Greater Exeter is within the Heart of the South West *Local Enterprise Partnership*. |
| *Local Housing Allowance* | A rate set by government, based on private sector rents in a broad rental market area, used to calculate housing benefit for private sector tenants. |
| *Local Housing Needs Assessment* | An assessment of the number and type of homes needed in an area. The assessment is not constrained by planning policy considerations |
| *Local Industrial Strategy* | This is an emerging strategy, being produced by the Heart of the South West *Local Enterprise Partnership*. Progress and emerging content is available here: www.heartofswlep.co.uk/about-the-lep/strategies-and-priorities/local-industrial-strategy/ |
| *Local plan* | *Development plan document*s adopted by local planning authorities, including any 'saved' policies from plans that are otherwise no longer current, and those *development plan document*s that deal specifically with minerals and waste. |
| *Low carbon* | Causing or resulting in only a relatively small net emission of man-made carbon dioxide into the atmosphere compared to conventional/established technologies or practices. |
| *Major development* | For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m2 or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015. |
| *Major Road Network* | A nationally recognised network of the most important local authority roads based on volume of traffic flows and importance to the economy. |
| *Mix of homes* | Homes of different types, sizes and tenures. |
| *Mixed use (or mixed use development)* | Provision of a mix of complementary uses, such as residential, community and leisure uses, on a site or within a particular area. |
| *Modal filtering* | Highway or street designs which enable permeability for some forms of transport, such as buses, cycles and pedestrians, but limit movement for other modes such as private cars or heavy goods vehicles. |

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| *National biodiversity metric* | The Defra Biodiversity Metric is designed to provide ecologists, developers, planners and other interested parties with a means of assessing changes in biodiversity value (losses or gains) brought about by development or changes in land management. The metric is a habitat based approach to determining a proxy biodiversity value. Further information is available online. |
| *National Planning Policy Framework (NPPF)* | The National Planning Policy Framework was first published on 27 March 2012 and updated on 24 July 2018 and 19 February 2019. This sets out the government's planning policies for England and how these are expected to be applied. |
| *National Skills Academy for Construction Industry Training Board's Client Based Approach* | This is a free toolkit for organisations that are planning or procuring construction projects. It provides information and guidance on employment and skills requirements. Further information is available online. |
| *Natura 2000* | *Natura 2000* sites are nature conservation sites of European importance and are designated either *Special Protection Areas* (for birds) or *Special Areas of Conservation* (for animals and habitats). In addition, *Ramsar* sites (Internationally Important Wetlands) are treated as if they were *Natura 2000* sites in accordance with government policy. |
| *Natural England Standing Advice* | This is the criteria Natural England have issued for local planning authorities to consider how a development might affect *protected species* on or near a proposed development site when reviewing a planning application. |
| *Neighbourhood development plan* | A plan prepared by a Parish Council, Town Council or Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Purchase Act 2004). |
| *Net Gain (biodiversity)* | Development that leaves biodiversity in a better state than before, using a quantifiable method such as the national biodiversity metric to measure gains and losses to calculate the net change. |
| *Net Zero (emissions)* | Refers to achieving an overall balance between emissions produced and emissions taken out of the atmosphere resulting in neither a surplus nor a deficit of emissions when gains and losses are added together. |
| *Open access ducting* | Ducting refers to generally plastic tubing that can accommodate multiple fibre optic cables and sub-ducting. Open access ducting should be operated by a mutual stewardship arrangement and made available in perpetuity to all fibre providers (for a fee), rather than being tied to one or more specified providers only. |
| *Outline planning application/consent* | Outline consent is the approval of an outline planning application. An application for outline planning permission allows for a decision on the general principles of how a site can be developed. Outline planning permission is granted subject to conditions requiring the subsequent approval of one or more 'reserved matters'. |
| *Park and change* | The aim of Park and Change is to allow you to park at the designated location and change to a more sustainable mode of travel. |
| *Part L of the 2013 Building Regulations (Conservation of Fuel and Power)* | This part of the Building Regulations for England and Wales covers energy efficiency requirements in new and existing buildings. |

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| *Passive design* | Approaches to building design and development masterplanning that maximise natural heating, cooling, lighting and ventilation opportunities, and minimise additional energy use for these purposes. These can include techniques that increase thermal massing and insulation and take account of orientation and solar gain. |
| *Permanent and transit sites* | A permanent site for gypsy and traveller communities is intended for long-stay use by residents. It has no maximum length of stay but has often constraints on travelling away from the site. A transit site is intended for short term use and has a maximum period of stay. |
| *Plan period* | The plan period for the GESP is 2020-2040. The National Planning Policy Framework is clear that strategic policies should be prepared over a minimum 15 year period and a local planning authority should be planning for the full plan period. |
| *Planning obligations* | A legal agreement entered into under Section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal. Planning obligations must be necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development proposed. |
| *Planning performance agreements* | A project management tool which the local planning authorities and applicants can use to agree timescales, actions and resources for handling particular applications. A planning performance agreement is agreed voluntarily between the applicant and the local planning authority. |
| *Planning Use Classes Order (B1, B2 & B8)* | The Town and Country Planning (Use Classes) Order 1987 puts uses of land and buildings into various categories. Planning permission is not needed for changes of use within the same use class. Specific Use Classes mentioned in the GESP area:<br>- B1 Business - Offices (other than those that fall within A2), research and development of products and processes, light industry appropriate in a residential area.<br>- B2 General industrial - Use for industrial process other than one falling within class B1 (excluding incineration purposes, chemical treatment or landfill or hazardous waste).<br>- B8 Storage or distribution - This class includes open air storage. |
| *Points of presence* | An interconnection point on a digital connectivity network. |
| *Policy map* | A policies map must illustrate geographically the application of policies in a development plan. The policies map may be supported by such other information as the Local Planning Authority sees fit to best explain the spatial application of development plan policies. |
| *Practice Guidance* | Practice Guidance (or National Planning Practice Guidance) is a web-based resource which brings together government planning guidance on various topics into one place. It was launched in March 2014 and coincided with the cancelling of the majority of government circulars which had previously given guidance on many aspects of planning. |
| *Priority habitats* | A list of habitats identified in the Natural Environment and Rural Communities Act (2006) Section 41 which are of principal importance for the conservation of biodiversity in England. |
| *Priority species* | A list of species identified in the Natural Environment and Rural Communities Act (2006) Section 41 which are of principal importance for the conservation of biodiversity in England. |

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| *Productive / Productivity* | The higher the output for a give input, the more productive that process is. In this case it generally refers to labour productivity, i.e. how much output a worker produces (per hour or per job, depending on the measurement approach). |
| *Productivity Strategy* | The strategy for economic development produced by the Heart of the South West Local Enterprise Partnership. The report is available online at: https://heartofswlep.co.uk/wp-content/uploads/2018/04/HeartoftheSouthWestProductivityStrategy.pdf |
| *Protected species* | Certain plant and animal species protected to various degrees in law, particularly the Wildlife and Countryside Act, 1981 (as amended). |
| *Pump priming* | The stimulation of economic activity by investment, particularly government investment. |
| *Purpose built student accommodation (PBSA)* | Housing built specifically for university students, either on- or off-campus. Homes usually comprise either self-contained studios or 'cluster' flats with private kitchens and shared living space, or modern halls of residence containing en-suite bedrooms with shared kitchen, dining and living facilities. |
| *Ramsar* | Ramsar sites are wetlands of international importance, designated under the Ramsar Convention. These are called a Natura 2000 site. |
| *Registered Provider* | Organisations that provide affordable housing as defined in the Housing and Regeneration Act 2008. Registered providers include local authority landlords and private registered providers (such as not-for-profit housing associations and for-profit organisations). |
| *Reserved matters application* | Reserved matters are those aspects of a proposed development which an applicant can choose not to submit details of with an outline planning application, (i.e. they can be 'reserved' for later determination). These are defined in article 2 of the Town and Country Planning (Development Management Procedure) (England) Order 2015. This will typically include information about the layout, access, scale, landscaping and appearance of the development. Under section 92 of the Town and Country Planning Act 1990, applications for approval of reserved matters must be made within a specified time-limit, normally 3 years from the date outline planning permission was granted. |
| *Section 106 agreements* | A legal agreement under section 106 of the 1990 Town & Country Planning Act. Section 106 agreements are legal agreements between a planning authority and a developer, or undertakings offered unilaterally by a developer, that ensure that certain extra works related to a development are undertaken. |
| *Shared Mobility Service* | The shared use of a vehicle, bicycle, or other transportation mode on an as-needed basis, such as car clubs and cycle hire services. |
| *Simplified Building Energy Model (SBEM)* | A way of modelling compliance with Part L of Building Regulations, particularly for non-residential buildings. |

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| *Small sites* | In order to help diversify the housing market, local planning authorities are required to identify, in their development plans and brownfield registers, 10% of the housing requirement on sites no larger than 1ha in size unless there are strong reasons why this target cannot be achieved. |
| *Smart Energy Networks* | A system that is designed to manage flows of energy that is cost effective, secure, integrated, flexible and sustainable. Infrastructure which can enable the transition of national, local and decentralised electricity and gas grids to become smart could include energy storage and management infrastructure. In particular, this may refer to infrastructure which can help to enable the proliferation of electric vehicles (including *vehicle to grid* technologies), and increased levels of renewable and low carbon energy generation. |
| *Smart transport* | Innovative approaches to transport planning to solve problems, concentrating on active and sustainable travel and technology. |
| *Soft landing packages* | Support, usually public sector support, to encourage and help inward investment into an area. |
| *Solar masterplanning* | Optimising the use of natural light and heat through design and orientation of buildings to ensure a comfortable living environment throughout the year. |
| *South East Devon European Site Mitigation Strategy* | Published in June 2014, this is the implementation plan to provide mitigation for recreational pressure impacts on the Exe Estuary Special Protection Area (SPA), the East Devon Pebblebed Heaths Special Area of Conservation (SAC) and Special Protection Area (SPA), and Dawlish Warren Special Area of Conservation (SAC). These are Natura 2000 sites. Further information and the strategy is available online. |
| *South West Digital Health Accelerator* | Digital health accelerators work intensively with innovators and companies to refine, develop, and scale their innovation in the NHS and social care sector. |
| *Special Area of Conservation (SAC)* | Areas given special protection under the European Union's Habitats Directive, which is transposed into UK law by the Habitats and Conservation of Species Regulations 2010. They provide increased protection to a variety of wild animals, plants and habitats. These are also called a Natura 2000 site. |
| *Special Protection Area (SPA)* | Areas which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds found within European Union countries. They are European designated sites, classified under the Birds Directive. These are also called a Natura 2000 site. |
| *Standard Assessment Procedure (SAP)* | The method used to assess and compare the energy and environmental performance of dwellings. It is used for implementing Part L of the Building Regulations. |
| *Statement of Common Ground* | The National Planning Policy Framework and accompanying Planning Practice Guidance require local planning authorities to produce a Statement of Common Ground as a written record of progress made on the planning for strategic matters across local authority boundaries. |

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| *Strategic Environmental Assessment* | A procedure (set out in the Environmental Assessment of Plans and Programmes Regulations 2004) which requires the formal environmental assessment of certain plans and programmes which are likely to have significant effects on the environment. The Strategic Environmental Assessment for this consultation is included in our Sustainability Appraisal Report, which is available at: www.gesp.org.uk/xxxx |
| *Strategic Infrastructure Fund* | A fund for specific, priority infrastructure projects which have benefits for a large area. Funds are managed jointly by partner local authorities. |
| *Strategic Road Network* | Highways England manages the strategic road network in England, comprising motorways and some A roads. |
| *Suitable Alternative Natural Greenspace (SANG)* | This is natural green space with wild countryside and walks, needed to help protect internationally important conservation sites at the East Devon Pebblebed Heaths, Dawlish Warren and the Exe Estuary. It provides more leisure choices to explore the environment and enjoy nature at its best for the growing population and people living in new developments nearby. In particular, dogs and dog walkers will be encouraged to visit SANGs. |
| *Supplementary Planning Document* | Documents which add further detail to the policies in the local plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan. |
| *Sustainability Appraisal Report* | Sustainability Appraisal is a statutory requirement of the Planning and Compulsory Purchase Act 2004. It 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 Sustainability Appraisal process involves appraising the likely social, environmental and economic effects of the policies and proposals within a plan from the outset of its development. The Sustainability Appraisal Report produced alongside this consultation is available at: www.gesp.org.uk/xxxxxx |
| *Sustainable development* | The objective of sustainable development can be summarised as meeting the needs of the present population without compromising the ability of future generations to meet their own needs. Achieving sustainable development within the planning system includes three overarching themes: Economic; social; and environmental. |
| *Sustainable transport/ travel* | Modes of transport which have a limited or negligible environmental impact, in particular on congestion, air quality and carbon emissions. These typically include active travel (e.g. walking and cycling) and public transport (e.g. bus or rail). |
| *Sustainable Urban Mobility Plan* | Initial name for a standalone Exeter Transport Strategy. Progress and emerging content is available here: www.devon.gov.uk/roadsandtransport/traffic-information/transport-planning/innovasump/ |
| *Teignbridge Rule* | A planning policy contained in the Teignbridge Local Plan 2013-2033 that requires sites of more than 20 dwellings to include at least 5% of plots for sale to custom and self-builders. |

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| *Three phase electricity grid connection* | The UK electricity grid is generally operated as a three phase system, whereby there are three separate electrical connections in addition to a neutral connection across the majority, of the network. However, only a single connection (or phase, plus the neutral connection) currently serves the majority of homes in the UK. All electrical uses of a home are run on this single phase which has a maximum capacity. This, therefore constrains the load that can be put on a single house supply and can curtail proliferation of electric vehicles (and in time vehicle to grid technologies), and on-site renewable and low carbon energy generation (in particular roof-top solar photovoltaic panels). A three phase connection brings in three separate electrical connections and therefore enables two way flows and higher electrical load capacities. |
| *Transformational sectors* | The economic sectors with the potential to change the local economy including data analytics, environmental futures, smart transport, health innovation and other digital futures. |
| *Travel to work area* | Travel to work areas are a geography created to approximate labour market areas. In other words, they are derived to reflect self-contained areas in which most people both live and work. |
| *Utility Network Plan* | A document setting out how development proposed will incorporate digital infrastructure as one of the essential utilities in accordance with the gigabit-capable connectivity commitment within GESP. |
| *Vehicle to Grid* | Technology which can enable electric vehicles to take electricity from the grid when demand is low and return it when demand is high. Such technology is expected to play an important role in making the UK's electricity grid smarter in order to accommodate proliferation of electric vehicles by helping to even out peaks and troughs in demand. |
| *Viability appraisal* | A financial assessment to enable a local authority or a developer to establish the viability of a development project. It is based on a comparison of development cost related to development value and should be used to ensure that policies, infrastructure requirements and affordable housing targets are realistic and deliverable. The role for viability appraisal is primarily at the plan making stage. |
| *Waste heat* | Heat generated as a by-product arising from industrial or commercial processes |
| *White paper* | White papers are policy documents produced by the government that set out their proposals for future legislation. |
| *Windfall* | Sites which are developed but have not been specifically identified as available in the local plan process. They normally comprise previously-developed sites that have unexpectedly become available. |

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# The GESP Draft Policies and Site Options Consultation Document

## Sustainability Appraisal Report

## Final Report

Prepared by LUC
June 2020

**Project Title**: Sustainability Appraisal of the Greater Exeter Strategic Plan

**Client**: East Devon District, Exeter City, Mid Devon District, and Teignbridge District Councils

| Version | Date | Version Details | Prepared by | Checked by | Approved by |
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| 1 | 11/05/2020 | Draft SA Report for Greater Exeter Strategic Plan: Draft Policies and Site Options Consultation document | Kieran Moroney<br>Natalie Collins<br>Harry Briggs<br>Kate Nicholls | Kate Nicholls | Taran Livingston |
| 2 | 25/05/2020 | Final SA Report for Greater Exeter Strategic Plan: Draft Policies and Site Options Consultation document | Kieran Moroney<br>Natalie Collins<br>Harry Briggs<br>Kate Nicholls | Kate Nicholls | Taran Livingston |
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## Sustainability Appraisal Report

## Final Report

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June 2020

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# 1 Introduction

1.1 East Devon, Exeter City, Mid Devon and Teignbridge District Councils commissioned LUC in May 2018 to carry out a Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) of the Greater Exeter Strategic Plan (GESP).

1.2 This SA Report relates to the Draft Policies and Site Options Consultation (September 2020) version of the GESP and it should be read in conjunction with that document.

## Background to the GESP

1.3 The GESP will cover the Greater Exeter Authorities of:

- East Devon District Council;
- Exeter City Council;
- Mid Devon District Council; and
- Teignbridge District Council.

1.4 Devon County Council is also a partner in this joint planning work.

1.5 The GESP will set out strategic policies for development across the four local planning authority areas for the period covering 2020 to 2040. The individual authorities will produce more detailed Local Plans for their own areas that will sit under and be informed by the GESP.

1.6 It should be noted that around 30% of Dartmoor National Park falls in Teignbridge district and a very small part in Mid Devon. The National Park Authority is a planning authority in its own right and produces its own Park wide plan. The GESP and this SA/SEA report does not cover National Park areas, albeit with the caveat that some data sources quoted in this report may extend or refer to areas that lie beyond the GESP area and there are also cross-boundary matters that are addressed in this report.

1.7 The principles of sustainable development are at the heart of the planning system. The SA process is intended to ensure that through plan-making LPAs have considered social, environmental and economic concerns when producing Development Plan Documents (DPD). The GESP will have the status of a DPD.

## Sustainability Appraisal and Strategic Environmental Assessment

1.8 Sustainability Appraisal is a statutory requirement of the Planning and Compulsory Purchase Act 2004. It 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 within a plan from the outset of its development.

1.9 Strategic Environmental Assessment (SEA) is also a statutory assessment process, required under the SEA Directive[1], transposed in the UK by the SEA Regulations[2] (Statutory Instrument 2004, No 1633). The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment and which set the framework for future

[1] SEA Directive 2001/42/EC

[2] The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633), as amended by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232). It should be noted that the purpose of the amendments to the SEA Regulations is to ensure that the law functions correctly after the UK has left the European Union. No substantive changes are made to the way the SEA regime operates.

consent of projects requiring Environmental Impact Assessment (EIA)[3]. The purpose of SEA, as defined in Article 1 of the SEA Directive is *"to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans….with a view to promoting sustainable development".*

1.10 SEA and SA are separate processes but have similar aims and objectives. Simply put, SEA focuses on the likely environmental effects of a plan whilst SA includes a wider range of considerations, extending to social and economic impacts. National Planning Practice Guidance[4] shows how it is possible to satisfy both requirements by undertaking a joint SA/SEA process, and to present an SA Report that incorporates the requirements of the SEA Regulations. The SA/SEA of the GESP is being undertaken using this integrated approach and throughout this report the abbreviation 'SA' should therefore be taken to refer to 'SA incorporating the requirements of SEA'.

1.11 At the time of writing, the UK including the GESP area is in the midst of the coronavirus pandemic. Clearly, this unprecedented public health crisis will have a wide range of short, medium and long-term impacts, many of which will take time to become clear. The SA addresses 'human health' as one of the topics that the SEA Regulations require to be considered; however the SA has not specifically addressed the pandemic when appraising site and policy options. Once the public health situation has evolved and the effects becomes clearer, later iterations of the SA may consider proposals for the GESP in the particular context of the pandemic. The baseline evidence relating to health (see **Chapter 3** and **Appendix 3**) will be updated at each stage to reflect the impacts of the pandemic and to provide up-to-date context for the SA.

## Other assessments undertaken

1.12 Under Article 6 (3) and (4) of the Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive) land-use plans, including Development Plan Documents, are also subject to Habitats Regulations Assessment (HRA). The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European site and to ascertain whether it would adversely affect the integrity of that site. A separate HRA for the GESP is being undertaken and the findings have been drawn on to inform the SA where relevant.

## Structure of this report

1.13 This report is the SA Report for the Draft Policies and Site Options Consultation (September 2020). **Table 1.1** below signposts how the requirements of the SEA Regulations have been met within this report.

**Table 1.1: Requirements of the SEA Regulations and where these have been addressed in this SA report**

| SEA Regulation Requirements | Where covered in this SA Report |
|---|---|
| Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated (Reg. 12). The information to be given is (Schedule 2): | |
| a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes | Chapter 1, Chapter 3, Chapter 4 and Appendix 2. |
| b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme | Chapter 3 and Appendix 3. |
| c) The environmental characteristics of areas likely to be significantly affected | Chapter 3 and Appendix 3. |

[3] Under EU Directives 85/337/EEC and 97/11/EC concerning EIA.

[4] http://planningguidance.planningportal.gov.uk/

| SEA Regulation Requirements | Where covered in this SA Report |
|---|---|
| d) 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 and 92/43/EEC. | Chapter 3 and Appendix 3. |
| e) The environmental 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 | Chapter 3 and Appendix 2. |
| f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects) | Chapters 4 and 5 and Appendices 4 and 6 |
| g) 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; | Chapters 4 and 5 and Appendices 4 and 6. |
| h) 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 provides information about how the assessment was undertaken and difficulties encountered. Chapter 2 also summarises the approach taken to identifying policy and site options for the GESP and Appendix 7 provides information about the reasons for selecting or rejecting policy and site options. |
| i) a description of measures envisaged concerning monitoring in accordance with Reg. 17; | As explained in Chapter 6, this will be included in the subsequent SA Report for the Draft GESP, as monitoring indicators have not yet been identified for the GESP, and this SA Report covers a number of options that may not be included in the Draft GESP. |
| j) a non-technical summary of the information provided under the above headings | A separate non-technical summary document will be prepared to accompany the next SA Report for the Draft GESP. |
| The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Reg. 12(3)) | Addressed throughout this SA Report. |

| SEA Regulation Requirements | Where covered in this SA Report |
|---|---|
| **Consultation:**<br>• authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Reg. 12(5)) | Consultation on the SA Scoping Report was undertaken between 27th February and 10th April 2017. |
| • 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 (Reg. 13) | Consultation is being undertaken on the Draft Policies and Site Options Consultation version of the GESP during Autumn 2020, and subsequent consultation will be undertaken on the Draft GESP at a later stage. |
| • other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Reg. 14). | N/A |
| **Taking the environmental report and the results of the consultations into account in decision-making (Reg. 16)** | |
| **Provision of information on the decision:**<br>When the plan or programme is adopted, the public and any countries consulted under Reg. 14 must be informed and the following made available to those so informed:<br>• the plan or programme as adopted<br>• a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report, the consultation 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<br>• the measures decided concerning monitoring | To be addressed after the GESP is adopted. |
| **Monitoring** of the significant environmental effects of the plan's or programme's implementation (Reg. 17) | To be addressed after the GESP is adopted. |
| **Quality assurance:** environmental reports should be of a sufficient standard to meet the requirements of the SEA Regulations. | This report has been produced in line with current guidance and good practice for SEA/SA and this table demonstrates where the requirements of the SEA Directive have been met. |

1.14 This section has introduced the SA process for the GESP. The remainder of the report is structured into the following sections:

- **Chapter 2: Methodology** describes the approach that is being taken to the SA of the GESP.
- **Chapter 3: Sustainability Context for Development in Greater Exeter** describes the relationship between the GESP and other relevant plans, policies and programmes; summarises the social, economic and environmental characteristics of the area and identifies the key sustainability issues.
- **Chapter 4: Sustainability Appraisal findings for the Policy Options** summarises the SA findings for the reasonable alternative policy options that are being considered for the GESP, including the overall spatial development strategy.
- **Chapter 5: Sustainability Appraisal Findings for the Site Options** summarises the SA findings for the reasonable alternative site options that are being considered for allocation in the GESP.
- **Chapter 6: Monitoring** describes the approach that should be taken to monitoring the likely significant effects of the GESP.

- **Chapter 7: Conclusions** summarises the key findings from the SA of the Draft Policies and Site Options version of the GESP and describes the next steps to be undertaken.

1.15 The main body of the report is supported by a number of appendices (presented in a separate document) as follows:

- **Appendix 1** presents the **consultation responses** that were received in relation to the SA Scoping Report and explains how each one has been addressed.
- **Appendix 2** presents the updated **review of relevant plans, policies and programmes** (this was originally presented in the SA Scoping Report and has been updated where appropriate).
- **Appendix 3** presents the updated **baseline information** for Greater Exeter (this was originally presented in the SA Scoping Report and has been updated where appropriate).
- **Appendix 4** presents the detailed SA matrices for the **strategy alternatives** (**strategic growth and distribution options)** that are being considered for the GESP.
- **Appendix 5** presents the **assumptions used** during the sustainability appraisal of **site options**.
- **Appendix 6** presents the detailed SA matrices for the **Potential Site Options** that are being considered for the GESP, and reasonable alternative site options.
- **Appendix 7** presents the detailed **audit trail of site options and policy options and the decision-making process** in relation to those which have been taken forward or rejected.

# 2 Methodology

2.1 In addition to complying with legal requirements, the approach being taken to the SA of the GESP is based on current best practice and the guidance on SA/SEA set out in the National Planning Practice Guidance, which involves carrying out SA as an integral part of the plan-making process. **Table 2.1** below sets out the main stages of the plan-making process and shows how these correspond to the SA process.

**Table 2.1: Corresponding stages in plan making and SA**

| |
|---|
| **GESP Step 1: Evidence Gathering and engagement** |
| SA stages and tasks |
| **Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope**<br>• 1: Identifying other relevant policies, plans and programmes, and sustainability objectives<br>• 2: Collecting baseline information<br>• 3: Identifying sustainability issues and problems<br>• 4: Developing the SA framework<br>• 5: Consulting on the scope of the SA |
| **GESP Step 2: Production** |
| SA stages and tasks |
| **Stage B: Developing and refining options and assessing effects**<br>• 1: Testing the GESP vision and priorities against the SA framework<br>• 2: Developing the GESP options<br>• 3: Evaluating the effects of the GESP<br>• 4: Considering ways of mitigating adverse effects and maximising beneficial effects<br>• 5: Proposing measures to monitor the significant effects of implementing the GESP |
| **Stage C: Preparing the Sustainability Appraisal Report**<br>• 1: Preparing the SA Report |
| **Stage D: Seek representations on the GESP and the Sustainability Appraisal Report**<br>• 1: Public participation on GESP and the SA Report<br>• 2(i): Appraising significant changes |
| **GESP Step 3: Examination** |
| SA stages and tasks |
| • 2(ii): Appraising significant changes resulting from representations |
| **GESP Step 4 & 5: Adoption and Monitoring** |
| SA stages and tasks |
| • 3: Making decisions and providing information |
| **Stage E: Monitoring the significant effects of implementing the GESP**<br>• 1: Finalising aims and methods for monitoring<br>• 2: Responding to adverse effects |

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

## Stage A: Scoping

2.3 The SA process began with the production of a Scoping Report for the GESP. This was prepared by the Greater Exeter Authorities, in partnership with Devon County Council.

2.4 The Scoping stage of the SA involves understanding the social, economic and environmental baseline for the Plan area as well as the sustainability policy context and key sustainability issues. The Scoping Report presented the outputs of the following tasks:

- Policies, plans and programmes of relevance to the GESP were identified and the relationships between them were considered, enabling any potential synergies to be exploited and any potential inconsistencies and incompatibilities to be identified and addressed.
- Baseline information was collected on environmental, social and economic issues in the plan area. This baseline information provides the basis for predicting and monitoring the likely effects of options for policies and site allocations and helps to identify alternative ways of dealing with any adverse effects identified.
- Key sustainability issues for the plan area were identified and their likely evolution without the implementation of the GESP was considered.
- A Sustainability Appraisal framework was presented, setting out the SA objectives against which options and subsequently policies would be appraised. The SA framework provides a way in which the sustainability impacts of implementing a plan can be described, analysed and compared. It comprises a series of sustainability objectives and associated factors (or sub-questions) that can be used to 'interrogate' options and policies drafted during the plan-making process. These SA objectives define the long-term aspirations of the plan area with regard to social, economic and environmental considerations. During the SA process, the performances of the plan options (and later, policies) are assessed against these SA objectives and sub-questions.

2.5 Public and stakeholder participation is an important part 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. The SA Scoping Report for the GESP was published for consultation with the public between 27th February and 10th April 2017.

2.6 **Appendix 1** lists the comments that were received during the consultation on the SA Scoping Report and describes how each one has been addressed during the preparation of this SA Report. In light of the comments received a number of amendments were made to the review of plans, policies and programmes, the baseline information and the key sustainability issues. These parts of the SA Report have also been updated to reflect the current situation regarding Brexit, as well as the latest sources of available information. They will continue to be updated as necessary at each stage of the SA process to ensure that they remain up to date and reflect the current situation in the plan area.

2.7 The updated versions of the review of plans, policies and programmes and the baseline information are presented in **Appendices 2** and **3** respectively of this report and are summarised in **Chapter 3**.

### Changes to the SA framework

2.8 The SA Scoping Report involved the production of the SA framework to allow for the appraisal of the various elements of the GESP (namely sites and policies) as well as the reasonable alternatives considered to identify any significant likely effects. This was developed by the four authorities from analysis of the international, national and local policy objectives, the baseline information, and the sustainability issues identified for the plan area.

2.9 The SA framework was reviewed by LUC (the SA consultants commissioned in 2018) following the Scoping stage. A number of changes have been incorporated to ensure that the effects of the plan can be presented in relation to each of the topics required by the SEA Regulations and in response to the consultation responses following the publication of the SA Scoping Report. For reasons of clarity the SA objectives are now presented numerically, where previously they were listed alphabetically.

2.10 **Table 2.2** overleaf presents the updated SA framework for the GESP which now includes 14 headline SA objectives. The table also shows how all of the 'SEA topics' have been covered by the SA objectives.

2.11 To avoid identifying numerous 'mixed' effects (i.e. positive and negative) the headline SA objectives of 'landscape', 'climate change adaption', 'land resources', 'water resources', and 'wellbeing' have been separated out. Factors associated with these headline SA objectives have

been moved as relevant. Consultation responses received in relation to the SA Scoping Report have resulted in additional criteria relating to the AONBs and National Park being included under the headline SA objective of landscape, and reduction in congestion being considered under the headline SA objective of connectivity and transport.

2.12 In summary the main changes to the headline SA objectives are:

- Biodiversity/recreational Green Infrastructure (GI) opportunities separated from landscape/coast in original SA objective 1.
- Soil quality/mineral resources/reuse of Previously Developed Land (PDL) plus water quality and flood risk separated from original SA objective 3.
- Air quality/noise/light separated from original SA objective 5 along with social deprivation under a separate 'wellbeing' objective.

**Table 2.2: Revised SA framework for the GESP**

| Sustainability Objective | Factors | SEA Topic(s) covered |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | • Natural habitats and biodiversity; flora and fauna<br>• Recreational and leisure opportunities compatible with conservation, and creation of multi-functional green infrastructure | • Biodiversity, fauna, flora<br>• Population/human health (recreation) |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | • Landscapes (including AONBs and National Park) and landscape character<br>• Coast | • Landscape<br>• Water (coast) |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | • Conservation of heritage assets within their setting, including Listed Buildings, Conservation Areas, Archaeological sites and Scheduled Monuments<br>• Safeguard cultural heritage and local character by conserving and enhancing existing built environment, and creating new high quality built environment, including streets, spaces, public realm and detailing of new buildings. | • Cultural heritage |
| **4. CLIMATE CHANGE MITIGATION**<br>To minimise greenhouse gas emissions. | • Development that minimises the need to travel by providing access to public transport, cycle and walking links to help reduce use of private car<br>• Energy efficient developments and buildings, which make the best use of renewable and low carbon energy generation.<br>• Multi-use green infrastructure which supports or creates transport networks. | • Air<br>• Climatic factors |
| **5. CLIMATE CHANGE ADAPTATION**<br>To adapt to the possible effects of climate change. | • Flood risk and the threat to people and property, and coastal change and adaptation. | • Climatic factors |
| **6. LAND RESOURCES**<br>To utilise our land resources efficiently and minimise their loss or degradation. | • Soil quality<br>• Safeguard mineral resources<br>• Reuse of previously developed land<br>• Minimise waste (reuse, recycle, recover) | • Soil<br>• Material assets (land, minerals) |
| **7. WATER** | • Water quality and quantity | • Water |

| Sustainability Objective | Factors | SEA Topic(s) covered |
|---|---|---|
| **RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or degradation. | | |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | • Supply of housing (accommodating population growth and changes in household composition)<br>• Housing mix (tenure and size)<br>• Housing delivery and diversity of supply (e.g. Housing Association affordable, volume builder and small builder open market, custom and self-build)<br>• Housing affordability | • Population |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | • Cycle and walking networks<br>• Open space and green infrastructure in new developments and existing settlements<br>• Public recreational, play and leisure opportunities | • Population<br>• Human health |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | • Social deprivation<br>• Air quality, noise and light pollution<br>• Safe and secure environment with reduced fear of crime | • Population<br>• Air |
| **11. ACCESS TO SERVICES**<br>To provide accessible and attractive services and community facilities for all ages and interests. | • Access to area wide services (nursery and pre-school, primary, secondary, further and higher education; healthcare; etc.)<br>• Community facilities (local shops, meeting venues, public houses, places of worship)<br>• Cultural buildings and facilities (e.g. libraries, museums, cinemas)<br>• Access to high speed broadband | • Population<br>• Human health |
| **12. JOBS AND LOCAL ECONOMY**<br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | • Employment land supply to cater for businesses of all sizes<br>• Mix of employment offer<br>• Productivity of local economy and access to labour supply<br>• Access to education and skills training<br>• Protect existing tourism businesses and offer | • Population<br>• Material assets |
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and town centres. | • Diverse city and town centre economy<br>• Strengthen and safeguard the vitality and viability of centres<br>• Impact of new development on existing centres<br>• Access to existing centres | • Population |
| **14. CONNECTIVITY AND TRANSPORT**<br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks | • Access to services – links between homes, services and businesses by active modes of transport (e.g. cycling and walking)<br>• Access to public transport (e.g. distance to and frequency of bus and rail services)<br>• Estimated car reliance and use | • Air<br>• Climatic factors<br>• Population/material assets (in terms of benefits for economy) |

| Sustainability Objective | Factors | SEA Topic(s) covered |
|---|---|---|
| and other transport infrastructure both within the Greater Exeter area and beyond. | • Access to local road network<br>• Impact on Strategic Road Network (i.e. M5 J29 - 30)<br>• Reduction in congestion | |

### Revised scoring system

2.13 A revised scoring system was also set out following the Scoping stage. This resulted in scores being presented on a scale from significant positive (++) to significant negative (--) instead of from +3 to -3. It was judged that the original scoring system, which presented scores from +3 to -3, has the potential to include too many variable scores and this could lead to confusion when identifying any significant effects, which is a requirement of the SEA Regulations.

## SA Stage B: Developing and refining options and assessing effects

2.14 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.

2.15 Regulation 12 (2) of the SEA Regulations requires that:

"The (environmental or SA) 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."

2.16 Any alternatives considered for the plan need to be 'reasonable'. This implies that 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 National Planning Policy Framework) or site options that are unavailable or undeliverable.

2.17 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 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.

2.18 This section provides an overview of how the policy and site options have been identified and appraised and how this will feed into the development of the GESP.

### Identification and appraisal of housing growth strategic options and distribution scenarios

*Housing growth strategic options*

2.19 The GESP authorities must start with the Objectively Assessed Need (OAN) as defined by the Government's Standard Method. Meeting the OAN is a test of soundness for the plan to be passed at examination.

2.20 The options for growth were therefore based on the Government standard method requirement as a minimum (option 1). A proportional increase was then applied to this requirement for options 2 and 3 (10% and 25% respectively). A proportional decrease was not considered because this could not be justified and would result in the plan not being found to be 'sound'.

2.21 The 10% increase option was selected because it would help to meet more of the housing need, in particular for affordable housing, and to allow for flexibility to deal with future changes and uncertainties, with benefits to the supply of all forms of housing. The 25% increase option was selected because it would help to meet more of the housing need, in particular for affordable housing, and also because this level of development could form the basis for moving towards transformational growth within the GESP area, supporting a stronger economy, and providing greater levels of funding for key infrastructure delivery by seeking government support for some form of infrastructure funding deal to support the scale of new homes being built.

2.22 The Greater Exeter authorities selected Option 1 as the proposed approach providing a target for housing growth in the Greater Exeter area. This target will meet the OAN for the area.

2.23 The reasonable alternative growth options have been subject to SA in accordance with the methodology described further ahead in this chapter, and the findings are summarised in **Chapter 4**. The detailed appraisal matrices for the growth options can be found in **Appendix 4**.

*Distribution scenarios*

2.24 The spatial development strategy was informed by a number of factors which led to the identification of seven alternative distribution scenarios by the GESP authorities. The distribution scenarios considered were guided by planning considerations, including one or more of the following:

- The GESP Vision and Priorities.
- Minimising carbon emissions by reducing travel and/or reliance on cars.
- Providing access to housing including affordable housing to as many people as possible.
- Maximising people's access to employment, services and facilities.
- Maintaining the vitality of our existing settlements, including towns, cities and villages.
- Protecting internationally significant wildlife sites.

2.25 The following processes or considerations were also taken into account in identifying the scenarios:

- The discussions at the GESP Local Authority Elected Members' Reference Forums which identified potential broad areas of search for potential growth locations.
- Consultation responses to the Issues consultation (Regulation 18) (27th February 2017–10th April 2017).
- The availability of land i.e. identified through the Housing and Economic Land Availability Assessment (HELAA) sites and any other proposals by landowners/developers that were not initially submitted into the GESP HELAA process.
- A study of Strategic Brownfield Sites (January 2018) and a focussed study of Exeter Fringe Sites.
- The Liveable Exeter vision published by Exeter City Council identifying potential brownfield sites in the City and their vision for how these might be regenerated.
- The aim to avoid or minimise development impacts on important considerations such as AONB, National Parks, and important mineral deposits.
- The need to cover a range of development opportunities in one or other of the options.
- The need to consider both highly dispersed and highly concentrated development, together with an essentially "business as usual" approach.
- The need to examine more radical departures from current local plan approaches, potentially available because of the scale and scope of GESP, reflecting the transport features of Greater Exeter and two particularly important planning issues facing the area – housing need and European wildlife site protection.

2.26 The seven distribution scenarios identified by the GESP authorities based on the above considerations were:

- Scenario 1: Proportionate growth of all settlements in the settlement hierarchy.
- Scenario 2: Exeter and major town urban intensification.
- Scenario 3: Mainly rural distribution.
- Scenario 4: Public transport infrastructure corridors and hubs.
- Scenario 5: Concentrate on areas with the least affordable housing.
- Scenario 6: Locate development away from international wildlife sites.
- Scenario 7: Market-led.

2.27 The reasonable alternative distribution scenarios have been subject to SA in accordance with the methodology described further ahead in this chapter, and the findings are summarised in **Chapter 4**. The detailed appraisal matrices for the scenarios can be found in **Appendix 4**.

2.28 The spatial development strategy set by the plan must seek to meet the Vision and Priorities of the plan taking account of the constraints set by broader environmental, economic and social factors, and this might be achieved in more than one way. The spatial development strategy proposed by the Greater Exeter authorities in the Draft Policies and Site Options Consultation document is a hybrid and takes the key elements of strategy options 2, 4 and 7, but allows for significant locally determined flexibility.

2.29 The proposed spatial development strategy identifies four potential strategic growth areas, related to existing or potential rail access and settlements with economic strength or potential. The Greater Exeter authorities consider that these have the best combination of economic, social and environmental benefits (and/or the potential to minimise negative impacts compared to other options). They also reflect the vision of an accessible and networked city region of linked and distinct communities.

2.30 The spatial development strategy as set out in the consultation document is appraised in **Appendix 4** and the findings are summarised in **Chapter 4**.

2.31 The Draft Policies and Site Options Consultation document considers potential strategic site options within the broad growth areas, designed to provide new neighbourhoods with access to jobs and services, sustainable transport options and the potential to make great places. Each has a possible role to play in the spatial development strategy for the area although the scale of development and the level of infrastructure investment necessary in each varies. The identification and appraisal of the strategic site options is explained further ahead in this section.

### Identification and appraisal of policy options

2.32 High level options for the policies to be included in the GESP were identified by the officers within the GESP team responsible for preparing the plan. Reasonable alternative options for various policy topics were drawn from the most up-to-date evidence and guided by the national level policy set out in the NPPF. The reasons for taking forward proposed policy options in the GESP Draft Policies and Site Options Consultation document and discounting other options are presented in **Table A7.2** in **Appendix 7**. Where no alternative options have been identified, the justification for this is also provided. This is generally the case where an alternative or failure to include a policy would be contrary to national planning policy or would not be supportive of the vision or priorities of the GESP.

2.33 The reasonable alternative policy options have been subject to SA in accordance with the methodology described further ahead in this chapter, and the findings are presented in **Chapter 4**.

2.34 Once Greater Exeter authorities have produced the next iteration of the GESP, the revised draft policies will also be subject to SA and the findings will be presented in an updated SA Report.

### Identification and appraisal of site options

2.35 The main inputs and steps taken to decide which sites should be included in the SA/SEA process to be appraised as potential growth locations in the GESP have been described below. This includes all potential sites suitable for uses including housing, mixed use or employment developments.

2.36 The initial stage was the Housing and Economic Land Availability Assessment (HELAA). This included a public 'call for sites' from 27th February 2017 – 10th April 2017. Over 700 submissions were received, with all larger sites (or combination of sites) suitable for the GESP (based on the agreed HELAA methodology) assessed by officers and the HELAA panel. This process also excluded unsuitable HELAA sites based on the agreed methodology. HELAA site submissions continued to be received and these were added and considered throughout the process.

2.37 Advice on all HELAA sites was received from local authority specialists and statutory consultees. Considerations included expert advice on site specific ecology, landscape, heritage, archaeology and environmental health issues. These site-specific comments informed and highlighted key opportunities and constraints.

2.38 Twelve workshop meetings of the GESP Local Authority Elected Members' Reference Forum were held between 2017 and 2020. These workshops provided elected members with opportunities to identify potential broad areas of search for potential growth locations. In particular, Members recognised the need for the GESP to identify and assess sites close to transport corridors, near existing settlements and consider the implications of key national constraints such as the AONB and protected European Protected sites. Recommendations from the Members Forum were taken alongside consideration of the responses to the Issues consultation (Regulation 18) (27th February 2017 – 10th April 2017) to inform the distribution scenarios (discussed above). Further assessment by the GESP authorities of potential distribution scenarios followed, which helped ascertain the preferred distribution and corresponding broad areas of search for identifying additional sites for further consideration.

2.39 A study of Strategic Brownfield Sites (January 2018) and a focussed study of Exeter Fringe Sites were carried out to provide a robust assessment of the urban capacity of Exeter and its immediate surroundings. Exeter City Council also produced its Liveable Exeter Vision document (published February 2019) which further informed site opportunities. The GESP team has also taken into account specific proposals by landowners/developers that were not initially submitted into the GESP HELAA process.

2.40 Based on all of the above processes, some of which were iterative, and informed by comprehensive site visits, the GESP team has identified and included a wide range of strategic development site options to be considered as reasonable alternatives.

2.41 Throughout the process, appropriate oversight has been provided by the Project Assurance Group (Heads of Council Planning Departments), the Principals Group (a steering committee including the Chief Executives) and the Growth and Development Board Leadership Group (Chief Executives, Council Leaders and key partners including Homes England, Exeter University and the LEP).

2.42 From this process, 78 reasonable alternative residential and employment site options in total were considered for inclusion in the GESP Draft Policies and Site Options Consultation document by the GESP authorities, and were all subject to SA in accordance with the methodology described further ahead in this chapter. The findings are summarised in **Chapter 5** of this report and the detailed SA matrices for the different types of site options can be found in **Appendix 6**.

2.43 The GESP Draft Policies and Site Options Consultation document contains 39 'Potential Site Options' which are considered to have potential for allocation in the Greater Exeter Strategic Plan. The GESP authorities concluded that the remaining 39 of the 78 site options were not suitable for inclusion in the GESP.

2.44 **Table A7.1** in **Appendix 7** presents an audit trail of the 78 reasonable alternative site options originally identified and appraised in this SA Report and the GESP authorities' reasoning for rejecting certain sites options which are not included in the GESP Draft Policies and Site Options Consultation document.

2.45 The Greater Exeter authorities will take into account the findings of the SA as well as other relevant factors when deciding which are the preferred sites for allocation in the Draft GESP and which site options to reject. Not all of the 39 Potential Site Options included in the Draft Policies and Site Options Consultation document will need to be taken forward for allocation in the next iteration of the GESP. Information about the reasons for selecting preferred sites for allocation or rejecting other site options will be provided in the next iteration of the SA Report.

## SA Stage C: Preparing the Sustainability Appraisal report

2.46 This SA Report describes the process that has been undertaken to date in carrying out the SA of the GESP Draft Policies and Site Options Consultation document. It sets out the findings of the appraisal of policy and site options, highlighting any likely significant effects (both positive and negative, and taking into account any likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects as relevant.) Note that the cumulative effects of implementing the whole GESP cannot be predicted at this stage as there are still decisions to be made on policy and site options to be included in the GESP.

2.47 It should be noted that this SA Report is not the formal SA Report required under Regulation 12 of the SEA Regulations 2004. The formal SA Report will be published at a later stage alongside the Greater Exeter Strategic Plan – Publication Version (currently expected in early 2022) in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

## SA Stage D: Consultation on GESP and this SA Report

2.48 The four Greater Exeter authorities are inviting comments on the GESP Draft Policies and Site Options Consultation document and this SA Report. Both documents are being published on the GESP website and Councils' websites for consultation in autumn 2020.

2.49 **Appendix 1** presents the consultation comments that were received in relation to the SA Scoping Report and explains how they have been addressed. Information about the consultation responses received in relation to this SA Report and how they have been addressed will be provided in the next iteration of the SA Report to be prepared.

## SA Stage E: Monitoring implementation of the GESP

2.50 An explanation of how monitoring of the social, environmental and economic effects of implementing GESP is presented in **Chapter 6**; however potential indicators will be recommended in the next iteration of the SA Report once the likely significant effects of implementing the GESP are identified (as the next version of the GESP will include preferred policies and site allocations, rather than a range of options).

## Appraisal methodology

2.51 The reasonable alternative policy and site options for the GESP set out in the Draft Policies and Site Options Consultation document (September 2020) have been appraised against the SA objectives in the SA framework (see **Table 2.2** earlier in this section), with scores being attributed to each option to indicate its likely sustainability effects on each objective as follows:

**Figure 2.1: Key to symbols and colour coding used in the SA of the Greater Exeter Strategic Plan**

| | |
|---|---|
| ++ | The option is likely to have a **significant positive** effect on the SA objective(s). |
| ++/- | The option is likely to have a mixture of **significant positive** and **minor negative** effects on the SA objective(s). |
| + | The option is likely to have a **minor positive** effect on the SA objective(s). |
| 0 | The option is likely to have a **negligible** or no effect on the SA objective(s). |
| - | The option is likely to have a **minor negative** effect on the SA objective(s). |
| --/+ | The option is likely to have a mixture of **significant negative** and **minor positive** effects on the SA objective(s). |
| -- | The option is likely to have a **significant negative** effect on the SA objective(s). |
| ? | It is **uncertain** what effect the option will have on the SA objective(s). |
| +/- or ++/-- | The option is likely to have an equal mixture of **both minor or both significant positive and negative** effects on the SA objective(s). |

2.52 Where a potential positive or negative effect is uncertain, a question mark was added to the relevant score (e.g. +? or -?) and the score is colour coded as per the potential positive, negligible or negative score (e.g. green, yellow, orange, etc.).

2.53 The likely effects of options need to be determined and their significance assessed, which inevitably requires a series of judgments to be made. This appraisal has attempted to differentiate between the most significant effects and other more minor effects through the use of the symbols shown above. 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 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. However, scores are relative to the scale of proposals under consideration.

2.54 The time frames assumed throughout the SA of the GESP are as follows:

- Short term 0-5 years.
- Medium term 5-10 years.
- Long term 10-20 years.

2.55 'Long-term' also includes effects extending or arising beyond the plan period. National policy is assumed to endure for the long-term. Some climate change effects will also be long-term. At the strategic development sites, it is assumed that there will be no short-term effects because of the lead-in times required before development takes place on-site. This does not mean that a start could not be made; only that it is considered unlikely.

2.56 All effects are assumed to be permanent, at least for the lifetime of the development, unless explicitly stated (e.g. with regards to effects during the construction phase of developments).

2.57 The SA findings for the reasonable alternative policy options are described in **Chapter 4**.

### Assumptions applied during the SA

2.58 SA inevitably relies on an element of subjective judgement. However, in order to ensure consistency in the appraisal of the site options, a detailed set of assumptions was developed by LUC in consultation with the GESP officers and applied consistently to the appraisal of site options. These assumptions are presented in **Table A5.1** and **Table A5.2** in **Appendix 5** and were applied mainly through the use of Geographical Information Systems (GIS) data, but also with

reference to other technical assessments undertaken by the four Greater Exeter authorities such as landscape sensitivity and initial HRA work.

2.59 The assumptions set out clear parameters within which the SA effects described in **Figure 2.1** above 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. In all cases distances are measured from the closest boundary of the assessment site to the boundary of the relevant feature.

2.60 With respect to proximity to services, public transport links and employment, the Chartered Institute for Highways and Transportation published Guidelines for Providing for Journeys on Foot in 2000, which is still frequently used to make assumptions regarding 'desirable', 'acceptable' and 'preferred maximum' walking distances to access different destinations. It states that 80% of walking journeys in urban areas are less than 1 mile, which equates to around a 10 minute walk based on average walking speeds. The suggested acceptable walking distances for different destinations that have been referred to in these SA assumptions are presented in **Table 2.3**.

**Table 2.3: Recommended walking distances by purpose of trip[5]**

| | Town Centres (m) | Commuting/School/ Sight-seeing (m) | Elsewhere |
|---|---|---|---|
| Desirable | 200 | 500 | 400 |
| Acceptable | 400 | 1,000 | 800 |
| Preferred maximum | 800 | 2,000 | 1,200 |

2.61 For the purposes of the appraisal, walking distances were 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, the actual distance depending on factors such as the specific housing location within a larger site and the availability of a direct route. The walking distances used in the appraisal varied depending upon the type of destination being accessed and the mode of transport. These distances are outlined in the SA assumptions in **Appendix 5.**

### Assumed characteristics of strategic residential and employment development sites

2.62 In order to enable the appraisal of residential and employment strategic site options to be carried out in a consistent way, a set of generic characteristics/minimum standards that are assumed for new development (varied by scale of site) was developed by the GESP officers for each type of site as shown in **Table 2.4** and **Table 2.5** overleaf. It has been assumed that these standards of development and infrastructure/service provision would be achieved on any of the strategic site options that have been assessed. These assumptions have been applied for consistency throughout the assessments, and they do not prejudice the ability of the local authorities to set higher policy requirements in plan making or require higher standards in decision taking.

2.63 The GESP officers provided information relating to the gross site and developable (net) site areas for each site option appraised. The approximate total capacity figures for residential sites relates to the amount of dwellings that could be accommodated in the net area of the site, based on the HELAA methodology. The net developable area was identified by discounting constrained areas from the gross site area. A proportion of each site was also discounted to allow for the provision of other uses such as strategic infrastructure.

2.64 The total capacity for each site was then calculated by applying the relevant density assumptions to the net developable area. The density assumptions assigned by the GESP officers varied depending on the type/location of residential site option: for Exeter City (101-120 dwellings per hectare); main town centres (51-100 dwellings per hectare); urban extensions and new communities (31-40 dwellings per hectare). The range of dwellings per hectare assumed to be able to be delivered at the different type/location of site results in a range of total dwellings assumed for each site option.

[5] Chartered Institute for Highways and Transportation (2000) Guidelines for Providing for Journeys on Foot.

2.65 The Draft Policies and Site Options Consultation document includes additional information about the 39 Potential Site Options included in the document, including specific infrastructure requirements and amended capacity figures taking those requirements into account. The SA has not taken this information into account at this stage, as the same information is not available for all reasonable alternative site options and it is a requirement of the SEA Regulations that the options are considered on a consistent basis. The approach to appraising the 78 reasonable alternative site options described above allows for this requirement to be met. At the next stage of plan making the next SA report will consider the likely effects of the allocated sites, taking into account the specific information set out in the GESP about how those sites will be developed and their capacities factoring in infrastructure requirements.

2.66 The SA findings for the reasonable alternative residential and employment site options are summarised in **Chapter 5**, with detailed appraisal matrices presented in **Appendix 6**.

**Table 2.4: Assumed characteristics of Residential Sites**

| Residential sites with capacity for fewer than 500 homes | Residential sites with capacity for 500 - 1,000 homes | Residential sites with capacity for 1,000-1,999 homes | Residential sites with capacity for 2,000 – 3,999 homes | Residential sites with capacity for more than 4000 homes |
|---|---|---|---|---|
| • Provide limited employment opportunities.<br>• No shops or services.<br>• No school or education facilities on site.<br>• Local public open space, and children's play areas provided on site.<br>• Active travel and roads within development and to nearest main settlement.<br>• Flood risk management (e.g. SUDS).<br>• Protection of European protected species and habitats and/or SANGS.<br>• No development on/over nationally or internationally designated wildlife or heritage sites (e.g. scheduled ancient monument, designated heritage asset, SSSI, ancient woodland, SAC, SPA). | • Provide small scale mixed use employment opportunities.<br>• Small cluster / hub of shop and services.<br>• Primary school on site or equivalent expansion of nearby facilities.<br>• Local public open space and children's play areas on site.<br>• Active travel and roads within development and to nearest main settlement.<br>• Flood risk management (e.g. SUDS).<br>• Protection of European protected species and habitats and/or SANGS.<br>• No development on/over nationally or internationally designated wildlife or heritage sites (e.g. scheduled ancient monument, designated heritage asset, SSSI, ancient woodland, SAC, SPA). | • Provide medium scale mixed use employment opportunities and business park or employment estate.<br>• Neighbourhood hub with shops and services including small supermarket.<br>• Primary school on site.<br>• Strategic and local scale public open space, children's play areas and playing pitches on site.<br>• Active travel, sustainable transport links and roads within development and to nearest main settlement (including an additional frequent bus service to the site).<br>• Flood risk management (e.g. SUDS).<br>• Protection of European protected species and habitats and/or SANGS.<br>• No development on/over nationally or internationally designated wildlife or heritage sites (e.g. scheduled ancient monument, designated heritage asset, SSSI, ancient woodland, SAC, | • Provide large scale mixed use employment opportunities and business park or employment estate.<br>• Neighbourhood hub with shops and services including small supermarket and community building.<br>• Primary school on site.<br>• Strategic and local scale public open space, children's play areas and other sport and leisure provision.<br>• Active travel, sustainable transport links and roads within development and to nearest main settlement (including an additional frequent bus service to the site).<br>• Flood risk management (e.g. SUDS).<br>• Protection of European protected species and habitats and/or SANGS.<br>• No development on/over nationally or internationally designated wildlife or heritage sites (e.g. scheduled ancient monument, designated heritage asset, SSSI, | • Provide large scale mixed use employment opportunities and business park or employment estate.<br>• Town centre with shops, services, commercial space and other mixed uses including small supermarket and community building.<br>• Primary schools and secondary school on site.<br>• Strategic and local scale public open space, children's play areas and other sport and leisure provision.<br>• Active travel, sustainable transport links and roads within development and to nearest main settlement (including an additional frequent bus service to the site).<br>• Flood risk management (e.g. SUDS).<br>• Protection of European protected species and habitats and/or SANGS.<br>• No development on/over nationally or internationally designated wildlife or |

| Residential sites with capacity for fewer than 500 homes | Residential sites with capacity for 500 - 1,000 homes | Residential sites with capacity for 1,000-1,999 homes | Residential sites with capacity for 2,000 – 3,999 homes | Residential sites with capacity for more than 4000 homes |
|---|---|---|---|---|
| | | SPA). | ancient woodland, SAC, SPA). | heritage sites (e.g. scheduled ancient monument, designated heritage asset, SSSI, ancient woodland, SAC, SPA). |

**Table 2.5: Assumed Characteristics of Employment Sites**

| Employment sites of up to 10 ha | Employment sites of 10 ha – 20 ha | Employment sites of 20 ha or more |
|---|---|---|
| • No residential<br>• Mix of plot sizes available to buy or rent<br>• No shops or services.<br>• Active travel and roads within development.<br>• Flood risk management (e.g. SUDS).<br>• Protection of European protected species and habitats and/or SANGS.<br>• No development on/over nationally or internationally designated wildlife or heritage sites (e.g. scheduled ancient monument, designated heritage asset, SSSI, ancient woodland, SAC, SPA). | • No residential<br>• Mix of plot sizes available to buy or rent<br>• 1 small shop<br>• Active travel and roads within development and to nearest main settlement.<br>• Flood risk management (e.g. SUDS).<br>• Protection of European protected species and habitats and/or SANGS.<br>• No development on/over nationally or internationally designated wildlife or heritage sites (e.g. scheduled ancient monument, designated heritage asset, SSSI, ancient woodland, SAC, SPA). | • No residential<br>• Mix of plot sizes available to buy or rent<br>• Limited number of shops and other services or facilities (e.g.: gym, crèche)<br>• One local green space<br>• Active travel, sustainable transport links and roads within development and to nearest main settlement (including an additional frequent bus service to the site).<br>• Flood risk management (e.g. SUDS).<br>• Protection of European protected species and habitats and/or SANGS.<br>• No development on/over nationally or internationally designated wildlife or heritage sites (e.g. scheduled ancient monument, designated heritage asset, SSSI, ancient woodland, SAC, SPA). |

## Difficulties Encountered

2.67 It is a requirement of the SEA Regulations that consideration is given to any data limitations or other difficulties that are encountered during the SA process. For some of the proposed policies, some details were not confirmed in this version the GESP. For example, for Policy GESP 18: Build-to-rent Homes and Policy GESP 21: Accommodation for Gypsy and Traveller Communities, the location of selected sites to meet these policy requirements have not been included. Uncertainty may be reduced at the next stage of the SA as the draft policies are likely to be more detailed and location of development is confirmed.

2.68 There was a need to ensure that a large number of site options could be appraised consistently. This was achieved by the use of assumptions relating to each SA objective, as described above.

2.69 Appraisal of each SA objective against the SA assumptions was based firstly on GIS data where applicable and then informed by further information which was provided by the individual Councils. In some instances differing levels of detail were put forward by the authorities and the consultants appraising the site options had to use professional judgement to incorporate this information in the appraisal while maintaining a consistent approach to the appraisal of all sites. The provision of differing levels of information related to the identification of priority habitat and land which has been designated as a Mineral Safeguarding Area. For these issues further ecological studies were available from some of the authorities in relation to some of the sites and details of whether the relevant authority could confirm that minerals extraction would take place before any other type of development was also available for only some sites. In addition, GIS data relating to all types of open space was not available for all four districts, so 'Major Open Spaces' only were used in relation to SA objective 9: Health. Finally, surface water flooding data was not available and therefore the risk of surface water flooding was not able to be taken into account.

2.70 It is acknowledged that the assessment of sites that contain existing development are limited in that it is not known at this stage of the assessment if the existing development would be retained as part of any new development within the site. Therefore, for SA assumptions that take into account the proximity of sites to particular features or the presence of features within sites, the whole site boundary and area has been used in determining the score, inclusive of any existing development present on site. The net area of the site which does not contain existing development has been used for SA assumptions which relate to site capacity.

2.71 The accessibility of high speed internet was informed by public data available from Ofcom[6]. This data does not cover all parts of the plan area and as such proximity to current provision and professional judgement was used to inform assessment of potential accessibility to this type of service at relevant site options.

2.72 In order to identify the likely effects of site options on SA objective 2: landscape, the SA drew on a Landscape Sensitivity Assessment for each site which was provided by LPA officers from each district. A small number of the site options were subject to boundary revisions in between these assessments being prepared and the SA being undertaken; therefore the assessments in those cases are based on slightly different boundaries to those appraised in this SA. Where this is the case, it is noted in the detailed SA matrix for the site. In all cases, the likely effects of development on the landscape are already marked as uncertain as effects will also be influenced by factors such as the design and layout of sites.

[6] Ofcom (2018) View broadband availability. Available at: checker.ofcom.org.uk/broadband-coverage.

# 3 Sustainability Context for Development in the plan area

## Review of Plans, Policies and Programmes

3.1 Annex 1 of the SEA Directive requires:

(a) "an outline of the…relationship with other relevant plans or programmes"; and

(e) "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 In order to establish a clear scope for the SA it is necessary to review and develop an understanding of the environmental, social and economic objectives contained within international and national policies, plans and strategies that are of relevance to the emerging GESP. Given the SEA Directive requirements above, it is also necessary to consider the relationship between the GESP and other relevant plans, policies and programmes.

3.3 During the Scoping stage of the SA, a review was undertaken of the other plans, policies and programmes that are relevant to the GESP, as described in **Chapter 2**. This review has been updated since it was originally presented in the Scoping Report in order to reflect comments received during the Scoping consultation and changes in relevant planning policy. The updated policy review can be seen in full in **Appendix 2** and the key findings are summarised below.

## Relationship between the GESP and other plans and programmes

3.4 The GESP must be in conformity with the National Planning Policy Framework (NPPF), the requirements of which are described in detail in the next section.

3.5 The GESP will include strategic policies and proposals for land use in the Greater Exeter area. It will provide a joined-up vision for the area and by delivering new homes and economic growth in the right areas, as supported by transport and infrastructure improvements it will help ensure growth occurs in a sustainable manner. As part of this approach the area's natural and built environments will be conserved and where there are opportunities to secure enhancements these will be promoted.

3.6 The standards and site allocations to be included in the plan will need to take account of the wide range of plans that currently exist at the sub-regional and local levels which provide context for the emerging plan.

*District-level planning policy*

3.7 The local authorities within the plan area, as well as Devon County Council at the county level, have all adopted plans which are of relevance to the preparation of the GESP. These will continue to contain development management policies and smaller allocations for their respective areas.

3.8 The adopted local level and county level plans comprise:

- Mid Devon Core Strategy (2007) which sets out growth of approximately 6800 dwellings and 300,000 square metres of employment up to 2026; Mid Devon Allocations and Infrastructure Development Plan Document (2010); and Mid Devon Development Management Policies (2013);

- East Devon Local Plan (2016) which sets out development of a minimum of 17,100 new homes up to 2031 and around 150 hectares of land for employment purposes; and East Devon Villages Plan (2018);
- Teignbridge Local Plan (2014) which sets out a need for 12,400 dwellings up to 2033 as well as land to support the development of about 3 hectares of business, industrial and warehousing sites per year;
- Exeter Core Strategy (2012) which sets out requirement for the provision of at least 12,000 dwellings and around 60 hectares of employment land up to 2026; and Exeter Local Plan First Review (2005); and at the county level
- Devon Minerals Plan (2017) and Devon Waste Plan (2014).

3.9 A number of review plans and new plans are also currently being worked on by the local authorities. These will form part of the Local Plans for each of the respective local authority areas. Plans currently being worked on include the following:

- The Mid Devon Local Plan Review which was submitted to the Planning Inspectorate on 31st March 2017 for examination and is currently at post hearing sessions stage;
- The Teignbridge Local Plan Review for which consultation is taking place on the Draft plan from March-June 2020;
- The East Devon Cranbrook DPD which was submitted to the Secretary of State in August 2019 and is currently going through the Examination process;
- The East Devon Gypsy and Traveller DPD which has undergone several calls for sites and is still awaiting landowners to submit sites for consideration; and
- The Exeter Development Delivery DPD for which consultation on the Draft plan took place in July 2015; and
- Neighbourhood Plans.

3.10 Following the Localism Act 2011, Neighbourhood Plans have increasingly been used in the planning process and give the opportunity for the local community to contribute towards shaping their area. The preparation of the GESP requires consideration of Neighbourhood Plans within the four districts in Greater Exeter to ensure local context is reflected in the strategy. Within East Devon, there are 18 'made' (or resolved to be made) Neighbourhood Plans and a further 21 that are being produced. Within Mid Devon, there are four neighbourhood plans currently being produced for Tiverton, Crediton, Cullompton and Silverton. There are three Neighbourhood Plans currently being produced (or in consideration) and eight that have been adopted or made in Teignbridge District. The St James Neighbourhood Plan was adopted by Exeter City Council in July 2013 and now forms part of the statutory development plan.

*AONB Management Plans and National Park Plans*

3.11 The plan area takes in portions of the Blackdown Hills AONB and East Devon AONB and also lies directly adjacent to the Dorset AONB. The current Blackdown Hills AONB Management Plan runs from 2019 to 2024 and sets out a vision for the area and how challenges and opportunities should be met. The management framework for the East Devon AONB is set out in the 2019 Partnership Plan. In addition to protecting the important AONB landscape, the plan sets out a requirement to protect and enhance the World Heritage Site coastline as well as internationally important habitats and cultural heritage in the area. Similarly, the Dorset AONB Management Plan was also adopted in 2019. The document seeks to protect and enhance the special qualities of the landscape while helping to promote a thriving local community where employment opportunities are accessible to all.

3.12 Dartmoor National Park falls partially within Teignbridge District and Mid Devon District. While the land within the National Park does not fall under the remit of the GESP it is still appropriate to be aware of the context set by the planning policy in this area. The current Local Plan in Dartmoor comprises the Core Strategy 2006 – 2026, the Development Management and Delivery Plan document and the Minerals Local Plan. The Local Plan is currently under review and consultation on the Final Draft Local Plan ended in November 2019. Exmoor National Park falls outside of the

boundaries of Mid Devon District to the north. Exmoor National Park Authority formally adopted the Exmoor National Park Local Plan to 2031 in July 2017 and this now forms the statutory development plan for the area.

*Neighbouring Authorities' Local Plans*

3.13 Throughout the preparation of the GESP and the SA process, consideration will be given to the Local Plans being prepared by the authorities that surround Greater Exeter. The development proposed in those authorities could give rise to in-combination effects with the effects of the GESP, and the effects of the various plans may travel across local authority boundaries. There are a number of authorities that border Greater Exeter and their Local Plans include: West Dorset, Weymouth and Portland Local Plan (2015)[7]; South Somerset Local Plan (2015)[8]; Taunton Deane Core Strategy (2012)[9]; West Somerset Local Plan (2016)[10]; North Devon and Torridge Local Plan (2018)[11]; Plymouth and South West Devon Joint Local Plan (2019)[12]; and Torbay Local Plan (2015)[13]. It should be noted that the context for surrounding local plans will change with the local government reorganisation that is occurring in West Somerset and Dorset.

3.14 There is also need for consideration of the impacts which occur across the Heart of the South West LEP (Local Enterprise Partnership) area. The LEP area covers all of the GESP area as well as the remaining areas within Devon together with the areas of Plymouth, Somerset and Torbay. The LEP seeks to reposition the combined area's profile and reputation at a national and global level. The Heart of the South West Strategic Economic Plan (SEP) (2014) sets out a vision, objectives and strategy to maximise economic growth in the area. Priorities to achieve this economic growth and facilitate uplift in local prosperity are set out for the period 2014 to 2030 in the plan, which presents immediate and longer term aims. Additionally, the LEP Local Industrial Strategy, which has been submitted to Government, 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. The LEP has been formed under the leadership of the private sector and is supported by local authorities as well as higher education and further education facilities across the area.

## Environmental, Social and Economic Objectives Relevant to the GESP

3.15 There are a wide range of plans, policies and programmes at the international and national levels that are relevant to the emerging GESP. The key components of the full review presented in **Appendix 2** are summarised below.

*Key international plans, policies and programmes*

3.16 At the international level, 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') are particularly significant as they require SEA and HRA to be undertaken in relation to the emerging GESP. 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.

[7] West Dorset District Council and Weymouth and Portland Borough Council (2015) *West Dorset, Weymouth & Portland Local Plan 2011-2031*

[8] South Somerset District Council (2015) *South Somerset Local Plan 2006-2028*

[9] Taunton Deane Borough Council (2012) *Taunton Deane Core Strategy 2011-2028*

[10] West Somerset District Council (2016) *West Somerset Local Plan up to 2032*

[11] North Devon District Council and Torridge District Council (2018) *North Devon and Torridge Local Plan 2011-2031*

[12] West Devon Borough Council, South Hams District Council and Plymouth City Council (2019) *Plymouth and South West Devon Local Plan 2014-2034*

[13] Torbay District Council (2015) *Torbay Local Plan 2012-2030*

3.17 There are a wide range of other EU Directives relating to issues such as water quality, waste and air quality, most of which have been transposed into UK law through national-level policy; however the international directives have been included in **Appendix 2** for completeness.

3.18 As of the end of January 2020 the UK has left the EU. A transition period is now in place until 31st December 2020. During this period, all EU rules and regulations will continue to apply to the UK. As such, the documents presented in this report and in **Appendix 2** include those relating to the EU. As set out in the Explanatory Memorandum accompanying the Brexit amendments[14], the purpose of the Brexit amendments to the SEA Regulations is to ensure that the law functions correctly after the UK has left the EU. No substantive changes are being made by this instrument to the way the SEA regime operates.

*Key national plans, policies and programmes*

3.19 There is also a wide range of national level plans, policies and programmes with relevant objectives for the SA, which are summarised in **Appendix 2**. The publication of the National Planning Policy Framework in 2018 (as updated in February 2019) which is supported by the online Planning Practice Guidance (PPG)[15] provides a particularly important context for the production of the SA. The GESP must be consistent with the requirements of the NPPF, which sets out information about the purposes of Local Plan-making. It states that in addition to being positively prepared, justified and effective, plans will be considered sound if they are capable of:

*"enabling the delivery of sustainable development in accordance with the policies in (the) Framework."*

3.20 In addition to contributing to the achievement of sustainable development the NPPF also requires plans to be prepared positively in a way that is 'aspirational but deliverable'. This means that opportunities for appropriate development should be identified in order to achieve net gains across the three overarching objectives of sustainable development: that is to say achieving the economic, social and environmental objectives of the planning system. Significant adverse impacts on these objectives should be avoided however and, where possible, alternative options which reduce or eliminate these types of impacts should be taken forward. Where this is not possible mitigation followed by compensatory measures should be pursued.

3.21 National policy within the NPPF of most relevance to the emerging plan has been summarised below. This document contains guidance for the inclusion of strategic policies which should be limited to those necessary to address the strategic priorities of an area as well as any relevant cross boundary issues. It is stated in the NPPF that strategic policies to address each local planning authority's priorities can be included in joint or individual Local Plans.

3.22 The NPPF also states that strategic policies, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. Exceptions should only be made where the protection of areas or assets of particular importance provide strong reason for restricting the overall scale of development or where the potential adverse impacts significantly and demonstrably outweigh the benefits. The duty to cooperate between local authorities on strategic matters that cross administrative boundaries should involve collaboration that will contribute towards the development of strategic policies.

3.23 Strategic policies are required to look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities. These types of policies are also required by the NPPF to provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period. This should include Local Plans and Neighbourhood Plans within Combined Authorities supporting the delivery of strategic policies contained in spatial development strategies.

3.24 The Government is also setting out goals for managing and improving the environment within the next 25 years within its **environment plan**[16]. The document seeks to influence planning from a national level down and therefore will be relevant to the scope of the SA and the plan process.

[14] Explanatory Memorandum to the Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 No. 1232

[15] http://planningguidance.planningportal.gov.uk/

[16] HM Government (January 2018) *A Green Future: Our 25 Year Plan to Improve the Environment*

Reference has been included within each topic below to the relevant text from the environment plan.

*Population Growth, Health and Wellbeing*

3.25 The **NPPF** includes as part of its social objective the promotion of "*strong,* vibrant *and healthy communities*" by:

- "ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and
- by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing."

3.26 Ultimately planning policies and planning decision making should "*aim to achieve healthy, inclusive and safe places*".

3.27 The document states that strategic policies should set out the pattern, scale and quality of development and make sufficient provision for *"housing (including affordable housing) employment, retail, leisure and other commercial development … [as well as] community facilities (such as health, education and cultural infrastructure)."* Policies should reflect "*the size, type and tenure* of *housing needed".* This policy approach is to include but should not be limited to housing requirements relating to affordable homes, families with children, older people, students, people with disabilities, service families, travellers, those who rent their homes and people wishing to commission the construction of their own homes. At major developments providing new housing planning policies and decisions should expect at least 10% of new provision to be delivered for affordable home ownership subject to conditions and exemptions.

3.28 To help to diversify opportunities for builders, promote a better mix of site sizes and increase the number of schemes that can be built-out quickly to meet housing need, the NPPF states that at least 10% of the sites allocated for housing through a local authority's plan should be on sites no larger than one hectare unless it can be demonstrated that there are strong reasons why this target cannot be achieved. In the case of the GESP strategic sites only are to be allocated. The Local Plans which sit below will address the remaining housing need including the need for providing smaller sites at least 10% of the overall number allocated.

3.29 Where there is an identified need, development of sites not already allocated for housing to provide entry-level homes suitable for first-time buyers is to be supported by local planning authorities unless such need is already to be met at other locations within the authority area. These sites should comprise of entry-level homes that offer one or more types of affordable housing.

3.30 The document also promotes a theme of enhancing healthy and safe communities which is to be achieved by creating places which *"promote social interaction (and) enable and support healthy lifestyles*."

3.31 As part of this approach social, recreational and cultural facilities and services that the community needs should be provided guided by planning policies which:

- "plan positively provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services;
- support the delivery of local strategies to improve health, social and cultural wellbeing for all sections of the community;
- guard against the unnecessary loss of valued facilities and services."

3.32 Plan making through the guidance of the NPPF recognises the important role of access to open spaces and other facilities which provide opportunities for sport and physical activity has in terms of health and wellbeing of communities. The importance of delivering a sufficient choice of school places to meet the needs of existing and new communities is also recognised in the document and local planning authorities should take a "*proactive, positive and collaborative approach to meeting this requirement*".

3.33 The NPPF also sets out that the standard method provided in national planning guidance should be used to undertake a local housing need assessment identifying the minimum number of homes needed. Unmet need from neighbouring areas will also need to be taken into account as part of the calculation. The **Housing Delivery Test Measurement Rule Book**[17] sets out how the measurement of housing delivery in the area of relevant plan-making authorities is calculated.

3.34 **A Green Future: Our 25 Year Plan to Improve the Environment** 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 document identifies six key areas upon which action will be focused. Those of relevance to the topics of population growth, health and wellbeing are using and managing land sustainably; and connecting people with the environment to improve health and wellbeing. These two key areas are of relevance to the emerging GESP as follows:

- Using and managing land sustainably:
    - Embed an 'environmental net gain' principle for development, including housing and infrastructure.
    - Carbon offsetting.
- Connecting people with the environment to improve health and wellbeing:
    - Help people improve their health and wellbeing by using green spaces including through mental health services.
    - Encourage children to be close to nature, in and out of school, with particular focus on disadvantaged areas.
    - 'Green' our towns and cities by creating green infrastructure and planting one million urban trees.
    - Make 2019 a year of action for the environment, working with Step Up To Serve and other partners to help children and young people from all backgrounds to engage with nature and improve the environment.

3.35 The **January 2018 to March 2019 report**[18] on the 25 Year Environment Plan included details progress that has been made on the aims of the plan. This includes the publication of a draft Environment Bill, introduction of an Agriculture Bill into Parliament and consultation undertaken on plans for biodiversity net gain.

3.36 Defra's **2018 Net Gain Consultation Proposals** document[19] consulted on the objectives of biodiversity net gain policy which developers should seek to achieve when building new housing or commercial development. The document also sets out the core concepts of biodiversity net gain and environmental net gain thereby providing context regarding whether biodiversity net gain for development should be mandated.

*Economy*

3.37 The **NPPF** contains an economic objective to "help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity."

3.38 It also requires that planning seeks to "create the conditions in which businesses can invest, expand and adapt" with policies **required** to "set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth". Policies addressing the economy should also seek "to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment." In addition to making sufficient provision for housing, the NPPF states that strategic policies are required to make provision for

[17] Ministry of Housing, Communities and Local Government (July 2018) *Housing Delivery Test Measurement Rule Book*
[18] Defra (May 2019) *25 Year Environment Plan progress report: January 2018 to March 2019*
[19] Defra (December 2018) *Net gain Consultation proposals*

infrastructure for various uses including transport, telecommunications and environmental management.

3.39 Planning policies are also required specifically to address support for the rural economy. Sustainable growth and expansion of all types of business and enterprise in rural areas should be supported, both through conversion of existing buildings and well-designed new buildings, while the diversification of the rural economy and promotion of sustainable rural tourism and leisure developments is also supported.

3.40 The NPPF also supports the role of town centres as functioning at the heart of local communities. This support is required to provide for a "*positive approach to [town centres'] growth, management and adaptation*." Included within this support is a requirement to *"allocate a range of suitable sites in town centres to meet the scale and type of development needed, looking at least ten years ahead."*

3.41 The government's **Industrial Strategy** white paper[20] identifies Clean Growth as one of the main challenges for UK industry. As part of an approach to boost productivity and earning power across the country clean growth should be promoted to maximise opportunities to move in this direction. To achieve this aim funding plans for electric vehicles and a Transforming Cities fund that will provide £1.7bn for intra-city transport have been identified through the strategy.

*Transport*

3.42 The **NPPF** requires that "transport issues should be considered from the earliest stages of plan-making". The scale, location and density of development should reflect "opportunities from existing or proposed transport infrastructure". To help reduce congestion and emissions, and improve air quality and public health the planning system should focus significant development "on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes." The framework also requires that planning policies support an appropriate mix of uses across an area to further help reduce the need to travel as well as the provision of high-quality walking and cycling network.

3.43 While the framework promotes the use and development of sustainable transport networks it also requires that "where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development" should be identified and protected.

*Air, Land and Water Quality*

3.44 The **NPPF** states that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued soil and the economic and other benefits of the best and most versatile agricultural land. Policies should also prevent new and existing development from "*contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution."*

3.45 The document also requires that strategic policies should seek to make the most effective use of land in meeting local requirements making as much use as possible of previously-developed or 'brownfield' land. Furthermore, policies should "*support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land*".

3.46 **A Green Future: Our 25 Year Plan to Improve the Environment**[21]: The three key areas of relevance to the emerging GESP are as follows:

- Using and managing land sustainably:
    - Embed a 'net environmental gain' principle for development, including natural capital benefits to improved and water quality.
    - Protect best agricultural land.
    - Improve soil health, and restore and protect peatlands.

[20] HM Government (2017) Industrial Strategy: Building a Britain fit for the future

[21] HM Government (2018) *A Green Future: Our 23 Year Plan to Improve the Environment* [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf

- Recovering nature and enhancing the beauty of landscapes:
  - Respect nature by using our water more sustainably.
- Increasing resource efficiency and reducing pollution and waste:
  - Reduce pollution by tackling air pollution in our Clean Air Strategy and reduce the impact of chemicals.

*Waste*

3.47 **National Planning Policy for Waste (2014)[22]:** The document sets out the Government's ambitions for working towards a more sustainable and efficient approach to resource use and management. All local planning authorities are required to consider policies within the document in their approach to waste management at local authority level.

*Climate Change Adaptation and Mitigation*

3.48 The **NPPF** contains as part of its environmental objective a requirement to mitigate and adapt to climate change, *"including moving to a low carbon economy"*. The document also states that the "*planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change."* To achieve these aims new development should be planned to ensure appropriate adaptation measures are included (including green infrastructure) and should be designed, located and orientated as to help to reduce greenhouse gas emissions.

3.49 The revised framework also requires that development is directed away from areas which are at highest existing or future risk of flooding. Where development is required in such areas, the "*development should be made safe for its lifetime without increasing flood risk elsewhere."*

3.50 In relation to coastal change in England planning policies and decisions should take account of the UK Marine Policy Statement and marine plans. Furthermore, plans should "*reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast".*

3.51 **A Green Future: Our 25 Year Plan to Improve the Environment**[23]: The key areas in the document of relevance in terms of 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.

3.52 **The Government's Clean Growth Strategy (April 2018)[24]**: sets out policies and proposals that are intended to drive emissions down during the next decade. This includes identification of areas where there needs to be most progress, both through technological breakthroughs and large-scale deployment. Proposals include development of Green Finance capabilities, improving business and industry efficiency, improvement of home energy efficiency, a shift to low carbon transport and enhancing the benefits of natural resources

*Biodiversity*

3.53 A further requirement of the **NPPF's** environmental objective is that the planning system should contribute to protecting and enhancing the natural environment including helping to improve

[22] https://www.gov.uk/government/publications/national-planning-policy-for-waste

[23] HM Government (2018) *A Green Future: Our 23 Year Plan to Improve the Environment* [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf

[24] HM Government (2018) *The Clean Growth Strategy: Leading the way to a low carbon future* [online] Available at: https://www.gov.uk/government/publications/clean-growth-strategy

biodiversity, and using natural resources prudently. In support of this aim the framework states that plans should "*identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks"* and should also "*promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.*"

3.54 The framework requires that plans should take a strategic approach in terms of "maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries". Planning decisions should be reflective of the principle that *"development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists."*

3.55 **A Green Future: Our 25 Year Plan to Improve the Environment**[25]: The key areas in the document of relevance in terms of the protection and promotion of biodiversity are recovering nature and enhancing the beauty of landscapes; securing clean, productive and biologically diverse seas and oceans; and protecting and improving our global environment. Actions that will be taken as part of these three key areas are as follows:

- Recovering nature and enhancing the beauty of landscapes:
    - Develop a Nature Recovery Network to protect and restore wildlife, and provide opportunities to re-introduce species that have been lost from the countryside.
- Securing clean, healthy, productive and biologically diverse seas and oceans:
    - Achieve a good environmental status of the UK's seas while allowing marine industries to thrive, and complete our economically coherent network of well-managed marine protected areas.
- Protecting and improving our global environment:
    - Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.
    - Support and protect international forests and sustainable agriculture.

*Historic Environment*

3.56 Of relevance to the approach of the planning system to the historic environment the **NPPF** contains an environmental objective to contribute to the protection and enhancement of the built and historic environment. The document also sets out a strategy to seek "*the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay and other threats."* Such a strategy is required to take into consideration the desirability of sustaining and enhancing the significance of heritage assets and bringing them into viable use.

3.57 It should also take account of the wider benefits of conserving the historic environment, the contribution new development can make in terms of character and distinctiveness and the opportunity for the historic environment to contribute to this character and distinctiveness. Local authorities should also maintain or have access to a historic environment record which is to be supported by up to date evidence.

*Landscape*

3.58 The GESP will be required to have consideration for the conservation and enhancement of landscape character in the plan area. The **NPPF** includes as part of its approach to protecting the natural environment, recognition for the intrinsic character and beauty of the countryside, and the wider benefits to be secured from natural capital. Importantly, great weight is to be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty.

[25] HM Government (2018) A Green Future: Our 23 Year Plan to Improve the Environment [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf

3.59 As part of the approach to achieving well-designed places the NPPF states that planning policies and decisions should ensure that developments "*are sympathetic to local character and history, including the surrounding built environment and landscape setting*."

3.60 **A Green Future: Our 25 Year Plan to Improve the Environment**[26]: The key areas in the document of relevance in terms of the conservation and enhancement of landscape character are recovering nature and enhancing the beauty of landscapes. Actions that are to be taken to support on these issues are as follows:

- Working with AONB authorities to deliver environmental enhancements.
- Identifying opportunities for environmental enhancement of all England's Natural Character Areas, and monitoring indicators of landscape character and quality.

## Baseline Information

3.61 Baseline information provides the context for assessing the sustainability of proposals in the GESP and it provides the basis for identifying trends, predicting the likely effects of the plan and monitoring its outcomes. The requirements for baseline data vary widely, but it must be relevant to environmental, social and economic issues, be sensitive to change and should ideally relate to records which are sufficient to identify trends.

3.62 Schedule 2 of the SEA Regulations requires data to be gathered on biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the inter-relationship between the above factors. 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, education, transport, energy, waste and economic growth.

3.63 The collection and interpretation of baseline information is a valuable way in which we can gain an understanding and strategic overview of what kind of place Greater Exeter is. Given the breadth of topics covered it reflects on the current state of the environment, economy, societal issues and those characteristics which are most likely to be affected. This understanding allows us to not only consider the likely effects and impacts of the GESP but also how it can make a positive contribution towards the overall quality of human life and social, economic and environmental wellbeing.

3.64 As with the review of relevant plans, policies and programmes, updates have been made to the baseline information since it was originally presented in the Scoping Report in order to reflect comments received during the Scoping consultation and any change in local circumstances since the production of this document. The updated baseline information is presented in **Appendix 3**.

## Key Sustainability Issues

3.65 A set of key sustainability issues for the plan area was identified during the Scoping stage of the SA and was presented in the Scoping Report (November 2016). The list of key issues was reviewed as part of preparing this SA Report to reflect the updated baseline information and comments received during the period of consultation following the publication of the SA Scoping Report.

3.66 The SEA Regulations sets a requirement (Schedule 2) for the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme to be described in the Environmental (SA) Report. **Table 3.1** overleaf also describes the likely evolution of each key sustainability issue if the GESP were not to be adopted.

3.67 Predicting the nature of future trends can be difficult, particularly given that it is dependent at least in part on national and global economic climates. External factors such as the decision of the UK to leave the European Union, are likely to have some form of impact on national circumstances

[26] HM Government (2018) A Green Future: Our 23 Year Plan to Improve the Environment [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf

including economic performance at a local level. To some extent these factors remain an unknown.

3.68 Whilst there are certain trends that would appear likely to continue across Greater Exeter without implementation of a joint strategic plan, it should be noted that existing Local Plans and/or Core Strategies are in place which, through their policies and proposals, would ensure that the area would not be left in a policy void without implementation of the GESP. These plans all have end dates of between 2026 and 2033. In this respect, the 'business as usual' scenario is that existing Local Plans prepared at the district level, and any made Neighbourhood Plans sitting beside them, would provide the policy framework for future development. The GESP provides an opportunity for an additional layer of policy to be provided which addresses planning issues on a coordinated, strategic and cross boundary level which would otherwise be dealt with through Duty to Cooperate discussions involved in the preparation of individual Local Plan reviews.

**Table 3.1: Key sustainability issues for the plan area and likely evolution without the GESP**

| Headline issue | Key sustainability issue | Likely Evolution without the GESP |
|---|---|---|
| Environmental | | |
| Biodiversity and European protected species' habitats | The 19 SACs, SPAs and Ramsar sites across Greater Exeter are sensitive to development, human activity and climate change pressures. Cross border impacts should also be considered (e.g. impacts occurring within Dartmoor). Locally designated and non-designated wildlife sites, and biodiversity in broader terms, are also vulnerable to loss and erosion, through direct development pressure, or direct and indirect consequences of human activities. | The plan area's biodiversity is at threat from issues relating to development as well as human activities such as pollution, travel, recreation and agricultural practices. These and other activities can result in loss of habitat, adverse impacts on food sources and influences the rate of climate change which are of importance to biodiversity.<br><br>Lack of a coordinated approach to development and infrastructure could lead to the potential degradation of valued habitats and nature conservation areas across the GESP area. It will also result in an opportunity to achieve the enhancement of biodiversity features in the plan area being lost.<br><br>Current numbers of European and National nature conservation sites with some small increases in the number of locally designated sites are likely to be maintained even without implementation of the GESP. Failure to provide a coordinated strategic approach to development and infrastructure is more likely to result in inappropriate greenfield development. This could result in damage in terms of the sub-region's green infrastructure as well as the potential loss of habitat space and species. |
| Flood risk | There are places within Greater Exeter which are particularly susceptible to groundwater, fluvial and tidal flooding. Most of the developed coastline associated with the Exe Estuary will require defending over the longer term and is vulnerable to climate change and sea level rise. | Increases in flood risk are likely to occur in the plan area due to climate change which is expected to result in increased rainfall and rising sea levels. Considering that development can result in higher levels of impermeable areas certain aspects of flood risk are cumulative. The use of sustainable drainage systems (SuDS) will be encouraged through GESP site allocations. However, without a coordinated strategic approach to development and supporting infrastructure, growth in the plan area is more likely to be inappropriately located and/or inappropriately designed as to increase flood risk. |
| Mineral resources | There are nationally important mineral resources within Greater Exeter that constrain development in specific locations. | Inappropriately located development has the potential to result in the sterilisation of mineral resources or reduce the ability to access them safely. Development over the plan period would continue to be guided by GESP policies as well as the Devon Minerals Plan which would prevent important mineral resource sites from being adversely affected. The GESP provides an opportunity to consider these sites in a more holistic manner, particularly when providing guidance for new large-scale development sites. |
| Water Quality | The majority of the groundwater within Greater Exeter has poor chemical status, largely due to historic mining, natural geology and farming practices. | Improvements in the Building Regulations are likely to help improve the water efficiency of new dwellings. Even in the absence of the GESP, water company initiatives such as metering should also have a positive effect in this regard. Issues such as farming practices are less likely to be affected by planning policy in the area. The GESP may, however, present opportunities for site specific policy to take account of the potential impacts new development may have in terms of |

| Headline issue | Key sustainability issue | Likely Evolution without the GESP |
|---|---|---|
| | | geology and from this is likely to help protect water quality. |
| Soil quality | The best and most versatile agricultural land within Greater Exeter is at risk from erosion resulting from flooding and surface water run-off, which is likely to increase as the climate changes. | The GESP will set out a coordinated strategic approach to development and infrastructure, providing better opportunities to minimise impacts relating to the erosion of agricultural soils than would otherwise exist. |
| Air quality | Air pollution in the Greater Exeter area has been predicted to result in at least 198 premature deaths per year. | Teignbridge, Mid Devon Exeter have produced an Air Quality Action Plans as of 2009, 2017 and 2019 respectively. These plans aim to improve air quality and take account of the potential for adverse health impacts which are likely to be associated with air pollution. These Action Plans should help to improve air quality within Teignbridge and Exeter. The GESP supports a more coordinated strategic approach to development and transport infrastructure and this should help limit the levels of NO2 and PM10 emitted in the plan area. Without this coordinated approach, levels of these pollutants might be maintained or might increase due to the additional growth over the plan period. Air pollutants would be likely to particularly affect urban centres. |
| Risk to coastline | The coastline areas of Greater Exeter are vulnerable to damage and degradation from development, tourism, leisure, sea level rises, and the increasing severity of storm surges. | The impacts of climate change may be compounded if development proceeds in a less coordinated manner without the implementation of the GESP. Adverse impacts are considered to be more likely if developments (including tourism and recreation) occur in areas of coastline which are particularly vulnerable to change. |
| Climate Change | Greater Exeter carbon emissions are above the UK average, in part due to car dependency and distances to access work. The quality of housing stock may also be relevant. Greater Exeter is generating low levels of renewable energy and there is a disparity across the area in the distribution of commercial renewable energy production schemes. | Increased traffic is likely to exacerbate all existing problems relating to vehicle-based carbon emissions in the plan area. The GESP facilitates the sustainable transport improvements and travel planning required to support strategic growth in the area.<br><br>Planning policy is an important tool for the delivery of renewable energy technology in new development. The GESP can provide further support in the long-term approach to climate change mitigation and adaptation to benefit people and biodiversity. It can also require the achievement of carbon reduction targets and low carbon development in each of the local authority areas. As such, without the GESP development may be less ambitious in its energy performance, and planning gains are less likely to be delivered in a timely and coordinated manner. |
| Landscape | Specific landscape settings (including at the specially designated landscapes with the AONB and National Parks) and views may be eroded, including views within and without the area (e.g. to and from Dartmoor National Park). | The high level of development to be delivered over the plan period means that landscape setting may be threatened by inappropriate development and masterplanning. Impacts may also be influenced by climate change.<br><br>A coordinated strategic approach to development and infrastructure supported through the GESP, presents an opportunity to address areas of poor landscape character as well as protecting higher value areas including the AONBs and |

| Headline issue | Key sustainability issue | Likely Evolution without the GESP |
|---|---|---|
| | | National Parks. This approach is expected to help reduce the potential for degradation of nationally significant landscapes, local landscape character and townscape quality. |
| Recreation | Consideration should be made for the potential adverse impacts increased development may have in terms of recreational pressures on the AONBs and National Parks. Specific impacts are likely to relate mostly to the biodiversity value and landscape quality of these areas. | Areas which are valued for their landscape setting and biodiversity sensitivity are potentially at risk from significant increases in recreational pressures. These pressures are more likely to arise if development is not guided in a more coordinated approach through the GESP which takes account of cumulative effects on these nationally significant landscapes. |
| Social | | |
| House prices | Average house prices within Greater Exeter are high, particularly in relation to low wage levels, although the rate of house price inflation has slowed over recent years. | Without a coordinated strategic approach to development and infrastructure set out through the GESP, there may be some risk of unplanned development in inappropriate locations, particularly where Local Plans are out of date. Good planning through the GESP will enable developers to build homes to meet the need. The NPPF (Housing Delivery and 5-year land supply tests) ensures homes will be delivered where they are not adequately planned for, which is likely to be to the detriment of local policy and mitigation measures. |
| Affordable housing and self-build | There is a shortage of affordable housing across Greater Exeter to meet the overall needs identified. There is demand for self-build but little available supply of sites. | In the absence of the GESP, the Local Plan in each local authority area is still expected to help to ensure housing and affordable housing is delivered. The GESP presents an opportunity to address delivery of both affordable housing and self-build homes to ensure their delivery across the plan area in a more coordinated manner. |
| Deprivation | Social deprivation is an issue for parts of the Greater Exeter area, where poor housing conditions and crime hotspots occur. | The coordinated strategic approach to development and infrastructure supported through the GESP presents opportunities to directly address plan area issues of crime, deprivation and access to services. It is likely that without this type of approach these issues are less likely to be positively addressed, although policies in Local Plans will continue to be in place to try to provide suitable remedies. A coordinated approach will allow cross-boundary issues to be addressed more comprehensively.<br>The patterns of deprivation within the plan area are likely to be in line with existing trends to a certain extent regardless of whether or not the GESP is adopted. Impacts on these issues will be dependent to a large part upon external pressures beyond the scope of the GESP. |
| Ageing Population | Due to a disproportionately high amount of people aged 65 and over, Greater Exeter has an increasing dependent population with resulting health, financial and social care issues. | The GESP can help to ensure the built environment helps to address the changing needs of the population in line within an increased average age. A coordinated approach to service provision and design of new development can help to ensure that improvement occurs in life expectancy (and quality of life) as well as health indicators.<br><br>It is unlikely that the GESP can greatly affect the plan area's age demographic in the short term. However, by requiring a coordinated approach to development |

| Headline issue | Key sustainability issue | Likely Evolution without the GESP |
|---|---|---|
| | | which provides accessible education opportunities, housing provision and facilitates high quality employment growth, younger people may be encouraged to stay in the area. |
| Open Space | Some locations suffer from a deficiency in access to green infrastructure such as public open space and public rights of way. | The GESP provides opportunities to address strategic open space and other recreational space deficiencies, for example through large scale allocations. However, Local Plans (and the duty to cooperate) may equally address these issues. |
| Economic | | |
| Low average wages | Wages within Greater Exeter are 11% lower than UK average wages. | The GESP provides an opportunity to achieve improvements in productivity, GVA, uplift in wages, retention of skilled workers, provision of suitable employment land, access to employment opportunities in the wider plan area and diversification of job offer across the plan area. Without the GESP, a less coordinated approach could result in new employment and commercial infrastructure not being provided in a manner which best addresses local circumstances, and limited opportunities for the improvements described above. |
| Low average productivity/GVA | There is low productivity/GVA across Greater Exeter, which falls significantly short of National GVA average. | |
| Lack of high skilled employment opportunities | Higher paid employment sectors are underrepresented within Greater Exeter. The area loses a high proportion of graduates. | |
| Limited delivery of employment land | Very little employment land within Greater Exeter has been delivered other than sites which have been delivered with the assistance of significant grant funding. | |
| Job types | The economy of the Greater Exeter area is heavily focused on Exeter city and its urban fringe, where the highest paid jobs and opportunities for skilled professionals are located. | |
| Transport, accessibility and connectivity | High car dependency and distances travelled is an expensive burden on many households and it is causing congestion problems on parts of our road network. | Increased traffic as a result of growth supported in the plan area is likely to exacerbate issues of congestion as well as air pollution and greenhouse gas emissions. The GESP will help to facilitate the implementation of transport improvements through a coordinated and strategic approach which will facilitate the level of growth needed.<br><br>While the local authorities' Local Plans would continue to help to mitigate some of these adverse impacts, the GESP presents the opportunity to help promote modal shift through the pattern of growth supported and the delivery of new sustainable transport infrastructure, including promotion of active travel. |

# 4 Sustainability Appraisal Findings for the Policy Options

4.1 This chapter presents the SA findings for the policy options that have been considered for the GESP. The appraisal of the vision and priorities for the plan area are presented first, along with the cross-cutting policy on sustainable development, followed by the strategic options for the level of new housing to be provided and the spatial development strategy. The proposed spatial development strategy set out in the consultation document has then been appraised, followed by the remaining policy options in the order they are presented in the GESP Draft Policies and Site Options Consultation document (September 2020). The focus of the GESP is the allocation of strategic sites. While the NPPF requires that at least 10% of the housing requirement for a local authority area should be provided on smaller sites (no larger than 1ha), Local Plans which sit below the GESP will address the remaining housing including the need for smaller sites.

4.2 The detailed appraisal matrices for the strategic options for the level of new housing and alternative scenarios for the spatial development strategy, as well as the spatial development strategy proposed in the consultation document, are presented in **Appendix 4**.

4.3 The appraisal of the vision and priorities and the policies for the plan area have been presented in this chapter only alongside the reasonable alternatives considered for each policy (i.e. there is not an appendix setting out more detailed SA matrices). The policy options are grouped together by the relevant topic heading which each of the individual chapters in the GESP Draft Policies and Site Options Consultation document seek to address.

4.4 The reasons for taking forward proposed policy options in the GESP Draft Policies and Site Options Consultation document and discounting other options are presented in **Table A7.2** in **Appendix 7**.

## Vision and Priorities and Sustainable Development Policy

4.5 The Draft Policies and Site Options Consultation document presents the vision for Greater Exeter as it would be at the end of the plan period (2040). The vision for the plan area sets out aspirations for Greater Exeter for the period up to 2040 and is divided into three main sections. These are the role of the plan as a strategic document that concentrates on big issues over the long term; detailing a pen portrait of the kind of place Greater Exeter aspires to be as a networked city region that is prosperous, inclusive and on a path to being a low carbon economy; and nine key priorities that provide the direction and thrust for achieving this vision. The nine key priorities to deliver the vision include achieving 'greater' efficiency (carbon neutrality by 2040), ambition, innovation, connectivity, prosperity, housing delivery, biodiversity, education and wellbeing.

4.6 Considering the interrelationship between the plan vison and the priorities which will support its achievement, the vision and nine priorities have been subject to appraisal together as presented in **The first** policy in the GESP is an overarching policy relating to sustainable development and therefore the likely effects of that policy are also shown in **Table 4.1** and summarised below.

4.7 Table 4.**1** below and the summary text which follows. The first policy in the GESP is an overarching policy relating to sustainable development and therefore the likely effects of that policy are also shown in **Table 4.1** and summarised below.

**Table 4.1 Summary of SA scores for the Vision and Priorities of the GESP and Policy GESP1**

| SA Objective | Vision and priorities | GESP 1: Sustainable Development |
|---|---|---|
| SA1: Natural environment | + | + |
| SA2: Landscape | + | + |
| SA3: Historic and built environment | + | + |
| SA4: Climate change mitigation | ++ | 0 |
| SA5: Climate change adaption | +? | 0 |
| SA6: Land resources | +? | + |
| SA7: Water resources | +? | + |
| SA8: Homes | ++ | + |
| SA9: Health | + | + |
| SA10: Wellbeing | ++ | + |
| SA11: Access to services | ++ | + |
| SA12: Jobs and local economy | ++ | + |
| SA13: City and town centres | + | + |
| SA14: Connectivity and transport | ++ | 0 |

### Greater Exeter Vision, Priorities and GESP 1: Sustainable Development

4.8 The vision and priorities of the GESP are expected to have largely positive effects in relation to all of the SA objectives considering their high-level nature and given that they set out an aspirational vision for the plan area. The vision and priorities are furthermore set out not to be overly onerous or prescriptive as to result in adverse impacts and many of the effects identified are unlikely to be significant. Additionally, GESP 1 provides overarching principles related to sustainable development to filter down to Local and Neighbourhood Plan level. Due to the non-specific, but high level and aspirational objectives of this policy, minor positive effects are expected in relation to the majority of the SA objectives.

4.9 The vision for the plan area states that, by 2040, there will be a reliable, sophisticated and sustainable transport system within Greater Exeter. 'Greater connectivity' is also one of the priorities outlined to support the achievement of the vision. Dependency on private cars is currently an issue within Greater Exeter that contributes to congestion problems on many of the areas' main roads. As such, the vision is expected to have significant positive effects in relation to SA objective 14: **connectivity and transport**. As part of the vision of the plan area being supported by a functional sustainable transport system, Greater Exeter will be an area which is accessible and linked. Minor positive effects are also expected in relation to SA objective 9: **health** as supporting an increasingly linked plan area could result in increased uptake of active travel and result in greater levels of physical activity among residents in Greater Exeter. The delivery of an efficient transport network is likely to help promote other strands of the vision including reducing carbon emissions and the promotion of an economy which is productive, where high quality jobs are accessible and growing academic and skills base are used to promote 'smart growth'. The efficiency priority of achieving carbon neutrality by 2040 is likely to contribute to the vision's statement of achieving a low carbon economy. The promotion of delivering a sustainable

transport network is also likely to help contribute to achieving lower carbon emissions across the plan area and therefore significant positive effects are expected for the vision and priorities in relation to SA objective 4: **climate change mitigation**. Currently, the GVA of Greater Exeter is below the national average, high paid employment sectors are underrepresented within Greater Exeter and wages are lower than the UK average. As such, the vision and priorities are also expected to have significant positive effects in relation to SA objective 12: **jobs and local economy**.

4.10 Significant positive effects are also expected for the vision and priorities in relation to SA objective 10: **wellbeing** as the potential boost to the local economy is likely to contribute to increased investment to the area, and there is a specific priority relating to improving wellbeing through healthy active communities. Furthermore the vision and priorities are supportive of the delivery of high quality housing to meet local needs, which is likely to help address the issue of housing affordability and existing poor housing conditions which exist in some areas of Greater Exeter. These elements of the GESP are therefore likely to help address indicators of deprivation.

4.11 Following on from this, strong emphasis is set out through the vision and priorities for the creation of distinct communities where high quality homes are provided in the right places. The GESP presents an opportunity to address the issue of affordable housing, which there is an identified shortage across Greater Exeter. This is largely due to average house prices in Greater Exeter being between eight and ten times the area's average income. This ratio is substantially higher than the national ratio where average house prices are seven times the average income. As such, the vision and priorities are expected to have significant positive effects in relation to SA objective 8: **homes**. In combination with housing delivery, the vision and priorities which set out support for healthy active communities with a range of services and facilities and greater opportunities for education to attract and retain a world class workforce are likely to result in improved access to high quality educational facilities in the plan area. As such, the vision and priorities are expected to have significant positive effects in relation to SA objective 11: **access to services and facilities**. The statement made in the priorities that new communities will be 'gigabit' ready is also likely to help contribute positively to this SA objective due to the potential for Greater Exeter to have full access to a high speed digital network. Minor positive effects are also expected in relation to SA objective 13: **city and town centres** as the Vision's commitment to housing delivery and education has the potential to increase the vitality and viability of existing city and town centres in Greater Exeter by increasing the overall expenditure within them.

4.12 Additional and less direct positive impacts are expected to result considering the statement included in the vision which relates to the celebration of the area's beauty and ensuring that there is good access to greenspaces. Considering this strand of the vision minor positive effects are expected in relation to SA objective 1: **natural environment,** SA objective 2: **landscape** and SA objective 3: **historic and built environment**. The landscape character in Greater Exeter is defined in part by the presence of a number of protected landscapes and a rich legacy of heritage assets. It is likely that the identified section of the vision will support the conservation and enhancement of these features. The prioritisation of rebuilding biodiversity as part of the vision will be of benefit in terms of ensuring that developments proposed across the area do not have adverse impacts on protected habitats and instead provide opportunities for the achievement of net gains in biodiversity.

4.13 For SA objective 6: **land resources** and SA objective 7: **water resources**, uncertain minor positive effects are expected. While the vision does not make specific reference to preservation of key land and water resources, the commitments made in relation to protecting the beauty of the area are also likely to result in preservation and enhancement of key assets associated with these SA objectives. The statement that the 'city-town-country-coast environment' will be utilised fully suggests that the preservation and enhancement of key land and water resources will underpin decisions made in the GESP. Uncertain minor positive effects are also expected in relation to SA objective 5: **climate change adaptation**. There are no direct statements suggesting new and existing communities will be made resilient to potential flood risks in the future. However, the vision's intention includes a commitment to protect the natural environment which is likely to provide protection to landscape features that provide flood mitigation.

## Strategy Alternatives

### Strategic options for the level of housing development

4.14 This section summarises the SA findings for the strategic options relating to the overall level of housing provision to be made for the plan period. Three options were considered in relation to the number of new homes to be provided in Greater Exeter up to 2040.

4.15 **Table 4.2** below summarises the likely effects relating to each growth option. The effects are summarised below this table with more detail provided in the appraisal matrix in **Appendix 4**.

**Table 4.2: Summary of SA scores for level of housing growth strategy options**

| Strategy options for the level of housing development |
|---|
| ***Option 1:*** Minimum provision (total homes - 53,260; additional homes - 19,870)<br>***Option 2:*** Mid-range (total homes - 58,586; additional homes - 25,196)<br>***Option 3:*** Transformational (total homes - 66,575; additional homes - 33,185) |

| SA Objective | Option 1 | Option 2 | Option 3 |
|---|---|---|---|
| SA1: Natural environment | - | -- | -- |
| SA2: Landscape | -? | --? | --? |
| SA3: Historic and built environment | -? | --? | --? |
| SA4: Climate mitigation | -? | +/-? | +/--? |
| SA5: Climate change adaption | - | - | - |
| SA6: Land resources | -- | -- | -- |
| SA7: Water resources | -- | -- | -- |
| SA8: Homes | + | ++ | ++ |
| SA9: Health | ? | ? | ? |
| SA10: Wellbeing | +/-? | ++/-? | ++/--? |
| SA11: Access to services | ? | ? | ? |
| SA12: Jobs and local economy | + | ++ | ++ |
| SA13: City and town centres | ? | ? | ? |
| SA14: Connectivity and transport | - | +?/- | +?/-- |

*Description of effects of options for levels of housing growth in relation to SA objectives*

4.16 The level of growth supported by all three housing provision options is likely to give rise to adverse effects in relation to SA objectives which relate to the protection of the environment. The greater land take required through Option 2 and Option 3, which is likely to include a higher amount of greenfield land, is expected to have significant negative effects in relation to SA objective 1: **natural environment**, SA objective 2: **landscape** and SA objective 3: **historic and built environment** for Options 2 and 3. The lower level of growth supported through Option 1 could prevent the need for a wider distribution of development to areas of sensitivity, as well as potentially reducing the number of greenfield sites required to support the growth strategy. As

such Option 1 could reduce adverse effects on habitat loss, fragmentation and disturbance, as well as landscape character and the setting of historic assets in the plan area. The negative effect for Option 1 in relation to these three SA objectives is therefore likely to be minor. The negative effect recorded in relation to SA objective 2 and 3 for all options is uncertain, given that the design of new development will play a significant role in terms of providing opportunities for mitigation of effects and enhancement of biodiversity, landscape and historic/built environment, and design proposals are not set out at this stage.

4.17 While the land take required through Options 2 and 3 would be higher than Option 1, the finite number of brownfield sites in the GESP area is likely to result in a large amount of greenfield being developed through all options. Therefore, a significant negative effect is expected in relation to SA objective 6: **land resources** both in terms of loss of greenfield land generally but also loss of higher value agricultural land. Each option is also likely to result in development occurring alongside water courses which flow into the Exe Estuary. This area has been identified as having particular sensitivities to changes in water quality. A significant negative effect has therefore been recorded for all options in relation to SA objective 7: **water resources**. While it is expected that increases in impermeable surfaces in the plan area as a result of greenfield land take would result in increased flood risk, any change in flood risk in the plan area is likely to be influenced by the location of new development in relation to Flood Zones 2 and 3 as well as Critical Drainage Areas. Considering that development might be sited to avoid these areas given the limited area of Greater Exeter which they cover, the negative effect expected in relation to SA objective 5: **climate change adaption** is likely to be minor.

4.18 Increasing the number of homes over the plan period is expected to result in additional journeys being undertaken on a day to day basis as a result of commuting and a need for residents to access services and facilities. An increased need to travel, particularly by private vehicle is expected to result in adverse impacts in terms of higher levels of greenhouse gas emissions. Effects will be dependent upon the location of new housing development in relation to existing employment opportunities as well as sustainable transport links and services and facilities, although much of the new development should be at a scale large enough to support new service provision and may also help to reduce the need to travel for some residents. However, as the three housing provision options are not spatially specific in terms of where new development will be located, a negative effect is expected in relation to SA objective 4: **climate change mitigation** and SA objective 14: **connectivity and transport** due to the general likely increase in trips and greenhouse gas emissions. The negative effect is likely to be significant for Option 3 considering the significantly higher level of growth supported. The higher levels of growth supported through Options 2 and 3 are likely to provide increased opportunities for securing central government funding to support sustainable transport improvements. The negative effect recorded for these two options in relation to SA objective 4 is therefore combined with a minor positive effect.

4.19 Increased numbers of journeys being undertaken regularly in the plan area could have additional adverse impacts in terms of wellbeing due to air pollution associated with road transport. It is expected that this issue will be influenced by local air quality to some degree. The negative effects for each option are the same as those identified for SA objective 4 and SA objective 14 above. However, all options and particularly Options 2 and 3 would provide new homes in the plan area and directly address the issue of housing affordability. As such the negative effect expected for Option 1 (minor negative), Option 2 (minor negative) and Option 3 (significant negative) in relation to SA objective 10: **wellbeing** is expected to be combined with a positive effect. The higher number of homes supported through Option 2 and Option 3 make this a significant positive effect.

4.20 Improved access to housing in the plan area is also expected to have direct positive effects in relation to SA objective 8: **homes** and more indirectly with regards to SA objective 10: jobs and **economy**. The increased beneficial impact in terms of housing affordability supported through higher growth under Option 2 and Option 3 as well as the likely increase in subsidised homes being developed in the GESP area means that a significant positive effect has been identified for

these options in relation to SA objective 8. Option 1 is expected to have a minor positive effect. Options 2 and 3 are most likely to help promote the objectives of the Local Enterprise Partnership's Productivity Strategy by providing a higher number of new homes in the plan area which might encourage a younger and more skilled workforce to live and work in Greater Exeter. This is in addition to any benefit to local employment opportunities which might occur as a result of new construction in the plan area.

4.21 The spatial distribution of new growth will have the most influence in terms of residents' access to services and facilities including those relating to health and town centre uses. None of the housing growth options address the spatial distribution of growth in the plan area and therefore an uncertain effect has been recorded in relation to SA objective 9: **health**, 11: **access to services** and 13: **city and town centres**.

### Distribution scenarios

4.22 This section summarises the SA findings for the seven distribution scenarios considered in relation to new growth to be provided in Greater Exeter up to 2040.

4.23 **Table 4.3** below summarises the likely effects relating to each scenario. The effects are summarised below this table with more detail provided in the appraisal matrix in **Appendix 4**.

**Table 4.3: Summary of SA scores for the distribution scenarios considered**

| Strategic options for the distribution of new development |
|---|
| ***Scenario 1:*** Proportionate growth of all settlements in the settlement hierarchy |
| ***Scenario 2:*** Exeter and major town urban intensification |
| ***Scenario 3:*** Mainly rural distribution |
| ***Scenario 4:*** Public transport infrastructure corridors and hubs |
| ***Scenario 5:*** Concentrate on areas with the least affordable housing |
| ***Scenario 6:*** Locate development away from international wildlife sites |
| ***Scenario 7:*** Market-led |

| | Scenarios | | | | | | |
|---|---|---|---|---|---|---|---|
| **SA Objective** | **1** | **2** | **3** | **4** | **5** | **6** | **7** |
| **SA1: Natural environment** | +/-- | +/-- | -- | +/-- | +/-- | ++/- | +/-- |
| **SA2: Landscape** | -? | -? | --? | --? | --? | --? | --? |
| **SA3: Historic and built environment** | --? | +/--? | --? | --? | --? | --? | --? |
| **SA4: Climate change mitigation** | +/- | ++ | -- | ++ | +/- | +/-- | ++/- |
| **SA5: Climate change adaption** | - | - | - | - | - | - | -- |
| **SA6: Land resources** | +/- | +/-- | -- | +/-- | +/-- | +/-- | -- |
| **SA7: Water resources** | -- | -- | -- | -- | -- | - | -- |
| **SA8: Homes** | + | ++/- | +/-- | + | ++ | -- | ++/- |
| **SA9: Health** | ++/- | ++/- | +/-- | +/- | +/- | +/-- | ++/- |
| **SA10: Wellbeing** | +/- | ++/- | +/-- | +/- | ++/- | +/-- | ++/-- |
| **SA11: Access to services** | ++/- | ++/- | +/-- | +/- | +/- | +/-- | ++/- |
| **SA12: Jobs and local economy** | +/- | ++/- | --? | + | +/- | +/-- | ++/- |
| **SA13: City and town centres** | ++/- | ++ | -- | +/- | +/- | +/-- | ++/-- |
| **SA14: Connectivity and transport** | +/- | ++/-? | -- | ++ | +/- | +/-- | ++/- |

*Description of effects of distribution scenarios in relation to SA objectives*

4.24 All seven scenarios considered would distribute a high level of development across the GESP area over the plan period which is likely to result in adverse impacts in terms of safeguarding environmental assets. A significant negative effect has been recorded in relation to all scenarios in terms of SA objective 1: **natural environment**, except for Scenario 6 given that this scenario specifically seeks to prevent negative impacts on the international wildlife sites in the plan area, therefore it is likely to have significant positive effect instead. However, this scenario is still likely to result in adverse impacts on local biodiversity designations given that the focus of the distribution strategy is to protect international wildlife sites.

4.25 Scenarios 1, 2, 4, 5 and 7 have greater potential to promote opportunities for green infrastructure provision at locations which are already developed, therefore they are likely to have minor positive effects in relation to SA objective 1 as well as the negative effects identified. The

relatively high level of growth to be provided at each location being considered for Scenario 7 could support the incorporation of extensive amounts green infrastructure across numerous locations in the plan area. These scenarios are also expected to result in the majority of new growth being provided at locations which are not in close proximity to the international biodiversity designations in the plan area. Scenario 3 is not expected to result in a beneficial impact in terms of this SA objective given that development is to be distributed mostly to rural locations, which is likely to present a reduced number of opportunities to incorporate green infrastructure at more developed locations.

4.26 It is likely that the large amount of greenfield land take required through each scenario considered would have adverse impacts in terms of landscape. The negative effect expected in relation to SA objective 2: **landscape** is likely to be significant for Scenarios 3, 4, 5 and 6 considering that these scenarios include high amounts of growth away from the larger settlements of the plan area which may affect the rural character of the undeveloped locations. Scenario 3 is likely to result in particularly adverse effects in these terms considering the wider distribution of to rural areas supported through this scenario. While Scenarios 1 and 2 could result in adverse impacts on the setting of the Coastal Protection Areas to the south and south west of the plan area they are considered less likely to result in effects on the respective character of the AONBs or National Parks considering the urban focus of growth through these scenarios.

4.27 Scenario 7 would not result the delivery of a high proportion of development at the smaller settlements in the GESP area. However, this scenario would include development almost entirely at greenfield sites which presently contribute to the landscape setting of the plan area. Furthermore, this scenario is also likely to impact the existing character of the East Devon AONB, Blackdown Hills AONB and Dartmoor National considering that areas for development have been identified within or at the edges of these designations. Therefore, a significant negative effect is also expected for Scenario 7 in relation to SA objective 2. All effects recorded in relation to landscape are uncertain given that they will be influenced to a large extent by the design and specific layouts of new development.

4.28 Focussing growth at urban areas of Greater Exeter may result in potential adverse impacts on the setting of a high number of heritage assets such as conservation areas and listed buildings considering that they are mostly concentrated at settlements such as the city of Exeter, the area towards the Exe estuary by Newton Abbot and Teignmouth, as well as Tiverton, Sidmouth, Exmouth and Crediton. Some heritage assets including scheduled monuments and registered parks and gardens such as Manhead Park and Ugbrooke Park are located in more rural locations and development distributed in this manner through Scenario 3 is likely to have adverse impacts in this regard. A significant negative effect is therefore recorded in relation to all scenarios for SA objective 3: **built and historic environment**. The negative effect expected in relation to Scenario 2 is combined with a minor positive effect given that distributing most growth to the largest settlements is likely to result in the most opportunities to make use of brownfield land which may be to the benefit of the character of these locations dependent upon the manner in which new development is delivered. Considering the significant influence that the design of new development will have in terms of the built environment all effects recorded are uncertain.

4.29 The potential influence that the distribution of growth scenarios have on increased numbers of journeys in the plan area is likely to affect the level of greenhouse gas emissions, wellbeing in terms of air quality and connectivity in Greater Exeter. It is expected that providing new growth at locations which benefit from the strongest service provision or sustainable transport links (Scenarios 2, 4 and to a lesser extent 7) would have the most beneficial impacts and as such positive effects have been recorded in relation to SA objective 4: **climate change mitigation**, SA objective 10: **wellbeing** and SA objective 14: **connectivity and transport**.

4.30 The beneficial effects are mostly expected to be significant for these scenarios, the exception being Scenario 4 in relation to SA objective 10; while this approach is expected to help prevent any significant increase in the need to travel across the plan area it could result in new growth occurring within AQMAs at Exeter, Crediton, Cullompton, Teignmouth and Newton Abbot thereby

aggravating existing air quality issues. As such a mixed minor positive and minor negative effect is expected in relation to SA objective 10 for Scenario 4. For Scenario 7 the significant positive effect expected in relation to SA objective 10 is likely to be combined with a significant negative effect. This scenario would result in the delivery of two new settlements (to the east of Exeter and to the east of Cullompton) of a size which could be delivered to be relatively self-contained. Limited potential for high levels of outward travel and associated greenhouse gas emissions would therefore result. However, the new settlement to the east of Cullompton could intensify existing air quality issues at the nearby AQMA and the new settlement to the east of Exeter could result in some residents being affected by air pollution considering the close proximity of Exeter Airport.

4.31 By distributing growth to areas which are less accessible and failing to provide housing in areas where the greatest issues of housing affordability are currently identified, Scenarios 3 and 6 are likely to result in a significant negative effect in relation to SA objective 4, SA objective 10 and SA objective 14. Scenario 3, which would provide more development in the rural areas of Greater Exeter, is likely to result in most adverse impacts in terms of increased need to travel. The wider distribution of growth is expected to prevent the critical mass being achieved at each strategic development site, which might otherwise help deliver new services and facilities. This approach is, however, likely to address rural deprivation in terms of delivering new homes at such locations meaning that the significant negative effect expected for this scenario in relation to SA objective 10 is likely to be combined with a minor positive effect.

4.32 Despite the differing patterns of distribution supported through each scenario, similar negative effects are expected in relation to SA objective 5: **climate change adaption**. The scenarios which promote a higher level of growth at the more urban locations (most notably 1 and 2) are likely to provide a higher number of opportunities for use of brownfield land and thereby less likely to increase the area of impermeable surfaces. Scenario 7 would locate new development almost exclusively at relatively large greenfield sites as a result of their viability for developers. This scenario is considered the most likely to result in a significant increase in impermeable surfaces in the GESP area to the detriment of flood risk. Flood risk in the plan area will also be affected by the relationship of new growth to Flood Zones 2 and 3 as well as Critical Drainage Areas. It is likely that through most scenarios, development can be located to avoid these higher risk areas. Therefore, the negative effect expected for the majority of the scenarios is likely to be minor. The negative effect for Scenario 7 is expected to be significant as this scenario would result in the highest increase in impermeable surfaces in the plan area and would also result in a new settlement to the east of Cullompton which is likely to be constrained by the area of higher flood risk surrounding the River Culm. Areas towards Axminster, Feniton and Dawlish which would experience growth through this scenario are also within Critical Drainage Areas.

4.33 Promoting growth at the more urban locations of the plan area (most notably through Scenarios 1 and 2) is expected to result in increased opportunities for the re-use of brownfield land. As such a minor positive effect has been recorded in relation to SA objective 6: **land resources**. The approach set out through Scenario 2 may result in a high level of development occurring in areas which include minerals safeguarding areas and higher value agricultural soils, including by Exeter, Newton Abbot and Teignmouth as well as by Cullompton and Tiverton. As such the negative effect expected for this scenario is likely to be significant. Significant negative effects are also expected in relation to Scenarios 3, 4, 5 and 6 for this SA objective. As Scenario 3 would result in more development at the more rural locations of the plan area a significant negative effect alone is expected for this approach. Scenario 7 would result in development of sites that are almost exclusively greenfield, including at the two new settlements to the east of Exeter and to the east of Cullompton. The areas identified for these two new settlements also include substantial areas of higher value agricultural soils. A significant negative effect alone is therefore expected in relation to SA objective 6 for this scenario. This is in contrast to the mixed minor positive and significant negative effect expected for Scenarios 4, 5 and 6 as less rural growth and potentially less greenfield land take would result through these scenarios.

4.34 It is expected that all scenarios have the potential to have adverse impacts on water quality in the plan area as a result of construction and increased levels of human activities following delivery of

new development. The high levels of growth supported through all scenarios are expected to result in some level of growth occurring in close proximity to the Exe Estuary at which particular sensitivities to water pollution have been identified. Where development would not occur at the Exe Estuary, development is likely to occur at water courses which flow into this river. The exception to this is Scenario 6 which has been specifically set out to minimise the potential for adverse impacts on the international biodiversity designations in the plan area, including the Exe Estuary SAC. Through this scenario most of the new development would occur to the north of the plan area away from the Exe Estuary. As such all scenarios are expected to have a significant negative effect in relation to SA objective 7: **water quality**, apart from Scenario 6 which is likely to have a minor negative effect in relation to this SA objective.

4.35 The majority of the scenarios considered are likely to have beneficial effects in terms of housing delivery and improving the affordability of housing in the plan area. The exception to this is Scenario 6, which seeks to ensure the protection of international biodiversity sites in the plan area; this could result in development locations which would be out of step with market demand. Housing delivery may therefore not be feasible in some of the areas at which it is to be delivered through this scenario. Considering that this scenario could result in the housing need for the plan area not being met, a significant negative effect is expected in relation to SA objective 8: **homes**.

4.36 Scenario 3 would help to address issues of housing affordability at rural locations, but would not address this issue at areas of the greatest need in the larger settlements such as Exeter, Newton Abbot and Teignmouth and therefore an overall mixed minor positive and significant negative effect is expected in relation to SA objective 8. Scenarios 2 and 5 are expected to have a significant positive effect in relation to this SA objective because they would provide new homes in areas where greatest need and affordability issues have been identified in urban areas and could result in development where demand is highest thereby meaning viability might be more easily overcome. Scenario 2 may result in growth being focussed at a smaller number of larger sites which could positively affect viability but may not result in faster build out rates meaning that the positive effect expected in relation this SA objective is combined with a minor negative effect.

4.37 It is likely that Scenario 7 would have benefits in terms supporting some faster delivery rates of housing in higher value more rural areas. The spatial distribution set out through this scenario would also align with areas most affected by housing affordability issues, but only in part. The delivery of new homes almost exclusively on relatively large greenfield sites may support increased opportunities for the delivery of affordable homes, considering the reduced potential for viability issues to result. It is expected that this scenario would have a mixed significant positive and minor negative effect in relation to SA objective 8. Scenarios 1 and 4 would result in similar patterns of growth to Scenario 2 but would focus development towards the largest settlements to a lesser degree, thereby achieving a more dispersed pattern of growth. As such, affordability issues at Exeter in particular would be less directly addressed but issues of slower build out rates are more likely to be avoided. A minor positive effect in relation to SA objective 8 is therefore expected for Scenarios 1 and 4.

4.38 The level of access to services, facilities and employment opportunities as well as town centre locations, which each scenario provides is likely to be related to some degree. This includes services and facilities such as GP surgeries and hospitals as well areas of open space and recreation facilities, which will help to promote physical and mental health for residents in the plan area. Shorter travel distances to such services and areas as well as to accessibility of sustainable transport links are also likely to encourage the uptake of active modes of transport and beneficial effects for the SA objectives relating to these issues.

4.39 It is expected that Scenario 3 would have a significant negative effect in relation to SA objective 9: **health**, SA objective 11: **access to services**, SA objective 12: **jobs and local economy** and SA objective 13: **city and town centres**. Allowing for a more dispersed distribution and more growth at rural parts of the plan area is likely to result in a higher number of residents having limited access to services and facilities (including healthcare provision), as well as employment

opportunities and town centre locations. This scenario may allow for the delivery of some new service provision at rural locations dependent upon whether new growth is provided at a scale large enough to support such provision. As such the significant negative effect expected in relation to SA objective 9 and SA objective 11 is likely to be combined with a minor positive effect.

4.40 Scenario 6 is expected to have similarly adverse impacts in relation to SA objectives 9, 11, 12 and 13 because development would not be focussed towards the largest settlements where more services, facilities and employment opportunities are available. As this scenario would include a higher level of growth at smaller, northern settlements of the plan area (and not distribute the same level of growth to the more rural areas of the Greater Exeter when compared to Scenario 3) the significant negative effect is mixed with a minor positive effect for these SA objectives. These northern settlements would provide a proportion of new residents with access to some services and facilities, employment opportunities and town centres; albeit that the level of provision would be reduced compared to that allowed for at the largest settlements of the plan area. Scenario 1 and Scenario 2 would have mostly significant positive effects across these four SA objectives, as Scenario 2 would see more development focussed towards the largest settlements of the plan area and Scenario 1 would provide proportionate growth at all settlements of the plan area. However, Scenario 1 is unlikely to make as much use of existing services, facilities and employment opportunities in the larger settlements in comparison to Scenario 2, therefore the positive effect in relation to SA objective 12: jobs and local economy is expected to be minor. The significant positive effect expected for Scenario 2 in relation to SA objective 13: city and town centres is likely to be combined with a minor negative effect. A minor negative effect has been identified for Scenario 2 in relation to this SA objective because new residents at smaller settlements of Greater Exeter would have less good access to larger centres in the plan area.

4.41 Scenarios 4 and 5 would deliver the majority of growth along transport corridors in the plan area and at locations that would address affordability issues in Greater Exeter respectively. These approaches are expected to result in some growth at the rural areas as well as at the larger settlements of Greater Exeter. Therefore, new residents at the larger settlements would have a good level of access to services and facilities as well as employment opportunities and town and city centres, while those in the rural areas would have reduced access to these provisions. A mixed minor positive and minor negative effect has therefore been recorded in relation to SA objective 9, SA objective 11, SA objective 12 and SA objective 13 for these two scenarios. The exception to this is SA objective 12: jobs and local economy for Scenario 4. It is expected that this approach would provide many residents with easy access to sustainable transport links which provide access to employment opportunities. Furthermore, these locations are also likely to benefit from access to the strategic road network meaning that this scenario may encourage inward economic investment in the plan area. As such a minor positive effect alone is expected for Scenario 4 in relation to SA objective 12.

4.42 The distribution of development to be delivered through Scenario 7 would see many residents having a good level of access to the larger centres of the GESP area, as well as the services and facilities and employment opportunities there. However, some residents would be located at more isolated locations along the A30 and at the new settlement to be delivered at Bicton within the East Devon AONB. A mixed significant positive and minor negative effect is therefore expected for this scenario in relation to SA objective 9: health, SA objective 11: access to services and SA objective 12: jobs and local economy. The delivery of the two new settlements (to the east of Exeter and to the east of Cullompton) would provide the critical mass to support new service provision for new and existing residents and could also incorporate new high-quality employment land to attract inward investment. The delivery of these new settlements could, however, have adverse impacts on the viability of the nearby existing town centre at Cullompton and district and local centres in Exeter dependent upon their design. The relatively isolated location and smaller size of the new settlement to be delivered at Bicton may mean that it does not have the critical mass to support the required service provision and ensure its long term viability. Therefore, the significant positive effect expected for Scenario 7 in relation to SA objective 13: town centres is expected to be combined with a significant negative effect.

### Proposed Spatial Development Strategy

4.43 The Draft Policies and Site Options Consultation document proposes a spatial development strategy which takes forward the key elements of distribution scenarios 2, 4 and 7 above, while allowing for significant locally determined flexibility for local authorities to apply through their own local plans. The detailed SA matrix for the proposed spatial development strategy can be found in **Appendix 4** and the findings are summarised below.

**Table 4.4 Summary of SA scores for the proposed spatial development strategy**

| SA Objective | Proposed spatial development strategy |
|---|---|
| SA1: Natural environment | +/--? |
| SA2: Landscape | -? |
| SA3: Historic and built environment | +/--? |
| SA4: Climate change mitigation | ++ |
| SA5: Climate change adaption | - |
| SA6: Land resources | +/-- |
| SA7: Water resources | -- |
| SA8: Homes | ++/- |
| SA9: Health | ++ |
| SA10: Wellbeing | ++/- |
| SA11: Access to services | ++/- |
| SA12: Jobs and local economy | ++/- |
| SA13: City and town centres | ++ |
| SA14: Connectivity and transport | ++ |

4.44 By directing most development to the larger urban centres, the spatial development strategy is likely to have a range of positive effects on the social and economic SA objectives in particular. A sufficient number of homes should be delivered to meet demand, and a high number of residents will have good levels of access to the employment opportunities, services and facilities in those areas, particularly because development outside of the central Exeter area is to be focussed along the rail routes extending out from Exeter. There should also be good opportunities for walking and cycling, due to the proximity of most development to the main towns, and access to recreation opportunities should be generally good. Significant positive effects are therefore likely in relation to SA objectives 8: **homes**, 9: **health**, 10: **wellbeing**, 11: **access to services**, 12: **jobs and local economy**, 13: **city and town centres** and 14: **connectivity and transport**. A significant positive effect is also likely in relation to SA objective 4: **climate change mitigation** due to the focus of the spatial development strategy on reducing the need to travel long distances, particularly by car.

4.45 However, the significant positive effects identified for SA objectives 8, 10, 11 and 12 are mixed with a minor negative effect in all cases. For SA objective 8: **homes** this is due to the lower level of growth in rural areas meaning that housing affordability in those areas may not be well addressed. The limited growth in rural areas also accounts for the minor negative effects identified in relation to SA objective 11: **access to services**, as limited growth in rural areas means that little would be done to address rural service provision, and 12: **jobs and local economy** as opportunities for developing the rural economy may be limited. The potential minor negative effect against SA objective 10: **wellbeing** is due to the fact that the spatial development strategy focuses development near to locations that have declared AQMAs and so development could compound air quality issues in those locations.

4.46 Delivering a large amount of new development at the main towns within the GESP area will help to maximise opportunities for developing brownfield sites and therefore help to mitigate the impacts of large-scale new development on the environmental SA objectives; however most development will still occur on greenfield sites. Development will be steered towards areas which are known to have sensitivities relating to biodiversity, the historic environment, soils and water quality. Potential significant negative effects are therefore identified for SA objectives 1: **natural environment**, 3: **historic and built environment**, 6: **land resources** and 7: **water resources**. In several cases these effects are mixed with minor positive effects, due to the benefits associated with there being some potential for brownfield land use and because development being steered largely away from more rural areas should help to minimise effects in those areas. The potential negative effects of development are in several cases uncertain as they will depend to a great extent on the specific sites allocated for development, which are being subject to SA separately. It may also be possible to mitigate effects, in part through the implementation of policies in the GESP and within the authorities' local plans.

## Climate Emergency

4.47 In line with national policy requirements and the recent "climate emergency"declarations of Devon County Council and all the Greater Exeter Councils, the GESP seeks to ensure that the plan area transitions to a net-zero carbon future. This is seen as a key driver for the various policy elements included in the plan. As such, Chapter 5 of the GESP proposes that by 2040 the plan area will achieve net-zero carbon emissions. To help contribute to this overall aim the chapter contains seven policies that addresses the achievement of low carbon development through design and construction measures, as well as low carbon energy production and storage measures.

4.48 **Table 4.5** at the end of this section summarises the likely effects relating to the Proposed Policies and reasonable alternatives considered for inclusion in this section of the GESP, with explanatory text provided below. The justification for the Proposed Policies and reasonable alternatives considered is provided in **Appendix 7**.

### GESP 2: Climate Emergency

4.49 This section summarises the SA findings for the approach the GESP should take in relation to meeting the overarching carbon reduction target. The Proposed Policy, GESP 2, sets out to achieve net-zero carbon emissions within Greater Exeter by 2040, which is in accordance with the Climate Change Act target for carbon reduction. Two reasonable alternatives were considered in relation to this issue, which are a less ambitious target (i.e. less than net-zero reduction) (RA-1) or a more ambitious target (i.e. achieving net-zero sooner) (RA-2).

4.50 For all policy options considered, negligible effects are expected in relation to the majority of SA objectives due to their focus being limited to achieving a reduction in carbon emissions.

4.51 For the Proposed Policy and RA-2, significant positive effects are expected in relation to SA objective 4: **climate change mitigation**. Carbon reduction targets of net-zero for Greater Exeter by 2040 or sooner are likely to ensure that new infrastructure proposals and development

applications are judged in terms of their contribution to meeting these more substantial targets for lowering carbon emissions. The effects are likely to be minor positive for RA-1 as a lower target is likely to result in less stringent requirements to reduce carbon emissions within Greater Exeter during the plan period and will conflict with the part that the Greater Exeter area needs to play in meeting the UK Climate Change Act. Additionally, carbon reduction targets of net-zero by 2040 or earlier have the potential to result in improved air quality within Greater Exeter during the plan period. Such an approach is likely to result in reduced dependency upon energy from fossil fuel sources as alternative forms of production are encouraged as well as the achievement of more energy efficient buildings which will require reduced energy to operate. As such, for the Proposed Policy and RA-2, minor positive effects are expected in relation to SA objective 10: **wellbeing**. Negligible effects are expected for RA-1 in relation to this SA objective as, with a lower carbon reduction target, the potential for air quality improvements is reduced.

4.52 Despite the potential positive impacts that a carbon reduction target of achieving net-zero much sooner than 2040 could have, this target is considered to be potentially unfeasible and has the potential to have adverse impacts on the delivery rate of housing and transport infrastructure. This is due to potentially more stringent regulations on housing design in terms of net-zero targets and transport infrastructure. As such, minor negative effects are expected for RA-2 in relation to SA objective 8: **housing** and SA objective 14: **connectivity and transport**. For the Proposed Policy and RA-1 the minor negative effects for these SA objectives are uncertain. Targets to reach net-zero or reduce carbon emissions in Greater Exeter would still be in place through these options but they would be markedly less stringent. As such, the potential for adverse impacts on the building and transport infrastructure sectors is more of an unknown.

### GESP 3: Net-Zero Carbon Development

4.53 This section summarises the SA findings for the approach the GESP should take in relation to contributing towards the overarching carbon reduction target set out in policy GESP 3. The Proposed Policy, GESP 3, requires all developments constructing new home(s) or non-residential floorspace or change of use to submit a carbon statement. Two reasonable alternatives are considered in relation to this issue which are to include more demanding requirements for carbon statements (RA-1) or for carbon statements to only be required in the case of 'major' developments (RA-2).

4.54 For the Proposed Policy and RA-1, significant positive effects are expected in relation to SA objective 4: **climate change mitigation**. The requirements proposed in the carbon statements include ensuring that developments meet high energy efficiency standards and maximise the proportion of energy from renewable or low carbon sources. It is likely that this approach would make a significant contribution towards Greater Exeter's net-zero targets during the plan period. Additionally, the policy includes a requirement that development proposals should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life Cycle Carbon Assessment, which includes demonstrating action taken to reduce life-cycle carbon emissions. This is likely to ensure long-term success in the net-zero performance of Greater Exeter's new housing stock, beyond the extent of the plan period. Small developments have contributed a significant number of completions across the Greater Exeter area in the past and will likely do so in the future also. Requiring carbon statements for only major developments (RA-2) would mean that this portion of new growth in the plan area could contribute positively to achieving carbon emission targets but that the proportion of new growth from minor developments would not. As such, mixed minor positive and minor negative effects are expected for RA-2 in relation to SA objective 4.

4.55 The use of green infrastructure as supported through the Proposed Policy has the potential to mitigate and possibly enhance effects in relation to the character of the existing landscape and may offer opportunities to promote biodiversity within new developments. As such, minor positive effects are expected for the Proposed Policy and RA-1 in relation to SA objective 1: **natural environment** and SA objective 2: **landscape**. These effects are uncertain given that any impact will be dependent in part upon the design of any green infrastructure which comes forward. The provision of green infrastructure also has the potential to positively address flood risk in the plan area and therefore minor positive effects are also expected in relation to SA objective 5: **climate change adaptation** for the Proposed Policy and RA-1. For RA-2, only

major developments would be required to provide green infrastructure. For this option the effects relating to SA objective 5 are uncertain. Major development would form an unknown but potentially significant proportion of the overall level of development delivered over the plan period. For the Proposed Policy and RA-1, minor positive effects are also expected in relation to SA objective 9: **health** and SA objective 10: **wellbeing.** The overall enhancement of new developments and the provision of green infrastructure is more likely to create healthy communities and may provide opportunities for residents to partake of physical activities. Both policies could also help to increase the proportion of energy which comes from renewable or low carbon source, which may have additional positive impacts in terms of air quality. Additionally, the policy requires that temperature discomfort will be avoided through passive design and solar master planning, which is likely to be of particular benefit to the health and wellbeing of elderly and disabled residents. Negligible effects are expected for RA-2 in relation to this SA objective as there is less potential for the aforementioned benefits where only larger developments are required to submit net-zero carbon statements.

4.56 Although the proposal in RA-1 for higher demands in carbon statements (e.g. all buildings on new developments to deliver in-use energy performance data) may yield positive impacts in relation to net-zero targets, there is potential for a stricter policy to affect the deliverability and viability of new developments, which could result in a reduction in the rate of housing delivery. As such, minor negative effects are expected for RA-1 in relation to SA objective 8: **homes**. However, the effects are uncertain as the rate of housing delivery will ultimately depend on developer decisions, which are unknown at this stage. Conversely, minor positive effects are expected for RA-2 in relation to this SA objective. The more flexible policy suggested in this option could improve the potential viability of smaller housing developments, which could contribute to an increased rate of housing delivery to meet identified needs within Greater Exeter. The effects are also uncertain in this instance considering possible future changes to building regulations and the role developer decisions will play in terms of securing a higher rate of housing delivery.

### GESP 4: Low Carbon Energy

4.57 This section summarises the SA findings for the approach the GESP should take in relation to low carbon energy, renewable energy schemes and smart energy networks. The Proposed Policy, GESP 4, will only permit non-renewable forms of energy generation where there is no prospect of allocated renewable energy facilities being delivered to meet demand and where all reasonable opportunities for using zero or low emissions technology have been taken. The policy requires that proposals should minimise and mitigate impacts on local amenity and the natural and historic environment. Further, proposals are required to demonstrate no likely significant effects on the integrity of Natura 2000 sites. One reasonable alternative is considered in relation to this issue, which is a more prescriptive policy which might entail specific technologies and more specific smart energy development types under specific criteria.

4.58 For the Proposed Policy and the reasonable alternative considered, significant positive effects are expected in relation to SA objective 4: **climate change mitigation**. The suggested provisions for increased renewable and low carbon energy use within Greater Exeter are likely to reduce the reliance on carbon. In particular, the support for smart energy networks through the policy is likely to improve overall energy efficiency within Greater Exeter. Further support for decentralised energy networks provides opportunities for increased energy efficiency due to the potential for reduced energy loss during transmission compared to a large power plant and the ability to use waste heat from energy generation. In the case of the reasonable alternative considered, minor negative effects are also expected in combination with the significant positive effects. While this approach may improve certainty for applicant due to the specific criteria, there is a possibility that innovation and flexibility will be stifled in a fast changing policy area which requires an element of flexibility, particularly in gaining community support in relation to wind development.

4.59 The potential success of renewable energy provision through the Proposed Policy is further strengthened by the suggestion that communities should be encouraged to develop their own low carbon/renewable energy proposals through neighbourhood plans. This may yield benefits to the local economy associated with community ownership, revenue and local jobs. As such, minor

positive effects are expected for the Proposed Policy in relation to SA objective 12: **jobs and local economy**. The reasonable alternative considered could provide more certainty for applicants and therefore their willingness to make application. As such, it is expected that this approach could result in a higher level of investment in this sector and additional job creation. Significant positive effects are therefore expected in relation to SA objective 12 for this option.

4.60 Provision of infrastructure to support renewable energy production (particularly those which are of a larger scale) in Greater Exeter could potentially result in the loss or interruption of land used for agricultural uses and impacts on existing landscape character. Furthermore, there is potential for renewable energy developments to have adverse impacts on the setting of designated heritage assets and important biodiversity and geodiversity sites in the area. However, the Proposed Policy sets out that impacts relating to the natural and historic environment should be avoided, minimised or mitigated. As such, uncertain effects are expected in relation to SA objective 1: **natural environment, SA objective 2: landscape,** SA objective 3: **historic and built environment** and SA objective 6: **land resources** for the Proposed Policy, as there is the potential for adverse effects to be avoided, minimised or mitigated but the locations and design of any renewable energy developments coming forward is unknown. The requirement in the policy that proposals must demonstrate no significant adverse effects on Natura 2000 sites is likely to ensure that proposed locations are less sensitive in terms of natural environment considerations. The effects relating to these SA objectives for the reasonable alternative are also uncertain. A more prescriptive approach could result in the allocation of sites or identification of suitable areas for this type of development. If land which is less sensitive in these regards was identified as part of this approach the potential for adverse effects is likely to be minimised.

### GESP 5: Heat Networks

4.61 This section summarises the SA findings for the approach the GESP should take in relation to the delivery of heat networks in Greater Exeter. The proposed policy, GESP 5, looks to connect and deploy heat networks and utilise waste heat where viable and feasible. In particular, connections will be required where major developments or development proposals that produce more than 1 Megawatt thermal waste heat are located within 1km of a heat network. Additionally, if no heat network exists or is proposed, the policy requires that new heat networks or combined heat and power plants should be deployed where developments propose at least 1,200 homes or 10Ha of commercial development. There are two reasonable alternatives being considered in relation to this issue which are to be more prescriptive (RA-1) by requiring smaller developments to connect to a heat network or to be less prescriptive (RA-2) whereby developments should consider heat networks but are not required to connect to them.

4.62 Significant positive effects are expected for the proposed policy and RA-1 in relation to SA objective 4: **climate change mitigation**. The utilisation of heat networks is likely to result in significantly increased energy efficiency in comparison to individual boilers in developments, which will in turn contribute to reduced carbon emissions. The GESP includes a number of strategic scale housing and employment allocations, which are over the 1,200/10Ha threshold outlined in the policy for connection to heat networks. For RA-2, there is no strict requirement for connection to heat networks and therefore it is likely that less development within the GESP will utilise heat networks with this approach. As such, reduced minor positive effects are expected for RA-2 in relation to SA objective 4.

4.63 Minor negative effects are expected for RA-1 in relation SA objective 8: **housing**. A requirement for smaller developments to also be connected to heat networks could reduce the viability of such housing schemes and therefore result in fewer homes being delivered during the plan period. The reduction in viability is considered likely given that this approach is contrary to the evidence base which recommends the threshold of 1,200 homes or 10ha commercial development for connection to heat networks. However, the negative effects identified are uncertain as the rate of housing delivery will be largely impacted by developer decisions, which are unknown at this stage.

4.64 The delivery of heat networks as part of new developments has the potential to encourage investment into the local economy as well as creating job opportunities. Therefore, minor positive

effects are expected for the proposed policy and RA-1 in relation to SA objective 12: **jobs and local economy** due to the strong level of commitment in these policy approaches to requiring connection to heat networks. The effects are considered to be negligible for RA-2 in relation to this SA objective due to there being less potential for the creation of job opportunities related to heat networks as there is no strict requirement to connect to them.

4.65 Negligible effects are expected for the proposed policy and reasonable alternatives in relation to the majority of SA objectives due to the focus of the policy being energy consumption and resourcing.

### GESP 6: Suitable Areas for Solar PV Development

4.66 This section summarises the SA findings for the approach the GESP should take in relation to identifying suitable areas for solar PV development. The proposed policy, GESP 6, will support proposals for solar photovoltaic (PV) development where they are in areas identified as suitable based upon the GESP evidence base and where there will not be unacceptable impacts upon landscape and heritage assets and Natura 2000 sites. The policy also includes a requirement that installations are removed at the end of their life cycle and the land is restored to its previous use. There is one reasonable alternative being considered in relation to this issue, which is to allocate specific sites for solar PV development (RA-1).

4.67 Significant positive effects are expected for both the proposed policy and RA-1 in relation to SA objective 4: **climate change mitigation** as their implementation would likely deliver increased production of renewable energy within Greater Exeter, and therefore potentially decreased carbon emissions. There are notable merits in both approaches considered. Allocating specific sites for solar PV development, as outlined in RA-1, is likely to improve certainty for applicants and therefore their willingness to make an application. The approach outlined in the proposed policy may provide less certainty on individual sites, but it does provide greater flexibility and potential for a high proportion of the total wind resource across the GESP area to be utilised. Both approaches are expected to have minor positive effects in relation to SA objective 12: **jobs and local economy** due to the potential investment into the area and job opportunities that are likely to arise from renewable energy development.

4.68 Whilst the policy does include provisions to ensure there are not overly detrimental impacts on landscape and heritage assets, there is still potential for some alteration to the intrinsic rural character of Greater Exeter. Adverse impacts on these sensitive receptors will depend on the location of and design of potential solar PV development, which is unknown at this stage. Therefore, uncertain effects are expected for the proposed policy and reasonable alternative in relation to SA objective 2: **landscape** and SA objective 3: **historic environment.** There is also potential for the implementation of solar PV sites to result in adverse impacts on biodiversity through habitat disturbance and fragmentation. The policy does include a requirement that there are no likely significant effects or no adverse effects on the integrity of Natura 2000 sites, which is likely to go some way in ensuring that the most sensitive locations are protected from renewable energy development. However, the potential for development of this scale to result in disturbance is not entirely diminished through the policy's provisions and therefore minor negative effects are expected for the policy in relation to SA objective 1: **natural environment.** The negative effects identified in relation to SA1 are uncertain as the location and scale of such developments is not known.

4.69 Uncertain effects are also expected for both approaches in relation to SA objective 6: **land resources** as it is possible that such developments could result in the loss of high quality agricultural land (until the site is restored to its previous use at the end of life cycle), but the location and scale of sites is unknown at this stage.

4.70 Negligible effects are expected for the policy and reasonable alternative considered in relation to the majority of SA objectives due to the focus on renewable energy.

### GESP 7: Suitable Areas for Onshore Wind Development

4.71 This section summarises the SA findings for the approach the GESP should take in relation to identifying suitable areas for onshore wind development. The proposed policy, GESP7, will support proposals that offer climate change benefits and lie within areas that have been identified as suitable in the GESP evidence base and where there is no unacceptable impact on residential amenity from noise, vibration, visual intrusion and shadow flicker. The policy also requires that proposals will not have unacceptable landscape/heritage impacts or Natura 2000 sites and will not adversely impact air traffic operations or radar. There is one reasonable alternative (RA-1) being considered in relation to this issue, which is to allocate specific sites for onshore wind development within Greater Exeter.

4.72 Both the proposed policy and the reasonable alternative considered would likely result in increased production of renewable energy within Greater Exeter and therefore potentially decreased overall carbon emissions for the plan area. There are different benefits associated with both approaches considered. The approach outlined in RA-1 entails allocating sites or identifying suitable areas for large-scale wind development and therefore should improve certainty for applicants and therefore their willingness to make applications. The approach outlined in the proposed policy may provide less certainty on individual sites, but it does provide greater flexibility and potential for a high proportion of the total wind resource across the GESP area to be utilised. As such, significant positive effects are expected in relation to SA objective 4: **climate change mitigation** for both the proposed policy and reasonable alternative considered. Both approaches are expected to have minor positive effects in relation to SA objective 12: **jobs and local economy** due to the potential investment into the area and job opportunities that are likely to arise from renewable energy development.

4.73 Uncertain effects are expected for both the proposed policy and RA-1 in relation to SA objective 2: **landscape** and SA objective 3: **historic environment**. Whilst the policy does include provisions to limit the impacts on sensitive landscape and heritage receptors, there is still potential for onshore wind development to alter the intrinsic rural character of locations within Greater Exeter. However, the location and scale of such developments is not known at this stage. There is also potential for onshore wind development to cause disruption and fragmentation of habitats, both during the construction stage and once operational. The policy does include a requirement that there are no likely significant effects or no adverse effects on the integrity of Natura 2000 sites, which is likely to go some way in ensuring that the most sensitive locations are protected from renewable energy development. However, the potential for development of this scale to result in disturbance is not entirely diminished through the policy's provisions and therefore minor negative effects are expected for both approaches in relation to SA objective 1: **natural environment**. The negative effects identified in relation to SA1 are uncertain as the location and scale of potential developments is not known.

4.74 Uncertain effects are also expected for both approaches in relation to SA objective 6: **land resources** as it is possible that such developments could result in the loss of high quality agricultural land (until the site is restored to its previous use at the end of life cycle), but the location and scale of sites is unknown at this stage.

4.75 Negligible effects are expected for the policy and reasonable alternative considered in relation to the majority of SA objectives due to the focus on renewable energy.

### GESP 8: Energy Storage

4.76 This section summaries the SA findings for the approach the GESP should take in relation to renewable and low carbon energy storage within Greater Exeter. The proposed policy, GESP 8, will support proposals for renewable and low carbon energy storage were siting is located a suitable distance from residential areas and acceptable standards of road safety can be achieved, where impacts on landscape can be satisfactorily mitigated, where there is no unacceptable harm to heritage assets and where there will not be adverse impacts on the integrity of European

biodiversity sites. Additionally, the policy requires that proposals demonstrate there will not be excessive noise impacts from the development. There is one reasonable alternative (RA-1) being considered in relation to this issue, which is a more prescriptive approach whereby specific sites for energy storage are identified.

4.77 Alongside policies GESP 6 and 7, which will increase the production of renewable energy within Greater Exeter, it is important that these developments are accompanied by appropriate energy storage facilities. As such, minor positive effects are expected for both the proposed policy and RA-1 in relation to SA objective 4: **climate change mitigation** as this type of development will support long-term use of renewable or low carbon energy within Greater Exeter, reducing carbon emissions. The effects are uncertain for RA-1 as it is it is possible this approach could prove inflexible when considering the evolving nature of technology in relation to energy storage and the varying locations that may present themselves across the GESP as a result. Minor positive effects are expected for both approaches in relation to SA objective 12: **jobs and local economy**. There are a wide range of energy storage technologies, with lithium-ion batteries and pumped hydro-electric currently dominating currently. Within the context of an innovative and fast-advancing sector, it is likely that policy support for energy storage will further enhance this, providing investment into the area and job opportunities related to the sector.

4.78 Uncertain effects are expected for both approaches in relation to SA objective 1: **natural environment,** SA objective 2: **landscape** and SA objective 3: **historic environment**. Whilst the policy does include provisions to reduce adverse impacts on sensitive environmental receptors, it suggests such developments could be delivered on greenfield sites and therefore there it may not be possible to avoid some detrimental effects. However, the location and scale of such developments is not known at this stage.

4.79 Uncertain effects are also expected for both approaches in relation to SA objective 6: **land resources** as it is possible that such developments could result in the loss of high quality agricultural land and potentially mineral resources, but the location and scale of sites is unknown at this stage.

4.80 Negligible effects are expected for both approaches in relation to the majority of SA objectives due to the focus being constrained to energy storage.

**Table 4.5 Summary of SA effects for the proposed policies (GESP 2-8) and reasonable alternatives which seek to address the issue of Climate Change/reducing carbon emissions in the GESP**

| SA Objectives / Proposed Policy and Reasonable Alternatives | | SA1: Natural Environment | SA2: Landscape | SA3: Historic and Built Environment | SA4: Climate Change Mitigation | SA5: Climate Change Adaptation | SA6: Land Resources | SA7: Water Resources | SA8: Homes | SA9: Health | SA10: Wellbeing | SA11: Access to Services | SA12: Jobs and Local Economy | SA13: City and Town Centres | SA14: Connectivity and Transport |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| ***GESP 2: Climate Emergency*** | **Proposed Policy** | 0 | 0 | 0 | ++ | 0 | 0 | 0 | -? | 0 | + | 0 | 0 | 0 | -? |
| | **RA-1: Less ambitious** | 0 | 0 | 0 | + | 0 | 0 | 0 | -? | 0 | 0 | 0 | 0 | 0 | -? |
| | **RA-2: More ambitious** | 0 | 0 | 0 | ++ | 0 | 0 | 0 | - | 0 | + | 0 | 0 | 0 | - |
| ***GESP 3: Net Zero Carbon Development*** | **Proposed Policy** | + | + | + | ++ | + | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 |
| | **RA-1: More demanding** | + | + | + | ++ | + | 0 | 0 | -? | + | 0 | 0 | 0 | 0 | 0 |
| | **RA-2: Only at major development** | 0 | 0 | 0 | +/- | ? | 0 | 0 | +? | 0 | 0 | 0 | 0 | 0 | 0 |
| ***GESP 4: Low Carbon Energy*** | **Proposed Policy** | ? | ? | ? | ++ | 0 | ? | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 |
| | **RA-1: More prescriptive** | ? | ? | ? | ++/- | 0 | ? | 0 | 0 | 0 | 0 | 0 | ++ | 0 | 0 |
| ***GESP 5: Heat Networks*** | **Proposed Policy** | 0 | 0 | 0 | ++ | 0 | ? | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 |

| SA Objectives / Proposed Policy and Reasonable Alternatives | | SA1: Natural Environment | SA2: Landscape | SA3: Historic and Built Environment | SA4: Climate Change Mitigation | SA5: Climate Change Adaptation | SA6: Land Resources | SA7: Water Resources | SA8: Homes | SA9: Health | SA10: Wellbeing | SA11: Access to Services | SA12: Jobs and Local Economy | SA13: City and Town Centres | SA14: Connectivity and Transport |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | **RA-1: Be more prescriptive** | 0 | 0 | 0 | ++ | 0 | ? | 0 | -? | 0 | 0 | 0 | + | 0 | 0 |
| | **RA-2: Be less prescriptive** | 0 | 0 | 0 | + | 0 | ? | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| ***GESP6: Suitable Areas for Solar PV Development*** | **Proposed Policy** | -? | ? | ? | ++ | 0 | ? | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 |
| | **RA-1: Allocate specific sites** | -? | ? | ? | ++ | 0 | ? | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 |
| ***GESP7: Suitable Areas for Onshore Wind Development*** | **Proposed Policy** | -? | ? | ? | ++ | 0 | ? | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 |
| | **RA-1: Allocate specific sites** | -? | ? | ? | ++ | 0 | ? | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 |
| ***GESP8: Energy Storage*** | **Proposed Policy** | ? | ? | ? | ++ | 0 | ? | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 |
| | **RA-1: Be more prescriptive** | ? | ? | ? | ++? | 0 | ? | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 |

## Prosperity

4.81 To address the issue of achieving an improved level of prosperity for the residents of Greater Exeter, Chapter 6 of the GESP sets out seven policies to provide economic opportunities in the plan area. As part of the policy approach a focus will be made on increasing productivity. The achievement of improved productivity is to be secured in line with the Local Enterprise Partnership's Productivity Strategy and emerging Local Industrial Strategy.

4.82 **Table 4.66** at the end of this section summarises the likely effects relating to the Proposed Policies and reasonable alternatives considered for inclusion in this section of the GESP, with explanatory text provided below. The justification for the Proposed Policies and reasonable alternatives considered is provided in **Appendix 7**.

### GESP 9: Economic Targets

4.83 This section summarises the SA findings for the approach the GESP should take in relation to the setting of economic targets for the plan area. The Proposed Policy, GESP 9, sets out economic targets for the plan area which are to enable improved wellbeing and raise the standard of living, under an overarching objective of achieving sustainable development. No reasonable alternatives are considered in relation to this issue.

4.84 The Proposed Policy contains targets for the economy which are to be achieved by 2040. These targets have been informed by the Local Enterprise Partnership's Productivity Strategy and emerging Local Industrial Strategy, which seeks to double the size of the economy particularly through increased productivity in the area. It is expected that the inclusion of the headline target of the Productivity Strategy in the GESP will help to increase access to higher value employment opportunities in the plan area and therefore significant positive effects are expected in relation to SA objective 12: **jobs and local economy**. The provision of improved employment opportunities in the plan area is also likely to help improve opportunities for education including in-house training and internships.

4.85 It is considered likely that the provision of improved economic prospects in the plan area would help to address issues of social deprivation. The policy is specifically set out to improve wellbeing and raise the standard of living through the meeting of local economic targets in the plan area. As such, minor positive effects are expected in relation to SA objective 10: **wellbeing**.

4.86 The delivery of new employment opportunities in the plan area may result in increased construction activities and increased numbers of journeys being undertaken in the plan area. The policy, however, does not stipulate a level of growth to be delivered in areas which may be particularly sensitive to development. Furthermore, new employment may take place in low carbon sectors and/or may be supportive of home work patterns. As such, negligible effects have been identified in relation to SA objective 1: **natural environment**, and SA objective 14: **connectivity and transport**. It is noted however that increasing the size of the economy in the plan area will result in some level of increased carbon emissions. Uncertain minor negative effects are therefore recorded for the Proposed Policy in relation to SA objective 4: **climate change mitigation**. While the supporting text of the policy refers to improved housing affordability as a lever to raise productivity in the area it does not include requirements to improve the affordability of local housing. As such, negligible effects are also recorded in relation to SA objective 8: **homes**.

### GESP 10: Transformational Sectors

4.87 This section summarises the SA findings for the approach the GESP should take in relation to the ability of the Greater Exeter area to expand in transformational sectors. The sectors include data analytics, environmental futures, smart transport, health innovation and other digital future businesses. The Proposed Policy, GESP 10, sets out to enhance the ability of Greater Exeter to expand in such sectors and deliver productivity improvements with high quality well-paid jobs. It

is suggested that significant weight in planning decisions will be given in cases where investment in transformational sectors is likely to bring about positive economic impacts. Further provisions made in the policy include around 70ha of employment land to meet the development needs of transformational sectors, provision of one or more Digital Exchanges and collaborative action by Greater Exeter councils to support the expansion of these sectors. Two reasonable alternatives considered in relation to this issue, are to encourage different sectors to those identified (RA-1) or to limit transformational sector enhancement to specific allocations (RA-2).

4.88 Work to support on the Local Industrial Strategy for the Heart of the South West Local Enterprise Partnership area has identified that there are key sectors that could encourage changes and adaptations in the local economy that will drive increased economic productivity. As such, the Proposed Policy is expected to have significant positive effects in relation to SA objective 12: **jobs and local economy** as the provisions made to promote these transformational sectors are likely to attract investment to Greater Exeter and in turn deliver increased high quality employment opportunities. In the case of both the reasonable alternatives considered, the positive effects are likely to be minor in relation to SA objective 12. For RA-1, encouraging investment into different sectors to those outlined in the policy is still likely to be successful in driving economic productivity. However, the sectors outlined in the Proposed Policy have been informed by the Local Industrial Strategy and therefore provide more potential to achieve positive outcomes than the strategy outlined in RA-1. For RA-2, limiting investment to specific allocations is likely to prevent the full economic potential for the Greater Exeter area being realised. This approach is likely to limit the areas in which transformational sectors would be supported.

4.89 Investment into the transformational sectors outlined in the Proposed Policy has the potential to have positive impacts in relation to other SA objectives also. Smart transport is identified as a key transformational sector. This includes innovative methods for transport planning to resolve urban and rural transport issues. As such, minor positive effects are expected for the Proposed Policy in relation to SA objective 14: **connectivity and transport** due to the potential for improvements to the existing transport network. It is also suggested that it should be possible to build upon an existing presence of environmental expertise in the Greater Exeter area, particularly climate change modelling. Therefore, minor positive effects are also expected for the Proposed Policy in relation to SA objective 4: **climate change mitigation** due to the potential to reduce carbon emissions through innovation in this sector. For the reasonable alternatives considered, negligible effects are expected in relation to these objectives. It is considered likely that there will be reduced potential for benefits to result where the strategy has not been informed by the Local Industrial Strategy, or is limited spatially within Greater Exeter.

4.90 The transformational sectors identified will require high levels of digital connectivity and therefore it has been suggested by the Greater Exeter Digital Connectivity Strategy that the delivery of 'digital exchanges' would be beneficial to digital and tech-creative business hubs to accelerate their growth. The 'digital exchanges' suggested would act as neutral exchange points for digital networks (physical and electronic) to meet and will offer low cost internet transit and hosting with shared space for servers and data centres. The most suitable locations for such exchanges are to be identified through the emerging Digital Exchange/Transformational Infrastructure Scoping Report. As such, minor positive effects are expected in relation to SA objective 11: **access to services** due to the potential these provisions present to ensure businesses are provided with adequate levels of digital capacity and connectivity. An increase in productivity through enhancement of transformational sectors is likely to help address indicators of social deprivation in some of the plan areas. As such, minor positive effects are expected for the Proposed Policy in relation to SA objective 10: **wellbeing**. Both the reasonable alternatives are expected to have negligible effects in relation to these SA objectives as RA-1 has not been informed by the Local Industrial Strategy and RA-2 is not flexible enough to realise the full potential of transformational sectors across Greater Exeter.

### GESP 11: Employment Land

4.91 This section summarises the SA findings for the approach the GESP should take in relation to employment land. The Proposed Policy, GESP 11, would target the development of about 150 hectares of land for B1, B2 and B8 uses in the Greater Exeter area by 2040. This development is

to occur through GESP allocations, existing planning commitments and further sites allocated in future local and neighbourhood plans. Two reasonable alternatives considered in relation to this issue are to set a higher target than the Proposed Policy (RA-1) or to set a lower target than the Proposed Policy (RA-2).

4.92 GESP 11 is expected to result in a high level of employment growth over the plan period. This is likely to help improve residents' access to employment opportunities during the plan period. Significant positive effects are therefore expected in relation to SA objective 12: **jobs and employment** for GESP 11. The Proposed Policy is expected to provide significant headroom in the amount of land permitted and allocated overall as to meet local needs in line with Economic Development Needs Assessment (EDNA). Providing for higher targets through RA-1 is likely to allow for growth forecast in the EDNA to be met, but is not expected to result in a significantly higher amount of employment growth to be achieved (as set out in the findings of the EDNA). RA-2 is expected to result in a more limited amount of land to be allocated via GESP strategic sites meaning that the expected level of employment growth may not be met in the plan area. As such, overall mixed minor positive and minor negative effects are expected in relation to SA objective 12 for this option. Improving access to employment opportunities in the plan area is likely to help address an indicator of deprivation in the plan area. As such, minor positive effects are expected in relation to SA objective 10: **wellbeing** for all options considered. As RA-2 is less likely to support local economic growth, the minor positive effects are likely to be combined with minor negative effects.

4.93 The land take required to support economic growth in the plan area may result in adverse impacts in terms of the natural environment, landscape character, the built environment, flooding and water resources. These effects are expected to occur for all options, considering the finite amount of brownfield sites in the plan area, which will mean greenfield sites will be required to support new growth. The effects may include habitat loss, disturbance and fragmentation, development in areas of landscape sensitivity, development within the setting of heritage assets and development within close proximity to the River Exe Estuary SPA which has particular sensitivities to water pollution. Furthermore, greenfield land development may have other adverse impacts including increased levels of impermeable surfaces in the plan area leading to higher risk of flooding. As such, negative effects are expected for all options considered in relation to SA objective 1: **natural environment**, SA objective 2: **landscape**, SA objective 3: **historic environment**, SA objective 5: **climate change adaption** and SA objective 6: **land resources** and SA objective 7: **water resources**. The higher level of land which may come forward for development through RA-1 means that the negative effects identified for SA objective 1, SA objective 2, SA objective 3 and SA objective 6 are significant. Impacts relating to water quality and flood risk are dependent to a large extent on the specific relationship of new development to flood zones and Critical Drainage Areas in the GESP area as well as the Exe Estuary and therefore the negative effects expected for all options are minor.

4.94 While providing new employment opportunities in the plan area may reduce the need for some residents to travel longer distances to employment opportunities outside of the plan area, it is likely that this type of new growth will result in an overall increase in the number of journeys being undertaken on a regular basis. As such, negative effects are expected in relation to SA objective 4: **climate mitigation**. The effects are minor for all options considered given that the specific location of new development and its links with new and existing sustainable transport opportunities as well as residential development will have the greatest level of influence on the significance of effects. The specific location of new employment growth is not set out through any of these policy options considered, and potential employment site options have been appraised separately as set out in **Chapter 5**.

### GESP 12: Economic Delivery

4.95 This section summarises the SA findings for the approach the GESP should take in relation to economic delivery. The Proposed Policy, GESP 12, is set out to encourage new economic investment and development in the Greater Exeter area. The planning system is to be used as one of the tools to support a delivery strategy in the plan area which is to include prioritising and coordinating infrastructure to start or speed up economic development; using planning obligations

or other planning controls to ensure that the economic elements of mixed use developments occur in a timely fashion; monitoring existing policies and site allocations to ensure they are delivering against GESP economic targets. No reasonable alternatives are considered in relation to this issue.

4.96 The Proposed Policy is expected to have negligible effects in relation to the majority of SA objectives as its focus is constrained to encouraging economic investment and development in Greater Exeter. It does not support a specific level of growth or the development of specific locations in the plan area.

4.97 The Proposed Policy is expected to have significant positive effects in relation to SA objective 12: **jobs and local economy**. The policy requires that key economic indicators in Greater Exeter and economic progress in relation to GESP targets are considered as part of the decision making process for planning applications for economic development. Furthermore, the more flexible and supportive overall approach to growth and investment (including infrastructure coordination) is likely to help support economic growth in Greater Exeter.

4.98 The Proposed Policy is also expected to have minor positive effects in relation to SA objective 14: **connectivity and transport.** The policy seeks to prioritise infrastructure that is essential to the development of sites that will contribute to economic targets of the plan. This would likely include key strategic transport infrastructure that will improve connectivity in the plan area. Indirect effects of supporting increased economic productivity across Greater Exeter, relate to the potential for beneficial impacts in terms of social deprivation in the plan area, considering that higher value opportunities for employment may occur in Greater Exeter. As such, the Proposed Policy is likely to have minor positive effects in relation to SA objective 10: **wellbeing**.

### GESP 13: Strategic Economic Assets

4.99 This section summarises the SA findings for the approach the GESP should take in relation to protection of strategic economic assets in Greater Exeter. The Proposed Policy, GESP 13, sets out a list of key strategic economic assets which are to be protected from loss to other uses. Proposals for enhancements are to be supported at the locations listed which include established, allocated and permitted strategic employment areas. The reasonable alternative (RA-1) considered in relation to this issue is to include a shorter list of assets for protection.

4.100 While the development of locations for alternative use types may have adverse impacts in terms of the natural environment, landscape and the historic environment these issues are likely to be most influenced by the design and scale of development permitted as opposed to the broad use class it falls within. As such, it is expected that the protection of specific locations for employment uses, many of which are already in operation, where alternative uses might otherwise be permitted would have negligible effects in relation to SA objective 1: **natural environment**, SA objective 2: **landscape**, SA objective 3: **historic and built environment**.

4.101 The protection of key employment sites in the plan area is likely to help promote the Greater Exeter area to those considering investment by providing more certainty in terms of land available for economic development. Lack of suitable buildings has been identified as a key barrier to businesses attempting to start up, expand or move into Greater Exeter and it is considered that the Proposed Policy would directly address this issue. Significant positive effects are therefore expected in relation to SA objective 12: **jobs and economy** for this option. RA-1 would protect only some of the key economic assets in Greater Exeter. Therefore, while ensuring that some land would not be lost to other uses this option would provide less certainty to developers considering investment. Mixed minor positive and minor negative effects are therefore expected in relation to SA objective 12 for this option.

4.102 The Proposed Policy would mean that much of the future economic growth in the plan area would be able to benefit from commuting patterns which have been built up in recent years in the plan area. As such, employees are likely to be able to benefit from opportunities to make use of sustainable modes of transport and car sharing. Minor positive effects are therefore expected for the Proposed Policy in relation to SA objective 4: **climate change** and SA objective 14: **connectivity and transport**. RA-1 is likely to result in some of these existing commuting

patterns being disrupted, as employment uses are lost to uses such as housing, unless these are safeguarded by policies in Local Plans. Employment uses may be provided at locations which are less accessible to residents as alternative locations are required to come forward. This may, however, result in opportunities for the re-siting of employment uses to make better use of sustainable transport links as development occurs over the plan period. Any potential for positive effects will be dependent in part on how the overall pattern of growth (including the provision of new sustainable transport links) is achieved and how it relates to any new employment growth. As such, overall uncertain mixed minor positive and minor negative effects are expected for RA-1 for SA objective 4 and SA objective 14.

4.103 The Proposed Policy would result in less flexibility than RA-1 being provided at a higher number of key economic assets in terms of their suitability for re-development for alternative uses. As such, minor negative effects are expected for the Proposed Policy in relation to SA objective 6: **land use** and SA objective 8: **homes.** Allowing for the enhancement and renewal of a higher number of employment sites may promote a more efficient use of land resource in the plan area. This is particularly expected to be the case where employment sites are vacant or underused, given that it may help to limit the need to make use of additional greenfield land. This approach is also likely to make a higher number of sites potentially acceptable for housing delivery, as there would be lower number of sites protected from re-development as key economic assets. Minor positive effects are therefore recorded in relation to SA objective 6 and SA objective 8 for RA-1.

### GESP 14: Exeter Airport

4.104 This section summarises the SA findings for the approach the GESP should take in relation to the role of Exeter Airport. The Proposed Policy, GESP 14, sets out support for the increased role of Exeter Airport in driving economic success and sets a target to grow to 3 million passenger movements annually by 2040. This will include the Greater Exeter authorities supporting investment in the airport. An Airport Development Zone is to be defined within which suitable development will be supported, and a masterplan approved for the zone. No reasonable alternatives are considered in relation to this issue.

4.105 The Proposed Policy supports development within the Airport Development Zone which would increase access to the airport by a variety of means, improve airport operation and encourage a shift to zero carbon operations as well as ancillary operations.

4.106 The Proposed Policy is expected to have significant positive effects in relation to SA objective 12: **jobs and local economy**. There are multiple ways in which the Proposed Policy contributes positively to this SA objective. The overall expansion of the airport to grow to accommodate 3 million passenger movements annually by 2040 is likely to bring increased visitors to the Greater Exeter area, which will likely benefit tourism in the area. The expansion of the airport area itself, including increased retail and other services onsite, will provide employment opportunities in the area. Proposals for additional business accommodation, conference facilities and aviation related employment zones are also likely to establish the airport area as a thriving economic hub within Greater Exeter. However, the significant positive effects identified are uncertain due to Flybe entering administration in March 2020, which has reduced yearly passenger growth. The Proposed Policy's plans to combine airport expansion with more comprehensive access to sustainable transport links is likely to ensure that growth of the airport is more sustainable. The proposals to include dedicated, regular and high quality public transport routes from growth areas and existing centres within Greater Exeter is likely to contribute to the overall connectivity of the region. As such, significant positive effects are expected in relation to SA objective 14: **connectivity and transport**. As a result of the potential for the airport to be connected to Exeter City and other settlements and the additional visitors this may bring, minor positive effects are expected for the Proposed Policy in relation to SA objective 13: **city and town centres**. Additionally, the inclusion of active travel links as part of the airport transport strategy has the potential to result in improved health for employees at the airport and surrounding developments due to the physical exercise that could become part of their daily commutes. Therefore, minor positive effects are expected for the Proposed Policy in relation to SA objective 9: **health**.

4.107 The increased investment that airport expansion could bring to the region could contribute to a transformational effect in the region that may result in lower levels of social deprivation. As such, minor positive effects are expected for the Proposed Policy in relation to SA objective 10: **wellbeing**. However, whilst there are potential benefits of airport expansion, this is balanced against the possible adverse impacts that significant airport growth could cause to residents in close proximity due to increased noise pollution. As such, minor negative effects are also expected in combination with the minor positive in relation to SA objective 10. The effects are uncertain as the scale of disturbance will also depend upon whether GESP residential allocations come forward within the airport's 57db noise contour or if this contour would have to be adjusted to reflect any growth in airport operations. In addition, the proposed expansion of the airport will significantly increase the amount of flights at the airport and travel in the area associated with the airport, which is likely to give rise to a significant increase in carbon emissions. As such, significant negative effects are expected for the Proposed Policy in relation to SA objective 4: **climate change mitigation**. However, minor positive effects are also expected in combination with the significant negative as the Proposed Policy does indicate that there will be support given towards developments that contribute towards the aim of becoming a zero carbon airport.

4.108 The development proposals that are likely to come forward in relation to the overall Airport Development Zone masterplan, are expected to require additional land beyond that which is currently occupied by Exeter International Airport. As such, minor negative effects are expected for the Proposed Policy in relation to SA objective 2: **landscape**, SA objective 3: **historic and built environment** and SA objective 6: **land resources**. The expansion may result in the impacts on the existing landscape character particularly in relation to tranquillity considering the increased numbers of flights. The East Devon AONB is in relatively close proximity to the current airport boundary to the south east. A number of listed buildings and Rockbeare Manor registered park and garden is also within close proximity of the current boundaries of the airport and therefore there is potential for adverse impacts in relation to the setting of these designated heritage assets. In addition, undeveloped land surrounding the airport contains some areas of Grade 2 and Grade 3 (including Grade 3a) agricultural soils which might be lost to development. The expansion could also potentially cause the loss of or disturbance to valuable natural environment assets in the area. Beautiport County Wildlife Site is within close proximity to the airport to the east. Minor negative effects are therefore expected for the Proposed Policy in relation to SA objective 1: **natural environment**. These effects are uncertain given that any detailed proposals which might come forward for the expansion of the airport are unknown at this stage.

4.109 There is also potential for the airport expansion (particularly the increased car parking and supporting structures for the operation of aircrafts) to result in an overall increase in the level of impermeable surfaces in the area. As such, minor negative effects are expected for the Proposed Policy in relation to SA objective 5: **climate change adaptation** considering the potential for increased flood risk as a result. The effects are uncertain as the exact scale and location of any expansion to the airport and the potential design to include SuDS are unknown at this stage.

### GESP 15: Inclusive Employment and Skills

4.110 This section summarises the SA findings for the approach the GESP should take in relation to inclusive employment and skills development. The Proposed Policy, GESP 15, sets out to promote wider access to jobs and address skills shortages within Greater Exeter. As part of the policy's approach, major planning applications should be accompanied by proposals to invest in construction skills and for larger schemes, an Employment and Skills Plan is to be sought. The Proposed Policy also contains provisions that larger businesses expanding or moving into the area will be encouraged to sign up to an agreement to deliver links to local education and skills providers. The reasonable alternative (RA-1) considered in relation to this issue is a less flexible requirement for new businesses.

4.111 The Proposed Policy and RA-1 are expected to have negligible effects in relation to the majority of SA objectives as their focus is restricted to increasing access to employment through skills development.

4.112 The Proposed Policy and RA-1 are expected to have significant positive effects in relation to SA objective 12: **jobs and local economy**. It has been identified that there are distinct sectors within Greater Exeter in which there is a skills shortage, particularly in digital, construction and health/social care sectors. The Proposed Policy is likely to promote the development of skills in these areas, which will ensure these sectors are better able to realise their economic potential. However, for RA-1, minor negative effects are also expected in combination with the significant positive effects as there is potential that a less flexible policy may deter new investment or business expansion if the requirements are overly onerous.

4.113 There is potential for the Proposed Policy and the reasonable alternative to support unemployed people in taking steps towards employment through provision of increased opportunities for skills development. This could result in a reduction in social deprivation within Greater Exeter and therefore minor positive effects are expected for the Proposed Policy and the reasonable alternative in relation to SA objective 10: **wellbeing**.

**Table 4.6 Summary of SA effects for the proposed policies (GESP 9-15) and reasonable alternatives which seek to address the issue of Prosperity in the GESP**

| SA Objectives / Proposed Policy and Reasonable Alternatives | | SA1: Natural Environment | SA2: Landscape | SA3: Historic and Built Environment | SA4: Climate Change Mitigation | SA5: Climate Change Adaptation | SA6: Land Resources | SA7: Water Resources | SA8: Homes | SA9: Health | SA10: Wellbeing | SA11: Access to Services | SA12: Jobs and Local Economy | SA13: City and Town Centres | SA14: Connectivity and Transport |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| ***GESP 9: Economic Targets*** | **Proposed Policy** | 0 | 0 | 0 | -? | 0 | 0 | 0 | 0 | 0 | + | 0 | ++ | 0 | 0 |
| ***GESP 10: Transformational Sectors*** | **Proposed Policy** | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | + | + | ++ | 0 | + |
| | **RA-1: Different sectors** | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 |
| | **RA-2: Specific allocations** | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 |
| ***GESP 11: Employment Land*** | **Proposed Policy** | - | -? | - | - | - | - | - | 0 | 0 | + | 0 | ++ | 0 | 0 |
| | **RA-1: Higher targets** | -- | --? | --? | - | - | -- | - | 0 | 0 | + | 0 | ++ | 0 | 0 |
| | **RA-2: Lower targets** | - | -? | -? | - | - | -? | - | 0 | 0 | +/- | 0 | +/- | 0 | 0 |
| ***GESP 12: Economic Delivery*** | **Proposed Policy** | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | ++ | 0 | + |

| SA Objectives / Proposed Policy and Reasonable Alternatives | | SA1: Natural Environment | SA2: Landscape | SA3: Historic and Built Environment | SA4: Climate Change Mitigation | SA5: Climate Change Adaptation | SA6: Land Resources | SA7: Water Resources | SA8: Homes | SA9: Health | SA10: Wellbeing | SA11: Access to Services | SA12: Jobs and Local Economy | SA13: City and Town Centres | SA14: Connectivity and Transport |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| ***GESP 13: Strategic Economic Assets*** | **Proposed Policy** | 0 | 0 | 0 | + | 0 | - | 0 | - | 0 | 0 | 0 | ++ | 0 | + |
| | **RA-1: Shorter list of assets** | 0 | 0 | 0 | +/-? | 0 | + | 0 | + | 0 | 0 | 0 | +/- | 0 | +/-? |
| ***GESP 14: Exeter Airport*** | **Proposed Policy** | -? | -? | -? | +/-- | -? | -? | 0 | 0 | + | +/-? | 0 | ++? | + | ++ |
| ***GESP 15: Inclusive Employment and Skills*** | **Proposed Policy** | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | ++ | 0 | 0 |
| | **RA-1: Less flexible requirements** | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | ++/- | 0 | 0 |

## Housing

4.114 The GESP seeks to promote positive change in terms of providing sufficient homes to meet the needs of the area and by bringing a better balance between supply and demand. Chapter 7 sets out policy relating to overall housing provision over the plan period. Additional policies are included which address the level of new homes growth supported in future local plan reviews and requirements to ensure that the location of new homes means that they are accessible.

4.115 **Table 4.7** at the end of this section summarises the likely sustainability effects relating to the six Proposed Policies and reasonable alternatives considered for inclusion in this section of the GESP, with explanatory text provided below. The justification for the Proposed Policies and reasonable alternatives considered is provided in **Appendix 7**.

### GESP 16: Housing Target and Distribution

4.116 This section summarises the SA findings for the approach the GESP should take in relation to housing targets and distribution. The Proposed Policy, GESP 16, sets out to improve housing affordability by rebalancing housing supply and demand by delivering 2,663 homes per year in the Greater Exeter area (53,260 homes in total) during the period 2020-2040. To meet this target, delivery will be included from the following sources: approximately 33,390 from existing planning commitments; approximately 18,500 from GESP allocations; and approximately 12,000 residual homes to be identified in future local and neighbourhood plans. A headroom of approximately 20% has been allowed for against the overall target to ensure targets are met in light of the potential for interruptions to development such as commitments being started late, built out slowly or not even built out at all. Two reasonable alternatives are considered in relation to this issue: a higher proportion of development to be allocated in Local and Neighbourhood Plans (RA-1), or a lower proportion of development to be allocated in Local and Neighbourhood Plans (RA-2).

4.117 All options considered are expected to deliver a high number of homes over the plan period which is likely to improve local housing affordability. Therefore, significant positive effects are expected for all options in relation to SA objective 8: **homes**. The Proposed Policy would deliver sufficient new homes to meet the housing need for the plan area in line with the government's standard method, allowing sufficient headroom in supply to ensure that the need is met. However, for RA-1 and RA-2, minor negative effects are also expected in combination with the significant positive. In the case of RA-1, the allocation of a higher proportion of development within Local and Neighbourhood Plans could result in a greater risk of development being pushed towards unsustainable locations and an increase in uncertainty in housing delivery during the period of time between the adoption of the GESP and future Local and Neighbourhood Plans. In the case of RA-2, there is a risk that a lower proportion of development within Local and Neighbourhood Plans could result in development being overly concentrated within a few key areas of the GESP, potentially failing to meet the housing needs of existing communities not included in the GESP. There is also the potential for increased risk in relation to housing delivery being over reliant on large scale sites to come forward as they are typically delivered at a slower pace over a longer period of time and will make it more challenging to meet the NPPF requirement of ensuring 10% of housing is delivered on smaller sites.

4.118 The effects expected for the options considered in relation to SA objective 10: **wellbeing** are likely to be influenced to a large extent by the number of homes to be provided over the plan period. It is expected that by providing new homes in the plan area and improving housing affordability, an important indicator of social deprivation in Greater Exeter would be addressed to some degree. Therefore, all options are expected to have a significant positive effect in relation to improving housing affordability, but combined with a minor negative effect due to any potential increases in air pollution that could negatively affect wellbeing. The delivery of a high level of growth (as supported by all options considered) could result in increased levels of traffic in the

plan area depending on the extent to which sustainable transport options are delivered with new development.

4.119 The provision of new homes is also likely to benefit the local economy through the creation of construction jobs in the short term and by providing homes for workers in the long term. Improving housing affordability in Greater Exeter is likely to help encourage graduates and young people to live in the area thereby providing potential employers with access to a more highly skilled workforce. Effects in relation to SA objective 12: **jobs and economy** are therefore expected to be indirectly minor positive for all options through the creation of construction jobs as well as retention of a skilled workforce.

4.120 It is expected that delivering a high level of housing growth over the plan period would have adverse impacts in terms of greenfield land take considering the finite number of brownfield sites across the Greater Exeter area. All options support the delivery of significant amounts of growth and therefore the negative effects expected in relation to SA objective 6: **land resources** are likely to be significant for all options. Similar effects are likely in relation to SA objective 7: **water resources** given that the high levels of growth supported is likely to result in growth which might have an adverse impact on water quality at the Exe Estuary SPA. It is expected that delivering growth in close proximity to water courses which feed into the River Exe could result in water quality issues as a result of construction.

4.121 It is likely that the large amount of greenfield land take required as part of all three options would increase the area of impermeable surfaces in Greater Exeter, resulting in increased risk of flooding. Flood risk will be dependent in large part on the precise siting of development in relation to Critical Drainage Areas and Flood Zones 2 and 3. The negative effects expected in relation to SA objective 5: **climate change adaption** for the Proposed Policy and RA-2 are likely to be minor. Considering the potential for RA-1 to deliver growth in more areas which are constrained by flood risk (as it would be responding to local need and affordability rather than environmental constraints), the negative effects expected in relation to this SA objective are recorded as significant.

4.122 The higher reliance on larger sites likely to occur through RA-2 has the potential to have more detrimental impacts in terms of habitat loss, fragmentation and disturbance due to development being overly concentrated in a few areas within Greater Exeter. Similarly RA-1 would deliver growth which is less considerate of the potential environmental sensitivities of each authority (because a greater residual housing target is more likely to be based on local housing demand and affordability issues); therefore adverse impacts on biodiversity are more likely to result. More significant effects in terms of development which occurs within areas of sensitivity in relation to landscape and the historic environment may also result from RA-1 and RA-2 in comparison to the Proposed Policy, which would deliver growth based in locations based on an assessment of settlement structure, potential for additional brownfield and windfall sites and a broad assessment of the availability of smaller sites within each district. As such, significant negative effects are expected in relation to SA objective 1: **natural environment**, SA objective 2: **landscape** and SA objective 3: **historic and built environment** for RA-1 and RA-2, while minor negative effects are expected for the Proposed Policy. Uncertainty is attached to the negative effects identified in relation to SA objective 2 and SA objective 3 as the design of new development will have a significant influence on the scale of potential impacts on the landscape and built environment and possible mitigation.

4.123 Given the same overall level of housing provision, all options are likely to increase car use and have a minor negative effect on encouraging sustainable transport and climate change. As RA-2 would be more reliant on larger sites to meet the development need, this option is likely to provide the greatest potential to secure developer contributions and central government funding for infrastructure improvements. Opportunities to achieve this through the Proposed Policy and RA-1 may be more limited. The high number of journeys which are likely to be undertaken through both of these options means that minor negative effects are expected in relation to SA objective 4: **climate change**. Mitigation through infrastructure provision may be more likely to come forward through RA-2 meaning that the negative effects are combined with minor positive effects, while uncertain minor negative effects are expected for the Proposed Policy and RA-2.

Similar effects in relation to SA objective 14: **connectivity and transport** are expected for each option. Issues relating to transport are mostly reflective of those which will influence the release of greenhouse gases in the plan area.

4.124 The impact of new growth on health, access to services and facilities and town and city centres is likely to be based mostly on how well related homes are to these features. Providing new growth in areas which are accessible to existing healthcare facilities and open spaces is likely to promote public health in the plan area. Similar effects are expected in terms of viability of services and facilities and the town and city centres in Greater Exeter where new residents are located in areas where they would have a good level of access to these types of provisions. In all cases, the specific locations for allocating the residual housing target in Local and Neighbourhood Plans is unknown at this stage. As such, the effects on these issues are mostly unknown. Uncertain effects have therefore been recorded in relation to SA objective 9: **health**, SA objective 11: **access to services and facilities** and SA objective 13: **city and town centres** for the Proposed Policy and RA-2. In the case of RA-1, the increased reliance on Local and Neighbourhood Plan allocations creates greater uncertainty in the potential locations for development, which could result in development being pushed to less sustainable locations. As such, uncertain minor negative effects are expected in relation to these SA objectives for RA-1.

### GESP 17: Affordable Homes

4.125 This section summarises the SA findings for the approach the GESP should take in relation to affordable housing provision. The Proposed Policy, GESP 17, sets out to provide affordable housing as part of the overall housing delivery between 2020 and 2040. This will include 9,970 through existing planning commitments. The final portion of overall delivery is to be subject to further consideration and potential alteration during the preparation of Local Plans within Greater Exeter.

4.126 The Proposed Policy is expected to have negligible effects in relation to the majority of SA objectives due to its narrow focus which is related only to affordable housing provision.

4.127 The draft Local Housing Needs Assessment (2nd Edition) has identified a need for around 24,300 affordable homes during the GESP period, which equates to around 46% of the overall housing need.

4.128 The proposed policy is expected to have significant positive effects in relation to SA objective 8: **homes** given that it directly seeks to address affordability of housing in the plan area. However, it is not clear whether the proposed policy would provide a level of affordable housing which would meet the majority of the identified need and therefore the positive effects identified are uncertain.

4.129 It is expected that providing new affordable homes would also help to directly address an important indicator of deprivation in the plan area. As the Proposed Policy would provide affordable housing, but perhaps not to a level which would entirely meet local requirements mixed minor positive and minor negative effects are expected in relation to SA objective 10: **wellbeing**.

4.130 Minor positive effects are expected in relation to SA objective 14: **connectivity and transport**. A reasonable affordable housing approach out through the Proposed Policy represents a compromise to support the delivery of infrastructure in the plan area which is most likely to include improvements to the transport network. The effects are uncertain as delivery of supporting infrastructure in relation to housing delivery will be largely dictated by developer decisions, which are unknown at this stage.

4.131 Providing an element of affordable housing through the Proposed Policy is likely to have indirect positive effects in terms of the local economy by promoting the retention of a more skilled work force. Many graduates and other highly qualified candidates may be priced out of the plan area if affordable housing is not made available. As such, minor positive effects have been recorded in relation to SA objective 12: **jobs and economy**.

### GESP 18: Build to Rent Homes

4.132 This section summarises the SA findings for the approach the GESP should take in relation to the provision of build-to-rent homes. The Proposed Policy, GESP 18, sets out that a number of GESP site allocations will include a proportion of the site as build-to-rent homes, with the amount to be determined following the Options consultation. The Proposed Policy also requires build-to-rent schemes on those GESP site allocations, any other build-to-rent schemes of 10 or more homes, to include a proportion of affordable housing.

4.133 Negligible effects are expected in relation to the majority of SA objectives for the proposed policy as the focus is limited to supporting the delivery of build-to-rent homes in Greater Exeter.

4.134 The Local Housing Needs Assessment (2nd Edition) concluded that between 17% and 32% of additional homes delivered in the Greater Exeter area by 2040 should be for private rent. The target for build to rent homes is yet to be announced and there may be viability concerns for achieving over 17%, in line with the Local Housing Needs Assessment. As such, the Proposed Policy is restricted to uncertain minor positive effects in relation to SA objective 8: **homes** as it would likely contribute to meeting identified needs for private rent homes but may not include sufficient requirements as to meet the entirety of the housing need identified for this tenure within Greater Exeter.

4.135 The proposed policy is likely to play a role in helping to address social deprivation in the form of providing access to a specific type of housing in the plan area. This type of development is furthermore also expected to support the provision of an element of affordable homes. Minor positive effects are therefore expected in relation to SA objective 10: **wellbeing** for the proposed policy.

### GESP 19: Custom and Self-Build

4.136 This section summarises the SA findings for the approach the GESP should take in relation to the delivery of custom and self-build homes. The Proposed Policy, GESP 19, sets out a target for the delivery of around 5,000 plots for custom and self-build dwellings. It is suggested these would be supplied from the following sources: 2,100 from small windfall sites; at least 900 plots from GESP allocations; at least 5% of plots on all sites of 20 homes or more; and affordable homes which may be suitable for provision as custom or self-build homes. The policy also includes provisions to ensure a range of plot sizes are included, no unreasonable limitations on design and that each plot is marketed for at least 36 months at a fair valuation. One reasonable alternative is considered in relation to this objective, which is a higher site target for custom and self-build homes (RA-1).

4.137 The Proposed Policy and reasonable alternative considered are expected to have negligible effects in relation to the majority of SA objectives as their focus is restricted to the delivery of custom and self-build homes in the GESP.

4.138 The Local Needs Housing Assessment has identified a need for a total of 5,000 custom or self-build homes for the Greater Exeter area by 2040. As such, both the Proposed Policy and the reasonable alternative considered are expected to have significant positive effects in relation to SA objective 8: **housing** as they are likely to ensure that this identified housing need for Greater Exeter is met during the plan period. The approach of the Proposed Policy in relation to provision of a range of plot sizes for custom and self-build is also likely to contribute to meeting specific needs of the local community. Furthermore, providing for a number of custom and self-build plots that incorporate affordable home ownership is also likely to contribute positively to meeting local needs. For RA-1, minor negative effects are also expected in combination with the significant positive as a requirement for more custom or self-build homes could reduce the delivery of other housing products.

4.139 Minor negative effects are also expected for RA-1 in relation to SA objective 14: **connectivity and transport** as a requirement for more custom and self-build plots could lower the overall CIL income, considering self-build exemptions. This may result in fewer contributions to supporting transport infrastructure.

4.140 Both options would play a role in helping to address social deprivation in the form of providing access to specific types of housing to meet the needs of the plan area. This type of development is furthermore also expected to support the provision of an element of affordable homes. Minor positive effects are therefore expected in relation to SA objective 10: **wellbeing** for both options considered.

### GESP 20: Accessible Homes

4.141 This section summarises the SA findings for the approach the GESP should take in relation to the delivery of accessible homes. The Proposed Policy, GESP 20 sets out that developers should deliver all homes as either accessible and adaptable or wheelchair accessible/adaptable, unless the applicant can demonstrate there this would not be feasible. Requirements include that 75% of market homes and affordable homes should be accessible and adaptable dwellings, 25% of market homes should be adaptable for wheelchair users and 25% of affordable homes should be wheelchair accessible dwellings. One reasonable alternative is considered in relation to this issue (RA-1), which is a reduced target for accessible homes in residential developments.

4.142 The Proposed Policy and reasonable alternative considered are expected to have negligible effects in relation to the majority of SA objectives due to their focus being limited to the delivery of accessible homes as part of residential developments.

4.143 The Local Housing Needs Assessment concluded that 35% of households within Greater Exeter need to be some form of accessible dwelling, whereas currently only 18% of the existing house stock is accessible. The provisions made in the Proposed Policy for all new homes to meet building regulations to make them adaptable or accessible is likely to make a significant contribution to closing this gap by 2040. Considering the beneficial impact this approach is likely to have in terms of making housing accessible to people with disabilities and older people, significant positive effects are expected for the Proposed Policy in relation to SA objective 8: **homes**. For the reasonable alternative considered, the effects are reduced to a minor positive in relation to this SA objective considering the lower requirement which would be set out.

4.144 These effects are expected to be mirrored for both options in relation to SA objective 10: **wellbeing**. It is likely that both the Proposed Policy and RA-1 would provide a level of housing which is designed to better meet the needs of elderly or disabled people. Considering the higher level of provision required through the Proposed Policy the positive effects expected in relation to SA objective 10 are likely to be significant.

### GESP 21: Accommodation for the Gypsy and Traveller Communities

4.145 This section summarises the SA findings for the approach the GESP should take in relation to accommodation for gypsy and travelling communities. The Proposed Policy, GESP 21, sets out to provide access to appropriate accommodation for the gypsy and traveller communities between 2020 and 2040. This includes a target of 116 additional gypsy and traveller pitches to be provided between 2020-2040, three transit sites totalling 20 pitches to be allocated in Local Plans close to key road corridors and a site providing 12 plots for travelling showpeople to be allocated in a local plan. This requirement has been informed by the findings of the draft Local Housing Needs Assessment. Two reasonable alternatives are considered in relation to this issue which is a higher target for provision of accommodation for gypsy and traveller communities (RA-1) and to allocate all sites within the GESP instead of relying on the duty to cooperate to meet this need through Local Plan reviews.

4.146 The Proposed Policy and reasonable alternative considered are expected to have negligible effects in relation to the majority of SA objectives as their focus is limited to the provision of accommodation for gypsy and traveller communities.

4.147 The Local Needs Housing Assessment (2nd Edition) concluded that there is a need to provide a range of new permanent and transit sites for gypsy and traveller communities within Greater Exeter in the period 2020-2040. As such, the Proposed Policy is expected to have significant positive effects in relation to SA objective 8: **homes** as the targets outlined in the policy are likely to ensure that the accommodation needs of gypsy and traveller communities are met in

sustainable locations. It is likely that setting higher targets for gypsy and traveller provisions (RA-1) would provide a flexibility of supply in the plan area and including more sites for allocation in the GESP (RA-2) would provide more certainty in terms of meeting requirements across the Greater Exeter area. As such, significant positive effects have also been identified in relation to these two options. While the Proposed Policy may provide less certainty to meet requirements in the plan area, the explanatory text notes that it is the approach which responds best to the evidence base available.

4.148 Minor positive effects are also expected for the Proposed Policy in relation to SA objective 10: **wellbeing**. In the absence of the Proposed Policy, there is potential for gypsy and traveller communities to be restricted to accommodation at unsustainable sites and increases in social deprivation may result among these communities. Similar effects are expected for RA-1 and RA-2 considering the higher targets for this type development which would be set under RA-1 or the allocation of sites through the GESP that would be achieved (RA-2).

**Table 4.7 Summary of SA effects for the proposed policies (GESP 16-21) and reasonable alternatives which seek to address the issue of Housing in the GESP**

| SA Objectives / Proposed Policy and Reasonable Alternatives | | SA1: Natural Environment | SA2: Landscape | SA3: Historic and Built Environment | SA4: Climate Change Mitigation | SA5: Climate Change Adaptation | SA6: Land Resources | SA7: Water Resources | SA8: Homes | SA9: Health | SA10: Wellbeing | SA11: Access to Services | SA12: Jobs and Local Economy | SA13: City and Town Centres | SA14: Connectivity and Transport |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| ***GESP 16: Housing Target and Distribution*** | **Proposed Policy** | - | -? | -? | -? | - | -- | -- | ++ | ? | ++/- | ? | + | ? | -? |
| | **RA-1: Higher proportion to Local/Neighbourhood Plans** | -- | --? | --? | -? | -- | -- | -- | ++/- | -? | ++/- | -? | + | -? | -? |
| | **RA-2: Lower proportion to Local/Neighbourhood Plans** | -- | --? | --? | +/- | - | -- | -- | ++/- | ? | ++/- | ? | + | ? | +/- |
| ***GESP 17: Affordable Homes*** | **Proposed Policy** | 0 | 0 | 0 | 0 | 0 | 0 | 0 | ++? | 0 | +/- | 0 | + | 0 | +? |
| ***GESP 18: Build to Rent Homes*** | **Proposed Policy** | 0 | 0 | 0 | 0 | 0 | 0 | 0 | +? | 0 | + | 0 | 0 | 0 | 0 |
| ***GESP 19: Custom and Self*** | **Proposed Policy** | 0 | 0 | 0 | 0 | 0 | 0 | 0 | ++ | 0 | + | 0 | 0 | 0 | 0 |

| SA Objectives / Proposed Policy and Reasonable Alternatives | | SA1: Natural Environment | SA2: Landscape | SA3: Historic and Built Environment | SA4: Climate Change Mitigation | SA5: Climate Change Adaptation | SA6: Land Resources | SA7: Water Resources | SA8: Homes | SA9: Health | SA10: Wellbeing | SA11: Access to Services | SA12: Jobs and Local Economy | SA13: City and Town Centres | SA14: Connectivity and Transport |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| ***Build*** | **RA-1: Higher target** | 0 | 0 | 0 | 0 | 0 | 0 | 0 | ++/-? | 0 | + | 0 | 0 | 0 | - |
| ***GESP 20: Accessible Homes*** | **Proposed Policy** | 0 | 0 | 0 | 0 | 0 | 0 | 0 | ++ | 0 | ++ | 0 | 0 | 0 | 0 |
| | **RA-1: Lower target** | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | + | 0 | 0 | 0 | 0 |
| ***GESP 21: Accommodation for the Gypsy and Traveller Communities*** | **Proposed Policy** | 0 | 0 | 0 | 0 | 0 | 0 | 0 | ++ | 0 | + | 0 | 0 | 0 | 0 |
| | **RA-1: Higher targets** | 0 | 0 | 0 | 0 | 0 | 0 | 0 | ++ | 0 | + | 0 | 0 | 0 | 0 |
| | **RA-2: Allocate all sites within the GESP** | 0 | 0 | 0 | 0 | 0 | 0 | 0 | ++ | 0 | + | 0 | 0 | 0 | 0 |

## Movement and Communication

4.149 To achieve the vision of Greater Exeter as a networked city region the GESP seeks to promote an integrated approach to land use and transport. Chapter 8 of the GESP sets out policy support for low carbon and sustainable transport movements and also seeks to ensure that a major expansion in the digital infrastructure of the area is achieved.

4.150 **Table 4.8** at the end of this section summarises the likely effects relating to the Proposed Policies and reasonable alternatives considered for inclusion in this section of the GESP, with explanatory text provided below. The justification for the Proposed Policies and reasonable alternatives considered is provided in **Appendix 7**.

### GESP 22: Transport Strategy

4.151 This section summarises the SA findings for the approach the GESP should take in relation to the transport strategy. The Proposed Policy, GESP 22, sets out to develop a low carbon, efficient transport network, which will support sustainable growth within Greater Exeter. This will include enhanced transport choices and improved connectivity, as well as the promotion of active travel and facilitating innovative travel investment and management (e.g. car clubs and bike hire). One reasonable alternative (RA-1) is considered in relation to this issue, which is an approach of delivering 'big ticket' strategic public transport infrastructure, which could include new tram or light rails routes.

4.152 Significant positive effects are expected in relation to SA objective 4: **climate change mitigation** for both the proposed policy and the reasonable alternative considered. Economic growth in Exeter has resulted in a large proportion of people commuting from neighbouring districts (East Devon, Mid Devon and Teignbridge). Both options are likely to help promote modal shift by significantly increasing public transport capacity and efficiency. A reduction in the amount of people reliant on private car travel within Greater Exeter is likely to result in a reduction in overall carbon emissions, contributing positively to climate change mitigation. For the proposed policy, the promotion of active travel is also likely to contribute to modal shift as necessary to ensure that carbon emissions do not increase significantly as a result of the growth planned in the GESP. For the reasonable alternative considered, there are also minor negative effects expected in combination. The larger scale transport infrastructure considered in this option is likely to require at least a decade to implement. This could result in disturbance to current sustainable transport links over an extended period, which may give rise to an increase in carbon emissions in Greater Exeter. There is also the consideration with this option that the transport infrastructure suggested may not be delivered in time to support the projected housing growth, which could result in an increase in people reliant on private cars in the region. The minor negative effects are uncertain as the delivery schedule for transport infrastructure and potential disturbance mitigation strategies are unknown at this stage.

4.153 Significant positive effects are also expected for both the Proposed Policy and the reasonable alternative in relation to SA objective 14: **connectivity and transport.** In both cases, there is likely to be a reduction in congestion and increased public transport access and overall connectivity within Greater Exeter. For the reasonable alternative considered, minor negative effects are also expected in relation to this SA objective as there is potential for the implementation of 'big ticket' strategic transport infrastructure to result in significant disruption to existing transport links over an extended period of time. The effects are uncertain as the schedule and locations for transport infrastructure considered in this option are unknown at this stage.

4.154 The Proposed Policy and the reasonable alternative are likely to result in improved air quality within Greater Exeter due to less reliance on private car travel and a reduction in congestion on roads. The public transport upgrades and active travel routes proposed are likely to further reduce congestion, which may have positive impacts on the ability of people to access key local services and facilities within Greater Exeter. As such, minor positive effects are expected in

relation to SA objective 10: **wellbeing** and SA objective 11: **access to services**. For the Proposed Policy, minor positive effects are also expected in relation to SA objective 9: **health** as the provision of active travel routes is likely to be successful in promoting healthy communities.

4.155 The ability of people to access jobs or essential services and facilities using time efficient and sustainable modes of transport is essential to driving productivity in the local economy and maintaining the vitality of existing town centres within Greater Exeter. As such, both options are expected to have minor positive effects in relation to SA objective 12: **jobs and local economy** and SA objective 13: **city and town centres**.

4.156 The reasonable alternative considered has the potential to result in negative impacts on the existing landscape in Greater Exeter due to the relatively large amounts of land that would be required to facilitate potential light rail and tram infrastructure. This is of particular concern within Greater Exeter due to the presence of multiple AONBs. As such, minor negative effects are expected in relation to SA objective 2: **landscape**. For RA-1, minor negative effects are also expected in relation to SA objective 1: **natural environment**, SA objective 3: **historic and built environment** and SA objective 6: **land resources**. The delivery of large scale transport infrastructure has the potential to result in the loss of high value agricultural land, land that contributes positively to biodiversity of the area or land that contributes to the setting of designated heritage assets. This type of infrastructure provision also has the potential to result in habitat disturbance, fragmentation or loss as well as impacts on the landscape relating to tranquillity in particular. Any effect is uncertain for these SA objectives as the exact locations for transport infrastructure are unknown at this stage. Furthermore the design of any schemes may allow for the mitigation of any adverse impacts at least in part. The transport infrastructure suggested also has the potential to contribute to an increased level of impermeable surfaces in the area if greenfield land is used. This may result in increased flood risk from surface water. As such, minor negative effects are expected in relation to SA objective 5: **climate change adaptation** for RA-1**.** The effects are uncertain given that any increase in flood risk will also be dependent on the implementation of SuDS, a design consideration that is unknown at this stage.

### GESP 23: Sustainable Travel in New Developments

4.157 This section summarises the SA findings for the approach the GESP should take in relation to sustainable travel in new developments. The Proposed Policy, GESP 23, sets out to support a sustainable transport strategy that will help to reduce carbon emissions by planning for the majority of trips at major developments to be made using walking, cycling and public transport. One reasonable alternative is considered in relation to this issue which is the removal of active travel and sustainable travel as a priority (RA-1).

4.158 Negligible effects are expected in relation to the majority of SA objectives due to the focus of the options considered being focused on transport.

4.159 For the Proposed Policy, significant positive effects are expected in relation to SA objective 4: **climate change mitigation** and SA objective 14: **connectivity and transport** as the prioritisation of active travel and public transport is likely to help encourage a reduction in congestion and $CO_2$ emissions due to reduced reliance on private car trips. For RA-1, negative effects are expected as giving car dominated planning equal priority has the potential to result in increased congestion and carbon emissions within Greater Exeter due to greater reliance on private car trips. Considering the relationship between private car use and carbon emissions it is expected that failure to promote sustainable transport through RA-1 would result in significant negative effects in relation to SA objective 4.

4.160 Significant positive effects are expected for the Proposed Policy in relation to SA objective 9: **health** as the prioritisation of active travel over transport modes in new developments is likely to foster healthy communities in perpetuity by facilitating modal shifts in transport choices. In particular, the policy suggests that 'modal filtering' could be used in street design within the GESP, which will enable permeability of some forms of public transport and active travel, but will limit movement for modes such as private cars or heavy goods vehicles. Air quality is also less likely to be an issue if modal shift is achieved in the plan area. Furthermore, this approach may result in positive impacts on the overall wellbeing of residents in new communities as

neighbourhoods are likely to be quieter and safer in environments where active travel is a priority. As such, minor positive effects are expected in relation to SA objective 10: **wellbeing** for the Proposed Approach. RA-1 is expected to have negative effects in relation to SA objective 10 as it promotes the continued reliance upon private cars as the main mode of transport. The negative effects expected in relation to this SA objective for RA-1 are likely to be significant considering the adverse impact travel by fossil fuel reliant private vehicles is likely to have in terms of air quality.

### GESP 24: Travel Planning

4.161 This section summarises the SA findings for the approach the GESP should take in relation to the submission and implementation of travel plans for new developments. The Proposed Policy, GESP 24, sets out to ensure that all new developments for purpose built student accommodation or of at least 100 dwellings (or 1000m$^2$ non-housing floorspace) will be required to prepare Travel Plans. The policy proposes that residential travel plans could be delivered by the developer or through financial contribution to the Local Transport Authority. Two reasonable alternatives are considered in relation to this issue: a reduced threshold (10+ dwellings) for the requirement for development to be supported by a travel plan (RA-1); or for an increased threshold for requiring travel plans to sites of 500 or more dwellings or 2500m$^2$ or more employment (RA-2).

4.162 For the Proposed Policy and RA-1, similar significant positive effects are expected in relation to SA objective 4: **climate change mitigation** as the implementation of travel plans for new developments is likely to encourage some modal shift at a relatively low cost, which has the potential to limit overall carbon emissions resulting from new development. Although RA-1 would reduce the threshold at which developments would be required to be supported by a travel plan it is not expected that any further significant positive effects over and beyond the Proposed Policy would be achieved in terms of carbon emissions, considering the comparatively few movements generated from smaller developments. The converse is true for RA-2, where a lack of travel planning in new developments has the potential to result in increased private car reliance with new developments that will increase carbon emissions within Greater Exeter. Therefore, minor negative effects are expected in relation to SA objective 4 for RA-2.

4.163 The Proposed Policy and RA-1 are also expected to have minor positive effects in relation to SA objective 9: **health** and SA objective 10: **wellbeing.** The promotion of active travel transport modes as part of travel planning is likely to result in improved health of residents due to the potential for exercise to be incorporated into their daily commutes to work. A reduction in the overall amount of trips taken by private cars to and from new developments is likely to have positive impacts in terms of air quality, reducing noise pollution and increasing road safety. For RA-2, minor negative effects are expected in relation to these SA objectives as the lack of travel planning could result in new developments being dominated by private car travel, potentially reducing uptake of active travel among residents and increasing the potential for air and noise pollution.

4.164 Significant positive effects are expected for the Proposed Policy and RA-1 in relation to SA objective 14: **connectivity and transport**. Travel planning has the potential to address issues of congestion at new developments by limiting any reliance on transport by private cars. Minor negative effects are expected for RA-2 in relation to SA objective 14 as the lack of travel planning which is likely to result a higher number of new developments could give rise to increased levels of congestion. There may be impacts in terms of the ability of people to access services and facilities, particularly as it is suggested that information on the proximity to these should be required as part of travel plans. As such, minor positive effects are expected in relation to SA objective 11: **access to services** for the Proposed Policy and RA-1. Furthermore, increased requirement for travel planning to be undertaken is likely to improve access to employment opportunities in the plan area. The Proposed Policy states that Employee Travel Plans should include details on the potential sustainable transport options for staff and it is expected that this strand of the policy may further increase the accessibility of employment opportunities. As such, minor positive effects are also expected in relation to SA objective 12: **jobs and local economy** for the Proposed Policy and RA-1.

4.165 The requirements to submit travel plans with new developments could however result in reduced developer contributions for other policy requirements such as affordable housing. As such, minor negative effects are expected in relation to SA objective 8: **housing** for the Proposed Policy. The negative effects expected in relation to RA-1 are likely to be significant considering that the reduced threshold set out through this option is likely to mean more developments would be affected. The effects for these two options are uncertain as the rate of housing delivery will ultimately depend on developer decisions, which are unknown at this stage.

### GESP 25: Long Distance Strategic Trails

4.166 This section summarises the SA findings for the approach the GESP should take in relation to the delivery of long distance strategic trails for cycling and also walking. The Proposed Policy, GESP 25, sets out to provide a Strategic Walking and Cycle Network linking key towns to the existing strategic trail network, which includes the Teign Estuary Trail, the Clyst Valley Trail, the East of Exeter Trail, the Boniface Trail and the Mid Devon Trail. One reasonable alternative is considered in relation to this issue, which is an active travel policy that does not identify specific trails (RA-1).

4.167 For both the Proposed Policy and reasonable alternative considered, negligible effects are expected in relation to the majority of SA objectives due to their narrow focus relating to active travel infrastructure.

4.168 For the Proposed Policy, significant positive effects are expected in relation to SA objective 4: **climate change mitigation** and SA objective 14: **connectivity and transport**. The identification of key active travel infrastructure locations at strategic level will ensure that active travel infrastructure is adequately incorporated into the GESP allocation policies and the Infrastructure Delivery Plan at a later stage. As such, this is likely to result in a promotion of modal shift as to reduce dependency on travel by private vehicles and limit carbon emissions. Reduced reliance on private cars will reduce congestion on roads within Greater Exeter and the access to a comprehensive cycle network detailed in the Proposed Policy will increase overall connectivity within the region. The increased uptake of active travel among residents in Greater Exeter as supported by the Proposed Policy is also likely to promote healthier communities. As such, significant positive effects are also expected in relation to SA objective 9: **health** for the Proposed Policy. For the reasonable alternative, the effects are reduced to minor positive in relation to SA objective 4, 9 and 14. Uncertainty is also attached to the minor positive effects as promotion of the broad objective for active travel without identification of specific routes could possibly result in the promotion of a fewer number of cycle routes overall. As such, the full potential of a comprehensive strategic cycle network in Greater Exeter may not be realised.

4.169 For both the Proposed Policy and the reasonable alternative considered, minor positive effects are expected in relation to SA objective 10: **wellbeing** as the potential for the provision of active travel infrastructure to reduce reliance on private car trips is likely to result in positive impacts on air quality within Greater Exeter. The minor positive effects recorded for the reasonable alternative are uncertain for the reasons previously described.

### GESP 26: Rail and Bus Projects

4.170 This section summarises the SA findings for the approach the GESP should take in relation to the safeguarding and allocation of land for public transport projects. The Proposed Policy, GESP 26, identifies key locations to allow for the provision of new public transport routes, rail stations and infrastructure. No reasonable alternatives are considered in relation to this issue.

4.171 The Proposed Policy is expected to have significant positive effects in relation to SA objective 14: **connectivity and transport**. Working closely with transport operators and stakeholders to deliver upgrades to existing transport infrastructure and new transport infrastructure within Greater Exeter is likely to have positive impacts on access to public transport across the region. This is likely to facilitate modal shift in the plan area thereby contributing to a reduction in congestion. Delivery of new railway stations and rail improvements at Monkerton, Cullompton, Marsh Barton and Cranbrook will likely result in significantly improved transport connectivity in these areas for existing residents and new residents and also represents the minimum that is required over the plan period to achieve a frequent and resilient Devon Metro service.

Furthermore, the maintenance work outlined for main line rail along the coast near Dawlish is likely to contribute to the wider travel needs of residents in Greater Exeter and visitors from outside of the region.

4.172 For the Proposed Policy, significant positive effects are also expected in relation to SA objective 4: **climate change mitigation.** Greater uptake in public transport within Greater Exeter due to the proposed upgrades has the potential to reduce carbon emissions attributed to private car trips, contributing to national climate change mitigation targets and the overall priority to reduce carbon emissions in the GESP. Minor positive effects are expected in relation to SA objective 10: **wellbeing** given that there is potential for overall air quality to be improved and the level of noise pollution associated with car dominated neighbourhoods to be reduced.

4.173 The delivery of transport projects across the plan area is likely to result in a number of positive effects across a range of issues. However, there is potential for supporting development at a number of specific locations to result in adverse effects in relation to sensitive receptors. For example, the proposed new railway station at Marsh Barton would be located in an area in which there are multiple designated heritage assets in close proximity, including Southernhay and The Friars, Riverside and St. Leonard Conservation Areas to the north and Princes Square Conservation Area to the north west. There are also multiple Grade II and Grade II* listed buildings located within these areas. Additionally, the proposed location for a railway station at Cullompton is within 1km of Cullompton Conservation Area to the south-west which contains a high concentration of listed buildings. As such, minor negative effects are expected for the Proposed Policy in relation to SA objective 3: **historic and built environment** as there is potential for the new railway station to impact upon the setting of historic environment assets in the area. The effects on the historic environment are uncertain at this stage given that the design of any new development may provide opportunities for appropriate mitigation to be incorporated. Development at Marsh Barton is also likely to lie within close proximity to a number of biodiversity sites including Exeter Canal County Wildlife Site and Countess Wear County Wildlife Site meaning minor negative effects are expected in relation to SA objective 1: **natural environment**. These effects are uncertain considering that the exact location of any development and thus its relation with the surrounding areas of sensitivity, is not set out through the policy. The proposed location for a new station close to Monkerton is not in close proximity to any sensitive environmental receptors.

4.174 The delivery of new railway stations at Cranbrook East, Cullompton and Marsh Barton could potentially result in an increased level of development being adversely affected by higher levels of flood risk. There are significant areas of flood zone 2 and 3 adjacent to these proposed railway stations. Furthermore a new railway station is likely to increase the overall level of impermeable surface in the area and therefore issues relating to the safe infiltration of surface water may result. As such, minor negative effects are expected for the Proposed Policy in relation to SA objective 5: **climate change adaptation.** The effects are uncertain given that flood risk will depend in part on the provision of SuDS, a design consideration that is unknown at this stage. The proposed station at Monkerton is not in close proximity to areas of flood risk.

### GESP 27: Park and Ride around the City

4.175 This section summarises the SA findings for the approach the GESP should take in relation to the implementation of park and ride facilities. The Proposed Policy, GESP 27, sets out to deliver park and ride facilities (including park and change) located along seven main transport corridors within Greater Exeter. Two reasonable alternatives are considered in relation to this issue which are the provision of more park and ride facilities than set out for in the Proposed Policy (RA-1) or the provision of less park and ride facilities with a greater focus on capital investment into increasing road capacity instead (RA-2).

4.176 For the Proposed Policy, significant positive effects are expected in relation to SA objective 14: **connectivity and transport.** There is potential for the inclusion of the Proposed Policy to significantly reduce the level of congestion in and around Exeter, which could play a key part in supporting the increase in visitors and commuters to Exeter City that is likely to occur due to projected housing development in the area. As such, significant positive effects are also expected

for RA-1 in relation to SA objective 14 as the inclusion of additional park and rides to support access to other key settlements including Tiverton is likely to contribute to lower levels of congestion at these locations also. Considering that many of these additional locations may not have the potential to support viable provisions of this type due to limited demand the positive effects expected in relation to SA objective 14 for RA-1, that are over and above those expected for the Proposed Policy, are likely to be minimal. For RA-2, the positive effects are expected to be minor in relation to this SA objective considering that there is likely to be less potential for congestion to be alleviated as a result of fewer park and rides being delivered. Additionally, minor negative effects are also expected in combination as the increased level of capital which is to be spent on the road network could result in increased private car travel into the city centre in the long term, exacerbating congestion.

4.177 The transport corridors identified for park and ride development in the Proposed Policy act as key routes into Exeter for people to visit the city centre (providing expenditure in shopping and tourist related activities) and also to commute to work. As such, the extensive park and ride provision detailed in the Proposed Policy and RA-1 is expected to have minor positive effects in relation to SA objective 12: **local economy** and SA objective 13: **city and town centres**. In the absence of the park and ride infrastructure at the locations proposed, there is potential for housing development proposed during the plan period to increase private car trips into the city centre beyond reasonable levels, which could have adverse impacts on the ability of people to access job opportunities and the vitality of the city centre. As such, minor negative effects are expected for RA-2 in relation to these SA objectives. The minor negative effects expected in relation to SA objective 12 for RA-2, are likely to be combined with minor positive effects, however, given that increasing the capital investment on the road network may benefit certain economic sectors in the plan area, such as those which are dependent on HGV movements.

4.178 The increased number of private car trips into the city centre that could potentially arise as a result of the implementation of RA-2 could have adverse impacts on the air quality within the city centre, and therefore minor negative effects are expected in relation to SA objective 10: **wellbeing** for this policy option. Conversely, the reduced number of private car trips into the centre that could arise as a result of the Proposed Policy or RA-1 could have positive impacts on air quality, and therefore minor positive effects are expected in relation to this SA objective for these options. The same considerations apply to SA objective 4: **climate change mitigation**, where the Proposed Policy and RA-1 have the potential to reduce carbon emissions associated with car travel into the centre, while RA-2 would likely result in an increase. As such, minor positive effects are expected for the former options and minor negative effects are expected for the latter options in relation to SA objective 4.

4.179 Whilst there are positive impacts in increased park and ride provision, the land required for delivery at the locations outlined in the Proposed Policy and RA-1 could contribute to disruption of the existing landscape character, the loss of high quality agricultural land and disturbance to the setting of designated heritage assets within the area. The majority of proposed park and ride locations include areas where there is potential for loss of Grade 3a agricultural land. Furthermore, at the majority of the proposed locations, there are a number of heritage assets located in close proximity. This is particularly the case for development which might occur at Cowley Bridge Road corridor, at the Newton Abbot, Forches Cross A382 corridor, at the A30-A377 Alphington Road corridor, at the A38-A379 Matford Corridor and at the A376-A3052 corridor. Some of these locations lie within close proximity of areas which have been identified for their landscape sensitivity such as the A38-A379 Matford Corridor by the Teignbridge Coastal Protection Area North and the Newton Abbot, Forches Cross A382 corridor by Dartmoor National Park. As such, minor negative effects are expected in relation to SA objective 2: **landscape**, SA objective 3: **historic and built environment** and SA objective 6: **land resources** for the proposed Policy. There is potential for a high number sensitive locations to be required to accommodate new development through RA-1, considering the higher amount of development necessary and therefore the negative effects expected in relation to these SA objectives are likely to be significant for this option. Minor negative effects are also expected for RA-2 in relation to these SA objectives as there will still be some park and ride provision at potentially sensitive locations and the increased focus on road capacity improvements could cause disturbance to the tranquillity

of rural areas and the setting of designated heritage assets. In all cases, the effects are uncertain as the exact scale and locations for delivery are unknown at this stage.

4.180 Additionally, there is potential for park and ride provision at the locations proposed to have adverse impacts on the natural environment, particularly in cases where there are important biodiversity or geodiversity designations in close proximity. The proposed locations include areas at which natural environment designations could be affected such as at the B3181 Pinhoe Road corridor where the Poltimore County Wildlife Site is located in close proximity; the A30/Heavitree Road corridor which is in close proximity of a Strategic Nature Area; and the A30-A377 Alphington Road corridor which is adjacent to Alphington Whitestone Valley Park and Alphinbrook County Wildlife Site. As such, minor negative effects are also expected for the Proposed Policy in relation SA objective 1: **natural environment** for the Proposed Policy, as these are locally designated nature conservation sites rather than national or international. RA-1 is likely to result in a higher amount of land take and may deliver growth in a higher number of sensitive areas. Therefore, the negative effects identified in relation to SA objective 1 for this option are recorded as significant. In the case of RA-2 significant negative effects are also expected as some development to support park and ride provision is still likely to be required to be delivered at potentially sensitive land. There is also the possibility for a stronger focus on increasing road capacity to result in severance of habitats in some locations. In all cases, the effects are uncertain as the exact locations and amount of land needed for the delivery of this transport infrastructure is unknown at this stage.

4.181 There is also the potential for park and ride infrastructure developed on greenfield areas of land to result in an overall increase in the level of impermeable surfaces in that area, potentially increasing the flood risk. As such, minor negative effects are also expected for the Proposed Policy and RA-2 in relation to SA objective 5: **climate change adaptation**. The effects are also uncertain in this case as the flood risk will depend on the implementation of SuDS, a design consideration that is not known at this stage. Considering the higher level of development which is likely to be required support RA-1, the negative effects identified are significant.

### GESP 28: Electric Vehicles

4.182 The section summarises the SA findings for the approach the GESP should take in relation to the promotion of electric vehicles (EVs). The Proposed Policy, GESP 28, sets out to ensure that development proposals will include the necessary infrastructure to support the use of electric vehicles. The policy includes multiple considerations to ensure that residential and commercial development is 'EV ready' whilst also requiring that EV infrastructure is sited to integrate positively with the built environment and not adversely impact heritage assets. There is one reasonable alternative being considered in relation to this issue, which is a requirement for the provision of EV charging points on all parking spaces, both private and public (RA-1).

4.183 For both the Proposed Policy and reasonable alternative considered, negligible effects are expected in relation to the majority of SA objectives due to the narrow focus of the policy on EVs. The requirement for EV infrastructure to integrate positively with the built environment and avoid impacts on heritage assets should help to mitigate any potential negative effects that might occur at EV parking and charging locations, but is not considered to result in positive effects in its own right.

4.184 The GESP vision sets out to achieve net-zero carbon by 2040 and it is expected that uptake of electric vehicles could go some way to achieve this as long as the grid continues to decarbonise. As such, minor positive effects are expected for both the Proposed Policy and the reasonable alternative considered in relation to SA objective 4: **climate change mitigation.** The provision of 'EV ready' areas or charging points is expected to increase the potential for achieving modal shift. While RA-1 could result in a higher number of developments being 'EV ready', this type of transport currently makes a small portion of the car market and furthermore technology associated with its use is evolving quickly meaning that it may quickly become obsolete. As such, any additional positive effects expected for RA-1, over and above those expected for the Proposed Policy are likely to be minimal. Minor positive effects are also expected for both the Proposed Policy and reasonable alternative in relation to SA objective 10: **wellbeing** as a result of the

increase in air quality within Greater Exeter that could arise due to increased uptake of EVs. These positive effects are expected to be combined with minor negative effects given that EVs can emit particulate matter from tyres and brakes.

4.185 Minor positive effects are also expected for the Proposed Policy and reasonable alternative considered in relation to SA objective 14: **connectivity and transport**. Increased access to EV charging points is likely to increase the overall connectivity of communities within Greater Exeter and ensure that travel is not restricted to cars reliant on fossil fuels. However, the requirement in the reasonable alternative considered for full coverage of EV charging points in all parking spaces could have an adverse impact in terms of the viability of smaller schemes in particular. There is likely to be an additional cost to installing and maintaining EV charging points which may be required to be met by developer contributions. As such, uncertain minor negative effects are expected in relation to SA objective 8: **homes**.

### GESP 29: Highway Links and Junction Improvements

4.186 This section summarises the SA findings for the approach the GESP should take in relation to highway links and junction improvements. The Proposed Policy, GESP 29, sets out identified improvements that are required to support growth projected within Greater Exeter during the plan period. This includes increasing capacity in the strategic road network (M5 and A361) and major/local road network (A382,A3052/A376,A30, A377) within Greater Exeter through highway widening, junction enhancements and a new main link road from the A30 (Clyst Honiton) to the A3052. No reasonable alternatives are considered in relation to this issue.

4.187 The Proposed Policy is expected to have significant positive effects in relation to SA objective 14: **connectivity and transport** as the identified improvements are likely to improve access and traffic flow in the strategic and local road network within Greater Exeter. This is likely to ensure that housing and employment developments proposed in the GESP do not have adverse impacts on traffic flow on key routes. Furthermore, the Proposed Policy is also expected to have minor positive effects in relation to SA objective 12: **jobs and local economy.** The success and competitiveness of the economy within Greater Exeter is likely to be bolstered by high levels of efficiency in the strategic road network. This includes the ability of employers within Greater Exeter to access labour supplies, both in existing settlements and proposed employment development locations.

4.188 Significant negative effects are expected in relation to SA objective 4: **climate change mitigation**. The increased capacity available in the road network would result in an increased number of trips being taken by private car in the plan area and therefore greenhouse gas emissions are likely to rise. In addition, mixed minor positive and minor negative effects are expected for the Proposed Policy in relation to SA objective 10: **wellbeing** due to the potential for air quality to be improved through reducing congestion in the plan area; however, the overall increase in capacity for car journeys is expected to result in adverse impacts in terms of air quality. The minor negative effects in relation to both SA objectives are uncertain as the amount of trips taken by car will depend on the exact locations of proposed developments and the level of public transport provision and uptake.

4.189 The plans for a new link road to allow north to south travel between the A30 (Clyst Honiton) and the A3052 without the need to use motorway junctions is likely to have positive impacts on traffic flow in the area, considering this may be an area for large scale residential development during the GESP plan period, as identified through the Spatial Strategy and Proposed Site Options. However, landscape sensitivity is high in this area due to the presence of Clyst Valley Regional Park, which is also a location that is required to contribute to biodiversity goals in the GESP. Therefore, minor negative effects are expected in relation to SA objective 1: **natural environment and** SA objective 2: **landscape** as there is potential for the development of a new main road to disrupt the existing landscape character at this location. Furthermore, there is potential for a new main road to compromise the setting of designated heritage assets in the area and result in the loss of high quality agricultural land (there are parcels of Grade 2 agricultural across the area). As such, minor negative effects are also expected in relation to SA objective 3: **historic and built environment** SA objective 6: **land resources**.

4.190 There is potential for the other road improvements in the strategic road network specified in the Proposed Policy to also have adverse impacts on sensitive areas. Improvements which may result in impacts on nearby sensitive receptors include the delivery of a Cullompton Town Centre Relief Road which may result in impacts on the settings of the multiple designated heritage assets located in the town. This area takes in a heritage at risk zone. Furthermore, the widening of the A382 highway between Newton Abbot and Drumbridge may cause disturbance to the setting of Stover Park, a Registered Park and Garden located adjacent to the north of this section of road. All minor negative effects are uncertain as the exact location of the new road proposed and the scale and locations of other highway improvements are not confirmed at this stage.

### GESP 30: Movement in Exeter

4.191 This section summaries the SA findings for the approach the GESP should take in relation to Exeter's movement and public transport networks. The Proposed Policy, GESP30, will improve such networks by focussing on quality of place, requiring and enabling streets and corridor improvements to reduce dominance of cars, which will involve public realm enhancements in the City Centre, Heavitree Road and Cowick Street. The policy will also deliver a comprehensive pedestrian and cycle network within Exeter as well as improving cross-city bus corridors and also a new zero-emission transport subscription service. There are no reasonable alternatives being considered in relation to this policy.

4.192 Significant positive effects are expected for the policy in relation to SA objective 14: **connectivity and transport** due to the strong emphasis in the policy of improving sustainable transport links that will allow residents to move through Exeter, either to work or leisure destinations, with less reliance on private cars. The modal shift encouraged through the policy, both through the provision of sustainable transport links and the enhancements to key public realm locations, are likely to contribute to reduced overall transport related carbon emissions within Exeter City. Furthermore, the creation of a new zero-emission transport subscription service may foster a greater willingness amongst residents to switch to sustainable modes. As such significant positive effects are also expected for the policy in relation to SA objective 4: **climate change mitigation**. Although less direct, minor positive effects are expected for the policy in relation to SA objective 12: **jobs and local economy**. A more effective transport system within the city may increase the city's prospects as a commuting hub for workers and is also likely to increase trips into the centre for retail purposes.

4.193 A modal shift away from private car travel within Exeter is also likely to result in improvements to air quality, which is of particular importance due to the presence of several AQMAs within the city centre, which are contributing to poorer health amongst residents. Additionally, the focus on active travel options, especially in relation to key cycle routes, is likely to result in increased uptake of physical activity amongst residents, either to commute or for leisure. As such, minor positive effects are expected for the policy in relation to SA objective 9: **health**. Minor positive effects are also expected for the proposed policy in relation to SA objective 10: **wellbeing**. The improved access to public transport options may reduce the potential for social isolation of more vulnerable residents within Exeter and the overall enhancements of key public realms, where there is less traffic, are likely to improve resident's satisfaction with their neighbourhood. Furthermore, minor positive effects are expected for the proposed policy in relation to SA objective 13: **city and town centres** due to the support for the vitality of Exeter City Centre that the policy provides both through transport and public realm improvements.

4.194 Negligible effects are expected for the proposed policy in relation to the majority of SA objectives due to the narrow focus of the policy on transport enhancements.

### GESP 31: Settlement Specific Enhancements

4.195 This section summaries the SA findings for the approach the GESP should take in relation to improvements at key towns. The Proposed Policy, GESP 31, sets out to deliver comprehensive pedestrian and cycle networks in the identified towns, including Newton Abbot, Cranbrook, Crediton, Cullompton, Dawlish, Exmouth, Honiton, Teignmouth and the GESP strategic allocations (once selected). The policy supports a focus on quality of place by ensuring that street

improvements result in a reduction in the dominance of cars and that there is reliable and low carbon bus route network between the main settlements within Greater Exeter and growth areas. There are no reasonable alternatives being considered in relation to this issue.

4.196 Significant positive effects are expected for the policy in relation to SA objective 14: **connectivity and transport** due to the strong emphasis in the policy of improving bus routes that will allow residents in more rural areas to travel into or between key settlements, either to work or leisure destinations, with less reliance on private cars. The sustainable travel behaviour encouraged through the policy through the delivery of pedestrian and cycle routes and modal filtering in street improvements is likely to reduce carbon emissions related to key towns within Greater Exeter. As such, minor positive effects are also expected for the policy in relation to SA objective 4: **climate change mitigation**. Minor positive effects are expected for the policy in relation to SA objective 12: **jobs and local economy** as a more efficient transport system will make job opportunities in key towns within Greater Exeter more accessible. Furthermore, minor positive effects are expected for the proposed policy in relation to SA objective 13: **city and town centres** due to the support for the vitality of key town centres that the policy provides both through transport and public realm improvements.

4.197 A modal shift away from private car travel within key towns is also likely to result in improvements to air quality, which is important given the amount of growth key locations in the GESP will accommodate. Additionally, the focus on active travel options through the delivery of comprehensive pedestrian and cycle routes is likely to result in increased uptake of physical activity amongst residents, either to commute or for leisure. As such, minor positive effects are expected for the policy in relation to SA objective 9: **health**. Minor positive effects are also expected for the proposed policy in relation to SA objective 10: **wellbeing**. The improved access to public transport options may reduce the potential for social isolation of more vulnerable residents in Greater Exeter and the overall enhancements of key public realms, where there is less traffic, are likely to improve resident's satisfaction with their neighbourhood.

4.198 Negligible effects are expected for the proposed policy in relation to the majority of SA objectives due to the narrow focus of the policy on transport enhancements

### GESP32: Gigabit-Ready Developments

4.199 This section summarises the SA findings for the approach the GESP should take in relation to the provision of developments which allow for access to fixed and mobile internet services. The Proposed Policy, GESP 32, sets out to ensure that residents and businesses in new buildings have access to a choice of internet services with reliable and resilient gigabit per second speeds. Proposals of the policy include the incorporation of digital infrastructure as essential alongside other utilities during development and the provision of an open access ducting network suitable for full-fibre connections to each building. There is one reasonable alternative being considered in relation to this issue, which is a requirement for fibre-optic cabling without installation of open access ducting (RA-1).

4.200 It has been common in new housing developments for broadband connections to be limited, which has occurred due to there being no requirement for utility providers to connect new housing estates to the internet. The provision of open access ducting in new developments opens up the market to competition from different suppliers and significantly increases the likelihood of full internet coverage. As such, minor positive effects are expected for the Proposed Policy in relation to SA objective 10: **wellbeing** and SA objective 11: **access to services** as full internet coverage is an essential service in new developments that is likely to reduce the potential for social isolation. The reasonable alternative considered is expected to have mixed minor positive and minor negative effects in relation to these SA objectives. This approach would require fibre optic without open access ducting, which could allow all new homes to be connected to broadband but is more likely to result in new developments being provided with inadequate internet coverage.

4.201 For the Proposed Policy, minor positive effects are expected in relation to SA objective 4: **climate change mitigation**. Full coverage of internet access across new developments is likely to provide a greater proportion of residents with the potential to work from home. This could reduce

the amount of trips take to and from new developments using fossil fuel reliant vehicles, which may limit any increase in carbon emissions resulting from new growth. Considering the potential for reducing the need to travel in Greater Exeter, it is likely that the Proposed Policy could help to have a beneficial impact in terms of reducing congestion. Minor positive effects are therefore also expected in relation to SA objective 14: **connectivity and transport** for this option.

4.202 The Proposed Policy is also expected to have minor positive effects in relation to SA objective 12: **jobs and local economy.** Providing improved internet access at new developments in the plan area is likely to support the economic growth considering the important role this provision plays in business in the 21st century. As the reasonable alternative could result in some new developments being provided with haphazard or no internet access, overall mixed minor positive and minor negative effects are expected in relation to SA objective 12 for this option.

### GESP 33: Digital Spine

4.203 This section summarises the SA findings for the approach the GESP should take in relation to the incorporation of a 'digital spine' in Greater Exeter. The Proposed Policy, GESP 33, sets out to support the digital and economic transformation of the Greater Exeter area through the district councils working together with public and private sector partners to develop a regional fibre spine. It is proposed that the Greater Exeter Digital Infrastructure Cooperative comprising private and public partners including the Greater Exeter councils will be responsible for ownership, management and maintaining the digital spine. One reasonable alternative (RA-1) is considered in relation to this issue which is to increase the scope of the digital spine.

4.204 The Proposed Policy and the reasonable alternative considered are expected to have negligible effects in relation to the majority of SA objectives due to their focus being limited to delivering increased internet connectivity within Greater Exeter.

4.205 For both the Proposed Policy and the reasonable alternative considered, significant positive effects are expected in relation to SA objective 12: **jobs and local economy**. The transformation of the local economy in Greater Exeter during the plan period will likely not be possible without significant improvements to digital infrastructure in the region. The inclusion of public and private sector stakeholders, who express interest in the project, as part of the Greater Exeter Digital Infrastructure Cooperative is likely to help ensure that it will be possible to meet identified business and public sector needs. This cooperative approach is likely to help the area achieve its full economic potential. The connection of the spine to digital exchanges is likely to prove particularly attractive to the digital and tech-creative industry which is likely to help promote a strengthening and potential diversification of the economy in the plan area. However, for RA-1 the significant positive effects are uncertain. Increasing the scope of the spine may increase the potential costs of delivery for the Greater Exeter Councils in a time of economic pressures meaning that the delivery of the project might be inhibited in certain areas. The Proposed Policy will connect the spine to identified strategic locations and there will likely be the potential to expand the spine further in the future if additional need is required.

4.206 Minor positive effects are expected for both policy options in relation to SA objective 4: **climate change mitigation** as the increased digital connectivity that is likely to result in the region through the delivery of the spine may result in reduced need to travel by private car. A reduction in journeys being made by private car in the area is likely to reduce in carbon emissions. It is expected that this type of provision could help to promote home working in the plan area. As such, minor positive effects are also expected for the Proposed Policy and the reasonable alternative considered in relation to SA objective 14: **connectivity and transport** as a reduced need to travel could result in less congestion along busy routes in Greater Exeter.

4.207 Minor positive effects are also expected for the Proposed Policy and the reasonable alternative considered in relation to SA objective 10: **wellbeing** and SA objective 11: **access to services.** The delivery of the digital spine in the plan area will improve access to high-speed broadband and is therefore likely to help improve access to services particularly for people who might be less mobile. This type of provision may also help to reduce social isolation in Greater Exeter. As such, it is expected that both options would help to address potential indicators of social deprivation.

**Table 4.8 Summary of SA effects for the proposed policies (GESP 22-33) and reasonable alternatives which seek to address the issues of Movement and Communication in the GESP**

| SA Objectives / Proposed Policy and Reasonable Alternatives | | SA1: Natural Environment | SA2: Landscape | SA3: Historic and Built Environment | SA4: Climate Change Mitigation | SA5: Climate Change Adaptation | SA6: Land Resources | SA7: Water Resources | SA8: Homes | SA9: Health | SA10: Wellbeing | SA11: Access to Services | SA12: Jobs and Local Economy | SA13: City and Town Centres | SA14: Connectivity and Transport |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| ***GESP 22: Transport Strategy*** | **Proposed Policy** | 0 | 0 | 0 | ++ | 0 | 0 | 0 | 0 | + | + | + | + | + | ++ |
| | **RA—1: 'Big ticket' infrastructure** | -? | -? | -? | ++/-? | -? | -? | 0 | 0 | 0 | + | + | + | + | ++/-? |
| ***GESP 23: Sustainable Travel in New Developments*** | **Proposed Policy** | 0 | 0 | 0 | ++ | 0 | 0 | 0 | 0 | ++ | + | 0 | 0 | 0 | ++ |
| | **RA-1: De-prioritisation of active travel and sustainable transport** | 0 | 0 | 0 | -- | 0 | 0 | 0 | 0 | 0 | -- | 0 | 0 | 0 | - |
| | **RA-2: Equal priority for Electric Vehicles** | 0 | 0 | 0 | +/- | 0 | 0 | 0 | 0 | 0 | +/- | 0 | 0 | 0 | - |
| ***GESP 24:*** | **Proposed** | 0 | 0 | 0 | ++ | 0 | 0 | 0 | -? | + | + | + | + | 0 | ++ |

| SA Objectives / Proposed Policy and Reasonable Alternatives | | SA1: Natural Environment | SA2: Landscape | SA3: Historic and Built Environment | SA4: Climate Change Mitigation | SA5: Climate Change Adaptation | SA6: Land Resources | SA7: Water Resources | SA8: Homes | SA9: Health | SA10: Wellbeing | SA11: Access to Services | SA12: Jobs and Local Economy | SA13: City and Town Centres | SA14: Connectivity and Transport |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| ***Travel Planning*** | **Policy** | | | | | | | | | | | | | | |
| | **RA-1: Reduced threshold for travel plan** | 0 | 0 | 0 | ++ | 0 | 0 | 0 | --? | + | + | + | + | 0 | ++ |
| | **RA-2: Increased threshold for travel plan** | 0 | 0 | 0 | - | 0 | 0 | 0 | 0 | - | - | 0 | 0 | 0 | - |
| ***GESP 25: Active Travel Infrastructure*** | **Proposed Policy** | 0 | 0 | 0 | ++ | 0 | 0 | 0 | 0 | ++ | + | 0 | 0 | 0 | ++ |
| | **RA-1: No specific routes identified** | 0 | 0 | 0 | +? | 0 | 0 | 0 | 0 | +? | +? | 0 | 0 | 0 | +? |
| ***GESP 26: Public Transport Projects*** | **Proposed Policy** | -? | 0 | -? | ++ | -? | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | ++ |

| SA Objectives / Proposed Policy and Reasonable Alternatives | | SA1: Natural Environment | SA2: Landscape | SA3: Historic and Built Environment | SA4: Climate Change Mitigation | SA5: Climate Change Adaptation | SA6: Land Resources | SA7: Water Resources | SA8: Homes | SA9: Health | SA10: Wellbeing | SA11: Access to Services | SA12: Jobs and Local Economy | SA13: City and Town Centres | SA14: Connectivity and Transport |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| ***GESP 27: New Park and Ride*** | **Proposed Policy** | -? | -? | -? | + | -? | -? | 0 | 0 | 0 | + | 0 | + | + | ++ |
| | **RA-1: More park and ride** | --? | --? | --? | + | --? | --? | 0 | 0 | 0 | + | 0 | + | + | ++ |
| | **RA-2: Less park and ride** | --? | -? | -? | - | -? | -? | 0 | 0 | 0 | - | 0 | +/- | - | +/- |
| ***GESP 28: Electric Vehicles*** | **Proposed Policy** | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | +/- | 0 | 0 | 0 | + |
| | **RA-1: All parking spaces to be EV ready** | 0 | 0 | 0 | + | 0 | 0 | 0 | -? | 0 | +/- | 0 | 0 | 0 | + |
| ***GESP29: Highway Links and Junction Improvements*** | **Proposed Policy** | -? | -? | -? | -? | 0 | -? | 0 | 0 | 0 | +/-? | 0 | + | 0 | ++ |

| SA Objectives / Proposed Policy and Reasonable Alternatives | | SA1: Natural Environment | SA2: Landscape | SA3: Historic and Built Environment | SA4: Climate Change Mitigation | SA5: Climate Change Adaptation | SA6: Land Resources | SA7: Water Resources | SA8: Homes | SA9: Health | SA10: Wellbeing | SA11: Access to Services | SA12: Jobs and Local Economy | SA13: City and Town Centres | SA14: Connectivity and Transport |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| ***GESP 30: Movement in Exeter*** | **Proposed Policy** | 0 | 0 | 0 | ++ | 0 | 0 | 0 | 0 | + | + | 0 | + | + | ++ |
| ***GESP 31: Settlement Specific Enhancements*** | **Proposed Policy** | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | + | + | 0 | | + | ++ |
| ***GESP 32: Gigabit-Ready Developments*** | **Proposed Policy** | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | + | + | + | 0 | + |
| | **RA-1: No open access ducting required** | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | +/- | +/- | +/- | 0 | 0 |
| ***GESP 33: Digital Spine*** | **Proposed Policy** | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | + | + | ++ | 0 | + |
| | **RA-1: Increased scope** | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | + | + | ++? | 0 | + |

## Nature

4.208 The GESP seeks to promote a cross-boundary approach to environmental issues which the plan area faces. A consistent area-wide approach to such issues is expected to help to protect vital biodiversity assets in Greater Exeter, considering that many of these features and the pressures which affect them flow across the local plan / administrative boundaries of the plan area. While many of the natural environment and other environmental protection policies are set through national guidance and in the district level Local Plans, Chapter 9 of the GESP seeks to achieve at least a 10% overall enhancement in biodiversity. It also contains policy to promote woodland creation, protect the international sites of Exe Estuary, Dawlish Warren and East Devon Pebblebed Heaths and define the limits of the Clyst Valley Regional Park.

4.209 **Table 4.9** at the end of this section summarises the likely effects relating to the Proposed Policies and reasonable alternatives considered for inclusion in this section of the GESP, with explanatory text provided below. The justification for the Proposed Policies and reasonable alternatives considered is provided in **Appendix 7**.

### GESP 34: Rebuilding Biodiversity

4.210 This section summarises the SA findings for the approach the GESP should take in relation to achieving net gain in biodiversity at major developments. The Proposed Policy, GESP 34, sets out that major development proposals should demonstrate a 10% or greater net gain in biodiversity compared with pre-development. This should include calculating biodiversity losses, compensation and enhancements by using the most recent nationally endorsed biodiversity metric and also considering any adopted local authority guidance. It is suggested in the policy that compensation and enhancements will be delivered in accordance with the Greater Exeter Green Infrastructure Strategy and secured by planning conditions and/or planning obligations. Two reasonable alternatives are considered in relation to this issue, which are a higher target for net biodiversity gains (RA-1) or a lower target of between 5% and 10% (RA-2).

4.211 For the Proposed Policy and RA-1, significant positive effects are expected in relation to SA objective 1: **natural environment**. A requirement to demonstrate net gain in terms of biodiversity assets at new major developments of 10% or higher is likely to help contribute positively to the national requirement for the planning system to minimise impacts on, and provide net gains for biodiversity. The obligation to deliver this level of net gain in biodiversity is also more likely to ensure that mitigation and compensation measures are adequately considered in relation to development, which may in some cases result in the need for offsite compensation. In the case of RA-2, the effects are reduced to minor positive. Achieving 5% target for net biodiversity gain at major developments has been identified as the lowest target which would still achieve net gains in the plan area. A lower target places reduced requirement on developers to ensure that developments do not have adverse impacts on the natural environment.

4.212 Delivering net gains in biodiversity can also have beneficial impacts in terms of a number of other issues. The likely extensive provision of green infrastructure that will be utilised in developments to facilitate net gains in biodiversity has the potential to enhance and improve the existing landscape and built environment. As such, minor positive effects are expected in relation to SA objective 2: **landscape** and SA objective 3: **historic and built environment** for the Proposed Policy and RA-1. In addition, delivering net gains in biodiversity in line with the Greater Exeter Green Infrastructure Strategy will also likely require that blue infrastructure is considered also. Therefore minor positive effects are expected for the Proposed Policy and RA-1 in relation to SA objective 7: **water resources**, as improvements to blue infrastructure are likely to result in higher water quality in the water bodies in the plan area. Furthermore, the provision of green infrastructure within new developments ensures that there are areas of permeable surfaces where the safe infiltration of surface water can be achieved. This type of provision can also support the delivery of SuDS. As such, minor positive effects are expected for the Proposed Policy and RA-1 in relation to SA objective 5: **climate change adaptation** due to the potential for reduced flood

risk. For RA-2, negligible effects are expected in relation to these SA objectives as the lower target for net gains in biodiversity is likely to limit the potential for the aforementioned positive impacts.

4.213 The provision of green infrastructure within new developments may also have positive effects which extend beyond the natural environment and other potentially sensitive receptors. This type of provision may allow for the incorporation of walking and cycle routes, potentially resulting in fewer trips being taken by private car and therefore reduced carbon emissions. As such, minor positive effects are expected for the Proposed Policy and the RA-1 considered in relation to SA objective 4: **climate change mitigation.** The potential for fewer trips by private car could also result in improved air quality and also improved health among residents due to increased use of active travel. As such, minor positive effects are also expected for the Proposed Policy and RA-1 considered in relation to SA objective 9: **health** and SA objective 10: **wellbeing**. Furthermore, if active travel routes are integrated into green infrastructure sufficiently, they have the potential to better connect new developments internally and with the surrounding area and may act as key routes for commuting for residents. As such, minor positive effects are expected for the Proposed Policy and RA-1 in relation to SA objective 14: **connectivity and transport**. Negligible effects are expected for RA-2 in relation to these SA objectives as the lower target for net gains in biodiversity is likely to result in reduced requirement for developers to provide green infrastructure in new developments.

4.214 Whilst a target for demonstrating more than 10% net gains in biodiversity in new developments may give rise to a range of positive impacts this requirement would go beyond national consultation / evidence on mandating net gain. There is potential for this stricter requirement to decrease the viability of new developments, potentially reducing the overall rate of housing delivery. As such, minor negative effects are expected for RA-1 in relation to SA objective 8: **homes**. The effects are uncertain as the rate of housing delivery will ultimately depend on developer decisions, which are unknown at this stage. As the Proposed Policy and RA-2 would result in a requirement for biodiversity net gain which is in line with or lower than figures which respond to the evidence available, these options are not expected to have adverse impacts on housing delivery which is above a minimal level. As such, negligible effects are recorded in relation to SA objective 8 for these options.

### GESP 35: Woodland Creation

4.215 This section summarises the SA findings for the approach the GESP should take in relation to woodland creation in Greater Exeter in order to accord with advice of the Committee on Climate Change. The Proposed Policy, GESP 35, sets out to deliver 10,000 hectares of new woodland in the GESP area by 2040 across identified areas. Development proposals located within areas of higher priority will maximise opportunities to undertake woodland creation. There are two reasonable alternatives being considered in relation to this issue, which are a 50% higher target (RA-1) or a 50% lower target (RA-2).

4.216 The delivery of 10,000 hectares of new woodland in Greater Exeter by 2040 is likely to play a key role in carbon sequestration to support the area's ambitions of achieving net zero, especially given that a new native woodland can capture 300-400 tonnes of $CO_2$ per hectare ($tCO_2e/ha$) by year 50. As such, significant positive effects are expected for the proposed policy and RA-1 in relation to SA objective 4: **climate change mitigation**. Whilst the 50% higher target in RA-1 would result in increased sequestration of carbon, it is considered unlikely that this amount of woodland could realistically be delivered, given that the target in the proposed policy is already an significant upscale when compared to delivery in the past. As such, the positive effects identified for RA-1 in relation to SA4 are uncertain. Reduced minor positive effects are identified for RA-2 in relation to SA4 given the reduced level of carbon sequestration that would result through this policy.

4.217 The scale of woodland delivery proposed is likely to be very beneficial to biodiversity within Greater Exeter, providing habitats for multiple species and improving connectivity between existing habitats. The woodland creation mapping has been carried out in conjunction with biodiversity net gain Local Nature Recovery Networks, which will ensure that the benefits of both

this policy and GESP 34 are fully realised. Additionally, the supporting text requires that all new areas of woodland should accord with UK Forestry Standards, which will avoid any adverse impacts as a result of reforestation. As such, significant positive effects are expected for the proposed policy and RA-1 in relation to SA objective 1: **natural environment.** The effects are uncertain for RA-1 given that a 50% higher target may be undeliverable. Reduced minor positive effects are expected for RA-2 given the reduced level of biodiversity gains expected with a lower reforestation target.

4.218 Minor positive effects are expected for all approaches in relation to SA objective 9: **health** and SA objective 10: **wellbeing.** Significantly increased forestation within Greater Exeter, even at the lower target, is likely to improve air quality and the attractiveness of the area for residents as well as providing further locations where people of all ages can come into contact with nature.

4.219 The widespread nature of the identified areas for woodland creation across Greater Exeter means that, in some cases, there could be loss of high quality agricultural land and mineral resources. As such, minor negative effects are expected in relation to SA objective 6: **land resources** for all approaches. The effects are uncertain as the gains in biodiversity and carbon sequestration may outbalance the loss of agricultural land and mineral resources and there may be potential to extract mineral resources prior to reforestation of locations. Minor positive effects are expected in relation to SA objective 2: **landscape** and SA objective 3: **historic environment** as there is potential for reforestation to enhance the rural character of Greater Exeter and the setting of heritage assets. However, the effects are uncertain, as any alteration to the existing character of landscapes and heritage assets will need to be assessed.

4.220 Minor positive effects are expected for all approaches in relation to SA objective 5: **climate change adaptation** and SA objective 7: **water resources** due to the role woodland can play in reducing flood risk and improving water quality in rivers through filtration in roots.

4.221 Minor negative effects are expected for RA-1 in relation to SA objective: **homes** as a target of this scale may reduce the viability of housing allocations in the GESP where they are required to deliver new woodland, which in turn will slow the rate of housing delivery.

### GESP 36: Exe Estuary, Dawlish Warren and East Devon Pebblebed Heaths

4.222 This section summarises the SA findings for the approach the GESP should take in relation to managing pressures on the Exe Estuary SPA, Dawlish Warren SAC and the East Devon Pebblebed Heaths SAC/SPA. The Proposed Policy, GESP 36, sets out to mitigate additional pressures on these designated areas by ensuring that residential or holiday accommodation development within certain zones are considerate of certain criteria for development. No reasonable alternatives are considered in relation to this issue.

4.223 The Proposed Policy contains preventative measures to ensure that these particular European designated sites within Greater Exeter are not compromised by developments. The inclusion of mitigation measures to ensure that these designations are not put under significant level of visitor pressure associated with new developments is key to ensuring the GESP is in accordance with Habitats Regulations. As such, significant positive effects are expected for the Proposed Policy in relation to SA objective 1: **natural environment** given that the policy directly sets out to conserve important designated assets of the existing environment and preserve biodiversity. The European designated sites concerned are of high value for Greater Exeter and form a strong part of the region's landscape character. These areas also provide the setting for a number of designated heritage assets. As such, minor positive effects are also expected for the Proposed Policy in relation to SA objective 2: **landscape** and SA objective 3: **historic and built environment**.

4.224 The policy requirements that Strategic Access Management and Monitoring (SAMM) fees must be paid to support developments and SANGs provided within the identified zones are likely to be essential to ensuring that European sites are not compromised by significant levels of additional recreational pressure. In addition, the provision of Suitable Alternative Natural Greenspaces (SANGs) also has the potential to provide opportunities for recreation in close proximity to new developments and may contribute positively to creating healthy communities. The South East

Devon Mitigation Strategy identifies that SANGs should be closer to residents than protected sites, of a scale to provide multiple walking routes maintained in perpetuity with unrestricted public access. As such, implementation of the Proposed Policy in line with these suggestions is expected to have minor positive effects in relation to SA objective 9: **health** and SA objective 10: **wellbeing**.

4.225 Minor negative effects are expected for the Proposed Policy in relation to SA objective 8: **homes** and SA objective 12: **job and local economy**. There is potential for the requirements outlined to reduce the viability of some housing and tourist development within the zones identified. Furthermore parts of these areas have been identified as being entirely unsuitable for new development. The effects are uncertain as the rate of housing delivery or any provision of new tourist development will depend in part on developer decisions and as well as the ability to identify sites at more suitable locations which are unknown at this stage.

### GESP 37: Clyst Valley Regional Park

4.226 This section summarises the SA findings for the approach the GESP should take in relation to the delivery of Clyst Valley Regional Park. The Proposed Policy, GESP 37, sets out to provide high quality, accessible natural green space and enhance biodiversity, landscape quality and the historic environment through the establishment of the regional park. It is suggested that delivery of the park would be funded by a mixture of developer contributions, the Community Infrastructure Levy and other sources. One reasonable alternative is considered in relation to this issue, which is the designation of a different area for a regional park with different delivery requirements (RA-1).

4.227 The Proposed Policy is expected to have significant positive effects in relation to SA objective 1: **natural environment.** The policy states that the park will achieve a number of biodiversity benefits including provision of SANGs to mitigate the recreational impact of development on Natura 2000 sites, an increase in the amount of priority habitats and an increase in the population of protected or priority species by ensuring that breeding, resting and feeding sites are protected and enhanced. In addition, there is also a proposal to promote improvement in water quality at the River Clyst and tributaries (in accordance with the Water Framework Directive), which is likely to be beneficial in terms of biodiversity and water resources. Minor positive effects are also therefore expected for the Proposed Policy in relation to SA objective 7: **water resources**. The policy includes the requirement to achieve the conservation and enhancement of heritage assets located within the park (particularly those 'at risk'), which will include engaging with the public so they can contribute to these plans. As such, significant positive effects are also expected for the Proposed Policy in relation to SA objective 3: **historic and built environment**. The cumulative effects of these conservation and enhancement measures proposed are likely to also contribute to the overall landscape quality of the area and its status as a regional park is likely to ensure that landscape character is preserved in the long term. As such, significant positive effects are expected in relation to SA objective 2: **landscape**. In the case of the reasonable alternative considered, the effects are reduced to uncertain minor positive in relation to SA objective 1, SA objective 2, SA objective 3 and SA objective 7 as the use of a different area with different delivery requirements for a regional park has not been informed by evidence gathered as part of the Greater Exeter Green Infrastructure Strategy. The effects are uncertain dependent upon which land would be chosen as an alternative for the regional park.

4.228 As well as strong commitments to improve the natural environment, the Proposed Policy also makes provisions to make Clyst Valley highly user friendly. This includes a network of multi-use trails for recreational and commuting routes within the park and the provision of SANGs as alternative green spaces for residents to reduce to the level of visitor pressure on protected sites. As such, significant positive effects are expected in relation to SA objective 9: **health** for the Proposed Policy due to the recreational opportunities on offer increasing the likelihood creating healthy and active communities. Furthermore, the provision of routes for active travel through the park has the potential to encourage modal shift in the plan area, which in turn may result in a decrease in carbon emissions. As such, minor positive effects are expected in relation to SA objective 4: **climate change mitigation** for the Proposed Policy. In addition, increased uptake of active travel and less private car trips may give rise to improvements in air quality in the area

and therefore minor positive effects are expected in relation to SA objective 10: **wellbeing** for the Proposed Policy also. In the case of the reasonable alternative considered, uncertain minor positive effects are expected in relation to these SA objectives as a regional park that has not been informed by the Greater Exeter Green Infrastructure Strategy is less likely to contribute to identified health and wellbeing needs of residents.

4.229 The use of active travel routes by residents through the regional park has the potential to connect settlements in the area and provide alternative commuting routes, which may result in less congested roads. As such, minor positive effects are expected in relation to SA objective 14: **connectivity and transport** for the Proposed Policy. For the reasonable alternative considered, uncertain minor positive effects are expected as it is not clear if a regional park at a different location would be as effective in improving active transport options given it has not been identified by the Greater Exeter Green Infrastructure Strategy.

4.230 The preservation of existing green space and the potential for further provision of green infrastructure within the proposed regional park is likely to prevent an increase in impermeable surfaces in the area, which could have positive impacts on the areas propensity to flooding due to there being greater permeable surfaces available for the penetration of surface flood water. The regional park is also required by the policy to include implementation of natural flood management. As such, minor positive effects are expected for the Proposed Policy in relation to SA objective 5: **climate change adaptation**. Minor positive effects are also expected for the reasonable alternative considered in relation to this SA objective. However, the effects are uncertain as an alternative location has not been informed by the Greater Exeter Green Infrastructure and therefore may not contribute as effectively to reducing flood risk through green space provision.

**Table 4.9 Summary of SA effects for the proposed policies (GESP 34-37) and reasonable alternatives which seek to address the issue of Nature in the GESP**

| SA Objectives / *Proposed Policy and Reasonable Alternatives* | | SA1: Natural Environment | SA2: Landscape | SA3: Historic and Built Environment | SA4: Climate Change Mitigation | SA5: Climate Change Adaptation | SA6: Land Resources | SA7: Water Resources | SA8: Homes | SA9: Health | SA10: Wellbeing | SA11: Access to Services | SA12: Jobs and Local Economy | SA13: City and Town Centres | SA14: Connectivity and Transport |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| ***GESP 34: Rebuilding Biodiversity*** | **Proposed Policy** | ++ | + | + | + | + | 0 | + | 0 | + | + | 0 | 0 | 0 | + |
| | **RA-1: Higher target** | ++ | + | + | + | + | 0 | + | -? | + | + | 0 | 0 | 0 | + |
| | **RA-2: Lower target** | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| ***GESP 35: Woodland Creation*** | **Proposed Policy** | ++ | +? | +? | ++ | + | -? | + | 0 | + | + | 0 | 0 | 0 | 0 |
| | **RA -1: 50% Higher target** | ++? | +? | +? | ++? | + | -? | + | - | + | + | 0 | 0 | 0 | 0 |
| | **RA-2: 50% lower target** | + | +? | +? | + | + | -? | + | 0 | + | + | 0 | 0 | 0 | 0 |
| ***GESP 36: Exe Estuary, Dawlish Warren and East Devon Pebblebed Heaths*** | **Proposed Policy** | ++ | + | + | 0 | 0 | 0 | 0 | -? | + | + | 0 | -? | 0 | 0 |

| SA Objectives | | SA1: Natural Environ | SA2: Landsca pe | Historic and Built | Climate Change Mitigati | Climate Change Adaptat | SA6: Land Resourc | SA7: Water Resourc | SA8: Homes | SA9: Health | SA10: Wellbei ng | Access to Service | Jobs and Local | City and Town | Connect ivity and |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| ***GESP 37: Clyst Valley Regional Park*** | **Proposed Policy** | ++ | ++ | ++ | + | + | 0 | + | 0 | ++ | + | 0 | 0 | 0 | + |
| | **RA-1: Alternative area and requirements** | +? | +? | +? | +? | +? | 0 | +? | 0 | +? | +? | 0 | 0 | 0 | +? |

## Quality Places and Infrastructure

4.231 In addition to the requirement to provide the level of housing development which would meet the identified requirements of the plan area, Chapter 10 of the GESP seeks to ensure that this growth is of a high quality so that communities are supported by successful place making. National policy now places an increased level of priority on steering new development so that it is delivered in a timely fashion. To support the achievement of both high quality and appropriate rates of delivery the GESP seeks to adopt a master planning approach and apply the principles of garden city development were appropriate. New growth is also to be supported by appropriate infrastructure provision. These elements provide a linked up approach to securing the achievement of prosperous, healthy lives and high quality homes.

4.232 **Table 4.110** at the end of this section summarises the likely effects relating to the Proposed Policies and reasonable alternatives considered for inclusion in Chapter 10 of the GESP, with explanatory text provided below. The justification for the Proposed Policies and reasonable alternatives considered is provided in **Appendix 7**.

### GESP 38: Great Places

4.233 This section summarises the SA findings for the approach the GESP should take in relation to delivering strategic allocations contained in the GESP. The Proposed Policy, GESP 38, sets out to use a comprehensive approach to delivering high quality development with coordinated infrastructure provision that will be managed by a series of plans supporting each strategic allocation. Two reasonable alternatives are considered in relation to this issue which are a masterplan only approach (RA-1) or a specific design policy approach for developments (RA-2).

4.234 Significant positive effects are expected for the Proposed Policy in relation to SA objective 8: **homes** and SA objective 14: **connectivity and transport**. The multi-stage design process proposed is likely to help ensure a high quality development is promoted during housing delivery and that transport infrastructure is phased to be incorporated at appropriate times and locations during development. Without the design requirements proposed in Parcel Plan stage, which includes consideration for the relationship between development in the parcel in question and those adjacent, it is possible that GESP allocations will fall short of the standards required and be delivered in a manner which does not help incorporate the principles of positive place making. As such, for RA-1 the effects in relation to these SA objectives are likely to only be minor positive. For RA-2, negligible effects are expected in relation to these SA objectives as a specific design policy could be overly prescriptive and is therefore more suitable to be brought forward in future Local Plan reviews. It is not considered relevant to be applicable through the GESP. Therefore the positive effects identified for the Proposed Policy are unlikely to be achieved through RA-2.

4.235 The Proposed Policy is expected to have minor positive effects in relation to the majority of SA objectives as it states that Master Plans will be used to define the environmental, social and economic requirements for development to ensure the creation of high quality new places. The positive effects are likely to be more certain for this option, considering the more comprehensive approach to delivering high quality strategic development in line with the GESP vision and priorities.

4.236 For SA objective 1: **natural environment**, SA objective 2: **landscape** and SA objective 3: **historic and built environment**, the requirement to consider issues relevant to the land to be developed and the multi-step design process proposed is likely to increase the potential for appropriate consideration of the sensitivities of a given area and as such minor positive effects have been recorded. The Proposed Policy is expected to have minor positive effects in relation to SA objective 4: **climate change mitigation** given that delivering new development in line with Master Plans will likely allow for the encouragement of modal shift. This is expected to help limit any potential increase in carbon emissions as a result of new development. Master Plans are also expected to help deliver new development which would help to encourage active travel, which in combination with uptakes of other modes of sustainable transport is likely to help limit any air

pollution increase development might result in. Consequently in relation to SA objective 9: **health** and SA objective 10: **wellbeing** minor positive effects are expected for the Proposed Policy. RA-1 limits the potential for the appropriate considerations of these issues to help achieve the GESP vision through the adoption of a more limited approach of Master Plans alone. As such, the minor positive effects identified for the Proposed Policy in relation to SA objective 1, SA objective, 2, SA objective 3, SA objective 9 and SA objective 10 are uncertain for RA-1. Given that the approach of RA-2 is likely to be overly prescriptive to be applied through the GESP and is considered more suitable to be brought forward in future Local Plan reviews, the effects recorded for these SA objectives are negligible.

4.237 The requirement for Master Plans through to Parcel Plans to be submitted and approved is likely to ensure that site allocations are integrated with existing development as to promote accessibility to services and facilities, as well as existing centres and employment opportunities. The Proposed Policy furthermore requires that social requirements are met through Master Plans as to create high quality new places. It is expected that this approach would help to ensure that these types of provisions are accessible to residents. As such, minor positive effects are expected for the Proposed Policy in relation to SA objective 11: **access to services,** SA objective 12: **jobs and local economy** and SA objective 13: **city and town centres**. It should be noted that large scale new development may need to be supported by the provision of new uses which would improve service access in the plan area. However, this is not explicitly supported through the main text of the policy. The more limited approach to ensuring a high quality of development supported through RA-1 means that the minor positive effects expected in relation to SA objective 11, SA objective 12 and SA objective 13 are uncertain. Negligible effects are expected in relation to these objectives for RA-2. For this option the more prescriptive approach set out means that it may be more suitable to be brought forward through future Local Plan reviews and not the GESP itself. As such, the potential for the achievement of beneficial effects are likely to be lost.

### GESP 39: Delivering Homes and Communities

4.238 This section summarises the SA findings for the approach the GESP should take to achieve the delivery of housing which is of a suitable quality, at an appropriate pace. The Proposed Policy, GESP 39, seeks to put in places a series of mechanisms to achieve this improved rate of quality of delivery. These include establishing local development corporations, securing funding from various sources to support growth, and a proactive approach to preparing Master Plans and infrastructure planning. No reasonable alternatives are considered in relation to this issue.

4.239 There are a number of sites currently being considered in the GESP that are large and have multiple land ownerships. As such, the Proposed Policy is expected to have significant positive effects in relation to SA objective 8: **homes** and SA objective 14: **connectivity and transport**. The policy suggestions of securing government funding to promote the timely delivery of homes and potentially becoming directly involved in land assembly is a proactive approach that is likely to be essential in delivering GESP residential allocations. This policy is supportive of infrastructure provision in a proactive approach, which is likely to ensure that adequate transport options are provided for at new developments in a timely manner, thereby limiting the potential for congestion issues to arise. This approach may allow for the appropriate incorporation of sustainable transport links from the early stages of development, which may help to foster uptake of sustainable transport options. As such, minor positive effects are expected in relation to SA objective 4: **climate change mitigation** as well SA objective 10: **wellbeing** for the Proposed Policy. The positive effects expected in relation to SA objective 10 are reflective of the reduced potential for increases in air pollution associated with new development, because sustainable transport might be promoted. This approach may also help to encourage the promotion of more active modes of transport such as walking and cycling and therefore minor positive effects are expected in relation to SA objective 9: **health**.

4.240 Supporting a more proactive approach to infrastructure planning, investment and delivery is likely to help integrate new growth alongside existing centres, services and facilities and employment opportunities in the plan area. This approach is not only expected to help ensure that existing services etc. are accessible to new residents, but should also help to prevent these existing services etc. from becoming overburdened by high levels of new growth. Minor positive effects

are therefore also recorded for the Proposed Policy in relation to SA objective 11: **access to services**, SA objective 12: **jobs and local economy** and SA objective 13: **city and town centres**. It is also expected that the provision of appropriate infrastructure (including the delivery of transport infrastructure) to support new growth is likely to help ensure the plan area is attractive to those considering investing in Greater Exeter in the future.

4.241 The Master Plan approach supported through the Proposed Policy is also expected to result in beneficial impacts related to the achievement of a more holistic approach to the design of new development. Minor positive effects are expected for the Proposed Policy in relation to SA objective 1: **natural environment**, SA objective 2: **landscape**, and SA objective 3: **climate change**. An approach to new development supported by appropriate Master Plans is considered more likely help reach appropriate mitigation solutions in terms of addressing adverse impacts on sensitivity receptors. This is likely to include the potential for loss, fragmentation and disturbance of habitats, as well as impacts on sensitive heritage assets and landscapes as well as their respective settings.

### GESP 40: Garden City Principles

4.242 This section summarises the SA findings for the approach the GESP should take in relation to delivering a high quantity of development in line with the Garden City principles within Greater Exeter. The Proposed Policy, GESP 40, sets out that Culm Garden Village will be in line with these principles and it is suggested further garden communities may be delivered dependent upon the growth distribution taken forward as well as being allocated through Local Plans. No reasonable alternatives are considered in relation to this issue.

4.243 Garden City principles are set out to achieve high quality and sustainable development and therefore the Proposed Policy for delivering development in this manner is expected to have a range of beneficial effects. While the Proposed Policy states that a garden community is to be delivered at Culm Garden Village, it should be noted that the potential for adverse impacts in relation to development at this specific location has been considered through the allocation of part of this specific area of land. The appraisal of the Proposed Policy has instead focussed on the support for the application of the Garden City principles to development set out through the GESP.

4.244 Significant positive effects are therefore expected in relation to SA objective 1: **natural environment** and SA objective 2: **landscape** given that the policy sets out specific goals to enhance the existing natural environment through the provision of comprehensive green infrastructure. This approach is likely to provide opportunities for promotion of biodiversity and may result in the achievement of net gains in this area. The full incorporation of green infrastructure throughout development supported in the GESP may also help to ensure that new development is sympathetic to and enhances the existing landscape character. The policy furthermore states allocation should be delivered as to create distinctive local identities. This approach may also yield positive impacts in terms of the settings of designated heritage assets in the area. As such, minor positive effects are expected in relation to SA objective 3: **historic and built environment**.

4.245 The Proposed Policy is also expected to have significant positive effects in relation to SA objective 8: **homes**. The establishment of Garden Villages at larger GESP allocations will likely include a range of housing types as part of development. The Garden City principles include the provision of high quality, flexible, affordable homes. Furthermore, the Proposed Policy indicates that allocations delivered in line with the Garden City principles have the potential to provide a mix of uses that would support a range of accessible local job opportunities. Therefore, significant positive effects are expected in relation to SA objective 12: **jobs and local economy** due to the potential for promotion of access to job opportunities for new residents. Development is also to be supportive of the provision of cultural and recreational facilities. Therefore significant positive effects are expected in relation to SA objective 11: **access to services and facilities**. In addition, the Proposed Policy sets out to deliver integrated, multi-modal transport options and therefore significant positive effects are expected in relation to SA objective 14: **connectivity and transport** also. The provision of sustainable transport links is likely to reduce reliance on

private cars at garden community locations in Greater Exeter, contributing to a community that is well connected which is supported by less congested roads.

4.246 The delivery of strong integrated transport links at new garden communities is expected to help support accessibility to existing centres in the plan area thereby supporting their vitality and viability. Furthermore the principles of garden communities development require that new development performs a positive role in place-making. This type of development should also help to create distinctive, local identities. It is expected that this approach could help to support the creation of new centres which are accessible to new residents and therefore minor positive effects are expected in relation to SA objective 13: **city and town centres**.

4.247 The effect of strongly integrated sustainable transport links and green infrastructure, as well as a reduced need to travel due to provision of job opportunities and services and facilities in close proximity to residential development, is likely to also limit carbon emissions at potential garden communities. As such, minor positive effects are expected for the Proposed Policy in relation to SA objective 4: **climate change mitigation**. Considering the potential reduced need to travel at these locations as well as the strong sustainable transport links which are likely to be accessible, it is likely that any potential for increases in air pollution as a result of new development is likely to be limited. Minor positive effects are therefore expected in relation to SA objective 10: **wellbeing**. Furthermore, a well-connected community with a range of transport options is likely to reduce the potential for social isolation in potential garden communities These positive outcomes in relation to wellbeing are likely to be further supported through the policy given that it is stated that community engagement should form part of the planning process. The Proposed Policy also states that local governance and stewardship should be promoted at this type of development. Minor positive effects are also expected for the Proposed Policy in relation to SA objective 9: **health** as the provision of the recreational opportunities onsite and walking/cycle networks has the potential to encourage greater levels of exercise among residents within at garden communities.

4.248 The policy suggests that garden communities will be sufficiently future proofed and resilient to potential changes. This will likely include considerations of adaptation to climate change. Positive adaption may include the orientation of buildings to respond to sunlight and the incorporation of SuDS to provide mitigation for the potentially higher flood risk in the coming decades. As such, minor positive effects are expected for the Proposed Policy in relation to SA objective 5: **climate change adaptation**.

### GESP 41: Infrastructure Classification

4.249 This section summarises the SA findings for the approach the GESP should take in relation to the classification of infrastructure. The Proposed Policy, GESP 41, sets out to ensure councils within Greater Exeter will employ a clear and consistent classification of infrastructure so that robust decisions can be made on funding and delivery. The Proposed Policy details how funding for each type of infrastructure should be achieved. No reasonable alternatives are considered in relation to this issue.

4.250 The Proposed Policy seeks to provide clarity in terms of how infrastructure will be planned, prioritised and delivered in Greater Exeter. It does not support the provision of specific elements of infrastructure and does not set out requirements of development or those which developers would be required to meet. As such, negligible effects are expected in relation to the majority of SA objectives.

4.251 Minor positive effects are expected for the Proposed Policy in relation to SA objective 14: **connectivity and transport**. The policy approach provides clarity on how elements of infrastructure, at varying levels, are to be funded. As such, the potential for adverse impacts on the existing transport system are likely to be limited. While this may include elements of sustainable transport infrastructure which might otherwise help to promote modal shift in the plan area, the policy does not explicitly refer to this type of provision and therefore a negligible effects are expected in relation to SA objective 4: **climate change mitigation**. The maintenance and increasing levels of infrastructure which is considered essential to supporting economic growth in the plan area is also likely to be promoted by the Proposed Policy. Minor positive effects are

therefore also expected for the Proposed Policy in relation to SA objective 12: **jobs and local economy**.

4.252 The infrastructure classification proposed is also likely to be of benefit in terms of ensuring that housing delivery at GESP site allocations is supported by essential infrastructure in a timely manner. Adverse impacts relating to the rate of housing delivery may result if there are uncertainties relating to sources of funding for supporting infrastructure. The Proposed Policy is therefore likely to result in minor positive effects in relation to SA objective 8: **homes**. The effects are uncertain given that the rate of housing delivery will largely depend on developer's decisions, which are unknown at this stage.

### GESP 42: Strategic Infrastructure

4.253 This section summarises the SA findings for the approach the GESP should take in relation to the delivery of critical infrastructure in Greater Exeter. The Proposed Policy, GESP 42, sets out to secure the delivery strategic priority infrastructure that is required to achieve the GESP vision and GESP allocations. The specific Infrastructure Delivery Plan is yet to be published. No reasonable alternatives are considered in relation to this issue.

4.254 The Proposed Policy sets out the principle for the delivery of critical infrastructure in Greater Exeter. No specific elements of infrastructure have been included at this stage as they will be dependent upon the growth distribution which is taken forward. Furthermore the projects to be listed are likely to have been identified through other policies in the GESP and as such their specific effects on sensitive receptors will be appraised as part of the appraisal of other policies in the plan. As such, the appraisal of the Proposed Policy focusses on the principle of providing essential strategic infrastructure in the plan area.

4.255 Minor positive effects are expected for the Proposed Policy in relation to SA objective 14: **connectivity and transport** and SA objective 12: **jobs and local economy**. The policy identifies the potential for a establishing a joint mechanism for delivering funding collectively amongst the councils within Greater Exeter. This is likely to ensure that the strategic road network and other key transport infrastructure is able to cope with the increased pressure from development supported though the GESP. The Proposed Policy is also likely to support local economic growth by providing strategic infrastructure so as to encourage employment locations to remain accessible. The delivery of housing at allocated sites is unlikely to be supported without the necessary strategic priority infrastructure also being in place. The possible funding sources suggested in the Proposed Policy (i.e. the Strategic Infrastructure Fund) for delivering this critical infrastructure up to 2040 are likely to help ensure that a high rate of housing delivery is achieved. As such, minor positive effects are expected in relation to SA objective 8: **homes**. The effects are uncertain as the rate of housing delivery will largely depend on developer's decisions, which are unknown at this stage.

4.256 The provision of a high level of strategic infrastructure as supported by the Proposed Policy is, however, likely to result in a number of adverse impacts in terms of land take and potential proximity to sensitive receptors. It is expected that the provision of new strategic infrastructure in the plan area would require a high level of greenfield land take and therefore minor negative effects are expected in relation to SA objective 6: **land resources**. The provision of this infrastructure is likely to result in an overall increase in the area of impermeable surfaces and as such potential for flood risk. Therefore, minor negative effects are also expected in relation to SA objective 5: **climate change adaption**. Considering that the impacts relating to flood risk and land resources will be partly dependent upon the location of new development and infrastructure the effects are uncertain.

4.257 New strategic infrastructure which is provided in close proximity to water courses which run into the Exe Estuary SPA has the potential to adversely impact upon the water quality at this location, which has been identified as having specific sensitivities to this issue. Considering that new infrastructure may be sited to avoided this type of effect, uncertain minor negative effects are expected in relation to SA objective 7: **water resources** for the Proposed Policy.

4.258 The specific location and design of new strategic infrastructure will have the most influence on the potential for effects which relate to biodiversity, landscape setting and the historic environment, and this is unknown at this stage. However, the Proposed Policy supports the principle of delivery of large scale infrastructure over the plan period and is likely to result in adverse impacts in terms of these issues. Effects which might occur relate to issues such as habitat loss, fragmentation and disturbance, degradation of landscape character as well as development within the settings of heritage assets in the plan area. As such, potential minor negative effects are expected in relation to SA objective 1: **natural environment**, SA objective 2: **landscape** and SA objective 3: **historic and built environment**. The effects are uncertain given that the type and design of new infrastructure as well as its specific location will play an important role in determining the potential effects as well as any opportunities for mitigation.

### GESP 43: Viability

4.259 This section summarises the SA findings for the approach the GESP should take in relation to considering the viability of developments with regard to the undertaking of planning requirements at new developments. The Proposed Policy, GESP 43, sets out to ensure that developments provide the necessary planning requirements to create and maintain sustainable settlements and neighbourhoods. No reasonable alternatives are considered in relation to this issue.

4.260 The Proposed Policy is expected to have negligible effects in relation to the majority of the SA objectives as its focus is constrained to addressing any potential deviation from GESP policies due to viability concerns.

4.261 The Proposed Policy ensures that residential development and supporting infrastructure will be delivered in line with GESP policies and that deviance from policy will only be permitted where deemed appropriate. This approach will help to make development sustainable and in general allow for the creation of more sustainable places in Greater Exeter. Furthermore it is expected that the Proposed Policy would promote compliant development that meets identified needs in relation to considerations such as affordable housing and transport networks and the achievement of high quality development. Positive effects are therefore expected for the policy in relation to SA objective 8: **homes** and SA objective 14: **connectivity and transport**. As the policy relates specifically to the requirement for these types of provision with regard to the viability of developments, it is not expected that this policy would have any discernible adverse impact on the housing delivery rate. In any case the policy is expected to help achieve the delivery of high quality of new homes in the plan area as well as the achievement of the affordable housing target. The positive effects expected in relation to SA objective 8 are therefore likely to be significant.

4.262 The Proposed Policy is also expected to have minor positive effects in relation to SA objective 12: **jobs and local economy**. The absence of the Proposed Policy could result in adverse impacts in terms of the capacity of the local transport network which is likely limit the potential achieving an appropriate level of economic growth in Greater Exeter. The flexibility incorporated into the Proposed Policy, to allow deviation from GESP policy based on evidence of a need for significant additional infrastructure beyond that in site allocation policies is likely to be valuable in ensuring that development proposals are achieved despite potential obstacles and significant changes that could occur in the local and national economy during the plan period.

4.263 Further minor positive effects are expected in relation to SA objective 1: **natural environment**, 4: **climate change mitigation** 9: **health** and 10: **wellbeing**. It is likely that the policy may support the delivery of open spaces, low carbon development and sustainable transport provisions in line with policy requirements. These types of provisions would likely support habitat connectivity and as well the uptake of more active lifestyles and reduced reliance on travel by private vehicle. The positive effects for these SA objectives are uncertain given that the Proposed Policy does not make specific reference to these types of provisions.

**Table 4.10 Summary of SA scores for the proposed policies (GESP 38-43) and reasonable alternatives which seek to address Quality Places and Infrastructure Provision in the GESP**

| SA Objectives / Proposed Policy and Reasonable Alternatives | | SA1: Natural Environment | SA2: Landscape | SA3: Historic and Built Environment | SA4: Climate Change Mitigation | SA5: Climate Change Adaptation | SA6: Land Resources | SA7: Water Resources | SA8: Homes | SA9: Health | SA10: Wellbeing | SA11: Access to Services | SA12: Jobs and Local Economy | SA13: City and Town Centres | SA14: Connectivity and Transport |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| ***GESP 38 : Great Places*** | **Proposed Policy** | + | + | + | + | 0 | 0 | 0 | ++ | + | + | + | + | + | ++ |
| | **RA-1: Masterplan only** | +? | +? | +? | +? | 0 | 0 | 0 | + | +? | +? | +? | +? | +? | + |
| | **RA-2: Specific design policy** | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| ***GESP 39: Delivering Homes and Communities*** | **Proposed Policy** | + | + | + | + | + | 0 | 0 | ++ | + | + | + | + | + | ++ |
| ***GESP 40: Garden City Principles*** | **Proposed Policy** | ++ | ++ | + | ++ | + | 0 | 0 | ++ | + | + | ++ | ++ | + | ++ |
| ***GESP 41: Infrastructure Classification*** | **Proposed Policy** | 0 | 0 | 0 | 0 | 0 | 0 | 0 | +? | 0 | 0 | 0 | + | 0 | + |
| ***GESP 42: Strategic Infrastructure*** | **Proposed Policy** | -? | -? | -? | 0 | -? | -? | -? | +? | 0 | 0 | 0 | + | 0 | + |
| ***GESP 43: Viability*** | **Proposed Policy** | +? | 0 | 0 | +? | 0 | 0 | 0 | ++ | +? | +? | 0 | + | 0 | + |

# 5 Sustainability Appraisal Findings for the Potential Site Options

5.1 This chapter presents the SA findings for the 78 reasonable alternative site options that were considered for allocation in the GESP. Two types of site options have been appraised:

- Residential site options (59 sites).
- Employment site options (19 sites).

5.2 The sites were appraised in line with the detailed assumptions set out in **Appendix 5**, and in line with the assumed characteristics for different sizes of residential and employment sites shown in **Table 2.4** and **Table 2.5**. The site options have been assessed on the assumption that no mitigation measures are in place at this stage**,** in order for all options to be assessed on a consistent basis and for the SA findings to help inform decisions on which sites to take forward. Potential mitigation of effects identified is likely to come from the requirements of the GESP policies as they are drafted in more detail, and would also depend on the detailed proposals that come forward from developers at planning application stage. It is noted that each of the 39 Potential Site Options included in the GESP Draft Policies and Site Options Consultation document has a summary of the opportunities and sensitivities associated with the site and a list of potential planning requirements relating to design, infrastructure provision and other factors. However, in order to appraise all 78 site options on a consistent basis, this site-specific information has not been taken into account at this stage. Mitigation provided by GESP policies relating to preferred strategic site allocations will be considered in the SA at the next stage of plan preparation.

5.3 The SA effects identified for the 59 reasonable alternative residential site options are summarised graphically in **Table 5.1** below. The SA effects identified for the 19 reasonable alternative employment site options are summarised graphically in **Table 5.2** below. The detailed matrices for all of the residential and employment site options are presented in **Appendix 6** of this Report.

5.4 For the majority of SA objectives, the summary of potential effects for residential and employment site options have been provided together due to the assessment criteria being almost identical for both site types in relation to these SA objectives. For SA objectives where additional assessment criteria for residential or employment sites has resulted in further effects, this has been identified in the text. For SA objective 8: homes, the summary of potential effects relates only to residential sites as it is considered the employment sites will not contribute to this SA objective. In the case of SA objective 12: jobs and local economy, the assessment criteria used for the two site types is sufficiently different that the summaries of potential effects have been provided separately.

5.5 An additional summary section has been provided below each SA objective in relation to the effects of the Potential Site Options only. In those sections, reference has also been made to the additional information provided in the GESP consultation document about infrastructure and other requirements that will be needed for each of the Potential Site Options. This information has not influenced the likely effects identified in the SA at this stage because it is not available on a consistent basis for all reasonable alternative sites (as described above); however it is helpful to recognise that the specific requirements for sites set out in the GESP will have some influence on the sustainability effects of those sites. This information will be incorporated into the SA at the next stage.

5.6 From the 78 reasonable alternative site options, the plan-makers have identified 39 'Potential Site Options' within the GESP Draft Policies and Site Options Consultation document. The reasons for selecting the Potential Site Options and discounting the remaining site options are provided in **Table A7.1** in **Appendix 7**.

5.7 From **Table 5.1** and **Table 5.2** it can be seen that all of the site options are likely to have a mixture of positive and negative effects on the SA objectives, because all would be likely to have mostly positive social and economic effects associated with providing new homes, jobs and facilities, but a number of negative environmental effects associated with developing large greenfield sites. Conversely, some positive environmental effects could be achieved through the provision of green infrastructure within the sites and reducing the need for car travel by proximity of sites to existing settlements and sustainable transport links. Although there is a general pattern of effects for all sites across the different SA objectives (due to them all being appraised against the consistent set of assumptions set out in **Appendix 5** and based on the assumed characteristics and development standards described in **Table 2.4** and **Table 2.5**), there are generally slightly fewer significant negative effects identified for the 39 Potential Site Options than the discounted site options. As noted above, mitigation of potential negative effects has not yet been considered in the SA of the site options; therefore where significant negative effects have been identified, it is likely that these could be avoided or reduced through appropriate mitigation measures, and this will be considered at the next stage of the GESP preparation.

**Table 5.1 SA effects identified for the residential site options** – *'Potential Site Options' in the GESP Draft Policies and Site Options Consultation document highlighted by the site name in black text*

| Site Name | SA1: Natural Environment | SA2: Landscape | SA3: Historic and Built Environment | SA4: Climate Change Mitigation | SA5: Climate Change Adaptation | SA6: Land Resources | SA7: Water Resources | SA8: Homes | SA9: Health | SA10: Wellbeing | SA11: Access to Services | SA12: Jobs and Local Economy | SA13: City and Town Centres | SA14: Connectivity and Transport |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **East Devon** | | | | | | | | | | | | | | |
| **SA-ED-2:** Oil Mill Lane | ++/--? | -? | -?/+? | +? | -? | -- | --? | ++ | ++ | - | ++ | ++ | - | + |
| **SA-ED-3:** Hill Barton | ++/--? | --? | +?/-? | + | -? | -- | --? | ++ | ++ | --? | ++/-- | ++ | - | + |
| **SA-ED-4:** North East Lympstone | --?/+ | --? | +?/-? | ++/--? | -? | -- | --? | + | + | - | + | --/+ | - | ++ |
| **SA-ED-6:** Cranbrook South-East | ++/--? | --? | +?/-? | ++? | -? | -- | --? | ++ | + | - | ++ | + | ++ | + |
| **SA-ED-7:** Higher Greendale | ++/--? | --? | +?/-? | + | -? | -- | --? | ++ | ++ | - | --/+ | ++/- | - | + |
| **SA-ED-10:** Exmouth East | ++/--? | --? | --?/+? | ++? | -? | - | --? | ++ | ++ | - | ++ | ++ | ++ | + |
| **SA-ED-12:** Whimple | ++/--? | -? | +?/-? | + | --? | --? | --? | ++ | ++ | - | ++ | ++/-- | - | + |
| **SA-ED-14:** Bicton College | ++/--? | --? | --?/+? | -? | -? | +/--? | 0 | ++ | ++ | - | --/+ | + | - | -?/+ |
| **SA-ED-15:** Feniton | ++/--? | --? | +?/-? | + | --? | -- | -? | ++ | ++ | - | ++ | ++ | - | + |
| **SA-ED-17:** Ottery St Mary South/East | ++/--? | --? | +?/-? | ++? | -? | -- | -? | ++ | + | - | ++ | ++ | ++ | + |
| **SA-ED-18:** Honiton East | ++/-? | --? | +?/-? | ++ | -? | -- | -? | ++ | + | -- | ++ | + | ++ | ++ |
| **SA-ED-19:** Axminster South | ++/-? | --? | --?/+? | ++? | -? | --? | -? | + | + | - | ++ | +/- | ++ | + |
| **SA-ED-20:** Axminster North East | --?/+ | --? | +?/-? | ++?/--? | --? | --? | -? | + | + | - | ++ | ++ | ++ | -? |

| Site Name | SA1: Natural Environment | SA2: Landscape | SA3: Historic and Built Environment | SA4: Climate Change Mitigation | SA5: Climate Change Adaptation | SA6: Land Resources | SA7: Water Resources | SA8: Homes | SA9: Health | SA10: Wellbeing | SA11: Access to Services | SA12: Jobs and Local Economy | SA13: City and Town Centres | SA14: Connectivity and Transport |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **SA-ED-21:** Ottery St Mary West | ++/--? | --? | +?/-? | ++? | -? | --? | -? | ++ | ++ | - | ++ | ++ | ++ | + |
| **SA-ED-24:** Broadclyst South | ++/--? | --? | +?/-? | + | --? | -- | --? | ++ | ++ | - | + | + | - | + |
| **SA-ED-25:** Westclyst & Mosshayne Farms | ++/--? | -? | +?/-? | ++? | -? | -- | --? | ++ | ++ | - | ++ | ++ | ++ | + |
| **SA-ED-26:** Cowley | --?/+ | --? | --?/+? | --?/+ | -? | -- | --? | + | ++ | -- | +?/- | -- | - | + |
| **Exeter** | | | | | | | | | | | | | | |
| **SA-EX-1:** Attwells Farm | --?/+ | --? | +?/-? | ++/--? | -? | --? | 0 | + | ++ | --/+ | ++/- | + | ++ | ++ |
| **SA-EX-2:** Oaklands Riding School | --?/+ | --? | --? | ++?/--? | --? | --? | --? | + | ++ | -- | ++/- | ++ | ++ | + |
| **SA-EX-3:** Topsham and M5 | ++/--? | -? | +?/-? | ++? | -? | -- | --? | ++ | ++ | +/- | ++ | ++ | ++ | + |
| **SA-EX-4:** Stoke Hill | --?/+ | --? | +?/-? | ++?/--? | --? | --? | --? | + | ++ | --/+ | ++/- | ++ | ++ | + |
| **SA-EX-5:** Exeter St David's Station | --?/+ | 0? | +?/-? | ++/--? | -? | + | --? | + | ++ | --/+ | ++/- | ++/-- | ++ | ++ |
| **SA-EX-6:** Water Lane | ++/--? | --? | +?/-? | ++ | -? | ++/-? | --? | ++ | ++ | -- | ++ | ++/-- | ++ | ++ |
| **SA-EX-7:** North Gate | --?/+ | 0? | --?/+? | ++/-- | 0 | + | 0 | + | ++ | --/+ | ++/- | + | ++ | ++ |
| **SA-EX-8:** South Gate | --?/+ | -? | --?/+? | ++/--? | 0 | + | 0 | + | ++ | --/+ | ++/- | +/- | ++ | ++ |
| **SA-EX-9:** Howell Road Car Park | --?/+ | 0? | -? | ++/--? | 0 | + | 0 | + | + | -- | ++/- | + | ++ | ++ |
| **SA-EX-10:** Marsh Barton | ++/--? | 0? | +?/-? | ++ | -? | ++/-? | --? | ++ | ++ | -- | ++ | ++/-- | + | ++ |
| **SA-EX-18:** Pinhoe | --?/+ | 0? | +?/-? | ++/--? | -? | + | --? | + | + | -- | ++/- | ++/-- | ++ | ++ |

| Site Name | SA1: Natural Environment | SA2: Landscape | SA3: Historic and Built Environment | SA4: Climate Change Mitigation | SA5: Climate Change Adaptation | SA6: Land Resources | SA7: Water Resources | SA8: Homes | SA9: Health | SA10: Wellbeing | SA11: Access to Services | SA12: Jobs and Local Economy | SA13: City and Town Centres | SA14: Connectivity and Transport |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Trading Estate | | | | | | | | | | | | | | |
| **SA-EX-19:** East Gate | ++/--? | 0? | --?/+? | ++ | 0 | ++ | 0 | ++ | + | --/+ | ++ | --/+ | ++ | ++ |
| **SA-EX-22:** West Gate | --?/+ | --? | --?/+? | ++/--? | -? | + | --? | + | ++ | --/+ | ++/- | ++/-- | ++ | ++ |
| **SA-EX-23:** South Street, Market Street and Fore Street | --?/+ | 0? | --? | ++/--? | -? | + | 0 | + | ++ | --/+ | ++/- | --/+ | ++ | ++ |
| **SA-EX-26:** Sandy Gate | --?/+ | 0? | +?/-? | ++/--? | -? | ++/-- | 0 | + | + | -- | ++ | ++/-- | ++ | ++ |
| **Mid Devon** | | | | | | | | | | | | | | |
| **SA-MD-1:** Copplestone | ++/-? | --? | --?/+? | ++ | -? | -- | --? | ++ | ++ | +/- | ++ | ++/-- | - | ++ |
| **SA-MD-2:** West of Crediton | ++/-? | --? | +?/-? | ++? | -? | -- | 0 | ++ | ++ | --/+ | ++ | ++ | ++ | + |
| **SA-MD-3:** Crediton South | ++/-? | --? | +?/-? | ++ | -? | -- | --? | ++ | + | -- | ++ | ++ | ++ | ++ |
| **SA-MD-4:** Newton St Cyres and Sweetham | ++/-? | --? | +?/-? | ++ | -? | -- | --? | ++ | ++ | +/- | ++ | ++/-- | - | ++ |
| **SA-MD-5:** Land East of Tiverton | ++/--? | --? | --?/+? | ++?/-? | -? | -- | -? | ++ | + | - | ++ | ++/- | ++ | +/-? |
| **SA-MD-6:** West of Cullompton | ++/-? | --? | +?/-? | ++? | --? | -- | --? | ++ | + | -- | ++ | ++ | ++ | + |
| **SA-MD-7:** Land North West of Cullompton (Growen Farm) | ++/-? | --? | +?/-? | ++? | -? | -- | --? | ++ | ++ | -- | ++ | ++ | ++ | + |
| **SA-MD-8:** Land South of Hartnoll Farm | ++/--? | --? | --?/+? | +?/-? | -? | -- | -? | ++ | ++ | 0 | --/+ | ++/- | - | +/-? |

| Site Name | SA1: Natural Environment | SA2: Landscape | SA3: Historic and Built Environment | SA4: Climate Change Mitigation | SA5: Climate Change Adaptation | SA6: Land Resources | SA7: Water Resources | SA8: Homes | SA9: Health | SA10: Wellbeing | SA11: Access to Services | SA12: Jobs and Local Economy | SA13: City and Town Centres | SA14: Connectivity and Transport |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **SA-MD-9:** Culm Garden Village | ++/-? | --? | +?/-? | ++?/- | -? | -- | --? | ++ | ++ | -- | ++ | ++ | + | +/- |
| **SA-MD-10:** Hartnoll Farm | ++/-? | -? | --?/+? | ++? | -? | -- | -? | ++ | ++ | - | ++ | ++/- | ++ | + |
| **SA-MD-11:** Land off Crown Hill | -?/+ | -? | --?/+? | --?/+ | -? | -- | --? | + | + | - | + | +/- | - | + |
| **SA-MD-12:** Sampford Peverell South | ++/-? | --? | --?/+? | ++ | -? | -- | --? | ++ | ++ | - | + | ++/-? | - | ++ |
| **SA-MD-13:** Land North of Wiland | ++/-? | --? | +?/-? | ++ | -? | -- | --? | ++ | ++ | - | ++ | ++/- | - | ++ |
| **SA-MD-14:** Junction 27 area | ++/-? | --? | +?/-? | + | -? | -- | 0 | ++ | ++ | - | --/+ | ++/-- | - | + |
| **SA-MD-15:** Great Southdown Farm | ++/--? | --? | +?/-? | -- | -? | --? | 0 | ++ | ++ | - | --/+ | --/+ | - | --/+ |
| **Teignbridge** | | | | | | | | | | | | | | |
| **SA-T-1:** Land south east of Ipplepen | ++/--? | --? | +?/-? | -- | -? | -- | -? | ++ | ++ | - | ++ | ++ | - | --/+ |
| **SA-T-2:** Land Dolbeare Road, Ashburton | --?/+ | --? | +?/-? | --? | -? | --? | 0 | + | + | - | --/+ | --/+ | - | -? |
| **SA-T-3:** Houghton Barton West | ++/--? | --? | +?/-? | ++?/- | -? | -- | -? | ++ | ++ | - | ++ | ++ | ++ | +/- |
| **SA-T-4:** Ruby Farm, Two Mile Oak | --?/+ | -? | +?/-? | --? | -? | -- | 0 | + | + | - | -- | + | - | - |
| **SA-T-5:** South of Priory Road | --?/+ | --? | +?/-? | --?/+? | -? | -- | -? | + | ++ | -- | --/+ | + | - | - |

| Site Name | SA1: Natural Environment | SA2: Landscape | SA3: Historic and Built Environment | SA4: Climate Change Mitigation | SA5: Climate Change Adaptation | SA6: Land Resources | SA7: Water Resources | SA8: Homes | SA9: Health | SA10: Wellbeing | SA11: Access to Services | SA12: Jobs and Local Economy | SA13: City and Town Centres | SA14: Connectivity and Transport |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **SA-T-12:** East Golds Quarry | --?/+ | --? | -? | ++?/--? | -? | 0 | -? | 0 | + | -- | ++ | ++ | ++ | +? |
| **SA-T-13:** Land at Long Lane, Milber | +/-? | --? | --?/+? | ++?/--? | -? | --? | -? | + | ++ | -- | ++ | ++ | ++ | +? |
| **SA-T-16:** Exminster West | --?/+ | -? | -? | --?/+ | -? | -- | 0 | + | + | - | --/+ | + | - | + |
| **SA-T-17:** Markham Lane | ++/--? | --? | +?/-? | ++?/-? | -? | -- | 0 | ++ | ++ | -- | ++ | ++ | ++ | +/-? |
| **SA-T-18:** Peamore | ++/--? | --? | --?/+? | + | -? | -- | --? | + | ++ | -- | --/+ | ++ | - | + |
| **SA-T-19:** Land at Starcross | ++/--? | --? | +?/-? | ++ | --? | -- | --? | ++ | + | - | + | --/+ | - | ++ |
| **SA-T-20:** Port Road, north of Dawlish | ++/--? | --? | +?/-? | ++? | --? | -- | --? | ++ | ++ | +/- | --/+ | ++/- | ++ | + |

**Table 5.2 SA effects identified for the employment site options –** *'Potential Site Options' in the GESP Draft Policies and Site Options Consultation document highlighted by the site name in black text*

| Site Name | SA1: Natural Environment | SA2: Landscape | SA3: Historic and Built Environment | SA4: Climate Change Mitigation | SA5: Climate Change Adaptation | SA6: Land Resources | SA7: Water Resources | SA8: Homes | SA9: Health | SA10: Wellbeing | SA11: Access to Services | SA12: Jobs and Local Economy | SA13: City and Town Centres | SA14: Connectivity and Transport |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **East Devon** | | | | | | | | | | | | | | |
| **SA-ED-1:** Sowton | +/-? | --? | --?/+? | ++? | -? | -- | --? | 0 | + | - | + | ++ | + | + |
| **SA-ED-5:** Airport North | -? | --? | +?/-? | --?/+ | -? | ++/--? | 0 | 0 | - | - | -/+ | + | - | + |
| **SA-ED-8:** Airport Business Park | +/-? | -? | +?/-? | --/+? | -? | -- | 0 | 0 | +/- | - | --/+ | ++ | - | --/+ |
| **SA-ED-9:** Greendale Business Park | -? | -? | +?/-? | --? | -? | --? | --? | 0 | - | - | --/+ | + | - | - |
| **SA-ED-11:** Rockbeare Hill | +/-? | --? | +?/-? | +?/-? | -? | --? | --? | 0 | + | - | -- | ++ | - | -/+ |
| **SA-ED-13:** Daisymount | +/-? | --? | +?/-? | + | -? | --?/+ | 0 | 0 | ++ | - | -- | ++ | - | + |
| **SA-ED-16:** Fairmile | -? | -? | -? | --? | -? | -- | 0 | 0 | + | - | -- | + | - | -? |
| **SA-ED-22:** Land adjacent to Newcourt Barton | -? | --? | -? | --? | -? | -- | --? | 0 | - | - | -- | +? | - | -? |
| **SA-ED-23:** Adjoining Woodbury Business Park | -? | -? | -? | --? | -? | --? | 0 | 0 | + | 0 | --/+ | +? | - | - |
| **SA-ED-27:** Poltimore East | --? | --? | -? | --? | --? | -- | --? | 0 | + | 0 | --/+ | ++ | - | + |
| **SA-ED-28:** Hand-and-Pen | 0? | -? | -? | --?/+ | -? | --? | 0 | 0 | - | - | --/+ | +? | - | + |

| Site Name | SA1: Natural Environment | SA2: Landscape | SA3: Historic and Built Environment | SA4: Climate Change Mitigation | SA5: Climate Change Adaptation | SA6: Land Resources | SA7: Water Resources | SA8: Homes | SA9: Health | SA10: Wellbeing | SA11: Access to Services | SA12: Jobs and Local Economy | SA13: City and Town Centres | SA14: Connectivity and Transport |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Teignbridge** | | | | | | | | | | | | | | |
| **SA-T-6:** Land within Great Plantation | --? | -? | +?/-? | + | -? | -- | -? | 0 | ++ | - | --/+ | + | - | + |
| **SA-T-7:** Higher Mead Farm, Ashburton | --? | --? | -? | --? | -? | --? | 0 | 0 | + | 0 | -- | +? | - | - |
| **SA-T-8:** North of Forches Cross | --? | -? | +?/-? | ++? | -? | -- | 0 | 0 | + | - | + | + | + | + |
| **SA-T-10:** Land at Blatchford Farm and Berry Knowles | +/-? | --? | +?/-? | ++? | -? | --? | -? | 0 | + | -- | + | ++ | + | + |
| **SA-T-11:** Land east of Old Newton Road, Kingskerswell | --? | -? | -? | --?/+ | --? | 0 | -? | 0 | ++ | -- | + | + | + | + |
| **SA-T-14:** Jews Bridge Measow | --? | --? | -? | --?/+ | --? | --? | -? | 0 | ++ | - | --/+ | + | - | -? |
| **SA-T-15:** Broadway, Exeter Road, Kingsteignton | --? | --? | -? | ++?/--? | 0? | 0 | -? | 0 | + | -- | ++ | + | + | - |
| **SA-T-22:** Land at Ilford Park, Drumbridges | --?/+ | 0? | +?/-? | + | -? | ++/--? | 0 | 0 | ++ | - | --/+ | ++ | - | + |

### SA objective 1: Natural Environment

5.9 The 78 reasonable alternative site options were assessed in relation to this objective using criteria based on the conservation and enhancement of habitats and wildlife and provision of recreational and leisure opportunities that are compatible with conservation, as set out in **Appendix 5**.

5.10 Of the 59 residential and 19 employment sites assessed, 25 residential sites are considered likely to have a mixture of potential but uncertain significant negative and significant positive effects. The uncertain significant negative effect is due to the proximity of those sites (<250m) to internationally or nationally designated biodiversity or geodiversity sites or because the site has been flagged as Red or Amber in the separate HRA work. The potential significant positive effect identified for these sites is due to the site having the capacity to deliver over 1,000 homes which could make it more likely that development will be accompanied by provision of green infrastructure.

5.11 Uncertain significant negative effects are also expected for a further 20 (19 residential and one employment) of the 78 sites assessed, but in these cases the effect is mixed in combination with a potential minor positive effect. This is due to these sites being residential sites with capacity for fewer than 1,000 homes or employment sites with over 20ha capacity. Provision and retention of green infrastructure within development could still occur at these sites, but at a smaller scale than at large scale (>1,000 homes) residential developments.

5.12 There were seven out of the 78 sites that are expected to have uncertain significant negative effects without any positive effects in combination. These cases are employment sites that are less than 20ha in capacity and are therefore less likely to provide green infrastructure with development.

5.13 Out of the 78 sites assessed, 13 could have mixed significant positive effects in combination with uncertain minor negative effects, which is due to them being residential sites with the capacity to deliver over 1,000 homes and being located further away (250m-1km) from internationally or nationally designated sites or being within 250m of locally designated sites.

5.14 There are 12 sites that are likely to have uncertain minor negative or minor positive effects (mixed in some cases) due to their distance from natural environment designations (or proximity to locally important designations either national or international) or there being potential for low level provision of green infrastructure.

5.15 In the case of one of the 78 sites, uncertain negligible effects are recorded. This is an employment site located at a sufficient distance from natural environment designations to reduce potential for adverse effects but not of a sufficient size for development to be accompanied by the provision of green infrastructure.

*Potential Site Options*

5.16 For the same reasons described above, out of the 39 Potential Site Options (33 residential and six employment) included in the consultation document, under half (13 residential and one employment) are expected to have mixed uncertain significant negative effects and minor positive effects. A further 13 (residential) sites are likely to have uncertain significant negative effects in combination with significant positive effects.

5.17 Two of the Potential Site Options (employment) are expected to have uncertain significant negative effects alone.

5.18 Seven of the Potential Site Options (residential) could have significant positive effects in combination with uncertain minor negative effects.

5.19 The remaining three Potential Site Options (employment) are likely to have mixed uncertain minor negative and minor positive effects or uncertain minor negative effects.

5.20 The Draft Policies and Site Options Consultation document includes information on planning requirements for the Potential Site Options, some of which may provide mitigation for the potential negative effects identified in relation to SA objective 1 and potentially reduce the

significance of some of the likely negative effects. These requirements include funding for Suitable Alternative Natural Greenspace (SANG) to reduce the impacts of development on European sites; the provision of onsite green infrastructure, and requirements to protect species and their supporting habitats. These requirements will be taken into account at the next stage of the SA when appraising the sites that are selected for allocation in the Draft GESP.

### SA objective 2: Landscape

5.21 The 78 reasonable alternative site options were assessed in relation to this objective using criteria based on the conservation and enhancement of the existing landscape and natural environment, as set out in **Appendix 5**. This includes a particular focus on the contribution that AONBs and National Park make towards the existing landscape character. For seven of the sites, the landscape sensitivity assessment was based on a slightly different boundary to what is shown in the consultation document, because of some amendments that were made to the sites during the site identification and assessment process. For those sites[27], this contributes to the uncertainty attached to the potential effects identified for all site options, as detailed below.

5.22 Out of the 78 sites assessed, 52 (42 residential and 10 employment) are expected to have uncertain significant negative effects due to the Council officers' Landscape Sensitivity Assessment considering these locations as medium-high or high landscape sensitivity. Development at these locations has the potential to have significant adverse impacts on the character and quality of the existing landscape, although it will depend on the detailed design and layout of the development, which is not known at this stage.

5.23 Uncertain minor negative effects are likely for 17 (nine residential and eight employment) of the 78 sites assessed. In these cases, landscape sensitivity was assessed by the Council officers as low-medium or medium and therefore development could still have an adverse effect on the existing landscape, but this should not be significant.

5.24 The remaining nine sites (eight residential and one employment) were considered to be of low landscape sensitivity and therefore are expected to have a negligible effect, although this is uncertain as it will depend on the detailed design and layout of the development.

*Potential Site Options*

5.25 For the same reasons as set out above, out of the 39 Potential Site Options, just over half (19 residential and three employment) could have an uncertain significant negative effect, eight (six residential and two employment) could have an uncertain minor negative effect and the remaining nine (eight residential and 1 employment) are likely to have an uncertain negligible effect.

5.26 The Draft Policies and Site Options Consultation document includes information on planning requirements for the Potential Site Options, some of which may provide mitigation for the potential negative effects identified in relation to SA objective 2 and potentially reduce the significance of some of the likely negative effects. These requirements include incorporating onsite green infrastructure and open space, the provision of landscape buffers and carefully considered design and use of landscaping and planting. These requirements will be taken into account at the next stage of the SA when appraising the sites that are selected for allocation in the Draft GESP.

### SA objective 3: Historic and Built Environment

5.27 The 78 reasonable alternative site options were assessed in relation to this objective using criteria based on the conservation and enhancement of the existing historic environment and the promotion of high-quality architecture in new development, as set out in **Appendix 5**. This involved a focus on the conservation of designated heritage assets (e.g. World Heritage Sites, Listed Buildings, Scheduled Monuments, Registered Parks and Gardens, Registered Battlefields and Conservation Areas).

5.28 Out of the 78 sites assessed, 17 (16 residential and one employment) are expected to have uncertain significant negative effects in combination with uncertain minor positive effects. The

[27] This is the case for the following sites: SA-ED-12 Whimple, SA-EX-5 Exeter St David's Station; SA-EX-7 North Gate; SA-EX-10 Marsh Barton; SA-EX-18 Pinhoe Trading Estate; SA-T-5 South of Priory Road; and SA-T-8 North of Forches Cross.

uncertain significant negative effects are due to these sites containing higher significance designated heritage assets[28] within their boundaries. The uncertain minor positive effect is due to the site being of a sufficient size (>10ha) to accommodate a new high quality built environment or due to the site using a sufficient amount of previously used land (>1ha) to result in an improvement to the existing built environment.

5.29 A mixed uncertain minor negative and uncertain minor positive effect is identified for 47 (38 residential and nine employment) of the 78 sites assessed. In these cases, the sites do not contain higher significance designated heritage assets within their boundaries and have the potential to contribute a high-quality built environment or use of previously developed land. A number of these sites contain Grade II listed buildings within their boundaries but as defined in the NPPF, they are considered to be of less significance than other statutory assets of a higher grade.

5.30 Two sites (residential) are likely to have uncertain significant negative effects and the remaining 12 (three residential and nine employment) sites are likely to have uncertain minor negative effects.

*Potential Site Options*

5.31 For the same reasons as set out above, of the 39 Potential Site Options, 10 (nine residential and one employment) are expected to have uncertain significant negative and uncertain minor positive effects. Mixed uncertain minor negative and uncertain minor positive effects are identified for 25 (21 residential and four employment) of the potential site options.

5.32 Three potential sites options (two residential and one employment) are expected have uncertain minor negative effects and one potential site option (residential) is identified as likely to have uncertain significant negative effects.

5.33 The Draft Policies and Site Options Consultation document includes information on planning requirements for the Potential Site Options, some of which may provide mitigation for the potential negative effects identified in relation to SA objective 3 and potentially reduce the significance of some of the likely negative effects. These requirements include carefully considered design to ensure minimal impact on heritage features and their settings. These requirements will be taken into account at the next stage of the SA when appraising the sites that are selected for allocation in the Draft GESP.

### SA objective 4: Climate Change Mitigation

5.34 The assessment criteria for this SA objective focussed on the potential for the sites to minimise greenhouse gas emissions. Sites that minimise the need for car travel by proximity to existing settlements and sustainable transport links were considered to be more likely to contribute positively to this objective, as set out in **Appendix 5**.

5.35 Out of the 78 sites assessed, 10 (residential) are expected to have significant positive effects in relation to this SA objective as they are within 1km of a railway station and 500m of a bus stop with frequent services. Conversely, two sites (residential) are expected to have significant negative effects as they are more than 1km from a railway, are over 500m away from a bus stop and do not have any existing cycle routes.

5.36 There were 15 sites (12 residential and three employment) that are expected to have uncertain significant positive effects as they are located within or adjacent to Exeter or a Main Town and therefore are considered to be more likely to reduce the need to travel by car. Eight sites (two residential and six employment) of the 78 assessed are expected to have uncertain significant negative effects due to them being located over 5km away from Exeter City or a Main Town or because they are not of a sufficient capacity (<1,000 homes or <10ha) for development to include new sustainable transport links.

[2828] As defined in the NPPF, i.e. World Heritage Sites, Listed Buildings (Grades I and II*), Scheduled Monuments, Registered Parks and Gardens, Registered Battlefields and Conservation Areas.

5.37 There are a further 31 sites that are expected to have mixed overall effects, which include either significant negative or significant positive effects (in some cases minor and in some cases uncertain) due to their close proximity or more isolated position in relation to major settlements or sustainable transport links. The score recorded is also reflective of the sites having capacity to provide new sustainable transport links with development or if capacity to provide these types of links does not exist.

5.38 There were 11 (8 residential and three employment) sites that are likely to have a minor positive effect (one uncertain) alone due to their access to some sustainable transport links and their negligible effect in relation to assessment criteria with requirements of good proximity to settlements and site capacity. The one remaining site where uncertain minor negative effects are expected can be attributed to where access to sustainable transport links is limited and the potential for cycle routes to be used for commuting is uncertain.

*Potential Site Options*

5.39 For the same reasons as above, significant positive effects are expected for 13 (11 residential and two employment) of the 39 Potential Site Options, with six of these expected effects being uncertain (four residential and two employment). Uncertain significant negative effects are expected for one of the Potential Site Options (employment).

5.40 Three Potential Sites Options (residential) are expected to have significant positive effects in combination with uncertain minor negative and five Potential Site Options (three residential and two employment) are expected to have minor positive effects in combination with uncertain significant negative.

5.41 Significant positive and significant negative (in nine cases uncertain) effects are expected for 10 of the Potential Site Options (residential. The remaining seven Potential Site Options are likely to have either minor positive effects or in one case uncertain, minor negative effects.

5.42 The Draft Policies and Site Options Consultation document includes information on planning requirements for the Potential Site Options, some of which may provide mitigation for the potential negative effects identified in relation to SA objective 4 and potentially reduce the significance of some of the likely negative effects or increase the potential positive effects. These requirements include new and improved cycling and walking links, car-free developments supported by a car club and e-bike scheme, improvements to bus services and the delivery of district heat networks. These requirements will be taken into account at the next stage of the SA when appraising the sites that are selected for allocation in the Draft GESP.

### SA objective 5: Climate Change Adaptation

5.43 The assessment criteria for this objective focussed on the potential for sites to adapt to the negative impacts that climate change could have on flood risk. Effects were based on the sites' potential to increase impermeable surfaces in the Plan area on greenfield land, and their proximity to flood zones. Any negative effects on flood risk were considered to be uncertain as this will depend on the potential implementation of SuDS, which is a design consideration that is unknown at this stage.

5.44 There are 12 (nine residential and three employment) of the 78 sites assessed which are likely to have uncertain significant negative effects in relation to this objective as they are located entirely or mainly (>50%) on greenfield land that is within flood zone 3a or 3b or within a Critical Drainage Area.

5.45 Out of the 78 site assessed, 61 (46 residential and 15 employment) are likely to have an uncertain minor negative effect due as a result of them being largely greenfield land that is outside of flood zone 3a or 3b or brownfield land that is within flood zone 3a or 3b.

5.46 The remaining five (four residential and one employment) sites are expected to have negligible effects as they are located on brownfield land that is located outside of Flood Zone 3a or 3b.

*Potential Site Options*

5.47 For the same reasons as above, out of the 39 Potential Site Options, four (three residential and one employment) could have uncertain significant negative effects, 31 (26 residential and five employment) are expected to have uncertain minor negative effects and four (residential) are likely to have negligible effects.

5.48 The Draft Policies and Site Options Consultation document includes information on planning requirements for the Potential Site Options, some of which may provide mitigation for the potential negative effects identified in relation to SA objective 5 and potentially reduce the significance of some of the likely negative effects. These requirements include measures to address onsite flood risk, including surface water management, the provision of green infrastructure and open space within developments, and the incorporation of flood defence and resilience analysis and infrastructure. These requirements will be taken into account at the next stage of the SA when appraising the sites that are selected for allocation in the Draft GESP.

### SA objective 6: Land Resources

5.49 The 78 reasonable alternative site options were assessed in relation to this objective using criteria based on the efficient utilisation of land resources including minimising their loss or degradation, as set out in **Appendix 5**. This includes the protection of high quality agricultural land, the potential for use of previously developed land and the safeguarding of important mineral sites.

5.50 Out of the 78 sites assessed, 42 (35 residential and seven employment) are expected to have significant negative effects due to the potential for development at these greenfield sites to result in the loss of over 5ha of high quality agricultural land (Grade 1, 2 and 3a). A further 17 (10 residential and seven employment) sites are likely to have uncertain significant negative effects due to them containing Grade 3 agricultural land, but it is not known from the data available whether it is Grade 3a or the lower quality Grade 3b.

5.51 There is one site (residential) that is likely to have a significant positive effect as a result of it contributing to the use of over 5ha of previously developed land and having negligible effect on high quality agricultural land or mineral deposits. There are three further sites (one residential and two employment) that are expected to have significant positive or significant negative effects in combination (in two cases uncertain) due to the sites resulting in the loss of high quality agricultural land, but also offering potential for the use of previously developed land. There are two residential sites that are expected to have significant positive effects in combination with uncertain minor negative.

5.52 Seven (residential) of the 78 sites assessed are likely to have minor positive effects due to their potential to result in the use of up to 5ha of previously developed land. One site (residential) is expected to have minor negative effects due it containing less than 5ha of high quality agricultural land. There are two (one residential and one employments) sites that are expected to have mixed minor positive and uncertain significant negative effects. The overall mixed effect is recorded given that there is potential for the development of less than 5ha of previously developed land, but also considering that allocation of the site has the potential to result in the loss of over 5ha of high quality agricultural land. The remaining three sites (one residential and two employment) are expected to have negligible effects due to them containing little or no high quality agricultural land or mineral deposits and there also being no opportunity for the use of previously developed land.

*Potential Site Options*

5.53 For the same reasons as set out above, of the 39 Potential Site Options, one (residential) sites is expected to have a significant positive effect and 26 (22 residential and four employment) are expected to have significant negative effects (four uncertain).

5.54 Five (three residential and two employment) of the Potential Site Options are likely to have significant positive or significant negative effects in combination with negative or positive effects respectively (in some cases uncertain).

5.55 The remaining seven (residential) Potential Site Options are expected to have minor positive effects.

5.56 The Draft Policies and Site Options Consultation document includes information on planning requirements for the Potential Site Options, some of which may provide mitigation for the potential negative effects identified in relation to SA objective 6 and potentially reduce the significance of some of the likely negative effects. These requirements include limiting the lifespan of the development to enable minerals to be extracted in the long-term. These requirements will be taken into account at the next stage of the SA when appraising the sites that are selected for allocation in the Draft GESP.

### SA objective 7: Water Resources

5.57 The 78 reasonable alternative site options were assessed in relation to this objective using criteria based on minimising the degradation of watercourses in the study area. Particular focus was given to the effect of sites on the Exe Estuary SPA, as set out in **Appendix 5**. Any negative effects are considered uncertain as they will be dependent on the implementation of SuDS within development, a design consideration that is unknown at this stage. In addition, the location of sites could affect water quality, depending on whether they are in an area where there is capacity at the local sewage treatment works (STWs) to treat additional wastewater generated by the overall scale of development proposed. However, South West Water has advised that all potential sites for the GESP can be connected to existing STWs (some of which will require expansion), with no impact on the output water quality at any sites (i.e. all water quality will stay within permitted limits).

5.58 Out of the 78 sites assessed, 35 (30 residential and five employment) are expected to have uncertain significant negative effects in relation to this objective as they contain or are adjacent to a watercourse that runs into the Exe Estuary SPA and therefore development could result in negative impacts on water quality.

5.59 There are 19 (14 residential and five employment) sites likely to have uncertain minor negative effects as they contain or are adjacent to a watercourse that does not run into the Exe Estuary SPA.

5.60 The remaining 24 (15 residential and nine employment) sites are likely to have negligible effects as they are not in close proximity to any watercourses.

*Potential Site Options*

5.61 For the same reasons as set out above, of the 39 Potential Site Options, 20 (18 residential and two employment) are expected to have uncertain significant negative effects, six (residential) are expected to have uncertain minor negative effects and 13 (nine residential and four employment) are expected to have negligible effects.

5.62 The Draft Policies and Site Options Consultation document includes information on planning requirements for the Potential Site Options, some of which may provide mitigation for the potential negative effects identified in relation to SA objective 7. These requirements include carefully considered design relating to water quality management. These requirements will be taken into account at the next stage of the SA when appraising the sites that are selected for allocation in the Draft GESP.

### SA objective 8: Homes

5.63 The assessment criteria for this objective focussed on the potential for sites to meet the housing needs of Greater Exeter. All the employment sites recorded a negligible effect in relation to this objective as they will not contribute to housing need.

5.64 Out of the 59 residential sites assessed, 36 are expected to have significant positive effects due to them having the capacity to deliver over 1,000 homes and therefore making a significant contribution to the housing needs of Greater Exeter.

5.65 There are 22 sites that are expected to have minor positive effects due to them having the capacity for less than 1,000 homes.

5.66 One residential site is expected to have negligible effects despite having the capacity to deliver less than 1,000 homes. This is due to the site being unlikely to come forward during the plan period and therefore unlikely to contribute to the housing needs required in the GESP.

*Potential Site Options*

5.67 For the same reasons as set out above, out of the 33 potential residential site options, 18 are expected to have significant positive effects and 15 are expected to have minor positive effects.

5.68 The Draft Policies and Site Options Consultation document includes information on planning requirements for the Potential Site Options, although none of these are expected to influence the effects of the sites on SA objective 8 when they are taken into account at the next stage of the SA.

### SA objective 9: Health

5.69 The assessment criteria for this objective focussed on the potential for sites to promote healthy and active communities. This included consideration of the provision of cycle and walking networks and access to green infrastructure in the area, as set out in **Appendix 5**.

5.70 Of the 78 sites assessed, 45 (40 residential and five employment) are expected to have significant positive effects in relation to this objective. This is as a result of them being within 800m of a major open space and within 400m of a walking or cycle path or because they are large residential sites (>2,000 homes) that have potential to deliver significant open space and active transport links as part of new development.

5.71 There are 28 (19 residential and nine employment) sites that are likely to have minor positive effects due to them having access to either open space or walking or cycle paths, capacity for 1,000-1,999 homes or capacity for over 20ha of employment (and therefore potential to deliver a lesser amount of open space and active transport links).

5.72 There are four (employment) sites that are expected to have minor negative effects as they are not in good proximity to open space or walking/cycle links and are not of a sufficient size for development to include these considerations.

5.73 The remaining site is expected to have mixed minor positive and minor negative effects as it contains over 20ha of employment land but is not in good proximity to existing open space or walking and cycle links.

*Potential Site Options*

5.74 For the same reasons as set out above, of the 39 Potential Site Options, 26 (25 residential and one employment) are expected to have significant positive effects, 11 (eight residential and three employment) are expected to have minor positive effects, one (employment) is expected to have minor negative effects and one (employment) is expected to have mixed minor positive and minor negative effects.

5.75 The Draft Policies and Site Options Consultation document includes information on planning requirements for the Potential Site Options, some of which may provide mitigation for the potential negative effects identified in relation to SA objective 9 and potentially increase the likelihood or significance of positive effects. These requirements include the provision of green infrastructure and open spaces within developments, the provision of new and improved walking and cycle links and financial contributions towards new medical facilities. These requirements will be taken into account at the next stage of the SA when appraising the sites that are selected for allocation in the Draft GESP.

### SA objective 10: Wellbeing

5.76 The 78 reasonable alternative site options were assessed in relation to this objective based on criteria considering the site's proximity to noise and air pollution and the potential for

development at the sites to reduce deprivation levels in the area, as set out in **Appendix 5**. Specifically, the site's proximity to Exeter Airport noise contours, existing residential development, major roads and AQMAs was considered as well as whether the site is in an area that experiences higher levels of deprivation compared to the region as a whole. For employment sites, the proximity to Exeter Airport noise contours was not considered.

5.77 Out of the 78 sites assessed, 20 (17 residential and three employment) are expected to have significant negative effects. This is due to the sites being within 1km of an AQMA or being wholly within the Exeter Airport noise contour. Additionally, there is one site that is expected to have uncertain significant negative effects as it lies partially within the Exeter Airport noise contour and therefore there may be potential for site layout to avoid this area.

5.78 There are nine (residential) further sites that are expected to have significant negative effects, but in these cases it is in combination with minor positive effects. This is due to the site being located within an area of higher than average deprivation and therefore development could contribute positively to the areas by attracting investment.

5.79 There are 40 (27 residential and 13 employment) sites that are expected to have minor negative effects in relation to this objective. This is due to them either being in close proximity to existing development that could be affected by noise, light and air pollution from new development construction and occupation, in close proximity (<100m) to noise pollution sources or further than 1km from and AQMA but have been flagged likely to increase traffic in the AQMA.

5.80 There are four (residential) sites that are expected to have mixed minor positive and minor negative effects as they have potential to reduce deprivation levels in the area but may result in negative impacts related to air, light and noise pollution.

5.81 The remaining four sites (three employment and one residential) are expected to have negligible effects due to them being unlikely to have impacts on wellbeing, due to their distance from existing development, noise pollution sources and AQMAs.

*Potential Site Options*

5.82 For the same reasons as set out above, of the 39 Potential Site Options, 12 (residential) are expected to have significant negative effects, one (residential) is expected to have uncertain significant negative effects and eight (residential) are expected to have uncertain significant negative effects in combination with minor positive effects.

5.83 There were 15 (10 residential and five employment) Potential Site Options that are expected to have minor negative effects and two (residential) that are expected to have mixed minor positive and minor negative effects. The remaining potential site option (employment) is expected to have negligible effects.

5.84 The Draft Policies and Site Options Consultation document includes information on planning requirements for the Potential Site Options, some of which may provide mitigation for the potential negative effects identified in relation to SA objective 10 and potentially reduce the significance of some of the likely negative effects, as well as reinforcing potential positive effects. These requirements include noise mitigation measures such as triple glazing, planting, sound buffers and acoustic panelling, as well as measures that would help to address air quality issues including the incorporation of sustainable transport links such as new and improved walking and cycle routes. These requirements will be taken into account at the next stage of the SA when appraising the sites that are selected for allocation in the Draft GESP.

### SA objective 11: Access to Services

5.85 The 78 reasonable alternative site options were assessed in relation to this objective based on criteria considering their proximity to local services and facilities, as set out in **Appendix 5**. For residential sites, proximity to major settlements, broadband access, proximity to schools and the capacity of the site was considered. For employment sites, only the proximity to major settlements (Exeter City and other towns in the settlement hierarchy) and broadband access was considered.

5.86 Out of the 78 sites assessed, 32 (31 residential and one employment) are expected to have significant positive effects in relation to this objective due to them being sites located within or adjacent to a major settlement or residential sites that have the capacity to deliver over 4,000 homes and therefore being more likely to provide services, such as a town centre, and primary and schools, onsite. There are 10 (residential) sites that are expected to have significant positive effects in combination with minor negative effects. In these cases, the sites fulfilled one of the criteria relating to proximity to major settlements or site capacity resulting in the significant positive effects, but the minor negative effects expected can be attributed to sites that have capacity for fewer than 500 homes, or are only adjacent to an undefined village (defined village for employment sites) according to the settlement hierarchy of Local Plans. In some cases, minor negative effects expected for these sites can be attributed to locations where there is currently lower than 10Mbps broadband available.

5.87 There were six (one residential and five employment) sites out of the 78 assessed that are expected to have significant negative effects as a result of them not being adjacent to a major settlement. There were 18 (10 residential and 8 employment) further sites that are expected to have significant negative effects in combination with minor positive effects. In these cases the sites are not located next to a major settlement but fulfilled criteria of 30-300Mbps broadband or medium site capacity (500-3,999 homes for residential sites).

5.88 There is one site (residential) that is expected to have mixed significant positive effects in combination with significant negative effects. In this instance, the site is not located adjacent to any settlements but it is a larger site that has the capacity to deliver over 4,000 homes and is therefore more likely to include services and facilities onsite.

5.89 There are nine (five residential and four employment) sites out of the 78 assessed that are expected to have minor positive effects in relation to this objective. In the case of employment sites, the effects are due to them being located adjacent to a major settlement or have access to superfast broadband, or both (30-300Mbps). In the case of residential sites, the minor positive effects are due to them being adjacent to a Defined Village, having access to superfast broadband and being medium sized sites (500-3,999 homes).

5.90 Two sites (one residential and one employment), are expected to have mixed minor positive and minor negative effects and mixed uncertain minor positive and minor negative effects respectively. In the case of the former, this is a site that is within 500m of a primary school but not a secondary school, has capacity for less than 500 homes (and therefore is unlikely to provide a new school and is not located adjacent to a major settlement. For the latter, this is a site that is adjacent to Defined Village and has access to superfast broadband, but has capacity for less than 500 homes.

5.91 A large proportion of the residential sites are expected to have uncertain minor positive effects and in some cases uncertain significant positive effects in relation to their proximity to schools in the area. However, due to the objective containing multiple criteria, the more significant effects relating to a site's proximity to settlements or site capacity are shown in the summary tables.

*Potential Site Options*

5.92 For the same reasons as set out above, of the 39 Potential Site Options, 17 (residential) are expected to have significant positive effects, nine (residential) are expected have mixed significant positive effects in combination with minor negative effects and one (residential) site is expected to have mixed significant positive effects in combination with significant negative effects.

5.93 There were seven sites (four residential and three employment) that are expected to have significant negative effects in combination with minor positive effects.

5.94 Of the remaining Potential Site Options two are expected to have mixed minor positive and minor negative effects and three are expected to have minor positive effects only.

5.95 The Draft Policies and Site Options Consultation document includes information on planning requirements for the Potential Site Options, some of which may provide mitigation for the potential negative effects identified in relation to SA objective 11 and reinforce potential positive

effects. These requirements include contributions to additional school capacity or new onsite schools, contribution to increased GP capacity offsite or new provision onsite, and the provision of other new services, facilities and amenities. A town centre is to be included within larger developments. It is also required that all sites will need to provide high speed internet. These requirements will be taken into account at the next stage of the SA when appraising the sites that are selected for allocation in the Draft GESP.

### SA objective 12: Jobs and Local Economy

5.96 The 78 reasonable alternative site options were assessed in relation to this objective using criteria based on the likely creation of job opportunities. For residential sites, this included the proximity of the site to major settlements or existing or proposed employments sites, the potential for development to result in the loss of existing employment land, the potential for larger sites to include employment land as part of development and the effects that development could have on tourism in the area. For employment sites, this included the overall capacity of the employment site and the proximity of the site to high value employment clusters and labour supplies.

5.97 Out of the 59 residential sites assessed, 22 are expected to have significant positive effects in relation to this objective as a result of them being located within 1km of existing or proposed employment sites and adjacent to a major settlement, or because they have the capacity to deliver over 2,000 homes (or both). There were 10 sites that are expected to have mixed significant positive effects in combination with significant negative effects. The significant positive effects are due to them fulfilling proximity to employment sites/settlements criteria or capacity criteria whilst the significant negative effects are either a result of sites being located more than 1km from existing employment sites and not adjacent to a Main Town or because development is likely to result in the loss of existing employment uses in the site. A further six residential sites are expected to have mixed significant positive effects in combination with minor negative effects. The minor negative effects in these cases are due to there being potential for development at the site to impact negatively on the tourism in the area.

5.98 There is one residential site that is expected to have significant negative effects due to it being located over 1km from employment sites and not adjacent to a Main Town. A further seven sites are expected to have mixed significant negative effects in combination with minor positive effects. The minor positive effects are either a result of the site being within 1km of only one of the spatial criteria (within 1km of existing/proposed employment site or adjacent to Exeter or Main Town), or because the site is medium sized (500-1,999 homes). For these same reasons, 10 residential sites could have minor positive effects alone.

5.99 The remaining three residential sites are expected to have mixed minor positive effects in combination with minor negative effects. Minor negative effects at these sites are due to the potential impact that development could have on the tourism business in the area.

5.100 Out of the of the 19 employment sites assessed, seven are expected to have significant positive effects as they have the capacity to deliver over 20ha of employment land and, in some cases, are located with 3km of Exeter City centre, Exeter University or Exeter Science park/Sky Park and Airport Business Park.

5.101 Eight out of the 19 employment sites assessed could have a minor positive effect as they have the capacity for 5-20ha of employment land.

5.102 The remaining four sites are expected to have uncertain minor positive effects as they have the capacity for less than 5ha of employment land.

*Potential Site Options*

5.103 For the same reasons as set out above, of the 39 Potential Site Options 15 (11 residential and four employment) are expected to have significant positive effects and three (residential) are expected to have mixed significant positive effects in combination with minor negative effects.

5.104 There are eight of the Potential Site Options (residential) that are expected to have mixed significant negative effects in combination with significant positive effects, a further two sites

(residential) are expected to have significant negative effects in combination with minor positive effects and one site (residential) is expected to have significant negative effects.

5.105 There are eight Potential Site Options (six residential and two employment) that are expected to have minor positive effects and a further two (residential) that are expected to have mixed minor positive effects in combination with minor negative effects.

5.106 The Draft Policies and Site Options Consultation document includes information on planning requirements for the Potential Site Options, some of which may provide mitigation for the potential negative effects identified in relation to SA objective 12 and reinforce potential positive effects. While the incorporation of employment land has already been taken into account in the SA (as per the assumed characteristics for all sites), the requirements set out for specific Potential Site Options relate to the high quality of overall development including any employment provision. Other relevant requirements relating to the design of development and the incorporation of sustainable transport links, for example, will combine to increase the attractiveness of sites to investors, benefitting the economy. These requirements will be taken into account at the next stage of the SA when appraising the sites that are selected for allocation in the Draft GESP.

### SA objective 13: City and Town Centres

5.107 The assessment criteria for this objective focussed on supporting existing city and town centres in relation to new development, as set out in **Appendix 5**. Specifically, the proximity of sites to Exeter City centre or a Main Town centres was considered. For large residential sites (>4,000 dwellings), the potential for a new centre within development that might draw visitors away from existing town centres was also considered.

5.108 Out of the 78 sites assessed, 33 (residential) are expected to have significant positive effects in relation to this objective as they are residential sites that have the capacity to deliver less than 4,000 homes and are located within or adjacent to Exeter or a Main Town and therefore have the potential to increase the level of visitors to existing centres.

5.109 Seven sites (two residential and five employment) are expected to have minor positive effects as they are either large residential sites (>4,000 dwellings) located adjacent to Exeter or a Main Town or they are employment sites located adjacent to Exeter or a Main Town.

5.110 The majority of the sites (24 residential and 14 employment) are expected to have minor negative effects in relation to this objective as they are not located adjacent to Exeter or a Main Town.

*Potential Site Options*

5.111 For the same reasons as set out above, of the 39 Potential Site Options, 20 (residential) are expected to have significant positive effects, 15 (11 residential and four employment) are expected to have minor negative effects and four (two residential and two employment) are expected to have minor positive effects.

5.112 The Draft Policies and Site Options Consultation document includes information on planning requirements for the Potential Site Options, some of which may provide mitigation for the potential negative effects identified in relation to SA objective 13 and reinforce potential positive effects. These requirements include the provision of walking and cycle links to nearby town centres, and the provision of a town centre relief road (reducing traffic within town centres may benefit their vitality and viability). These requirements will be taken into account at the next stage of the SA when appraising the sites that are selected for allocation in the Draft GESP.

### SA objective 14: Connectivity and Transport

5.113 The assessment criteria for this objective focussed on the presence of existing transport infrastructure in relation to sites and the potential for provision of new transport links with development, as set out in **Appendix 5**. Specifically, the proximity of the site to public transport links was considered as well as the overall capacity of the site.

5.114 Out of the 78 sites assessed, both residential and employment, 20 (residential) sites are expected to have significant positive effects in relation to this objective as a result of them being located within 1km of a railway station and within 500m of a bus stop with frequent services.

5.115 There are three (two residential and one employment) sites that are expected to have mixed significant negative effects in combination with minor positive effects. The significant negative effects in these cases arise from these sites being located more than 1km from a railway station, over 500m away from a bus stop and not within 1km of any cycle routes. The minor positive effects are due to the site having sufficient capacity to provide sustainable transport links with development.

5.116 There are 37 sites (27 residential and 10 employment) that are expected to have minor positive effects (two uncertain) as they are either within 1km of a railway station or 500m of a bus stop and in some cases have the capacity (>1,000 dwellings/20ha employment) to be more likely to deliver sustainable transport links with development. The two sites where uncertainty is present is due to access to transport links potentially being blocked in one case and due to bus services being frequent for only some points in the day for the other.

5.117 Out of the 78 sites assessed, there are five sites (two residential and three employment) that are expected to have uncertain minor negative effects and six sites (two residential and four employment) that are expected to have minor negative effects. In the case of the latter, these are sites where they are not within 1km of a railway station but are within 500m of a bus stop with infrequent services (more than half hourly). For the former, these are sites that are not in good proximity to public transport links but do have an existing cycle route within 1km of the site. The effect is uncertain as it is dependent upon whether the route is suitable to be used for daily commutes.

5.118 The remaining seven sites (six residential and one employment) are expected to have mixed minor positive and minor negative (three uncertain) effects as they have sufficient capacity to deliver sustainable transport links with development but existing access to public transport within the area is limited.

*Potential Site Options*

5.119 For the same reasons as set out above, of the 39 Potential Site Options, 16 (residential) are expected to have significant positive effects and 18 (13 residential and five employment) are expected to have minor positive effects.

5.120 There is one residential site that is expected to have minor negative effects.

5.121 Three residential sites are expected to have mixed minor positive effects in combination with minor negative effects (one uncertain) and there is one employment site that is expected to have mixed minor positive and significant negative effects

5.122 The Draft Policies and Site Options Consultation document includes information on planning requirements for the Potential Site Options, some of which may provide mitigation for the potential negative effects identified in relation to SA objective 14 and reinforce potential positive effects. These requirements include the provision of new and improved sustainable transport infrastructure including bus routes, walking and cycle routes and promoting car-free development including car clubs and e-bikes. These requirements will be taken into account at the next stage of the SA when appraising the sites that are selected for allocation in the Draft GESP.

# 6 Monitoring

6.1 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.

6.2 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. Although potential significant effects have been identified in relation to a number of the site and policy options being considered for inclusion in the GESP, many of the site options in particular may not be taken forward into the next stage of the GESP and some of the policies still have to be worked up in more detail before the likely significant effects can be predicted with certainty. Therefore, monitoring indicators will be proposed in the next iteration of the SA Report in relation to all of the SA objectives in the SA framework for which likely (or uncertain) significant negative effects are identified in relation to the policies and sites allocated in the Draft GESP.

6.3 Where possible, the indicators proposed will draw from those in the monitoring framework that will be included in the Draft GESP. However, additional indicators may be proposed where no relevant indicators are included in the Draft GESP.

6.4 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 Councils continue the dialogue with statutory environmental consultees and other stakeholders that has already been commenced, and work with them to agree the relevant sustainability effects to be monitored and to obtain information that is appropriate, up to date and reliable.

# 7 Conclusions

7.1 The GESP Draft Policies and Site Options Consultation document (September 2020), and in particular the reasonable alternatives considered during its preparation have been subject to a detailed appraisal. The appraisal has been undertaken in line with the SA objectives which were developed at the scoping stage of the SA process and subsequently refined to reflect consultation comments received and also to ensure that the objectives reflect each of the topics required by the SEA regulations.

7.2 The SA Report has assessed the potential sustainability effects of 78 reasonable alternative site options, including the 39 Potential Site Options which were identified to be taken forward in the GESP Draft Policies and Site Options Consultation document. Appraisal of the strategic alternatives (the strategy options for the level of housing development and the distribution scenarios) considered for inclusion in the consultation document have also been presented in the SA Report. The appraisal of a further 43 Proposed Policies and reasonable alternatives (as well as the vision and priorities of the GESP) considered for inclusion in the GESP Draft Policies and Site Options Consultation document has also been undertaken and presented.

7.3 The vision and priorities of the GESP were assessed as having generally positive effects against a range of SA objectives. Considered as a whole, the various elements of this section of the plan combine to set out a positive, aspirational statement to guide the growth supported through the plan. Development is to be delivered in a manner which will help to ensure Greater Exeter is a place in which the right amount of housing and supporting development is delivered to allow for the needs of local residents to be met. Growth will be supportive of a transition towards a productive low carbon economy where essential services, facilities and employment opportunities for residents are highly accessible. The level and location of growth up to 2040 is to be balanced against a need to protect Greater Exeter's particular landscape and ecological sensitivities, given its location in relation to the AONBs, National Parks and international biodiversity designations.

7.4 In general, the Proposed Policies have been found to have a wide range of minor positive and significant positive effects in relation to the SA objectives, although a number of potentially minor and significant negative impacts have also been identified. These negative effects are mostly associated with the location of development (at the Potential Site Option locations) in relation to sensitive receptors in the plan area, as well as the land take required to support the level of development to be delivered over the plan period.

7.5 The plan area is influenced greatly by its location at the southern coastline of Devon and includes or is adjacent to a number of designated landscapes and internationally important biodiversity sites. As such, sensitive environmental features in terms of landscape (the East Devon, Blackdown Hills, Dorset AONBs) and biodiversity (including the Exe Estuary SPA and Ramsar site, East Devon Pebblebed Heaths SAC and East Devon Heaths SPA) have the potential to be adversely affected as a result of new development and higher levels of associated human activities, including travel and recreation. Much of the growth supported through the Proposed Policies would be delivered in areas which have the potential to affect these features due to the focus of development towards the more developed areas of the District, particularly by Exeter which sits at the top of the Exe Estuary. These more developed settlements of the plan area also include a high concentration of historic assets which are potentially sensitive to new growth, dependent upon its specific design and location. Tensions are therefore present in terms of the level of development the GESP needs to deliver to support both the housing and economic needs over the plan period and the potential for adverse impacts on sensitive features.

7.6 Focussing new growth towards the larger settlements of the plan area and established transport corridors is likely to provide new residents with good levels of access to services and facilities as well as employment opportunities, particularly by more sustainable modes of transport, which would in turn help to reduce adverse effects in terms of climate change and help to achieve the

carbon reductions set out in Greater Exeter's climate emergency declarations. An approach of this type would also help to deliver homes in areas of most need, and combined with supporting access to services and facilities, this strategy approach should help to address issues of social deprivation across Greater Exeter. The distribution of growth supported in the GESP onsultation document would not specifically include a strand of rural growth which could result in stagnation of service provision and employment growth at the smaller settlements within the GESP area, however strengthening sustainable transport provision is likely to help address this issue in part. This issue could also be addressed through Local Plan reviews as these will include strategies for delivering the residual amounts for housing and employment which will include development at rural settlements. This approach is set out through the GESP draft policies (GESP11 and GESP16).

7.7 The need to balance the potential adverse impacts relating to the sensitive environmental features of the plan area against the requirement for development to meet housing and employment as well as social needs, is explicitly recognised by the GESP Draft Policies and Site Options Consultation document. The document has identified a need to protect and enhance the highly valued and most sensitive areas. In addition, the consultation document also considers a number of policy approaches relating to achieving improved movement and connectivity, lower carbon emissions and the creation of higher quality places in the plan area. These include a promotion of gigabit-ready developments, as well as the delivery of new growth in line with Garden City principles at select GESP allocations. These policies are expected to help achieve a more sustainable approach to development in the plan area and may have particularly positive effects in term of climate change, health and wellbeing, landscape and natural and historic environment.

7.8 Taking the GESP Draft Policies and Site Options Consultation document as a whole, a number of Proposed Policies and Potential Site Options have been included, many of which will guide development over the plan period, dependent upon which are taken forward in the next version of the plan. Overall, these elements provide a basis to ensure that the level, type and location of growth in the plan area is appropriately balanced between the need to maintain and enhance the natural and built environment, to support economic aspirations for Greater Exeter and improve health and social wellbeing.

## Next Steps

7.9 This SA Report will be available for consultation alongside the GESP Draft Policies and Site Options Consultation document during the autumn 2020 Consultation. Following this consultation the responses will be reviewed and addressed where necessary. The Councils will take into account the SA findings described in earlier chapters of this report, as well as other relevant factors (including the outcomes of the consultation) when making final decisions with regards to which of the Proposed Policies and Potential Site Options to take forward as part of the next version of the GESP.

7.10 Once the next iteration of the GESP has been prepared, those draft policies and the sites selected for inclusion will be subject to SA and the SA Report will be updated. Any updated information about the Councils' reasons for decision making with regards to policy approaches and preferred sites will also be included in the next iteration of the SA Report.

7.11 Further consideration will also be given to potential mitigation measures required to help address any adverse impacts identified, as well as the approach to monitoring the likely significant effects of the plan.

LUC
June 2020

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# SA Report for the GESP Policies and Site Options Consultation Document

## Final Report

## Appendices

Prepared by LUC
June 2020

**Project Title**: Sustainability Appraisal of the Greater Exeter Strategic Plan

**Client**: East Devon District, Exeter City, Mid Devon District and Teignbridge District Councils

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| 1 | 11/05/2020 | Draft SA Report for Greater Exeter Strategic Plan: Draft Policies and Site Options Consultation | Kieran Moroney<br>Natalie Collins<br>Harry Briggs | Kate Nicholls | Taran Livingston |
| 2 | 25/05/2020 | Final SA Report for Greater Exeter Strategic Plan: Draft Policies and Site Options Consultation | Kieran Moroney<br>Natalie Collins<br>Harry Briggs | Kate Nicholls | Taran Livingston |
| 3 | 01/06/2020 | Updated Final SA Report for Greater Exeter Strategic Plan: Draft Policies and Site Options Consultation | Kieran Moroney<br>Natalie Collins<br>Harry Briggs | Kate Nicholls | Taran Livingston |

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# SA Report for the GESP Draft Policies and Site Options Consultation Document

## Final Report

## Appendices

Prepared by LUC
June 2020

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# Appendix 1
# Consultation Responses Received in Relation to the SA Scoping Report (February 2017)

**Table A1.1: Consultation comments received in relation to the GESP SA Scoping Report received up to May 2017 and how they have been addressed in this SA Report**

***Issues the consultation was seeking to consider:***

- Are the policies, plans, programmes, strategies and initiatives (PPPSIs) reviewed appropriate?
- Are there any other baseline indicators which should be used to provide useful information?
- Are the sustainability issues identified considered appropriate?
- Do the SA objectives cover all necessary issues?

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| Abbotskerswell Parish Council and Wolbourough Residents Association. | 1. The document refers to the importance of the SH SAC but fails to recognise significant areas of Teignbridge (and Torbay) with designated roosts, critical flyways and foraging grounds. It is important that the GESP acknowledges and reflects the SHSAC sustenance zones and flyways, and the many satellite roosts vital to the integrity of the SHSAC. These designated environmental areas must be protected against significant development and be "conserved and enhanced", as stated in the GESP Issues consultation document and NPPF Paragraph 114.<br>2. The document recognises sites currently designated with a high level of protection (e.g. County Wildlife Sites, SSSI's, AGLV, Historic Sites, etc). There are numerous other sites which are of also of significance but to date have not received designation. It is important to identify these and, where possible designate them, to avoid future conflicts or their loss.<br>3. The document recognises that 23% of the population are over 65. This significant group numerically are being ignored in terms of the provision of new housing. There must be an opportunity to free up larger residences if more bungalows etc. are built, preferably in "retirement" communities. Housing affordability is a major problem in an area with generally low income levels and high house prices. Many of the new housing developments are selling at "market" prices, substantially more than an acceptable mortgage multiplier. Switching the emphasis of some new development to the older generation would free up the wider housing market which in turn would allow lower value properties to become available to first-time buyers.<br>4. Social Housing – There is a clear need to meet the housing needs of all in our communities. There is no mention of core social housing need, previously called council housing; this is probably the most urgently needed category. Affordable | 1. The South Hams SAC is discussed alongside the other biodiversity assets in the plan area in **Appendix 3** of this SA Report. If further relevant evidence is produced through the Habitat Regulation Assessment at any stage this will be incorporated into the SA baseline data.<br>2. The document is seeking to establish a baseline for assessing the plan as it is being prepared. If there is no data available on locally important sites it is challenging to consider these. Evidence should also be proportionate.<br>3. Comment noted.<br>4. Noted. Evidence on the affordability of affordable housing will be sought.<br>5. Noted.<br>6. Noted.<br>7. The SEA will consider impacts of the plan (at each stage), including transport matters.<br>8. The SEA is unable to review all existing footpaths and cycle routes, and this level of evidence is not considered |

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[1] The GESP Council Officers prepared the SA Scoping Report and these responses to the consultation comments received. However, the LUC SA team has addressed those comments that relate to updating baseline information, plans and programme reviews and amending SA objectives in this latest version of the SA Report, therefore, the LUC SA team has updated page and Appendix number references to reflect where the information is now contained in this SA Report (rather than where it was presented in the SA Scoping Report).

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| | housing is not affordable for many people when ratios of house price to earnings often exceed 8-10 times local wage rates and rents take up 50-60% of net income. This lack of social housing needs to be addressed as a pre-requisite core infrastructure requirement for the GESP.<br>5. Agree that employment land should be focussed on extending existing business areas where there is already better infrastructure and ease of transport.<br>6. Teignbridge generally and Newton Abbot particularly have become dormitory towns for Exeter, Plymouth and Torbay. This has long-term social and environmental implications which need to be addressed at the draft plan stage.<br>7. The document notes the growth in van traffic. This is putting considerable strain on many of the GESP area's minor roads, designed for horses and carts and not modern vehicles. The Plan should consider the wider infrastructure as well as that associated with development sites.<br>8. The extension of cycle routes and footpaths is an essential element if there is to be any change in culture away from the motor vehicle. This should include a review of all existing such routes as many are inadequate, dangerous, particularly narrow shared cycle/pedestrian routes and narrow pavements beside fast moving traffic, or simply non-existent.<br>9. The Travel to Work Areas are in many cases a driver of increased vehicle use, particularly as new developments, be they business or residential, move further out from the centre and thus the communication hubs. With widely distributed pockets of development around Newton Abbot, the provision of economic bus services becomes more challenging.<br>10. Flood risk is likely to become an increasing problem. This must lead to land allocations avoiding flood plains and hillsides where there are existing developments downstream. | proportionate to the task.<br>9. Comment noted<br>10. Flood risk is discussed in **Appendix 3**. Evidence emerging from the Strategic Flood Risk Assessment will be used to inform the plan. |
| Blackdown Hills AONB Partnership | 1. Scant reference to AONBs in the area, and we would wish to ensure that proper regard is had to these nationally important designations. | 1. Noted. Further baseline information has now been included in the baseline evidence section of this report at **Appendix 3**. |
| Savills on behalf of Bloor Homes | 1. Stage B *Developing and Refining Options* must test all options rather than only considering a reduced range of options which may have been 'shortlisted' by the Councils through the wider plan making process. The testing of all the options available will ensure that the evidence base clearly demonstrates how any preferred options selected by the Councils meet the test of soundness in accordance with paragraph 182 of the NPPF.<br>2. Baseline - The inclusion of current plans and polices, notably existing local plans, as part of the baseline is supported. The levels of growth planned, including allocations, alongside infrastructure which has been secured either individually or within development proposals, should be considered as part of the baseline. This will ensure | 1. The SA will test all reasonable alternative options – **Chapters 4** and **5** present the SA findings of the policy and site options, and **Appendix 7** provides the audit trail of Councils' reasons for selecting or discounting each option considered.<br>2. Noted – it is agreed that existing plans and allocations should be referenced and these are now detailed as part of the review of plans, policies and programmes |

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| | that where opportunities exist for additional growth within these locations, supporting by already planned infrastructure, that these are appropriately assessed in the SA/SEA. | and baseline evidence in **Appendices 2** and **3**. Local Plans of the surrounding local authority areas have also been included in **Chapter 3**. Secured / planned infrastructure improvements identified within Infrastructure Delivery Plans have been included in the review of plans, policies and programmes in **Appendix 2**. |
| Mr Mark Brown | 1. It is good and thorough. I would very much like to see a firm commitment to phase out the use of glyphosate in the near future, and also a phasing out of any pension holdings in fossil fuel stocks. | 1. The SA does highlight the impact of agricultural chemicals on water quality as part of the baseline evidence in **Appendix 3**. However, it should be noted that the use of herbicides and the way pensions are invested are not within the scope of the land-use plan. |
| Alex Gandy on behalf of Dartmoor National Park Authority | 1. Landscape / Historic Environment - The potential impact of development in the GESP on the quality and character of the National Park should be identified as a key issue to be assessed as part of the SA, as well as potential impacts on the setting of heritage assets, particularly Conservation Areas, close to the National Park boundaries. Of particular concern is the potential for development, particularly that relate to housing, renewable energy and other major proposals, to impact on the National Park's views, landscape setting and landscape character.<br>2. Housing - Dartmoor's status as a National Park and its statutory purposes mean that it has limited land supply and is not a suitable place for large scale development, as reflected in the NPPF para 14 (footnote 4). The GESP should recognise its role in relieving development pressure on the National Parks as an important principle of delivering sustainable development in the region.<br>3. Access to open space - The National Park provides significant opportunities for access and recreation, with a large rights of way network and areas of open access. This brings with it obvious benefits for health and wellbeing for the region. However there is concern over the potential cumulative impact of increased recreational pressure in the National Park arising from the scale of growth in surrounding areas given the growth ambitions of Plymouth and the Greater Exeter area. Of particular concern is the damage and disturbance of wildlife sites from development which increases recreational use and leads to isolation and fragmentation of habitat.<br>4. Tourism - With regards tourism it is unclear whether the higher tourism figures reported in Teignbridge are due to the inclusion of Dartmoor National Park. Any inclusion of the National Park in these figures should be recognised, together with the likely increase in tourism which will result from housing development in the plan area | 1. The SA does consider landscape impacts and specialist advice from landscape professionals in the Councils has informed the appraisal of the site options. The landscape sensitivity assessment work provided by LPA officers which has informed the appraisal of sites in relation to the assumption for SA objective 2: landscape is considerate of landscape designations covered by the Local Plans. This includes the AONBs and Coastal Preservation Areas. Landscape impacts will include any impacts on Dartmoor. The SA Framework now explicitly includes reference to potential effects on the AONBs and National Park as part of the factors considered under SA objective 2.<br>2. The GESP Councils recognise this and all parties will continue to co-operate to deliver shared objectives.<br>3. The GESP will include a Habitats Regulations Assessment process, led by specialists and ecologists, to understand likely impacts (and mitigation measures) |

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| | and an assessment of the impact this may have.<br>5. Water quality / Flood Risk - Dartmoor is the source of 45% of South West Water's supply. A number of rivers rise on Dartmoor and flow into the GESP area. Flood risk is a potential cross-boundary issue, although the scale of development in the National Park is not likely to give rise to significant flood risk downstream. However there could be significant opportunities for natural flood management upstream within the National Park to reduce or mitigate flood risk within the GESP area. The Environment Agency is currently putting together a proposal for a programme of work to investigate flood management including the whole of Dartmoor NP, but with a particular focus on the Teign and Dart river catchments.<br>6. Air quality & emissions / Nature - The scoping report should identify potential impacts on Dartmoor's habitats. Vehicle emissions are a contributing factor to nitrogen deposition and significant increases in traffic volumes in the vicinity of important habitats is likely to have a negative impact. The cumulative impact of increased traffic volumes over the plan period is likely to be most significant along the A38 corridor, given Greater Exeter and Plymouth's growth aspirations.<br>7. Table 3 – sustainability issues - We would like to see potential impacts on Dartmoor National Park identified, particularly the impact of development on the special qualities and setting of the National Park and heritage designations, as well as views from the National Park. The potential cumulative effects of development leading to increased recreational pressure on the National Park should also be reflected in table 3.<br>8. Areas of particular environmental importance - Para 3.11 – although this section is focusing on European designated sites, we would expect to see recognition of the close proximity to the two National Parks and AONBs.<br>9. Sustainability objectives - The SA framework objectives and monitoring indicators should include assessment of potential impacts on the National Park as highlighted above. | on protected species and habitats.<br>4. It is not known if the tourism figures include the DNP area. Clearly Dartmoor is a significant attraction. An assessment of recreational impacts on protected habitats (including on Dartmoor) will form part of the HRA.<br>5. Comments noted. This matter will be considered by the Green Infrastructure team.<br>6. The scoping report was set out to establish the Sustainability Objectives based on readily available data. Later work in the plan making process has looked at more detailed potential impacts, based on growth options. This included potential effects on air quality and biodiversity through SA objectives 1 and 10.<br>7. The key sustainability issues for plan area (see **Chapter 3** in this SA Report) have been updated in this SA Report to reflect the potential for impacts of development on the specially designated landscapes within the AONBs and National Parks. The key sustainability issues also include the potential for impacts as a result of development on heritage assets and their respective settings. The potential for adverse increases in terms of recreational pressures have also been identified in relation to the Dartmoor National Park as part of the key sustainability issues. Impacts on the Dartmoor National Park including its special qualities and setting have been considered as part of the appraisal work through SA objective 2 with reference to the national park included in the factors. Impacts on heritage assets have been considered separately through SA objective 3. This |

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| | | separation of objectives is in line with the SEA topics and is to avoid numerous mixed effects being identified.<br>8. The sites identified as being with a 20km radius of the plan boundary by definition will incorporate a significant area of Dartmoor.<br>9. The SA Framework now includes reference to potential effects on the AONBs and National Park as part of the factors considered under SA objective 2. |
| Highways England | 1. Support of sustainable transport modes and willingness to work together. | 1. Noted. |
| Mr Richard Eley | 1. Increased productivity can lead to unemployment and increased deprivation, and negative economic growth. The HotSW has recently produced some very misleading statistics which underline these misperceptions. Increased productivity is only guaranteed to be beneficial, where all other factors are equal, which is very rarely the case. Productivity should be examined, and policies should be considered, but it is not a 'holy grail'.<br>2. The reason why there has been so little take up of allocated employment land is twofold: firstly, there is not a close relationship between plan-allocated employment land and economic activity. Allocating employment land does not ensure economic growth! It is a small factor. Creating the right business environment is much more important. So it is better to dual the A303 than put an employment site at the end of it whilst it remains single carriageway. Secondly, there is simply not the demand, and there has been a big over-allocation in Greater Exeter. We are now running 30% below the economic activity predicted for East Devon, and the gap will continue to grow.<br>3. We have allocated employment land to meet housing allocations and we are now proposing housing allocations to meet employment land allocations. To some extent, these needs are 'phantom'. This especially applies to housing need which is exaggerated through poor record-keeping. EDDC's housing list fell dramatically when they started ringing up individuals and found that they were on the list but no longer in need.<br>4. Perhaps the biggest myth is that house prices will fall if we build more. This is not in fact the case, beyond a very long term relationship between supply and demand. High house prices are a result of macro-economic circumstances not new build rates. Government policy today is specifically designed to avoid a significant slump in house prices. So building houses to lower prices flies in the face of what central government | 1. Noted. It is important the SA considers both the potential positives and negatives of increased productivity. (Negatives may include environmental consequences, unemployment, and risk that the increases in productivity go into profits rather than increased wages.)<br>2. Comments noted.<br>3. The GESP will be developed in light of a robust and up to date evidence base including an objectively assessed housing needs assessment, and economic development needs assessment. These will consider growth trends and delivery mechanisms for employment uses.<br>4. There is a relationship between the balance of housing supply and demand and house prices, albeit that there are other factors which also impact on house prices.<br>5. Comment noted.<br>6. The SA baseline in **Appendix 3** of this SA Report presents the *Percentage of Car Ownership* statistics, and *Number of Shopping Trips* statistics. The SA baseline does not currently include specific |

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| | is currently seeking.<br>5. We need to be very careful about the use of employment statistics: NOMIS stats are very unreliable at local level. This led EDDC to claim that East Devon had unemployment rates of 7% when they were in fact 2%: this affected policy.<br>6. The car congestion statistics look very poor, and reflect SUSTRANS preoccupations with travel to work scenarios. I recognise that you can only publish statistics that are available, but more useful material would be provided by comparing DCC traffic counts over recent times on the same stretches of road. These, I suspect would show congestion growth, rather than traffic decline. I assume suitable material is available.<br>7. The Plan needs to be evidence-based, no doubt. But evidence is not always reliable. It is often biased, and often flawed. Importantly, it can be misinterpreted by those who do not have statistical background and qualifications. So evidence is important, but it is not the be all and end all. And its quality is uncertain.<br>8. The Plan looks like it will over-state the importance of Exeter. Market and coastal towns need to be given greater emphasis in GESP.<br>9. There is no conflict between economic growth and the protection and enhancement of the environment. The two are positively interconnected. So protection of the environment will lead to economic growth. The Plan quite incorrectly insists the two objectives are in conflict, represented by an 'x' in the 'scoring system'. Economic growth is stronger within National Parks than outside them. A main objective of the GESP should be to achieve economic growth and improve the environment.<br>10. The Plan confirms the importance of SMEs, but there does not appear to be much representation of this vital group, who are the backbone of the local economy. There needs to be organised SME input to the Plan. Unfortunately, our LEP does not have any SME representation and refuses to allow SMEs to join the Board, so there is no voice for this sector. | 'congestion' statistics.<br>7. Comment noted.<br>8. Comment noted.<br>9. It is accepted that 'Jobs and Local Economy' will not have exclusively negative impacts on the Natural Environment. However, on balance there are likely to be equal or more negative than positive consequences, such as development of land. Scoring in matrix will be amended to reflect this. The compatibility testing of the SA objectives originally presented in the SA Scoping Report is not a requirement of the environmental report. As such it is not re-presented in this SA Report.<br>10. Comments noted. |
| Environment Agency | 1. Support. | 1. Support noted. |
| Exeter Green Party | 1. **Cohesive analysis and presentation of what the data is telling us.** The key data is not analysed or presented in a way that builds a picture of what is actually going on across the whole area, instead being too fragmented across respective districts. This is a serious omission if the plan is to actually address current and future challenges that arise across the area as a whole.<br>2. **Need to integrate transport policy influences and impacts.** Figure 3, page 11 lists plans and policies affecting the GESP. We appreciate that the boundaries of current land use planning do not allow for full integration of local authority and national transport planning. However, given the absolutely key, negative impacts (of all kinds) of the travel patterns within the GESP area, and the fact that economic development is a core part of the future Plan, every possible attempt needs to made to reference and integrate with Devon County Council's Highways Authority role and the HOTSW LEPs role in transport also, given that their economic strategy is in | 1. The SA baseline in this SA Report in **Appendix 3** provides suitable and proportionate evidence to identify the current characteristics and state of the environment, economy and social issues in the GESP area. It is not clear from the comment what else should be provided.<br>2. Agree that other relevant plans include the Devon Local Transport Plan 3 and HOTSW LEP Strategic Economic Plan. These are now included in the review of plans, policies and programmes in **Appendix 2**. |

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| Page 482 | practice the core driver for transport policy across the county.<br>3. **Congestion.** In line with our comment above regarding the absence of a clear picture of what is actually going on across the area, a significant omission in the report is mention of congestion as a serious and growing problem across the Exeter area; (Exeter being ranked as one of the most seriously congested cities in the UK recently). Congestion is not only bad for the economy, it also has health impacts, but critically, (and this tends to be ignored), has significant quality of life impacts for those living near it, people walking and cycling around the city, and in the general reduction of quality of the public realm through noise, loss of connectivity across roads etc.<br>The SEA/SA should provide evidence on congestion impacts and objectives relating to reducing congestion through achieving significant transport modal shifts away from private car journeys.<br>4. **Air quality.** The following statement is a highly misleading, at least for the Exeter area: *"Although generally improving, air quality concerns still remains an issue, mainly as a result of road congestion in some urban areas."*. It is misleading because:<br>• ECC's monitoring equipment for PM10s is out of date. ECC do not monitor PM2.5s at all – and these tiny particles have very serious health impacts. This means that any statement about current levels of traffic-derived air pollution are partial and therefore unreliable.<br>• Whilst overall air quality in the city area shows reductions of several key pollutants which arise mainly from traffic, it is also the case that there are no true 'safe levels' for any of these pollutants. Saying that air quality is 'generally improving' gives the false impression that air quality is broadly ok.<br>We therefore believe that the SEA/SA should be setting out goals that are about dramatically reducing air pollution from traffic as a key objective.<br>5. The report asserts **that issues of soil quality /erosion** fall outside the planning system. This is another highly misleading statement. Sustainable Drainage approaches can make significant contributions to improving flood management, water quality and reducing soil erosion.<br>6. **Causes of poor water quality.** For Exeter, poor water quality is also linked to chemicals from road run off, sewage pollution from Combined Storm Overflows, and leachate from old land fill sites. This points again to the importance of Sustainable Drainage approaches, and to the critical importance of sufficient and modern water infrastructure systems, to reduce the incidence of water polluted by sewage overflowing into the storm water system.<br>7. **Economy.** We feel that the description of the Greater Exeter economic system (p36) is misleading. It fails to capture the significantly changed realities of the city including: | 3. Comment noted. This SA Report includes baseline evidence on air quality in the GESP area in **Appendix 3**. If further evidence on congestion becomes available, if may be considered. The SA Framework has been updated to include reference to potential effects on the congestion as part of the factors considered under SA objective 14.<br>4. Comments noted. The task of the baseline information in the SA Scoping Report and this SA Report is not to set out goals. These will be set out in the GESP plan itself.<br>5. Most threats to soil resulting from agriculture and natural processes are outside the planning system. Wording has been amended to clarify meaning in the baseline evidence presented in **Appendix 3** of this SA Report.<br>6. Comment noted.<br>7. If additional evidence on shifting employment patterns or the consequences of the increasing size of the Exeter TTWA become available, they may be included.<br>8. Agree – the key sustainability issues have been updated in **Chapter 3** in this SA Report. Data on commuting distances will be sought.<br>9.<br>a. The definition of natural environment for SA purposes is not inconsistent with considering ecosystems services or natural capital. Air pollution is captured in the air quality component of "Wellbeing" which is SA objective 10.<br>b. Comment noted – text added to clarify that employment land should |

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| | • the inexorable shift of employment – in terms of numbers of people employed – from the Exeter city centre to its outer edges, including March Barton, and the concomitant impacts of this shift<br>• the reducing role of the city centre – fewer shoppers, fewer jobs etc.<br>Another glaring omission is the failure to highlight the huge significance of Exeter's enormous travel to work area, or draw conclusions as to the sustainability of this model. The SEA/SA should be setting out a clear description of the impacts of the current model (private car journeys dominating, with concomitant impacts on carbon emissions, air quality, reduction of market for public transport use etc.<br>8. **Listing of sustainability issues facing the area** (section 3.7).<br>• Under 'climate change' there is no mention of the fact that continuing with the current models of transport /economy/housing cannot possibly be congruent with reducing carbon emissions. This has to be key sustainability issue underpinning the entire SEA and a core objective. The GESP area cannot be moving towards a more sustainable future unless 'low carbon' is at the heart of the final GESP plan.<br>• Under 'economic': reference should be made to the related issues, growing over the past decade, for people to live further away from where they work, the loss of jobs in the GESP and wide Devon, and the overconcentration of jobs in Exeter. The SEA/SA appears to accept this as a given. Instead, the SEA should raise the objective of enabling economic activity to take place at a more local level and to positively seek ways to reduce overall travel.<br>9. **Sustainability objectives Section 4**<br>• The definition of 'natural environment' is too limited for both the SEA and GESP itself. It would be more useful to adopt the concept of 'natural capital' or eco-systems services. The current definition does not cover, for example, air pollution, and feels like a very old-fashioned way of defining 'environment'<br>• Under G, jobs and economy, the objective should be enabling economic activity to take place at a more local level e.g. micro-enterprise, social enterprises, and to positively seek ways to reduce overall travel.<br>• Under H city and town centres, add: protect and enhance green spaces in all urban and larger village settings.<br>• Given the impacts of Brexit, the risks of poor food security, deteriorating biodiversity, soil erosion, and the actual and potential importance of growing and processing food in the GESP area, there should be an objective relating to protecting the potential of Exeter's hinterland to continue to grow and process food, and to the importance of enabling people to 'grow their own' via allotments and spaces for community growing land.<br>10. **Section 4.4 – inter-compatibility of objectives.**<br>• We do not agree with the statement: *There will however be important decisions which need to be taken in plan making, informed by the findings of* | be provided for large and small businesses in SA objective 12 "Jobs and local economy".<br>c. Comments noted – SA objective 9 "Health" considers access to open space.<br>d. Comment notes - Green infrastructure (considered through SA objectives 1 "Natural Environment", 4 "Climate change mitigation" and 9 "Health") can include allotments.<br>10.<br>a. Comment noted – text clarified.<br>b. Within the context of the SA issues, there is limited conflict between the social and economic issues. The report acknowledges that there may be environmental consequence. |

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| | *Sustainability Appraisal when in identifying economic priorities, particularly in respect of the more rural and sensitive parts of the plan area* . The implication is that economic priorities mainly impact on landscape and visual amenity. In our view, the far more significant impacts are those decisions which continue the current, unsustainable patterns which have emerged in the GESP area, namely long distance car commuting, loss of jobs in outlying towns and villages and the disparity in housing availability and prices within the area.<br>• The report sees no conflict between the core social and economic objectives. We do not agree. Unless the interplay of housing, jobs and movement is actively addressed and planned in ways that reverse current trends, there will be extreme conflicts between social, economic and then of course environmental objectives. | |
| Mrs Maureen Mills | 1. Please could the abundance of Himalayan Balsam be addressed under water quality? This is an invasive plant which thrives to the exclusion of native plants, chokes rivers thereby changing the fauna. Currently removal of HB is addressed by volunteers only with no input from a statutory body. Reduction of HB may be seen in the River Tale, a tributary of the R. Otter - a result of years of effort, and still continuing. Support and involvement from DCC/EDC would widen awareness, interest and be seen as important, and if in the Plan would make a real difference. | 1. This matter may be too detailed for the SA Report to address. Comments will be noted by officers leading on the biodiversity elements of the plan. However, it should be noted that as a land-use plan, there is little that the GESP can actively do to tackle this specific issue. |
| Celine Dyke, Natural England | 1. Paragraphs 3.1 to 3.6 appear to refer to the environment only. We recommend that this introductory section also refers to the economic and social context.<br>2. Biodiversity (page 16): We recommend that you mention here that biodiversity is in general decline (NPPF para 109).<br>3. Landscape (page 18): This section does not make mention of the AONBs in the plan area.<br>4. Climate change: Current changes arising from climate change (habitat changes and biodiversity adaptation, coastal adaptation, need for cooling/shading etc) could be mentioned here as well as its causes.<br>5. Sustainability issues: The sustainability issues as identified in the table in paragraph 3.7 do not sufficiently reflect the baseline:<br>a. The table only refers to internationally protected sites (SAC, SPA and Ramsar) and ignores nationally and locally designated sites and biodiversity in undesignated areas. Biodiversity is in general decline which needs to be addressed by the Strategic Plan (NPPF para 109). The issue should also refer to biodiversity enhancement as well as protection.<br>b. The climate change line should identify the need for adaptation to climate change, to benefit people and biodiversity.<br>c. The baseline identifies that there is deficient access to open space in several areas within the plan area. This should be picked up in the sustainability | 1. Text included in this SA Report at **Chapter 3** which introduces the sustainability context for the development in the plan area and the SA refers to the SEA topics as well as the three pillars of sustainability.<br>2. Text on biodiversity added. The updated NPPF (2019) no longer makes reference to the general decline in biodiversity in the country.<br>3. Text on landscape added.<br>4. Text on climate change added.<br>5. In **Chapter 3** "Key sustainability issues" of this SA Report changes the following updates have been made:<br>a. Text on biodiversity added.<br>b. Text on climate change adaptation added.<br>c. Text on open space added.<br>6. Error! Reference source not found.**Chapter 2** in this SA Report |

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| | issues.<br>6. Chapter 4. Sustainability Objectives: In the table in paragraph 4.1 we recommend that you add the following:<br>a. Natural environment: Natural habitats and biodiversity, flora and fauna and green infrastructure<br>b. Climate change and resources: Coastal change/adaptation, climate change adaptation by biodiversity<br>c. Health and wellbeing: Cooling/shading<br>7. Appendix 2: Relevant plans, policies and programmes: 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 the plan area:<br>• Green Infrastructure strategies<br>• Biodiversity plans<br>• Rights of Way Improvement plans<br>• Shoreline Management Plans<br>• Coastal Access plans<br>• River Basin Management plans<br>• AONB management plans<br>• Relevant landscape plans and strategies. | presents the revised SA framework. The following updates have been made:<br>a. Text on multi-functional green infrastructure added in SA objective 1.<br>b. Text added on Coastal Change in SA objective 5.<br>c. Baseline does not have evidence that need for cooling/shading will be a significant issue.<br>7. Comments noted and relevant up to date plans are now included in **Chapter 3** and **Appendix 2** of this SA Report. |
| David Lobban, PCL Planning | 1. The draft scoping report lacks a consideration of weighting or balance to be given to derived objectives. These are not to be derived from superior authority but should be open to debate and scrutiny with varied private, public and community interests. Attention is drawn to the guidance set out in the NPPF 7 with regard to a general presumption of balance between the factors determining sustainable planning. | 1. The SA process has had an awareness of all of the SA objectives and the appraisal findings (which reflect the three pillars of sustainability referred to in the NPPF) have informed the plan making process. |
| Mr Trevor Preist | 1. P 28 Table 7 / P 87 Table 23 - There is an inconsistency in the completions for Exeter within these two tables and I was told that Table 7 is correct. This gives 4445 completions within Exeter in 10 years whereas Table 23 gives 6340. On page 28 in the section on 'Delivery' it quotes 11,300 homes delivered within GE in a 5 year period and at the top of page 29 it quotes 12,300 homes being built since the adoption of the District plans. To get both of these figures I believe one needs to use ALL the figures in Table 23.<br>2. P 36 Table 10: In 2011 Bristol had a population of 428,000 and Greater Exeter 452,000.<br>Although Table 10 refers to data in 2014 the difference in the scale of the numbers in the two columns compared with the closeness of the two above tells me that something is clearly wrong. It is likely that the Greater Exeter column in the table | 1. The data in Table 23 in the original Scoping Report is now out of date, because it included purpose built student accommodation, which can no longer be counted toward housing supply. An update is now included in **Appendix 3** of this SA Report.<br>2. The figures refer to Exeter. The text has clarified in the baseline evidence presented in **Appendix 3**.<br>3. The GVA figures in the table on p39 of the SA Scoping Report were included as |

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| Page 486 | contains the 2014 figures for Exeter.<br>3. P 37 Productivity and P 39 Table 15: The GVA figures on P 37 are in the range £29K - £33K whereas the weighted GVA total for GE in Table 15 is £43K. WHY ARE THEY SO DIFFERENT? £43K is larger than the UK average of £36.6K.<br>4. P 45 lines 3-4: 'the use of rail stations (and thus rail journeys) has increased by 262%'. This is deduced from Table 43 P 99. This table gives the evolution of passenger usage for each station within GE from 2000/1 to 2014/15 and then calculates a percentage growth for each station. The text adjacent to the table and also on P 45 quotes average station percentage increases. On this same page it explicitly states that across GE the (average) station usage has increased by 262% and that therefore journeys have increased by the same figure. NOT SO! To get the journey increase one needs to total the journeys in 2000/1 and in 2014/15 and then calculate the growth – this is about 100%. Averaging the station percentages, weights those with small usage equally with those having large usage. The resulting average has no relevance to the growth in journeys.<br>5. P 96 line 6: 'the population of working age in the Greater Exeter area has increased by a third, from 161,000 to 215,000'. In the section on Demographics (P 30) the number in the age group 16-64 is given as 277,500 for GE. In the 'Travel to work' data provided by the Census the age group used is 16-74. 'The population of working age' is an ill-defined quantity. These figures are NOT the population of working age BUT the number in the population who are working (i.e. working residents).<br>6. Table 39 (P 96) and Table 44 (P 100): I have trouble in reconciling the fact that the walking and cycling percentages in these Tables are markedly different, and it may be that they are expressed as percentages of different groupings. | LEP wide (Devon and Somerset). The Updated GVA figures have been included for the districts within the plan area in **Appendix 3** of this SA Report.<br>4. Agreed. Baseline evidence in **Appendix 3** has been the revised from the SA Scoping Report to show actual change (+5.7m trips) and revised percentage change, which is 105% between 2000 and 2015.<br>5. Comment noted.<br>6. Comment noted. |
| Vail Williams on behalf of Gleeson Developments Ltd | 1. There are currently inconsistencies within the draft scoping report in relation to the presented housing delivery figures. On page 28, it states that "*Completions across all districts have fluctuated over recent years (see Appendix 2 Table 23). Over 11,300 homes have been delivered in the area over the last 5 years (2011-12 to 2015-16)*". Page 28 also contains Table 7, which shows the housing completions by Local Authority against their annual delivery target. Both Table 7 and Table 23 (within appendix) show housing completions by Local Planning Authority. However, the figures presented for Exeter are different within the two tables. The figures presented in Table 23 of the appendices are significantly higher for Exeter compared to Table 7 and, consequently, the statement that over 11,300 homes have been delivered in the area over the last 5 years, appears incorrect as it is utilising the higher figures. It is noted that these figures are derived from the LPA Authority Monitoring Reports (AMRs) and reviewing the housing figures contained within Exeter City Council's AMR 2015-16 shows the annual number of dwellings completed matches the figures presented within Table 7 on page 28, not Table 23. Therefore, the number of homes that have been delivered in the area over the last 5 years, (2011-12 to 2015-16) is 10,149 rather than the reported 11,300. As a minor point, there is a typographical | 1. Point noted, has been amended in the baseline information in **Appendix 3**. The figures in table 23 in the SA Scoping Report included purpose-built student accommodation, which it has now been determined cannot count towards the 5 year housing land supply.<br>2. Point noted and related to the point above text updated in **Appendix 3**.<br>3. Comment noted.<br>4. Comment noted. Providing the site has been submitted via the HELAA process it will be considered.<br>5. Comment noted.<br>6. Comment noted.<br>7. Comment noted. |

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| Page 487 | error within Table 7 with the figure reported in 2015-16 for Exeter as 6,188; this should read 618.<br>2. On page 29 the draft scoping report states that "*Based upon the information presented above 12,300 homes have been built since the adoption progression of the various local plans covering the area*". However, totalling the figures provided above (Table 7 page 28) indicates the actual number of homes delivered is c.10,300, not the 12,300 as reported. Consequently, this has a knock on effect for the other figures presented within the paragraph in terms of the remaining number of homes to be delivered.<br>3. Notwithstanding this, the differing start dates for the plan period of each Local Authority demonstrates the difficulty in aligning these with the proposed Strategic Plan. Given these are presented as the base line data, it is considered fundamental that these figures are both sound, and a start date of the plan period for the GESP is clearly established. This will facilitate monitoring of both the GESP and the Local Plans.<br>4. **Pedlerspool, Exhibition Road, Crediton:** The Greater Exeter Strategic Plan identifies themes to help deliver the vision in response to the planning issues identified; including housing, infrastructure, environment and delivery. In terms of the proposal at Pedlerspool, as set out in detail within application reference 17-00348-MOUT, this meets and provides significant benefit when assessed against these overarching strategic themes. Crediton is recognised as one of Mid Devon's most sustainable settlements (under Policy S1 of the MDDC proposed submission document January 2017), and is considered a sustainable location for development. Consequently, there is support and recognition of Crediton's role for future development both within / adjoining the settlement and also its contribution to the wider rural area.<br>5. The proposal contains significant benefits for the local community, including provision under the theme "healthy communities" on social, sports and cultural facilities, due to provision for the rugby club. It is agreed that one of the key considerations for the GESP (and any of the District's Local Plans) is the deliverability of key sites to ensure a regular and adequate supply of housing and employment land over the plan period. The recently submitted application on Pedlerspool clearly demonstrates the deliverability of the site (subject to the details contained within the application on viability and gypsy and traveller provision) and provides more detailed information on other considerations, such as the incorporation of landscaping and heritage within the overall proposal.<br>6. It is considered that, in relation to the spatial strategy to deliver housing, whilst some significant strategic sites will help to deliver the necessary quantum of development, there needs to be a suitable range of sites to ensure flexibility and regular deliverability of the required housing. As part of this overarching strategy for housing delivery, the viability of schemes needs to be realistically assessed taking into account | |

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| | any policy burdens in accordance with paragraph 173 of the NPPF:<br>7. In conclusion, it is recognised that there are benefits of producing a Strategic Plan, and the cooperation between Local Authorities. However, this needs to be carefully considered given the relationship with the District's Local Plans and the Plan period. The Strategic Plan, whilst there may be the opportunity to utilise the existing evidence bases of the constituent LPAs, should take a strategic view to help shape and influence future development within the Greater Exeter area, rather than responding to issues and proposals already established in the Local Plans. It is considered that the proposal at Pedlerspool positively responds to the issues and themes raised within the consultation document and these representations should be read in conjunction with representations made to Mid Devon District Council and also the details and supporting documentation contained within the planning application (17-00348-MOUT). | |
| Savills on behalf of St Modwen Development Ltd | 1. The scope of the baseline assessment covers the range of relevant considerations. However, in line with national policy and guidance, within the assessment of impacts, caution should be applied in placing emphasis on existing local plan designations, such as landscape setting, green wedges etc. Their designation was a product of that relevant Local Plan, and whilst their continued designation may be considered appropriate at the end of the GESP process, wider sustainability objectives may override these local designations; or require the redefine of these boundaries. Therefore the weight given to any conflict with local plan designations should be considered in the round.<br>2. Land to the east of Exeter is promoted as a broad location for the Councils to consider within their emerging evidence base as an opportunity to deliver a sustainable new community, with significant functional links to the City of Exeter and the surrounding existing and proposed key employment centres within East Devon. | 1. Agree.<br>2. Providing the site has been submitted via the HELAA process it will be considered. |
| Mr Chris Wakefield | 1. European Directive 2001/42/EC is cited as a key reference for the environmental appraisal effort. These provisions are currently written in to the scoping report, but what provisions are made to secure them against alterations arising from our exit from the European Union?<br>2. Para 4.3 includes a mention of the likely conflict of environmental and economic objectives. It is important to remember that the natural environment sets absolute limits on human activity (because our global resources are finite), whereas current economic objectives are predicated on unfettered expansion. The contradiction here will ultimately have to be resolved in favour of the environment rather than the economy. So GESP, if it is to be meaningful as a 'development' plan, will need somehow to recognise this.<br>3. Evidence made available in support of policy changes is nowadays sometimes tampered with to achieve a political objective. A case in point is East Devon's Local Plan where policy aspirations were used to inflate the perceived housing needs of the | 1. No provisions have been made given that the outcomes of Brexit are unknown. Many EU Directives are transcribed into British law, such as the Birds and Habitats Regulations 2011. Text is included at **Chapter 3** of this SA Report about the current status of European legislation in light of Brexit. As per RTPI guidance SEA/SA is likely to be a continued requirement post Brexit under the Aarhus Convention (dependent upon whether or not the UK continues to be a signatory), and the Espoo Convention and its Protocol on SEA.<br>2. Comment noted. |

| Name / Organisation | Summary of Comments | GESP Councils Officers' Response[1] |
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| | area. I would like to see some provisions for wider democratic control of the plan and its outcomes, more than just the standard rounds of 'public consultations' which are now so widely distrusted. | 3. Comment noted. |
| Mrs C Brabner-Evans (Woodland Trust) | 1. The Woodland Trust recommends information about overall levels of tree cover and the details of woods and trees, particularly ancient woods and trees and veteran trees within the plan area. We recommend a clear commitment to protect ancient woods and trees as well as a target to achieve net gain in levels of tree cover during the plan period.<br>2. The Woodland Trust recommends that ancient woodland should be clearly referenced within this section of the Sustainability Appraisal. Ancient woodland is an irreplaceable natural resource that has remained constantly wooded since at least AD1600. It is important that there is no further avoidable loss of ancient trees through development pressure, mismanagement or poor practice. The Ancient Tree Forum (ATF) and the Woodland Trust would like to see all such trees recognised as historical, cultural and wildlife monuments scheduled under TPOs and highlighted in plans so they are properly valued in planning decision-making. There is also a need for policies ensuring good management of ancient trees, the development of a succession of future ancient trees through new street tree planting and new wood pasture creation, and to raise awareness and understanding of the value and importance of ancient trees.<br>3. Para 118 of the National Planning Policy Framework states that:" planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss." Following publication of the Housing White Paper, ancient woodland will soon benefit from the same protections as green belt land. This shows a clear direction of travel, recognising that the NPPF does not currently provide sufficient protection for ancient woodland. Until the NPPF is amended there is a clear role for Local Plans and associated documents to provide this improved level of protection and to ensure that irreplaceable habitats get the same level of protection as heritage assets enjoy under the NPPF.<br>4. Access to Open Space: Woods make particularly outstanding green spaces for public access because of the experience of nature they provide, their visual prominence alongside buildings which offers balance between the built and natural worlds, their low maintenance costs and their ability to accommodate large numbers of visitors. Woodland and related activities can also be valuable in promoting social inclusion. Woodland activities, such as tree planting, walking and woodland crafts, can provide a forum for people of all ages and cultural backgrounds to come together to learn about and improve their local environment. Easily accessible woods close to residential areas provide measurable benefits: they encourage people to exercise; help reduce the mental stresses of modern society; improve air quality and reduce respiratory | 1. The NPPF (paragraph 175) includes a clear commitment to protect Ancient Woodland. This has been reflected in **Chapter 3** of this SA Report which sets out the planning policy context for the GESP and SA process.<br>2. Further reference has been made to Ancient Woodland in the Biodiversity section of the baseline evidence section in **Appendix 3**.<br>3. Ancient Woodlands have been mapped as an 'absolute constraint' for the purposes of identifying growth options.<br>4. Comments noted. The baseline evidence section in **Appendix 3** has information relating to access to woodland in the county area. |

| Name / Organisation | Summary of Comments | GESP Councils Officers' Response[1] |
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| | diseases. Space for People research shows that less than 17% of the population of England has access to local woodland within 500m of their home. Across Devon this figure is lower than the national average at under 9% (Woodland Indicators by Local Authority 2016). We need to remedy this and bring the quality of life benefits trees and woods can offer to our communities. | |

# Appendix 2
# Review of Plans, Policies and Programmes

**Table A2.1: Review of plans, policies and programmes relevant to the preparation of the Great Exeter Strategic Plan and the SA**

*As of the end of January 2020 the UK has left the EU. A transition period is now in place until 31st December 2020. During this period, all EU rules and regulations will continue to apply to the UK. As such, the documents presented in this table include those at the EU level. As set out in the Explanatory Memorandum accompanying the Brexit amendments[2], the purpose of the Brexit amendments to the SEA Regulations is to ensure that the law functions correctly after the UK has left the EU. No substantive changes are being made by this instrument to the way the SEA regime operates.*

| Plan/ Policy/ Programme | Objectives and Requirements | How to incorporate into the GESP | Implications for the SA |
|---|---|---|---|
| **International** | | | |
| IPCC's Fifth Assessment Report on Climate Change (IPCC, 2014)[3] | To limit and/or reduce all greenhouse gas emissions which contribute to climate change | The GESP should support reduction in emissions of greenhouse gases. | Include sustainability objectives to support reduction in emissions of greenhouse gases. |
| The Cancun Agreement- UNFCC (2011) | Shared vision to keep global temperature rise to below two degrees Celsius, with objectives to be reviewed as to whether it needs to be strengthened in future on the basis of the best scientific knowledge available. | The GESP should aim to reduce emissions and include greenhouse gas emissions. | Include sustainability objects to support the reduction in greenhouse gas emissions and mitigation to climate change. |
| Johannesburg Declaration on Sustainable Development (2002) | Commitment to building a humane, equitable and caring global society aware of the need for human dignity for all.<br>Renewable energy and energy efficiency. Accelerate shift towards sustainable consumption and production. | Ensure that site allocations and policies take account of the principles of the Declaration. | Include sustainability objectives to enhance the natural environment and promote renewable energy and energy efficiency. |
| Aarhus Convention (1998) | Established a number of rights of the public with regard to the environment. Local authorities should provide for:<br>• The right of everyone to receive environmental information<br>• The right to participate from an early stage in environmental decision making<br>• The right to challenge in a court of law public decisions that have been made without respecting the two rights above or environmental law in general. | Ensure that site allocations and policies take account of the principles of the Convention. | Ensure that public are involved and consulted at all relevant stages of SA production.<br>*Relates to the overall SA process.* |
| **European** | | | |
| *The Convention* | The main purpose of the convention is to reinforce and promote policies for the conservation | Ensure site | Include SA objectives |

[2] Explanatory Memorandum to the Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 No. 1232

[3] IPCC (2014) Fifth Assessment Report on Climate Change

| Plan/ Policy/ Programme | Objectives and Requirements | How to incorporate into the GESP | Implications for the SA |
|---|---|---|---|
| *for the Protection of the Architectural Heritage of Europe (Granada Convention 1985)* | and enhancement of Europe's heritage and to foster closer European co-operation in defence of heritage. Recognition that conservation of heritage is a cultural purpose and integrated conservation of heritage is an important factor in the improvement of quality of life. | allocations and policies take account of the conservation of heritage. | on the conservation and enhancement of heritage and decision making criteria on architectural heritage. |
| *The European Convention on the Protection of Archaeological Heritage (Valetta Convention 1992)* | Agreement that the conservation and enhancement of an archaeological heritage is one of the goals of urban and regional planning policy. It is concerned in particular with the need for co-operation between archaeologists and planers to ensure optimum conservation of archaeological heritage. | Ensure site allocations and policies take account of the conservation of heritage. | The SA Framework should include an objective on the conservation and enhancement of heritage and decision making criteria on archaeological heritage. |
| *SEA Directive 2001* Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment | Provide for a high level of protection of the environment and contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. | Allocate sites and develop policies that are selected based on the SEA findings (as well as other relevant factors). | Requirements of the Directive must be met in Sustainability Appraisal where an integrated SA/SEA is being undertaken (as is the case for the GESP). *Relates to the overall SA process.* |
| *The Industrial Emissions Directive 2010* Directive 2010/75/EU on industrial emissions (integrated pollution prevention and control) | This Directive 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. | Allocate sites and develop policies that take account of the Directive as well as the more detailed policies derived from the Directive contained in the NPPF. | Include sustainability objective for reducing pollution. |

| Plan/ Policy/ Programme | Objectives and Requirements | How to incorporate into the GESP | Implications for the SA |
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| *Energy Performance of Buildings Directive 2010 on the energy performance of buildings 2010/31/EU* | The Directive aims to promote the energy performance of buildings and building units. It requests that member states adopt either national or regional methodology for calculating energy performance and minimum requirements for energy performance. | Policies and site allocations should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF. | Include SA objective relating to the energy performance/efficiency. |
| *The Birds Directive 2009* Directive 2009/147/EC is a codified version of Directive 79/409/EEC as amended | The preservation, maintenance, and re-establishment of biotopes and habitats shall include the following measures:<br>Creation of protected areas.<br>Upkeep and management in accordance with the ecological needs of habitats inside and outside the protected zones.<br>Re-establishment of destroyed biotopes.<br>Creation of biotopes. | Allocated sites and development management policies should make sure that the upkeep of recognised habitats is maintained and not damaged from development. Avoid pollution or deterioration of habitats or any other disturbances affecting birds. | Include sustainability objectives for the protection of birds. |
| *The Waste Framework Directive 2008* Directive 2008/98/EC on waste | Prevention or reduction of waste production and its harmfulness. The recovery of waste by means of recycling, re-use or reclamation. Recovery or disposal of waste without endangering human health and without using processes that could harm the environment. | Allocate sites and develop policies that take account of the Directive as well as more detailed policies derived from the Directive contained in | Include sustainability objectives that minimise waste production as well as promote recycling. |

| Plan/ Policy/ Programme | Objectives and Requirements | How to incorporate into the GESP | Implications for the SA |
|---|---|---|---|
| | | national policy. | |
| *The Air Quality Directive 2008* Directive 2008/50/EC on ambient air quality and cleaner air for Europe | Avoid, prevent and reduce harmful effects of ambient air pollution on human health and the environment | Allocate sites and develop policies that take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF. | Include sustainability objectives to maintain and enhance air quality. |
| *The Floods Directive 2007* Directive 2007/60/EC on the assessment and management of flood risks | Establish a framework for the assessment and management of flood risks, aiming at the reduction of the adverse consequences for human health, the environment, cultural heritage and economic activity associated with floods. | Allocate sites and develop policies that take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF. | Include sustainability objectives that relate to flood management and reduction of risk. |
| *The Water Framework Directive 2000* Directive 2000/60/EC establishing a framework for community action in the field of water policy | Protection of inland surface waters, transitional waters, coastal waters and groundwaters. | Allocate sites and develop policies that take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF. | Include sustainability objectives to protect and minimise the impact on water quality. |
| *The Landfill Directive 1999* Directive 99/31/EC on the landfill of waste | Prevent or reduce negative effects on the environment from the landfilling of waste by introducing stringent technical requirements for waste and landfills. | Allocate sites and develop policies that take account of the Directive as well as more | Include sustainability objectives to increase recycling and reduce the amount of waste. |

| Plan/ Policy/ Programme | Objectives and Requirements | How to incorporate into the GESP | Implications for the SA |
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| | | detailed policies derived from the Directive contained in national policy. | |
| *The Drinking Water Directive 1998* Directive 98/83/EC on the quality of water intended for human consumption | Protect human health from the adverse effects of any contamination of water intended for human consumption by ensuring that it is wholesome and clean. | Allocate sites and develop policies that take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF. | Include sustainability objectives to protect and enhance water quality. |
| *The Packaging and Packaging Waste Directive 1994* Directive 94/62/EC on packaging and packaging waste | Harmonise the packaging waste system of Member States. Reduce the environmental impact of packaging waste. | Allocate sites and develop policies that take account of the Directive as well as more detailed policies derived from the Directive contained in national policy. | Include sustainability objectives to minimise the environmental impact of waste and promote recycling. |
| *The Habitats Directive 1992* Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora | Promote the maintenance of biodiversity taking account of economic, social, cultural and regional requirements. Conservation of natural habitats and maintain landscape features of importance to wildlife and fauna. | Allocate sites and develop policies that have been selected taking into account HRA findings along with other factors. The GESP must be subject to Habitats Regulations | Include sustainability objectives to protect and maintain the natural environment and important landscape features. |

| Plan/ Policy/ Programme | Objectives and Requirements | How to incorporate into the GESP | Implications for the SA |
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| | | Assessment in line with the Directive. | |
| *The Nitrates Directive 1991* Directive 91/676/EEC on nitrates from agricultural sources. | Reduce water pollution caused or induced by nitrates from agricultural sources and prevent further such pollution. | Allocate sites and develop policies that take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF. | Include sustainability objectives to reduce water pollution. |
| *The Urban Waste Water Directive 1991* Directive 91/271/EEC concerning urban waste water treatment | Protect the environment from the adverse effects of urban waste water collection, treatment and discharge, and discharge from certain industrial sectors. | Allocate sites and develop policies that take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF. | Include sustainability objectives to reduce water pollution. |
| European Spatial Development Perspective (1999) | Economic and social cohesion across the community. Conservation of natural resources and cultural heritage. Balanced competitiveness between different tiers of government. | Allocate sites and develop policies that take account of the Spatial Development Perspective as well as more detailed policies derived from the Directive contained in the NPPF. | Include sustainability objectives to conserve natural resources and cultural heritage. |
| EU Seventh Environmental | The EU's objectives in implementing the programme are:<br>(a) to protect, conserve and enhance the Union's natural capital; | Develop policies that take | Include sustainability objectives to protect |

| Plan/ Policy/ Programme | Objectives and Requirements | How to incorporate into the GESP | Implications for the SA |
|---|---|---|---|
| Action Plan (2002-2012) | (b) to turn the Union into a resource-efficient, green and competitive low-carbon economy;<br>(c) to safeguard the Union's citizens from environment-related pressures and risks to health and wellbeing;<br>(d) to maximise the benefits of the Union's environment legislation;<br>(e) to improve the evidence base for environment policy;<br>(f) to secure investment for environment and climate policy and get the prices right;<br>(g) to improve environmental integration and policy coherence;<br>(h) to enhance the sustainability of the Union's cities;<br>(i) to increase the Union's effectiveness in confronting regional and global environmental challenges. | account of the Environmental Action Plan as well as more detailed policies derived from the Directive contained in the NPPF. | and enhance the natural environment and promote energy efficiency. |
| European Landscape Convention (Florence, 2002) | The convention promotes landscape protection, management and planning. | Ensure that site allocations and policies take account of the Convention. | Include sustainability objectives to protect the archaeological heritage. |
| **National** | | | |
| Ancient Monuments and Archaeological Act (1979) | The act makes provision for the investigation, preservation and recording of matters regarding historic or archaeological interest and for the regulation of operations and/or activities affecting them. | The GESP will seek to ensure policies that reflect the conservation and protection of heritage and archaeological assets. | The SA should ensure the concept of the Ancient Monuments and Archaeological Act is reflect through SA objectives and appraisal questions. |
| Localism Act (2011) | The Localism Act introduces a number of measures to decentralise decision making process to the local level, creating space for Local Authorities to lead and innovate, and giving people the opportunity to take control of decisions that matter to them. The Localism Act includes a number of important packages.<br>• The new act makes it easier for local people to take over the amenities they love and keep them part of local life;<br>• The act makes sure that local social enterprises, volunteers and community groups with a bright idea for improving local services get a chance to change how things are done.<br>• The act places significantly more influence in the hands of local people over issues that make a big difference to their lives.<br>• The act provides appropriate support and recognition to communities who welcome new development.<br>• The act reduces red tape, making it easier for authorities to get on with the job of working with local people to draw up a vision for their area's future.<br>• The act reinforces the democratic nature of the planning system passing power from | The GESP will need to reflect the principles of Localism as identified in the document. The GESP will need to incorporate the concept of Neighbourhood Planning, with the intention of giving neighbourhoods far more ability | To ensure the concepts of the Localism Act are embedded within the SA framework. *Relates to the overall SA process.* |

| Plan/ Policy/ Programme | Objectives and Requirements | How to incorporate into the GESP | Implications for the SA |
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| | bodies not directly to the public, to democratically accountable ministers.<br>• The act enables Local Authorities to make their own decisions to adapt housing provision to local needs, and make the system fairer and more effective.<br>• The act gives Local Authorities more control over the funding of social housing, helping them plan for the long- term.<br>In relation to planning, the Localism Act enables the Government to abolish regional spatial strategies, introduce Neighbourhood Plans and Local Referendums. | to determine the shape of the places in which people live. | |
| National Planning Policy Framework (2019) | Presumption in favour of sustainable development.<br>Delivering sustainable development by: | Development plan has a statutory status as the starting point for decision making. | Sustainability appraisal should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors. |
| | Delivering a sufficient supply of homes. | Development plans should be informed by a local housing need assessment, conducted using the standard method in national planning guidance[4]. | The SA Report should include a sustainability objective / appraisal question relating to the supply of housing. |
| | Building a strong, competitive economy. | Set out clear economic visions for that particular area. | Include a sustainability objective relating to strengthening the economy. |
| | Ensuring vitality of town centres. | Recognise town centres as the heart of their communities. | Include a sustainability objective relating to the vitality of town centres. |

[4] Ministry of Housing, Communities and Local Government (2018) Housing Delivery Test Measurement Rule Book

| Plan/ Policy/ Programme | Objectives and Requirements | How to incorporate into the GESP | Implications for the SA |
|---|---|---|---|
| | Promoting healthy and safe communities. | The GESP should be set out to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles. | The SA Report should include a sustainability objective / appraisal question relating to the promotion of healthy and safe communities. |
| | Promoting sustainable transport. | To implement sustainable transport modes depending on nature/location of the site, to reduce the need for major transport infrastructure. | Include a sustainability objective relating to sustainable transport. |
| | Supporting high quality communications infrastructure. | Enhance the provision of local community facilities and services by supporting the expansion of electronic communications networks. | Include a sustainability objective relating to improving communication. |

| Plan/ Policy/ Programme | Objectives and Requirements | How to incorporate into the GESP | Implications for the SA |
|---|---|---|---|
| | Making effective use of land. | The GESP should seek to promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. | The SA Report should include a sustainability objective / appraisal question relating to the use of previously developed land. |
| | Achieving well-designed places. | The GESP should set out a clear design vision – design policies should reflect local aspirations and be grounded in an understanding of each area's defining characteristics. | The SA Report should include a sustainability objective / appraisal question relating to good design. |
| | Protecting Green Belt Land. | To prevent urban sprawl by keeping land permanently open. | Include a sustainability objective relating to urban sprawl. |
| | Meeting the challenge of climate change, flooding, and coastal change. | The GESP should take into account the long-term implications for flood risk, coastal change, water supply, biodiversity and | Include a sustainability objective relating to climate change mitigation and adaption. |

| Plan/ Policy/ Programme | Objectives and Requirements | How to incorporate into the GESP | Implications for the SA |
|---|---|---|---|
| | | landscapes, and the risk of overeating from rising temperatures. | |
| | Conserving and enhancing the natural environment. | The GESP should distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries. | Include a sustainability objective relating to the conservation and enhancement of the natural environment. |
| | Conserving and enhancing the historic environment. | The GESP should set out a positive strategy for the conservation | Include a sustainability objective relating to the conservation and enhancement of historic features. |

| Plan/ Policy/ Programme | Objectives and Requirements | How to incorporate into the GESP | Implications for the SA |
|---|---|---|---|
| | | and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. | |
| | Facilitating the use of sustainable minerals. | Encourage prior extraction of minerals where practicable and environmentally feasible. | Include a sustainability objective relating to avoiding sterilisation of identified, viable mineral reserves. |
| Housing and Planning Act (2016) | The Act makes widespread changes to housing policy at the national level. Measures introduced in the Act relate to starter homes, and permitting the sale of higher value local authority homes. Starter homes are the new affordable housing product designed by the government to specifically meet the housing needs of younger generations and to allow them to access home-ownership. The overarching aim of the Act is to promote home ownership and increase levels of house building. | The GESP will need to take account of the provisions of the Act in relation to housing provision. | Include a sustainability objective relating to the provision of an appropriate range of housing within the District. |
| Housing White Paper (DCLG, 2017) Fixing our broken housing market | The emphasis of the Paper is on four areas:<br>• Local Planning Authorities planning for the right homes in the right places.<br>• Building homes faster.<br>• Diversifying the housing market.<br>• Helping people right now to invest in affordable homes. | The GESP will need to take account of the changes proposed in the White Paper. Greater clarity required in respect of Objectively Assessed Housing Need, delivery rates, the process of plan making, generation of new communities. | Include sustainability objectives relating to housing provision, community facilities and services. |

| Plan/ Policy/ Programme | Objectives and Requirements | How to incorporate into the GESP | Implications for the SA |
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| Part of the Housing White Paper Fixing our broken housing market Planning for the right homes in the right place: consultation proposals (DCLG, 2017) | The consultation document sets out a number of proposals to reform the planning system to increase the supply of new homes and increase local authority capacity to manage growth. Proposals include:<br>• A standard method for calculating local authorities' housing need.<br>• How neighbourhood planning groups can have greater certainty on the level of housing need to plan for.<br>• A statement of common ground to improve how local authorities work together to meet housing and other needs across boundaries.<br>• Making the use of viability assessments simpler, quicker and more transparent.<br>• Increased planning application fees in those areas where local planning authorities are delivering the homes their communities need.<br>It also includes a 'Housing need consultation data table' which sets out the housing need for each local planning authority using the proposed method, how many homes every place in the country is currently planning for, and, where available, how many homes they believe they need. | The objectively assessed need for housing will need to be based on the new standardised methodology for calculating housing need. | Include sustainability objectives relating to new housing provision and the local authority's capacity to manage growth. |
| National Planning Practice Guidance (2019) | Provides further guidance to be read alongside the NPPF on a range of topics that link to the promotion of sustainable development including:<br>• Air quality<br>• Climate change<br>• Conserving and enhancing the historic environment<br>• Flood risk<br>• Health and well being<br>• Housing and economic development<br>• Natural environment<br>• Minerals<br>• Rural housing<br>• Open space<br>• Transport<br>• Waste<br>• Water supply, wastewater and water quality | The NPPG sets out a range of social, economic and environmental considerations for the preparation of the plan. It also includes information on preparation of plans which can be taken into consideration. | The principles and requirements of national policy will need to be embedded within the SA framework and appraisal |
| National Planning Policy for Waste (2014) | Sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management. Replaces Planning Policy Statement 10. | The GESP should be in conformity with national waste planning policy. | Include a sustainability objective relating to waste generation and management. |
| Planning Policy for Traveller Sites (2015) | The Governments planning policy for Traveller sites which aims to:<br>• Ensure local planning authorities make their own assessment of need.<br>• Work collaboratively to meet need through identification of land setting pitch and plot targets.<br>• Plan for sites over a reasonable timescale. | The GESP should include any policies and site allocations needed to | Ensure the requirements of national planning guidance are reflected in the SA Framework. |

| Plan/ Policy/ Programme | Objectives and Requirements | How to incorporate into the GESP | Implications for the SA |
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| | • Protect Green Belt from inappropriate development.<br>• Promote more private Traveller site provision.<br>• Reduce number of unauthorised developments.<br>• Include fair, inclusive and realistic policies in Local Plans.<br>• Increase the number of sites in appropriate locations.<br>• Reduce tension between Travellers and settled communities in planning decisions.<br>• Ensure accessibility to services and facilities.<br>• Protect the local environment and amenity. | support Gypsy and Travellers. | |
| HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment | The 25 Year Environment Plan sets out government action to tackle a wide range of environmental pressures.<br>The 25 Year Environment Plan identifies six areas around which action will be focused. These include:<br>• Using and managing land sustainably.<br>• Recovering nature and enhancing the beauty of landscapes.<br>• Connecting people with the environment to improve health and wellbeing.<br>• Increasing resource efficiency, and reducing pollution and waste.<br>• Securing clean, productive and biologically diverse seas and oceans.<br>• Protecting and improving the global environment | Develop policies that promote conservation and enhancements of the natural environment and ensure that site allocations take account of the goals of the Environment Plan. | Include sustainability objectives that relate to the protection of the natural environment. |
| DEFRA (2019) Clean Air Strategy 2019 | The strategy sets out the comprehensive action that is required from across all parts of government and society to meet these goals. This will 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. These will support the creation of Clean Air Zones to lower emissions from all sources of air pollution, backed up with clear enforcement mechanisms. The UK has set stringent targets to cut emissions by 2020 and 2030. | Ensure that site allocations and policies will contribute to maintaining and improving air quality. | Include sustainability objectives to protect and improve air quality. |
| DEFRA and DfT (2017) Improving air quality in the UK: tackling nitrogen dioxide in our towns and cities: Draft UK Air Quality Plan for tackling nitrogen dioxide | The Plan provides an overview of actions that the UK Government plans to take to achieve reduction of harmful air pollution, particularly nitrogen dioxide. Proposes reducing air pollution is via charging Clean Air Zones (CAZs) – areas in which emission standards determine whether a vehicle's owner must pay a charge to enter. | Ensure that site allocations and policies will contribute to maintaining and improving air quality. | Include sustainability objectives to protect and improve air quality. |
| DEFRA (2017) | Statutory air quality plan for nitrogen dioxide (NO2), setting out how the UK will be reducing | Ensure that site | Include sustainability |

| Plan/ Policy/ Programme | Objectives and Requirements | How to incorporate into the GESP | Implications for the SA |
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| UK plan for tackling roadside nitrogen dioxide concentrations | roadside nitrogen dioxide concentrations. | allocations and policies will contribute to maintaining and improving air quality. | objectives to protect and improve air quality. |
| HM Government (2017) The UK Climate Change Risk Assessment | The Climate Change Act requires the Government to compile every five years its assessment of the risks and opportunities arising for the UK from climate change. It identifies six urgent climate change risks for the UK:<br>• Flooding and coastal change risks to communities, businesses and infrastructure.<br>• Risks to health, wellbeing and productivity from high temperatures.<br>• Risk of shortages in the public water supply, and for agriculture, energy generation and industry, with impacts on freshwater ecology.<br>• Risks to natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity.<br>• Risks to domestic and international food production and trade.<br>• New and emerging pests and diseases, and invasive non-native species, affecting people, plants and animals. | The GESP should acknowledge the six priority areas identified and ensure that policies and site allocations help to address such matters, rather than increasing the risks. | Include sustainability objectives relating to the six urgent climate change risks identified in the assessment. |
| DEFRA (2018) The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate | The programme sets out the strategy for adapting both to the climate change that is already evident, and that which we might see in the future. | The GESP should include policies which require development which is delivered to be adapted to climate change. | Include a sustainability objective relating to climate change adaptation. |
| HM Government (2017) The Clean Growth Strategy | Under the Climate Change Act, the Government is required to publish a set of policies and proposals that will enable the legally-binding carbon budgets, on track to the 2050 target, to be met. The Clean Growth Strategy sets out a range of policies and proposals, as well as possible long-term pathways for UK emissions in two ways – by decreasing emissions and by increasing economic growth. | The GESP should support renewable energy provision including electricity, heat and transport. | Include a sustainability objective relating to increasing energy provided from renewable sources. |
| HM Government (2017) | The Government White Paper sets out the approach to building an industrial strategy that addresses long term challenges to the UK economy by improving living standards and | The policies will need to | The SA will need to consider objectives in |

| Plan/ Policy/ Programme | Objectives and Requirements | How to incorporate into the GESP | Implications for the SA |
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| Industrial Strategy: Building a Britain fit for the future | economic growth by increasing productivity and driving growth across the whole country. It identifies five foundations of productivity: Ideas; people; Infrastructure; Business Environment; and Places. | encourage economic growth across the whole plan area and take account of changing economic conditions and requirements to support businesses and enterprises. | relation to economic growth and development. |
| Laying the Foundations: A Housing Strategy for England (2011) | The Housing Strategy sets out a package of reforms to :<br>• Get the housing market moving again<br>• Lay the foundations for a more responsive, effective and stable housing market in the future<br>• Support choice and quality for tenants<br>• Improve environmental standards and design quality. The new strategy addresses concerns across the housing market making it easier to secure mortgages on new home, improving fairness in social housing and ensuring homes that have been left empty for years and are lived in once again.<br>There is the target to deliver up to 100,000 new homes by freeing up public sector land with Build Now, pay later deals. | The GESP needs to include policies that help in the delivery of housing. | Include a sustainability objective relating to housing provision. |
| UK Government Sustainable Development Strategy: Securing the Future (2005) | The Strategy sets out 5 principles for sustainable development:<br>• Living within environmental limits;<br>• Ensuring a strong, healthy and just society;<br>• Achieving a sustainable economy;<br>• Promoting good governance ; and<br>• Using sound science responsibly.<br>The strategy sets four priorities for action:<br>• Sustainable consumption and production;<br>• Climate change and energy;<br>• Natural resource protection and environmental enhancement;<br>• Sustainable communities<br>The strategy commits to:<br>• A programme of community engagement;<br>• Forums to help people live sustainable lifestyles;<br>• Open and innovative ways for stakeholders to influence decision; educating and training | The GESP should seek to deliver sustainable communities. These are places which:<br>• Meet the diverse needs of existing and future residents<br>• People want to live and work in<br>• Are sensitive | To ensure that the requirements of the Strategy are embedded within the SA framework. |

| Plan/ Policy/ Programme | Objectives and Requirements | How to incorporate into the GESP | Implications for the SA |
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| | | to their environment<br>• Contribute to a high quality of life<br>• Are safe and inclusive<br>• Are well planned, built and run; and<br>• Offer equality of opportunity and good services for all | |
| English Heritage Historic England Corporate Plan 2018 to 2021 (2018) | The plan sets out its three purposes as to:<br>• Secure the preservation of ancient monuments and historic buildings;<br>• Promote the preservation and enhancement of the character and appearance of conservation areas; and<br>• Promote the public's enjoyment of, and advance their knowledge of, ancient monuments and historic buildings. | The GESP should contain a planning framework which safeguards the historic environment. | Include a sustainability objective relating to the historic environment. |
| National Policy Statement EN1: Overarching Energy Policy Statement (2011) | This policy document sets out government policy for the delivery of major planning applications for energy development. These will be dealt with by the Planning Inspectorate, rather than local authorities in which the development occurs. The document also specifies the criteria for waste management, traffic and transport , water quality and quantity, noise and vibration, open spaces and green infrastructure, the landscape , visual impact , dust flood risk, historic environment, odour, light, smoke/steam, insects, coastal change, aviation, biodiversity and geodiversity. | The GESP will need to be consistent with the National Policy Statement. | Include a sustainability objective relating to energy efficiency. |
| Energy White Paper: Our Energy Future (2003) | There are four key aims in this document:<br>• To put ourselves on a path to cut the United Kingdom carbon dioxide emissions- the main contributor to global warming- by some 60 % by about 2050, with real progress by 2020;<br>• To maintain the reliability of energy supplies;<br>• To promote competitive markets in the United Kingdom and beyond, helping to raise the rate of sustainable economic growth and to improve our productivity; and | The GESP and its policies need to promote development that is energy efficient and increases the | Include a sustainability objective relating to energy efficiency. |

| Plan/ Policy/ Programme | Objectives and Requirements | How to incorporate into the GESP | Implications for the SA |
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| | • To make sure that every home is adequately and affordably heated. | use and/ or availability or renewable energy. | |
| The Carbon Plan: Delivery our Local Carbon Future (2011) | The Carbon Plan sets out the government's plans for achieving the emissions reductions it committed to in the first four carbon budgets.<br>Emissions in the UK must, by law, be cut by at least 80% of 1990 by 2050. The UK was first to set its ambition in law and the Plan sets out progress to date. | The GESP will need to include policies that reflect the targets within the Carbon Plan. | Include a sustainability objective relating to greenhouse gas emissions. |
| Safeguarding our Soils - A Strategy for England (2011) | Current practices focus on protecting English soils and the important ecosystem services they provide. Research is focused on addressing evidence gaps to adapt and refine these policies in order to strengthen protection and their resilience as the climate changes. A Soil Strategy for England sets out the current policy context on soils and a number of core objectives for policy and research. | The GESP will need to include policies on the safeguarding of soils. | Include a sustainability objective relating to soils. |
| The Plan for Growth implementation update (2013) | The plan for growth, published alongside Budget 2011, and as part of the Autumn Statement 2011, announced a programme of structured reforms to remove barriers to growth for businesses and equip the UK to compete in the global race. These reforms span a range of policies including improving UK infrastructure, cutting red tape, root and branch reform of the planning system and boosting trade and inward investment, to achieve the governments four ambitions for growth:<br>• Creating the most competitive tax system in the G20<br>• Encouraging investment and exports as a route to a m ore balanced economy<br>• Making the UK the best place in Europe to start, finance and grow a business<br>• Creating a more educated workforce that is the most flexible in Europe. | The GESP policies will need to reflect the ambitions set out within the Plan for Growth 2013. | Include a sustainability objective relating to economic growth. |
| Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011) | The new, ambitious biodiversity strategy for England builds on the Natural Environment White Paper and provides a comprehensive picture of how the UK is implementing its international and EU commitments.<br>It sets out the strategic direction for biodiversity policy for the next decade (including rivers and lakes) and at sea. | The GESP will need to contain policies that protect biodiversity. | Include a sustainability objective relating to the protection and enhancement of biodiversity. |
| Lifetime Neighbourhoods (2011) | This document is a national strategy for housing in an ageing society. It seeks to support residents to develop lifetime neighbourhoods in terms of resident empowerment, access, services and amenities, built and natural environment, social networks/wellbeing and housing. | The policies and site allocations will need to reflect the requirements set out within the national strategy. | Include a sustainability objective relating to the creation of sustainable communities. |

| Plan/ Policy/ Programme | Objectives and Requirements | How to incorporate into the GESP | Implications for the SA |
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| UK Bioenergy Strategy (2012) | The UK Government has a responsibility to ensure that its policies only support bioenergy use in the right circumstances. This strategy is based on four principles which will act as a framework for future government policy on bioenergy.<br>In summary the four principles state that:<br>• Policies that support bioenergy should deliver genuine carbon reductions that help meet UK carbon emissions objectives to 2050 and beyond.<br>• Support for bioenergy should make a cost effective contribution to UK carbon emission objectives in the context of the overall energy goals.<br>• Support for bioenergy should aim to maximise the overall benefits and minimise costs (quantifiable and non-quantifiable) across the economy.<br>• At regular time intervals and when policies promote significant additional demand for bioenergy in the UK, beyond that envisaged by current use, policy makers should assess and respond to the impacts of this increased deployment on other areas, such as food security and biodiversity. | The principles of the Bioenergy Strategy 2012 will need to be reflected within the GESP policies. | Include a sustainability objective relating to energy efficiency and climate change. |
| Future Water: The Government's Water Strategy for England (DEFRA, 2008) | Sets out how the Government want the water sector to look by 2030 and an outline of the steps which need to be taken to get there.<br>The vision for 2030 includes:<br>• "improved the quality of our water environment and the ecology it supports, and continue to maintain high standards of drinking water quality from taps;<br>• Sustainably managed risks from flooding and coastal erosion, with greater understanding and more effective management of surface water;<br>• Ensure a sustainable use of water resources, and implement fair, affordable and cost-reflective water charges;<br>• Cut greenhouse gas emissions; and<br>• Embed continuous adaptation to climate change and other pressures across the water industry and water users". | Policies should aim to contribute to the vision set out in this Strategy. | Include SA objectives which seek to protect, manage and enhance the water environment. |
| The Climate Change Act 2008 (including 2050 Target Amendment Order 2019) | The Climate Change Act was passed in 2008 and established a framework to develop an economically credible emissions reduction path. It also strengthened the UK's leadership internationally by highlighting the role it would take in contributing to urgent collective action to tackle climate change under the Kyoto Protocol. The target was amended in 2019. The Climate Change Act now includes the following:<br>• 2050 target. The act commits the UK to reducing emissions to net zero by 2050 from 1990 levels. The target includes GHG emissions from the devolved administrations, which currently accounts for around 20% of the UK's total emissions.<br>• Carbon Budgets. The Act requires the Government to set legally binding 'carbon budgets'. A carbon budget is a cap on the amount of greenhouse gases emitted in the UK over a five-year period. The first four carbon budgets have been put into legislation and run up to 2027. | The GESP policies must reflect the objectives of The Climate Change Act, in order to contribute to achieving net zero UK carbon emissions. | Include a sustainability objective relating to climate change. |
| Heritage Protection for | The proposals in this White Paper reflect the importance of the heritage protection system in preserving our heritage for people to enjoy now and in the future. They are based around | The GESP policies will need | Include a sustainability objective relating to |

| Plan/ Policy/ Programme | Objectives and Requirements | How to incorporate into the GESP | Implications for the SA |
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| the 21st Century: White Paper (2007) | three core principles:<br>• Developing a unified approach to the historic environment;<br>• Maximising opportunities for inclusion and involvement; and<br>• Supporting sustainable communities by putting the historic environment at the heart of an effective planning system | to ensure that they protect the District's heritage assets. | cultural heritage. |
| The Air Quality Strategy for England vol. 1 (2007) | The Air Quality Strategy 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 strategy are to:<br>• Further improve air quality in the UK from today and long term.<br>• Provide benefits to health, quality of life and the environment. | The GESP policies will need to work towards further improving air quality in the UK. | Include a sustainability objective relating to air quality. |
| Working with the grain of nature – A Biodiversity Strategy for England (2011)) | This Strategy seeks to protect and improve the rural, urban, marine and global environment and lead on the integration of these with other policies across Government and internationally. | The GESP should minimise loss of biodiversity when allocating sites for development. | Include a sustainability objective relating to the protection and enhancement of biodiversity. |
| Energy Act (2008) | The Act works towards a number of policy objectives including carbon emissions reduction, security of supply, and competitive energy markets. Objectives: Electricity from Renewable Sources: changes to Renewables Obligation (RO), designed to increase renewables generation, as well as the effectiveness of the RO. Feed in tariffs for small scale, low carbon generators of electricity. Smart meters: the Act mandates a roll-out of smart meters to medium sized businesses over the next five years. Renewable heat incentives: the establishment of a financial support mechanism for those generating heat from renewable sources. | Policies and site allocations will have to ensure a positive contribution in meeting the climate change challenge by capitalising on renewable and low carbon energy opportunities and adaptation measures which reduce the threat of climate change. | Include a sustainability objective relating to energy efficiency and climate change. |
| Green Infrastructure and the Urban | Promotes the concept of multifunctionality – the integration and interaction of different activities on the same parcel of land. The Countryside In and Around Towns programme acknowledges Green Infrastructure as a key mechanism for delivering regional and local | Polices and site allocations to deliver new | Ensure the concept of green infrastructure is promoted through the |

| Plan/ Policy/ Programme | Objectives and Requirements | How to incorporate into the GESP | Implications for the SA |
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| Fringe (Natural England, 2009) | change. The strategy promotes regional coalitions to pool resources, regional stocktakes to examine the extent, state and potential of the GI, influencing RSS and LDFs, putting forward exemplar projects as examples of good practice to learn from. | green infrastructure and enhancement of existing assets in and around new developments to contribute to better quality, multifunctional environments. | SA framework. |
| Water for Life and Livelihoods: A Strategy for River Basin Planning (Environment Agency, 2006) | This document set out the Environment Agency's strategy to implement the European Water Framework Directive (WFD) by managing water based on river basin planning. The document aims to reduce pollution, prevent deterioration and improve the condition of aquatic ecosystems including wetlands. | GESP policies should promote efficient use of water in new developments and good management of water resources | Consideration of water related issues within the SA framework. |
| National Infrastructure Plan (2014) | The Infrastructure Plan allows for long term public funding certainty for key infrastructure areas such as: roads, rail, flood defences and science. All elements highlighted in the Plan represent firm commitment by government to supply the funding levels stipulated. The Plan also highlights what steps the government will take to ensure effective delivery of its key projects | The GESP objectives and policies should support the delivery of infrastructure to support new development. | To ensure that infrastructure delivery in embedded within the SA framework. |
| Waste Management Plan for England (2013) | The Waste Management Plan follows the EU principal of waste hierarchy. This requires that prevention of waste, preparing for reuse and recycling should be given priority order in any waste legislation and policy. From this principal a key objective of The Plan is to reduce the level of waste going to landfill and to encourage recycling. The Plan also requires that larger amounts of hazardous waste should be disposed of at specially managed waste facilities. | The GESP policies will be required to incorporate the objectives of the national waste policy. In order to encourage the reduction of waste and the reuse of materials. | The objectives of the national waste policy will be required to be embedded within the SA framework. |

| Plan/ Policy/ Programme | Objectives and Requirements | How to incorporate into the GESP | Implications for the SA |
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| Flood and Water Management Act (2010) | The Act aims to reduce the flood risk associated with extreme weather. It provides for better, more comprehensive management of flood risk for people, homes and businesses, helps safeguard community groups from unaffordable rises in surface water drainage charges, and protects water supplies to the consumer. | The GESP should protect existing and future development as well as residents in Greater Exeter from flood risk. | The overview of flood risk management in England which is provided in the Act will need to be reflected in the Framework of the SA. |
| The Conservation of Habitats and Species Regulation 2017 | The Regulations provide for the designation and protection of 'European sites', the protection of 'European protected species' and the adaptation of planning and other controls for the protection of European sites. | The GESP should seek to ensure that development does not have an adverse effect on any European sites and European protected species. | The SA Report should include a sustainability objective / appraisal question regarding the protection of European sites and species. |
| Door to Door: A strategy for improving sustainable transport integration (2013) DfT | The strategy's vision is for an inclusive, integrated and innovative transport system that works for everyone, and where making door-to-door journeys by sustainable means is an attractive and convenient option. Four key areas to address are highlighted:<br>• improving availability of information;<br>• simplifying ticketing;<br>• making connections between different steps in the journey, and different modes of transport, easier; and<br>• providing better interchange facilities. | The GESP should seek to enhance public transport provision and encourage active modes of travel such as walking and cycling. | The SA Report should include a relevant sustainability objective / appraisal question relating to sustainable transport. |
| National Policy Statement EN1: Overarching Energy Policy Statement (2011) | This policy document sets out government policy for the delivery of major planning applications for energy development. These will be dealt with by the Planning Inspectorate, rather than local authorities in which the development occurs. The document also specifies the criteria for waste management, traffic and transport , water quality and quantity, noise and vibration, open spaces and green infrastructure, the landscape , visual impact , dust flood risk, historic environment, odour, light, smoke/steam, insects, coastal change, aviation, biodiversity and geodiversity. | The GESP will need to be consistent with the National Policy Statement. | The SA Report should include a sustainability objective relating to energy efficiency. |
| Securing the Future: Delivering UK Sustainable Development | Enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life for future generations. There are 4 shared priorities:<br>• sustainable consumption and production;<br>• climate change and energy; | The GESP should contain policies that meet the aims of the Sustainable | The SA Report should include sustainability objective / appraisal questions to cover the shared priorities. |

| Plan/ Policy/ Programme | Objectives and Requirements | How to incorporate into the GESP | Implications for the SA |
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| Strategy (2011) DEFRA | • natural resource protection and environmental enhancement; and<br>• Sustainable communities. | Development Strategy. | |
| Healthy Lives, Healthy People: our Strategy for public health in England (2010) Depertment of Health | Protect the population from serious health threats; helping people live longer, healthier and more fulfilling lives; and improving the health of the poorest, fastest. Prioritise public health funding from within the overall NHS budget. | Policies within the GESP should reflect the objectives of the strategy where relevant. | The SA Report should include a sustainability objective / appraisal question relating to health and wellbeing. |
| Building a Greener Future: Policy Statement (2017) DCLG | This Statement confirms the government's intention to achieve 25% more energy efficient homes by 2010, 44% more efficient homes by 2013 and zero carbon (net carbon emissions should be zero per annum) homes by 2016. | Policies in the GESP should seek to promote zero carbon residential development. | The SA Report should include sustainability objectives / appraisal questions relating to renewable energy generation and energy efficiency. |
| UK Energy Roadmap (2011) DECC (as updated in 2013) | Make the UK more energy secure. Help protect consumers from fossil fuel price fluctuations. Help drive investment in new jobs and businesses in the renewable energy sector. Keep the UK on track to meet carbon reduction objectives | The GESP should encourage developments that would support renewable energy provision including electricity, heat and transport. | The SA Report should include sustainability objectives / appraisal questions relating to renewable energy generation and energy. |
| Circular 02/2013 - The Strategic Road Network and the Delivery of Sustainable Development (2013) Department for Transport | Support the economy through the provision of safe and reliable strategic road network, to allow the efficient movement of goods and people. A well-functioning road network provides safe and reliable journeys to enable growth by providing certainty, access to markets and improve mobility. | The GESP should contain policies to promote economic growth through a reliable road network. | The SA Report should include sustainability objectives/ appraisal questions relating to a reliable road network and efficient movement of people. |
| Preliminary Flood Risk Assessment (PFRA)(2009) | Provides an approach to managing flood risk across Europe, through a six year planning cycle based on a four stage process. Lead Local Flood Authorities (Unitary Authorities or County Councils) are responsible for doing a PFRA for local sources of flood risk, primarily from surface runoff, groundwater and water courses. | Policies within the GESP should reflect this approach to | The SA Report should include sustainability objectives/ appraisal questions in relation to |

| Plan/ Policy/ Programme | Objectives and Requirements | How to incorporate into the GESP | Implications for the SA |
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| Environment Agency | | manage flood risk. | flood risk management. |
| Planning (Listed Buildings and Conservation Areas) Act 1990 | The Listed Buildings and Conservation Areas Planning Areas Act is to work alongside laws relating to special controls in respects of buildings and areas of special architectural or historic interest. This includes the preservation of architectural and historic interest. | The GESP should include policies that reflect the conservation of architectural and historic assets as set out in the Listed Buildings and Conservation Areas Act. | Ensure the inclusion of heritage and historic interest in the formation of the SA objectives. |
| **Local** | | | |
| Water Resources Strategy Regional Action Plan for the South West (Environment Agency 2009) | The action plan shows how the South West region will meet the challenges posed by pressures on water resources over a 50 year period.<br><br>Actions include ensuring the water supply and demand is resilient to the effects of climate change, reducing carbon emissions associated with the supply of water, managing catchments better to protect water resources, enhancing biodiversity, reducing flood risk and improving the water efficiency of new housing and commercial developments. | GESP should be considerate of pressures on water resources in the plan area. | The action plan highlights the need to manage supply of water and catchments and protect water resources. |
| South West River Basin Management Plan (Environment Agency, 2015) | Priorities for local government include ensuring that local planning documents take into account the objectives of the SWRBMP. | GESP should be considerate of issues relevant to the river basin. | The management plan emphasises the importance of mitigation for development that affects water bodies. |
| Shoreline Management Plan (South Devon and Dorset Coastal Advisory Group, Dec 2010) | The document is an assessment of shoreline and estuary processes. It outlines the approach to managing coastal change in the area.<br><br>The objectives of SMPs are to:<br>• Improve our understanding of coastal processes.<br>• Work in partnership with all interested organisations and the public.<br>• Prepare a setting for the long term planning of coastal defences.<br>• Set out a plan over a 50 year timescale. | GESP should be considerate of challenges facing the shoreline/coastal areas in Greater Exeter. | The SA framework should consider impacts on coastal resources in the plan area. |
| Managing Flood and Coastal | The Strategy has reviewed the policies that are set out in the South Devon and Dorset Shoreline Management Plan (SMP) and covers a 100 year period. Key components are: | GESP should be considerate of | The SA framework should consider |

| Plan/ Policy/ Programme | Objectives and Requirements | How to incorporate into the GESP | Implications for the SA |
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| Erosion Risk for the Exe Estuary – Final Strategy (Environment Agency, May 2014) | -maintaining, improving and constructing new coastal defence schemes;<br>-providing flood warning systems;<br>-working with local authority planners to restrict development in flood risk areas;<br>-encouraging the use of flood resilience measures for existing properties in flood risk areas. | challenges facing the shoreline/coastal areas in Greater Exeter. | impacts on coastal resources in the plan area, and consider objectives to ensure flood risk has been taken account of. |
| The Nature of Devon – A Biodiversity and Geodiversity Action Plan (DCC, 2009) | Objectives of the action plan include ensuring that planning policies recognise the importance of biodiversity and the geological features of Devon, to ensure consideration is given to nature conservation issues in the implementation of planning. | GESP should be considerate of issues relating to biodiversity and geodiversity in the plan area over the plan period and beyond. | SA framework should ensure, as far as possible, biodiversity is supported and protected. |
| Devon Landscape Character Assessment (Devon Landscape Policy Group) | Devon's landscape character assessment describes the variations in character between different areas and types of landscape in the county. It provides an evidence base for local development frameworks and plans, articulating what people perceive as distinctive and special about all landscapes in Devon. It also set out strategies and guidelines for the protection, management and planning of the landscape. | The GESP should consider including policies which protect the landscape character of the plan area. | SA framework should consider the impact on landscape. |
| Devon Landscape Policy Group Advice Note 2: Guidance on the siting, design & assessment of wind & solar PV developments in Devon. (DCC, June 2013) | Balancing the need to support the transition to a low carbon future and the need for energy security with the management of Devon's unique and valued landscape is a key challenge. The landscape is also a major contributor to a strong tourism industry. The conservation of special landscape character is a core principle of the NPPF.<br><br>Devon has good conditions to produce wind and solar electricity, but it is important that the characteristics of Devon's landscape are not unacceptably harmed by poor design or inappropriate siting of renewable or low carbon technologies. | The GESP should consider including policies which protect the landscape character of the plan area. | The advice note highlights the need to harness renewable energy development opportunities in landscape context. |
| Historic Seascape Characterisation | The report allows an understanding of historic trends and processes to inform and frame the broader sustainable management of change through marine spatial planning, outreach and research projects. It is one of three projects commissioned to complete strategic-level HSC | The GESP should consider including policies | SA framework should consider the impact on marine environment. |

| Plan/ Policy/ Programme | Objectives and Requirements | How to incorporate into the GESP | Implications for the SA |
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| South West Peninsula (English Heritage, Jan 2014) | coverage of England's coasts. | which protect the seascape of the plan area. | |
| Heritage at Risk 2019 South West (Historic England) | The Register provides an annual snapshot of historic sites known to be at risk from neglect, decay or inappropriate development. It records relevant listed buildings, places of worship, scheduled monuments, industrial sites, conservation areas, parks and gardens, protected wrecks and battlefields. | The GESP should consider including policies which protect the heritage assets of the plan area. | The SA should contain an objective for and consideration of the protection and enhancement of the historic environment. |
| Devon Minerals Plan (DCC, Feb 2017) | The plan contains the Council's vision and objectives for minerals planning and policy framework and site proposals to maintain the supply of minerals and limit the impacts of their working. | The GESP should be considerate of mineral resources in the plan area. | The SA framework should consider recognised mineral areas and if possible avoid development of these areas. |
| Devon Waste Plan (DCC, Dec 2014) | There are six Objectives that identify how sustainable waste management will be achieved, including targets for recycling and energy recovery and measures for the provision of waste management capacity, addressing climate change, supporting communities and businesses, conserving and enhancing Devon's environment, and the transportation of waste. | The GESP should help to promote the achievement of the waste hierarchy as appropriate. | SA framework should assess whether the Plan helps to minimise waste. |
| Devon Sustainable Community Strategy (2008 – 2018) | The Devon SCS identifies 7 key priorities for the County: Economy, Environment, Health and Wellbeing, Homes and Housing, A Safer Devon ,Strong and Inclusive Communities and Inspiring Young People. | The GESP should be considerate of the priorities of the community strategy. | SA framework should ensure the strategy objectives related to land-use planning are considered. |
| Devon Education Infrastructure Plan (2016 – 2033) (DCC) | The key aims of the plan are to provide:<br>• schools with a clear understanding of how decisions are reached about pupil planning, estate maintenance processes and capital investment;<br>• Local Planning Authorities and housing developers with an understanding of their role in supporting the future pattern of education provision;<br>• the wider community with an understanding of how education provision will be delivered to support the development of Devon over the next 20 years; | The GESP should be considerate of the aims of the infrastructure plan. | SA should consider educational needs and identify any potential deficiencies. |
| Devon Partnership | 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 | The GESP should consider the | The assessment will help to inform the SA. |

| Plan/ Policy/ Programme | Objectives and Requirements | How to incorporate into the GESP | Implications for the SA |
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| Gypsy and Traveller Accommodation Assessment Report 2015 (Devon Partnership of local & national park authorities) | residential and transit/emergency sites, and bricks and mortar accommodation for the period 2014/15-2034/35. | inclusion of policies to address accommodation for gypsy and travellers. | |
| Heart of the South West Local Enterprise Partnership (LEP) Business Plan | Objectives include promoting infrastructure to connect markets. Priorities include addressing existing and future constraints on business growth (emphasising the need for ongoing public and private investment to improve connections into and within the area where current connectivity is impacting on productivity and competitiveness), encouraging the roll out of future electronic communication technologies for the region, encourage a joined up approach to future housing development to secure economic prosperity (including social infrastructure and appropriate affordable housing), ensure an integrated approach to economic development recognising the constraints the planning system can place on business growth, particularly affecting rural businesses. | The GESP should be considerate of the objectives of the LEP | The business plan will help to inform the SA. |
| Heart of the South West LEP Strategic Economic Plan 2014 – 2030 | This approach has been translated into 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 our Distinctive Assets. | The GESP should be considerate of the objectives of the LEP | SA framework should reflect the main land-use planning related measures of the strategic economic plan. |
| LEP Local Industrial Strategy – Greater Exeter: the engine for regional growth | 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.<br>The regional financing programme seeks to capitalise on the city's increasing prosperity through the City Fund and to self-manage the development of the wider Greater Exeter Region and in East Devon by initial accelerated strategic land acquisition and then delivery of housing, communities and city linked infrastructure to complement the growth of the area. | The GESP should be considerate of the objectives of the LEP Local Industrial Strategy | SA framework should reflect the main land-use planning related measures of the strategic economic plan. |
| Local Transport Plan 3, Devon & Torbay Strategy 2011 – 2026 (DCC, 2011) and | The plan has five key objectives:<br><br>• Deliver and support new development and economic growth<br>• Make best use of the transport network and protect the existing transport asset by prioritising maintenance<br>• Work with communities to provide safe, sustainable and low carbon transport choices | The GESP should be informed by the transport strategy. | SA should assess how the transport plan helps to deliver travel, transport and movement objectives. |

| Plan/ Policy/ Programme | Objectives and Requirements | How to incorporate into the GESP | Implications for the SA |
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| Implementation Plan (DCC, 2011) | Strengthen and improve the public transport network<br>• Make Devon the 'place to be naturally active' | | |
| State of Environment report (Devon Local Nature Partnership, March 2018) | The report considers trends which point to the future condition of the environment, as well as identifying current and likely future pressures that need to be considered in decision making. Such issues as Accessibility and Recreation, Land Use, Water Environment & Geology and Soil are covered. | The GESP should include policies which seek to promote the protection of the environment. | The environment report will help to inform the SA. |
| Plymouth & South West Devon Joint Local Plan (adopted March 2019) | The Joint Local Plan sets out where potential development will take place and how the area will change through to 2034. It is based on the Plymouth Housing Market Area, which includes all of Plymouth, South Hams and West Devon (excluding those parts of South Hams and West Devon within the Dartmoor National Park).<br><br>There is an overall housing requirement of 26,700 homes between 2014 and 2034, being distributed across the city, towns and villages. This assumes 19,000 homes being developed in and around the city; 7,700 homes being in the towns and villages.<br><br>The Plymouth Policy Area will also provide for around 291,400m$^2$ of employment floorspace and the Thriving Towns and Villages Policy area will provide for a further 83,700m$^2$ employment floorspace. | The GESP should be considerate of the policies at a local level. | The joint local plan will help to inform the SA. |
| South West Water Bournemouth Water Final Water Resources Management Plan (South West Water, Aug 2019) | The Plan presents the overall water resources strategy for the next 25 years up to 2044/45. It presents forecasts for how it is expected that demand will change due to changes in demographics and how supply is expected to vary taking into account factors such as the impact of climate change. | The GESP should include policies with are considerate of water resources issues in the plan area. | The SA framework will consider relevant objectives for water resources/ environment. |
| Devon Energy Policy and Action Plan (DCC, Oct 2015) | Sets out responsible energy management through continuous improvement of energy performance in order to avoid unnecessary expenditure, reduce carbon emissions and protect the environment.<br><br>Commits DCC to reduce its energy consumption from corporate buildings, street lighting and | The GESP should include policies with are considerate of the need to | The SA framework will include objectives to ensure that renewable energy has been taken account of. |

| Plan/ Policy/ Programme | Objectives and Requirements | How to incorporate into the GESP | Implications for the SA |
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| | transport by at least 2% per year to achieve a 30% reduction from 2012/13 levels by 2030, together with providing 30% of remaining energy consumption from renewable sources by the same date. The total package will reduce carbon emissions by about 50%. | manage energy performance in the plan area as to help reduce impacts on the environment. | |
| Devon Green Infrastructure Strategy (DCC, 2012) | Nine guiding principles promote a joined-up approach to planning and delivery of green infrastructure across local authority boundaries as part of sustainable development delivery. | The GESP should include policies which are considerate of improving the green infrastructure assets of the plan area. | The SA framework will consider relevant objectives for biodiversity and green infrastructure. |
| Devon Rights of Way Improvement Plan (DCC 2012) | The plan sets out to policies and actions to improve public rights of way and access for all. It recognises the importance of the public rights of way network to visitors and locals alike. Policies and actions set out in the plan seek to allow people to enjoy the countryside as well as enabling them to travel from place to place without having to use the car. | The GESP should include policies which are considerate of promoting access to rights of way in the plan area. | The SA framework will consider relevant objectives relating to improved access to public rights of way in the plan area. |
| Devon Local Flood Risk Management Strategy – 2014-2020 (DCC, June 2014) | It should act as a first point of call to provide guidance on any flood risk management issues in Devon and sets out principles that will balance the needs of communities, the economy and the environment through partnership working, with effective and sustainable risk management and prioritisation. | The GESP should include policies which are considerate of flood risk in the plan area. | The SA framework will consider objectives to ensure flood risk has been taken fully into account. |
| Western Power Distribution Business Plan (R110-ED1) 2015-2023. (April 2014) | WPD is a Distribution Network Operator (DNO) and distributes electricity to 7.8 million customers across the Midlands, South Wales and the South West. The greatest challenge to be faced is adaptation of networks and business processes to the demand for a low carbon environment.<br><br>The plan has used a 'best view' of the scale of low carbon technology and its impact on the network as informed by independent analysis. Alternative scenarios have been modelled to provide a range of potential outcomes. | The GESP should include policies which will help to promote the achievement of a lower carbon economy. | The WPD business plan will help to inform the SA. |

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| 7th Devon Local Aggregate Assessment 2008 – 2017. (DCC, Feb 2019) | Devon's diverse geology results in a wide range of land-won aggregate resources being available. The LAA is required to:<br>-forecast the demand for aggregates based on average 10 year sales data and other relevant local information,<br>-analyse all aggregate supply options and,<br>-assess the balance between demand & supply. | The GESP should include policies which do not adversely affect aggregate resources in the plan area. | The Devon Assessment will help to inform the SA. |
| Devon Rural Housing Enabler Business Plan 2014 -2018 (Devon RHE Team, April 2015) | The main aims are to:<br>-Continue to support delivery of affordable rural housing through partnership working,<br>-Support partners in responding to changing external environment and developing new and innovative methods of delivering affordable rural housing,<br>-Continue to evidence the need and make the case for affordable rural housing,<br>-Build a long-term sustainable RHE programme along socially enterprising lines. | The GESP should include policies to help ensure the provision of affordable and accessible homes. | SA should ensure affordable rural housing aims are taken into account. |
| Teignbridge Council Strategy 2016 – 2025 | The strategy's key objectives are: more affordable housing, reducing carbon emissions, job creation, sustainable travel options, community-led planning, encouraging young people to stay & keeping the district clean, green and safe. | The GESP be considerate of policies at a local level. | SA framework should be broadly compatible with the corporate objectives. |
| Teignbridge Local Plan 2013 – 2033 | The plan sets out to: increase the self-sufficiency of the district as a whole and the settlements within it; focus the majority of housing, employment and other development at the Heart of Teignbridge (the settlements of Kingskerswell, Kingsteignton and Newton Abbot). The plan sets out to deliver 12,400 homes during the 2013-2033 plan period. During the same period, 80.2ha of employment land has been identified for employment development. | The GESP be considerate of policies at a local level. | SA/SEA of the Local Plan has been carried out. |
| Teignbridge Infrastructure Delivery Plan and Schedule (Feb 2020) | The plan sets out to ensure that development is supported by adequate public infrastructure by providing broad time periods for delivery, the nature of the priority, the key delivery partners, and the likely costs of projects infrastructure planned at locations throughout Mid Devon. | The GESP be considerate of policies at a local level. | SA/SEA of the Local Plan has been carried out, which this document supplements. |
| Teignbridge Community Infrastructure Levy – Charging | TDC is the Charging Authority for the Teignbridge Local Plan Area. (i.e. excluding the Dartmoor National Park area of Teignbridge). The CIL raised will be spent within communities on improving and providing new infrastructure services, including roads, education, recreation, public transport etc. | The GESP be considerate of policies at a local level. | SA may consider the economic, social and environmental benefits or costs resulting from |

| Plan/ Policy/ Programme | Objectives and Requirements | How to incorporate into the GESP | Implications for the SA |
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| Schedule (July 2014) | | | the CIL. |
| Teignbridge Housing Strategy 2015 – 2020 | The strategy is divided into the following themes: a place to live, access to services, healthy lives & money matters. It includes the following aims:<br>- to maximise the delivery of affordable housing according to need<br>- to make sure that local housing is in a good state of repair<br>- to make best use of existing stock. | The GESP be considerate of policies at a local level. | SA framework should ensure that all relevant housing strategy objectives are considered. |
| Exminster Neighbourhood Development Plan (March 2015) | ENDP seeks to maximise the benefit to the whole neighbourhood area from the proposed Matford settlement development in terms of provision of accessible community, sports and leisure facilities. Maintaining the visual landscape quality and contribution of the rural setting of Exminster village by enhancing and protecting the quality and contribution of surrounding green space & maintaining a natural buffer zone between Exminster village and the settlement at Matford is a key objective. | The GESP should be considerate of the policies at a local level. | The SA may consider how community aspirations have translated into the Strategic Plan. |
| Newton Abbot Neighbourhood Development Plan (June 2016) | NANDP states that the future of the town should be founded on the principles of creativity, accessibility and sustainability; seeking to ensure the highest possible standards in all forms of development. The plan seeks to promote a strong sense of community within and across the town. In particular, by supporting the health and wellbeing of its residents through the provision of improved sports, community and recreation facilities. | The GESP should be considerate of the policies at a local level. | The SA may consider how community aspirations have translated into the Strategic Plan. |
| Abbotskerswell Neighbourhood Plan (2017) | Policies designed to protect and enhance the qualities of the village. | The GESP should be considerate of the policies at a local level. | Relevant to any proposals within the Parish. |
| Bishopsteignton Neighbourhood Plan (2017) | The policies set out in the plan are designed to meet the needs of the local community and ensure any development is sustainable. | The GESP should be considerate of the policies at a local level. | Relevant to any proposals within the Parish. |
| Beer Neighbourhood Plan (2018) | The policies set out in the plan aim to protect and enhance the natural environment in the area and deliver a consistent, community supported strategy. | The GESP should be considerate of the policies at a local level. | Relevant to any proposals within the Parish. |
| Bishops Clyst Neighbourhood Plan (2016) | The policies set out in the plan are designed to ensure that development allocated in the area is sustainable. | The GESP should be considerate of the policies at a local level. | Relevant to any proposals within the Parish. |
| Budleigh Salterton Neighbourhood Plan (2017) | The policies set out in the plan are designed to deliver sustainable development and ensure the qualities of the area are protected and enhanced. | The GESP should be considerate of the policies at a local level. | Relevant to any proposals within the Parish. |

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| Chardstock Neighbourhood Plan (2017) | The policies set out in the plan are designed to protect the area's natural environment and ensure that inappropriate development is not permitted. | The GESP should be considerate of the policies at a local level. | Relevant to any proposals within the Parish. |
| Ogwell neighbourhood Plan (April 2018) | The policies set out in the plan aim to meet identified needs of residents and protect the intrinsic character of the area. | The GESP should be considerate of the policies at a local level. | The SA may consider how community aspirations have translated into the strategic plan. |
| Ide Neighbourhood Plan (2018) | The policies set out in the plan provide aspirations for sustainable development in the area until 2033. | The GESP should be considerate of the policies at a local level. | The SA may consider how community aspirations have translated into the strategic plan. |
| Clyst St. George Neighbourhood Plan (2018) | The plan aims to meet identified community needs and ensure that growth in the area is in line with them. | The GESP should be considerate of the policies at a local level. | The SA may consider how community aspirations have translated into the strategic plan. |
| Dunkeswell Neighbourhood Plan (2017) | The policies outlined in the plan are designed to achieve the community's vision for the appropriate use of land in the area. | The GESP should be considerate of the policies at a local level. | The SA may consider how community aspirations have translated into the strategic plan. |
| East Budleigh Neighbourhood Plan (2017) | The policies set out in the plan provide a vision for the future of the community, which includes protection of natural and historic environment assets that define the area. | The GESP should be considerate of the policies at a local level. | The SA may consider how community aspirations have translated into the strategic plan. |
| Feniton Neighbourhood Plan (July 2018) | The plan seeks to address key issues outlined in community consultation. | The GESP should be considerate of the policies at a local level. | The SA may consider how community aspirations have translated into the strategic plan. |
| Ottery St Mary and West Hill Neighbourhood Plan (2018) | The plan outlines polices that are designed to protect the rural landscape of the area from adverse impacts of development in the area. | The GESP should be considerate of the policies at a local level. | The SA may consider how community aspirations have translated into the strategic plan. |
| Stockland | The plan's policies aim to deliver the community's vision and priorities for how they would | The GESP should | The SA may consider |

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| Neighbourhood Plan (2017) | like to see the area develop in the coming years. | be considerate of the policies at a local level. | how community aspirations have translated into the strategic plan. |
| Rockbeare Neighbourhood Plan (October 2018) | The policies outlined in the plan are designed to ensure the character of the Parish is preserved given the level of development projected in the area. | The GESP should be considerate of the policies at a local level. | The SA may consider how community aspirations have translated into the strategic plan. |
| Uplyme Neighbourhood Plan (2017) | The plan contains objectives and development control/management policies aimed at ensuring the community vision is met. | The GESP should be considerate of the policies at a local level. | The SA may consider how community aspirations have translated into the strategic plan. |
| Yarcombe and Marsh Neighbourhood Plan (2017) | The policies outlined in the plan represent the community's vision and priorities for how they would like to see the local area change in the coming years. | The GESP should be considerate of the policies at a local level. | The SA may consider how community aspirations have translated into the strategic plan. |
| Cullompton Neighbourhood Plan (submitted for examination in September 2019) | The polices set out in the plan represent the community's vision and priorities for how they would like to see the Cullompton area develop and change in the coming years. | The GESP should be considerate of the policies at a local level. | The SA may consider how community aspirations have translated into the strategic plan |
| Silverton Parish Neighbourhood Plan (submitted for Public Consultation in April 2020) | The policies outlined in the plan are designed to ensure that the existing qualities of the areas are maintained in the coming decades. | The GESP should be considerate of the policies at a local level. | The SA may consider how community aspirations have translated into the strategic plan. |
| Crediton Draft Neighbourhood Plan (to be submitted for consultation in May 2019) | The policies in the plan are committed to ensuring that development is sustainable during the plan period, with an emphasis on retaining the distinctive assets of arts-based projects and events and St Boniface heritage. | The GESP should be considerate of the policies at a local level. | The SA may consider how community aspirations have translated into the strategic plan. |
| East Devon Council Plan | The plan's identified priorities are to deliver an:<br>- outstanding place and environment; | The GESP should be considerate | SA framework should be broadly compatible |

| Plan/ Policy/ Programme | Objectives and Requirements | How to incorporate into the GESP | Implications for the SA |
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| 2020 - 2024 | - outstanding homes and communities;<br>- outstanding level of economic growth, productivity and prosperity; and<br>- outstanding council and council services. | of the policies at a local level. | with the corporate priorities. |
| East Devon Local Plan 2013- 2031 | A vision for East Devon to: play its part in boosting the economy of the Exeter sub-region by encouraging significant growth within the West End of the district, provide for more balanced communities where homes and jobs are in better alignment by for example providing major employment, housing and community facilities in Exmouth. The plan sets that a total of 16,393 dwellings will be delivered during the plan period. To deliver employment land it is set that large scale major housing developments should provide around 1ha of employment land for each 250 homes built. | The GESP should be considerate of the policies at a local level. | SA/SEA of the Local Plan has been carried out. |
| East Devon Infrastructure Delivery Plan Review (2017) | The plan sets out the infrastructure required to support the level of housing and economic development projected in the area. The plan sets out to deliver a range of infrastructure types including transport networks, communications technology, education and healthcare facilities, energy utilities and waste facilities, green infrastructure, flood risk and coastal change management infrastructure, public services and sport and recreation facilities. | The GESP be considerate of policies at a local level. | SA may consider the economic, social and environmental benefits or costs resulting from the provision of infrastructure. |
| East Devon Community Infrastructure Levy – Charging Schedule (April 2016) | East Devon DC is the Charging Authority for the East Devon Local Plan Area.<br><br>The CIL raised will be spent within communities on improving and providing new infrastructure services, including roads, education, recreation, public transport etc. | The GESP be considerate of policies at a local level. | SA may consider the economic, social and environmental benefits or costs resulting from the CIL. |
| East Devon AONB Management Plan 2019 – 2024 | The Plan identifies key issues facing the AONB, sets out long term objectives for its future and highlights the actions needed to conserve the landscape. | The GESP should include policies which are considerate of the protection of designated landscapes. | SA framework should consider the impact on landscape and related objectives identified in the management strategy. |
| East Devon AONB Partnership Plan 2019-2024 | Sets out policy to conserve and enhance the natural beauty of the East Devon landscape. This is to include sustainable management of the natural resources of the AONB including biodiversity and geological assets as part of a bigger, better and more joined up approach to landscape. The appropriate management of the high quality and internationally significant coastline is seen to form an important part of the future of the AONB. | The GESP should include policies which are considerate of the protection of designated landscapes. | SA framework should consider the impact on landscape and related objectives identified in the management strategy. |
| Cranbrook Plan Submission (Submission | Cranbrook is a new community in East Devon close to the city of Exeter. The Cranbrook Plan has been published in submission draft form and was open to public consultation from March to April 2019. | The GESP be considerate of policies at a | An SA of the document is being carried out. |

| Plan/ Policy/ Programme | Objectives and Requirements | How to incorporate into the GESP | Implications for the SA |
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| Draft version, Feb 2019) | | local level. | |
| Lympstone Neighbourhood Plan (April 2015) | LNP seeks to encourage and support: responsible development along with enhanced provision of amenities, activities and facilities; accessibility for all – maintain and improve transport, affordable housing and infrastructure; retention of rural identity and independence from Exmouth with no steps towards coalescence, amongst others. | The GESP be considerate of policies at a local level. | The SA may consider how community aspirations have translated into the Strategic Plan. |
| Exeter Core Strategy DPD (Feb 2012) | The plan vision contains an aim of providing houses, jobs and supporting infrastructure through maximising the use of previously developed land within the city, and through sustainable urban extensions to the east, at Newcourt and Monkerton/Hill Barton, and to the south west at Alphington. In delivering growth Exeter will build on its strengths and assets by safeguarding the hills to the north and north west, protecting the historic environment and enhancing green infrastructure. The plan sets out to deliver 12,000 homes during the plan period and 60ha of employment land, with 25ha additional at the Science Park and 40ha at the Skypark. | The GESP be considerate of policies at a local level. | SA of the Local Plan has been carried out. |
| Exeter Community Infrastructure Levy – Charging Schedule (Oct 2013) | Exeter City Council is the Charging Authority for the Exeter Development Plan Area.<br><br>The levy is expected to raise around £25m in the period to 2026 which can be used to fund a wide range of projects so long as they support development growth. | The GESP be considerate of policies at a local level. | SA may consider the economic, social and environmental benefits or costs resulting from the CIL. |
| Exeter Development Delivery Plan (Publication Version, 2015) | The plan sets out allocations for development, designations for protecting or safeguarding land and provides development management policies. | The GESP be considerate of policies at a local level. | SA/SEA of the local plan document this forms part of has been carried out. |
| Exeter Housing Strategy 2016 – 2020 (April 2016) | The housing strategy aims to respond to some of the complexities and realities of the housing crisis by addressing housing need and vulnerability, providing more housing and being a good landlord. | The GESP be considerate of policies at a local level. | SA framework should ensure that all relevant housing strategy objectives are considered. |
| St James Neighbourhood Plan (July 2013) | SJNP identifies the following aims: define a local hub for St James, 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. | The GESP be considerate of policies at a local level. | The SA may consider how community aspirations have translated into the Strategic Plan. |
| Mid Devon Corporate Plan | The plan has 4 main priorities for the Economy, Homes, Community and Environment which will focus on amongst other things: bringing new businesses into the district, building more | The GESP be considerate of | SA framework should be broadly compatible |

| Plan/ Policy/ Programme | Objectives and Requirements | How to incorporate into the GESP | Implications for the SA |
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| 2016 to 2020 (March 2016) | council houses, working with local communities to encourage them to support themselves and increasing recycling and reducing the amount of waste going to landfill. | policies at a local level. | with the corporate priorities. |
| Mid Devon Core Strategy 2026 (July 2007) | The market towns of Tiverton, Cullompton, Crediton and Bampton will be the main focuses of new development, in scale with their individual infrastructures, economies, characters and constraints. A network of villages with sufficient employment, services and public transport provision will be locations for limited development. The plan sets out to deliver 390 dwellings per year from 2006-2016 and 290 per year from 2016-2026. The plan also sets out a target of delivering around 14,700m$^2$ per year of employment floorspace during the plan period. | The GESP be considerate of policies at a local level. | SA of the Core Strategy has been carried out. |
| Mid Devon Local Plan Review – Proposed Submission (incorporating proposed modifications) (Jan 2017) | The document includes fourteen policies on development strategy, setting out the overarching principles that should guide development. The strategic site to the east of junction 28, Cullompton, has been identified as the strategic option for the direction of future housing and employment growth in Mid Devon. The revised plan period goes through to 2033 and sets out to deliver 7,860 dwellings during the plan period as well as 147,000m$^2$ of employment and commercial floorspace. The main hearings for the Local Plan examination concluded on 20th February 2019. Most recently the Proposed Main Modifications Consultation was concluded and consultation responses on these matters were sent to the Inspector on 28th February 2020. | The GESP be considerate of policies at a local level. | SA/SEA of the Local Plan Review is being carried out. |
| Mid Devon Community Infrastructure Levy – Draft Charging Schedule (March 2017) | Mid Devon DC is the charging authority. The Community Infrastructure Levy Draft Charging Schedule and associated documentation was submitted to the Planning Inspectorate on 31st March 2017 for examination. The aim of CIL is to provide funding for infrastructure by placing a charge on new development. A charge can only be made where the development will remain viable. | The GESP be considerate of policies at a local level. | SA may consider the economic, social and environmental benefits or costs resulting from the CIL. |
| Mid Devon Allocations and Infrastructure Development Plan Document (2010) | The plan sets out guidance on planning applications to provide clarity to developers and residents on which planning applications will be successful. The plan also sets out for sufficient infrastructure to be provided with development by ensuring that infrastructure providers make commitments to the plans set out in the document. | The GESP be considerate of policies at a local level. | This document forms part of the Mid Devon Core Strategy for which SA has been carried out. |
| Blackdown Hills AONB Management Plan 2019 – 2024 | The Plan:<br>- Describes the special qualities of the Blackdown Hills AONB.<br>- Explains why the AONB is important.<br>- Sets out an agreed vision for its future.<br>- Identifies the challenges and opportunities for the area, and how these will be tackled. | The GESP should include policies which are considerate of the protection of designated landscapes. | SA framework should consider the impact on landscape and related objectives identified in the management plan. |
| Mid Devon Draft Housing | The strategy has the following priorities:<br>- delivering affordable housing | The GESP be considerate of | SA framework should ensure that all relevant |

| Plan/ Policy/ Programme | Objectives and Requirements | How to incorporate into the GESP | Implications for the SA |
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| Strategy 2015 – 2020 (Sept 2015) | - making better use of existing housing stock<br>- preventing homelessness<br>- managing the impact of an aging population<br>- reducing the impact of welfare reform<br>It provides a framework and an evidence base for all the housing related activities of the Council and other partners. | policies at a local level. | housing strategy objectives are considered. |
| Dartmoor National Park Management Plan 2014 – 2019 (Nov 2013) | Central to the plan is the overall Vision and Ambitions, setting out where Dartmoor wants to be in 2034. There are 3 themes of Sustain, Enjoy and Prosper and within each a number of priorities for the first five years. | The GESP be considerate of policies at a local level. | SA framework should be broadly compatible with the management plan priorities. |
| Dartmoor National Park Management Plan 2020 – 2025 (Draft for consultation, Jan 2020) | Consultation on the Draft Management Plan is to run from 10th February to 31st May 2020. The document describes for everyone what the main issues, priorities, opportunities and challenges for the park are whilst encouraging everyone to work together to conserve and enhance the special qualities of the area for the benefit of all. It includes the vision of the National Park up to 2045. | | |
| Dartmoor Core Strategy DPD 2006 – 2026 (June 2008) | The core strategy sets a vision for the park, highlighting the distinctive characteristics and special qualities of Dartmoor and points to the role of planning in sustaining those qualities. The document sets a settlement strategy, focusing development in 8 Local Centres with development for local needs in thirty-four Rural Settlements. | The GESP be considerate of policies at a local level. | SA of the Core Strategy has been carried out. |
| Dartmoor Affordable Housing SPD (May 2014) | It aims to make clear the authority's expectations and provide guidance to support the delivery of affordable housing, from identifying need through to viability and legal agreements. The SPD is split into six topic areas; these aim to address the process of developing affordable housing, from identifying need through to viability and legal agreements. | The GESP be considerate of policies at a local level. | SA framework should ensure that all relevant affordable housing objectives are considered. |
| Dartmoor Development Management & Delivery Plan (July 2013) | The plan sets out two main areas of planning policy:<br>- subject related policies (e.g. housing, employment, tourism) to advise and manage development.<br>- site specific policies to set the planning framework for particular areas and land use.<br><br>Together with the Core Strategy its policies form the basis for decision making for development in Dartmoor National Park, to the period up to 2026. | The GESP be considerate of policies at a local level. | Ensure the implications of this document are met through the SA. |
| Exmoor National Park Partnership Plan | The Partnership Plan is closely linked to the Exmoor National Park Local Plan and provides long term objectives for what is to be achieved in relation to conserving and enhancing the special qualities of the area. This includes setting out ambitions that will be focussed on for | The GESP be considerate of policies at a | Ensure the implications of this document are met through the SA. |

| Plan/ Policy/ Programme | Objectives and Requirements | How to incorporate into the GESP | Implications for the SA |
|---|---|---|---|
| 2018-2023 (April 2018) | delivery during the five period of the plan and identifying potential opportunities and challenges that face Exmoor and the delivery of these ambitions.<br><br>The plan applies to the whole National Park, not just the National Park Authority and involves land property owners and managers related to Exmoor, people who live and work in the area and the wider public who visit the park. | local level. | |
| Exmoor National Park Local Plan 2011-2031 (July 2017) | The Local Plan contains both strategic and planning policies and development management policies. The policies set out an overall approach to future development in the National Park that will direct development to the most sustainable locations. Policies in the plan also aim to ensure that the special qualities of the National Park are conserved and enhanced, which will include supporting a thriving Exmoor economy for the period up to 2031. | The GESP be considerate of policies at a local level. | SA of the Local Plan has been carried out. |

# Appendix 3
# Updated Baseline Information

1 Baseline information provides the basis for predicting and monitoring the likely sustainability effects of a plan and helps to identify key sustainability issues and means of dealing with them.

2 Annex 1 of the SEA Directive requires information to be provided on:

a. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan;

b. The environmental characteristics of areas likely to be significantly affected;

c. Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC [the 'Birds Directive'] and 92/43/EEC [the 'Habitats Directive'].

3 This section presents the relevant baseline information for Great Exeter. Data referred to has been chosen primarily for regularity and consistency of collection, in order to enable trends in the baseline situation to be established, and also subsequent monitoring of potential sustainability effects. This information was initially prepared by the GESP officers, but subsequently LUC has updated the text and will continue to do so as necessary at each stage of the GESP preparation.

## Environmental Baseline Information

### Air Quality

4 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.

5 There are a total of seven AQMAs in Greater Exeter[5] consisting of:

- Crediton, Exeter Road & High Street;
- Cullompton, Station Road, Higher Street & Fore Street;
- Exeter, covers all main traffic routes in the city;
- Dawlish, Iddesleigh Terrace;
- Kingskerswell, A380;
- Newton Abbot Town Centre & Kingsteignton (incl Newton Road, Gestridge Road); and
- Teignmouth, Bitton Park Road.

6 There are a total of 13 AQMAs in Devon, excluding Plymouth. The plan area therefore accounts for over half of these, though the plan area is home to a number of the larger urban areas in Devon.

7 The location of AQMAs shows that they are associated with vehicle emissions which cause levels of nitrogen dioxide to exceed the health based annual mean air quality objective for residential properties.

8 In Exeter, for example, there is a need to reduce traffic emissions generally and emissions of nitrogen dioxide specifically along the five main arterial routes into the city. However the majority of national air pollutant objectives are met in the wider urban area, where air quality is generally very good and concentrations of all pollutants measured are stable or decreasing.

9 Air quality in the county (as taken from Defra's air quality monitoring station in Devon) has improved since 1988. Instances of moderate and high air pollution are generally attributable to high levels of ground level ozone which is a trans-boundary pollutant affected by factors beyond the Greater Exeter area. Concentrations tend to be higher at the coast and high altitudes.

[5] Exeter/East Devon/Mid Devon & Teignbridge Air Quality Action Plans; Number of days when air pollution is moderate or higher in the UK, 2010 to 2014 (detailed site data) – revised threshold (Defra, 2014); Exeter Air Quality Strategy 2015-2020 (ECC,2015).

10 Advancements in vehicle efficiency and low emission engines are expected to contribute to future improvements although the emissions from new vehicles have not in practice fully delivered the predicted benefits. In addition, a reduction in air pollution even where levels are below the objectives will bring public health benefits. Air quality remains an important issue for some of the urban areas.

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

### Soil Quality

12 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'.

13 Due to the varied geology the plan area has a number of different soil types, including those summarised below[6] :

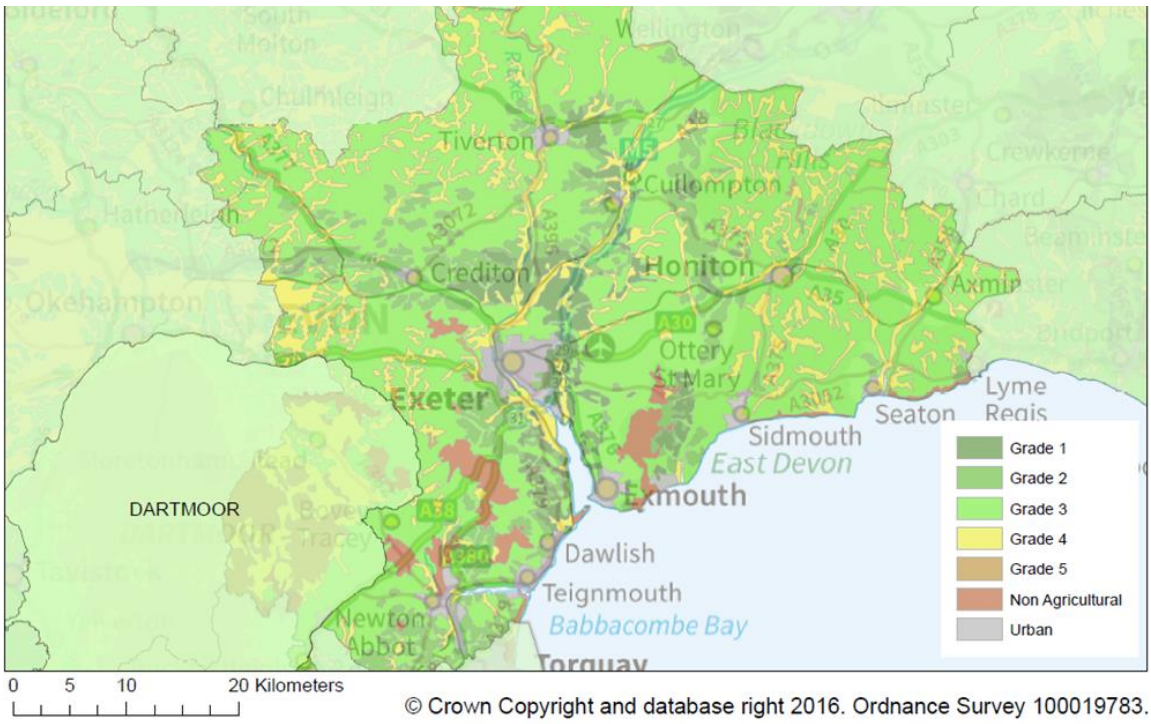
- East Devon: Slightly acid and clayey soils with impeded drainage, particularly concentrated on Woodbury Common; the soil type is ideal for woodland type habitats
- Exeter: Comprised mainly of freely draining and slightly acid loamy soils, the most common across Devon.
- Mid Devon: Contains a mix of freely draining slightly acid loamy soils, slowly permeable seasonally wet acid loamy and clayey soils and freely draining acid loamy soils over rock.
- Teignbridge: Freely draining slightly acid sandy soils are present on the coast adjacent to the River Exe and some inland areas of Teignbridge.

14 In broad terms, Grade 1 land is concentrated in or close to the Exe valley, with areas of Grade 2 land occurring in Teignbridge and in a belt across Mid Devon and in part of East Devon. Grade 4 land occurs around the fringes of Dartmoor and Exmoor. 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.

15 **Figure A3.1** displays the overall distribution of the varying grades of agricultural land across Greater Exeter.

[6] Soil Descriptions by Area of Devon, Soilscapes National Soil Resources Institute (2013)

**Figure A3.1: Distribution of agricultural land across Greater Exeter**




## Biodiversity

16 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[7]. Greater Exeter is home to an abundance of rare species (including dormice, otters, reptiles, bats and birds) and home to important habitat types (including woodland, meadows, hedges, heaths, ponds as well as varied coastline comprising rock pools, beaches, sand dunes and estuaries). Many sites and land areas are protected by national and EU legislation. The area sits within four terrestrial Natural Areas as defined by Natural England, which are South Devon, Devon Redlands, The Culm and the Blackdowns.

17 There are six Special Areas of Conservation in the GESP area, including: Beer Quarry and Caves (rare bats), Dawlish Warren (dunes), East Devon Pebblebed Heaths (lowland heathland), River Axe (supporting rare fish), Sidmouth to West Bay (sea cliffs) and South Hams (Greater Horseshoe Bats). Lyme Bay and Torbay (reefs and sea caves) is a currently a Site of Community Importance (but treated in planning as a Special Area of Conservation). There are also two Special Protection Areas, the Exe Estuary (also a Ramsar site and designated for waterbirds) and East Devon Pebblebeds (Dartford warbler and nightjar). There are a further eleven European Sites within 20kms of the area, such as the Culm Grasslands in North Devon.

18 There are 71 Sites of Special Scientific Interest (SSSIs) which are sites designated for wildlife and/or geological interest within the Greater Exeter area; 63% of which are in favourable condition and 19% in unfavourable recovering condition. The Government has set (in the Biodiversity 2020 report[8]) national targets for 50% of SSSI to be in favourable condition and 95% to be in favourable or unfavourable recovering condition by 2020. The distribution of designated sites within Greater Exeter is displayed overleaf in **Figure A3.2**.

19 There are approximately 732 non-statutory County Wildlife Sites (CWS) in the GESP area as well as many other County Geological Sites and Local Nature Reserves. The area also supports

[7] Ministry of Housing, Communities and Local Government (2019) NPPF - paragraph 174
[8] Defra (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem services

Ancient Woodlands and a wealth of UK Priority habitats (such as grazing marsh, lowland meadow, lowland heathland, hedgerows and coastal habitats). Ancient woodland is an irreplaceable natural resource that has remained constantly wooded since at least AD1600. There are approximately 564 ha of ancient woodland in and around the GESP area. The length of time ancient woodland takes to develop and evolve (centuries, even millennia), coupled with the vital links it creates between plants, animals and soils accentuate its irreplaceable status. The varied and unique habitats ancient woodland sites provide for many of the UK's most important and threatened fauna and flora species cannot be re-created. Approximately one quarter of priority UK Biodiversity Action Plan species are associated with woodland habitats. Forests, woods, and trees make a significant contribution to biodiversity, and ancient sites are recognised as being of particular value. Due to their longevity, ancient woodlands are more species rich, and are often refuges for specialist woodland species that struggle to colonise new areas[9].

20 European protected species found in this area include otter (widespread on rivers), dormice (widespread in woodlands, hedges and scrub), bats (widespread but it should be noted that the area supports Greater Horseshoes, Lesser Horseshoes, Barabastelle and Bechstein which are all Annex 1 species) and Great Crested Newts (the dispersed Devon population is concentrated in Teignbridge and East Devon). Nationally protected species include water voles (distribution restricted to a number of watercourses in East Devon), reptiles (widespread), Schedule 1 birds (including cirl buntings which occur in Teignbridge and East Devon) and a number of other species. The area also supports a large number of UK Priority / rare species including the only location in England (Chudleigh Knighton Heath) of a rare ant (Formica exsecta).

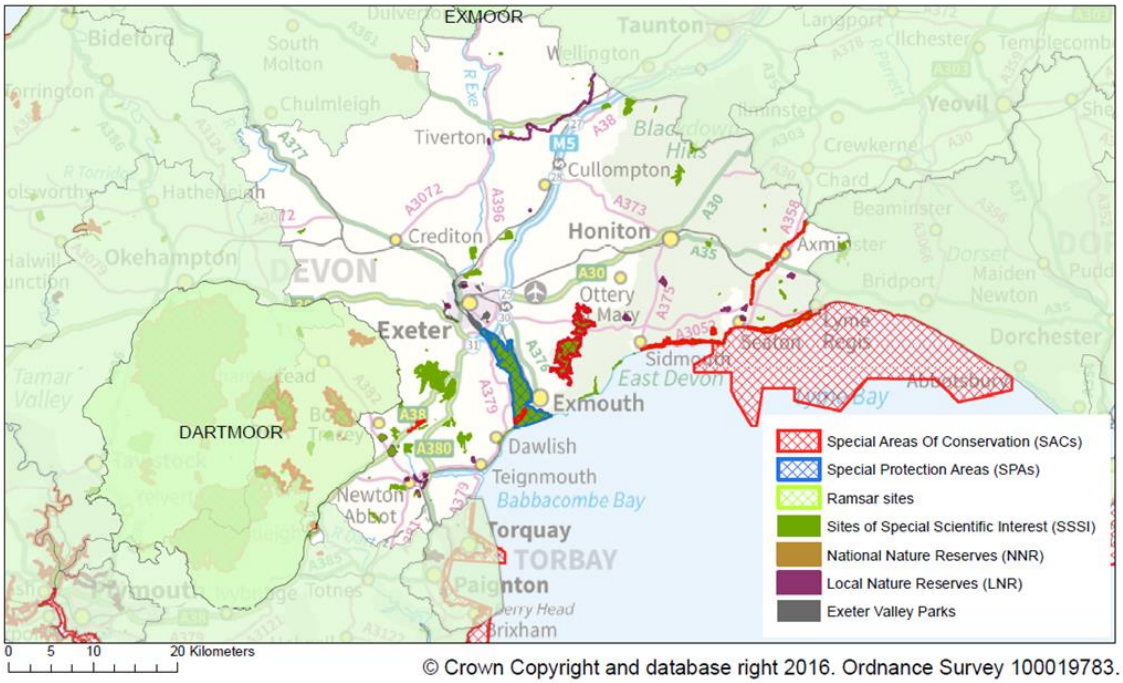
21 Vulnerability issues for habitats in the Greater Exeter include the following:

- 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.

22 Rebuilding Devon's Nature Map has identified opportunities where priority areas (river corridors and Strategic Nature Areas) are located in Devon for expanding wildlife habitats. However, opportunities also exist in and around development sites in all locations for wildlife enhancement.

[9] Devon State of the Environment Report (DLNP 2015); Natural England (https://designatedsites.naturalengland.org.uk/)

**Figure A3.2: Distribution of protected natural environment designations across Greater Exeter**




## Green Infrastructure

23 Green Infrastructure (GI) refers to the network of natural and semi-natural features within and around our villages, towns and cities. These features range in scale, from street trees, green roofs and private gardens through to parks, rivers, transport corridors and woodlands. At the larger scale, wetlands, forests and agricultural land are all captured by the term GI. This network can provide a vast array of benefits that support the health and wellbeing of communities.

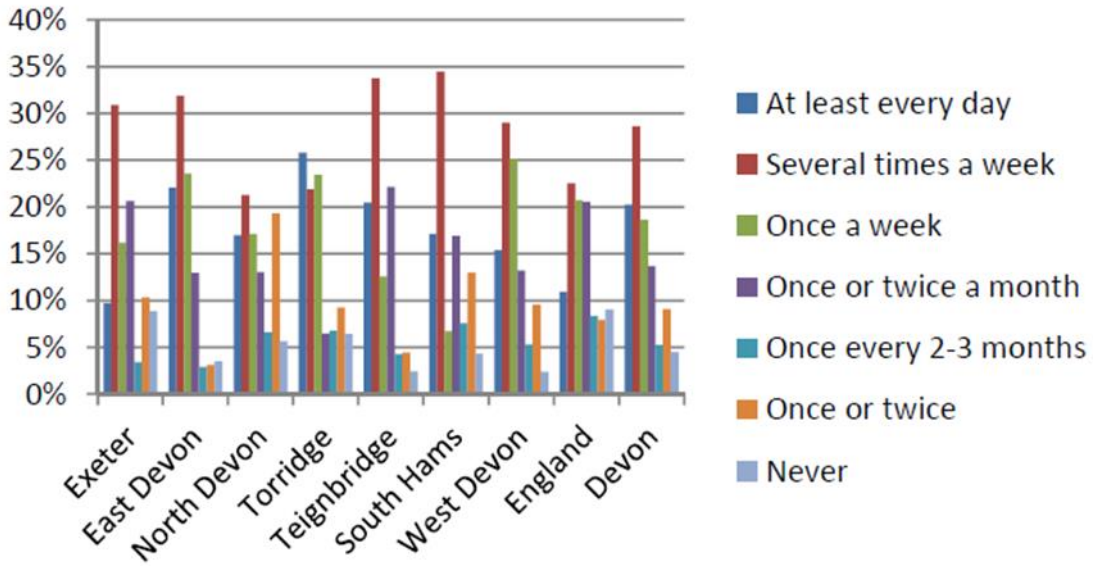
24 The Greater Exeter area exhibits a great wealth of natural green assets as measured by the diversity and value of wildlife, quality and character of the landscape. It also has a rich built and cultural heritage. The area's high quality natural environment is a major economic asset. It underpins the tourist economy and is a major factor in attracting and retaining employers. Prominent GI features in the area include the Exe and Teign Estuaries, the Haldon Hills and the Valley Parks of Exeter.

25 Green infrastructure is a holistic concept that interacts with many strands of the SA baseline data which follow, particularly sections on biodiversity, landscape and walking and cycling networks.

26 **Figure A3.3** shows that over 30% of residents in Exeter, East Devon and Teignbridge visit the natural environment several times a week. Less than 5% of residents in East Devon and Teignbridge never visit the natural environment while this is nearer to 10% in Exeter[10].

[10] Devon State of the Environment Report (DNLP, 2016)

**Figure A3.3: Frequency of visits to the natural environment by percentage of resident population (data for Mid Devon is unavailable due to small sample size) (Devon State of the Environment Report 2015)**




## Landscape

27 Exeter is surrounded by undeveloped hills that form a distinctive green backdrop to the City. 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.

28 In East Devon, the landscape varies quite dramatically east to west, with the west end area and closer to Exeter being characterised by mainly unsettled farmed valley floors, gently undulating lowland plains and lower rolling farmed and settled slopes. Locally distinctive landscapes within this area include some small wooded ridges and hilltops associated with the National Trust Killerton Estate, and a distinct area of Pebblebed Heaths in the centre of the District. The coast and countryside in the eastern side of the district by comparison includes cliffs, coastal slopes and combes, steep wooded scarp slopes and upper farmed and wooded slopes. The scenic and special qualities of the landscape here are protected through national and international designations including the East Devon and Dorset Coast World Heritage Site, the Blackdown Hills Area of Outstanding Natural Beauty (AONB) and the East Devon AONB. Such designations cover 66% of the district.

29 The Blackdown Hills AONB management plan 2019-2024, which sets out the policy framework for the conservation and enhancement of the AONB, was adopted by local authorities in spring 2019[11]. Key concepts within the plan include sustainable development and the potential for incorporating natural capital and an ecosystem approach to management of the AONB. The East Devon AONB Partnership Plan (formerly the 'East Devon Management Plan') for 2019-2024,[12] which also sets out to conserve and enhance the natural beauty of the East Devon landscape, was adopted in January 2019. In both cases, there is also an emphasis on increasing the amount of SSSIs in 'favourable condition' in within the AONBs, improving the level of community

[11] https://blackdownhillsaonb.org.uk/wp-content/uploads/2019/06/bhaonb_management_plan_2019-
[12] https://www.eastdevonaonb.org.uk/wp-content/uploads/2020/02/AONB-Partnership-plan_lowres_final.pdf

engagement in the management of the AONBs and improving the water quality of rivers that pass through the area.

30 The landscapes within Teignbridge are varied and diverse with many distinct and recognisable areas. This includes the Haldon Ridge and Foothills with its steep wooded slopes, forested plateau and upper farmed and wooded valley slopes, the Teign Estuary with its surrounding coastal slopes and combes, and the Bovey Basin with its lowland plains and farmed valley floors much modified by past and current mineral and waste development. The central part of the district has more gentle landscape features comprising rolling farmland and settled valley floors and slopes. The wooded ridges and hilltops in the south-west of the area provide the setting for Dartmoor National Park, its mass rising on western skylines beyond the planning area of Teignbridge. Sections of coast are valued for their undeveloped character, including areas around the Exe Estuary, the Teign Estuary and between Dawlish and Teignmouth. The scenic quality and distinctive rural character of much of the eastern half of Teignbridge is locally valued and protected through Local Plan designation of Area of Great Landscape Value.

31 Unlike the other authorities within the Greater Exeter area, Mid Devon is landlocked with no coastal landscape. There are however a wide network of watercourses and distinct valley landscapes including the Exe, Culm and Yeo Valleys, with often sparsely settled farmed valley floors cocooned by river valley slopes and combes in upper reaches. Reference to the latest dark skies data published by CPRE indicates that many areas in the north and west of the district offer dark night skies, including the area in the far north that is within the setting of Exmoor National Park. These areas are deeply rural and tranquil with a strong sense of place. More gently undulating lowland plains occur in a wide belt stretching from the east of Tiverton, along the M5 corridor and east of Cullompton. Another distinct area of lowland plain stretches to the east and west of Crediton. Elsewhere, lower rolling farmed and settled valley slopes, and upper farmed and wooded valley slopes are common in the area. Less frequently occurring landscape types include secluded valleys found in the central northern belt, wooded hilltops and ridges on the northern and southern fringes, steep wooded scarp slopes of the Blackdown Hills AONB in the far east of the District and larger patches of inland elevated undulating land dissected by sparsely settled farmed valley floors in the south- western corner. The latter provides the setting to Dartmoor National Park beyond.

32 The planning system gives great weight to conservation of important landscapes such as these in order to preserve the scenic beauty of the region. The GESP area excludes Dartmoor and Exmoor National Park but includes both the Blackdown Hills and East Devon AONBs that cover over 53,000 hectares, which equates to about 24% of the GESP area. Landscape impacts on any of the above designated areas will need to be considered.

### Coast

33 An impressive coastline extends across the southern boundary of the Greater Exeter area. This dominant landscape feature is of fundamental importance to the history, economy and culture of Devon. The dramatic sea cliffs and slopes of East Devon are a widely appreciated natural asset in the area. The coastline provides residents and visitors with opportunities for work in tourism and maritime industries as well as recreational opportunities and an exceptionally attractive place to play and relax.

34 The coast of the study area has varied and interesting geology and a diverse coastal topography has resulted from the erosive ability of wave energy and climatic conditions more generally. International recognition, on account of geological interest and importance, comes from inscription of the Dorset and East Devon Coast on the World Heritage Site list (outstanding universal value considerations – see UNESCO).

35 In addition to the underlying characteristics of the land an outstanding patchwork of flora and fauna exist along the coastline of East Devon and Teignbridge. Habitats include saltmarsh, dunes, cliffs and scree and intertidal estuaries. There is also a rich marine biodiversity beyond the coastline.

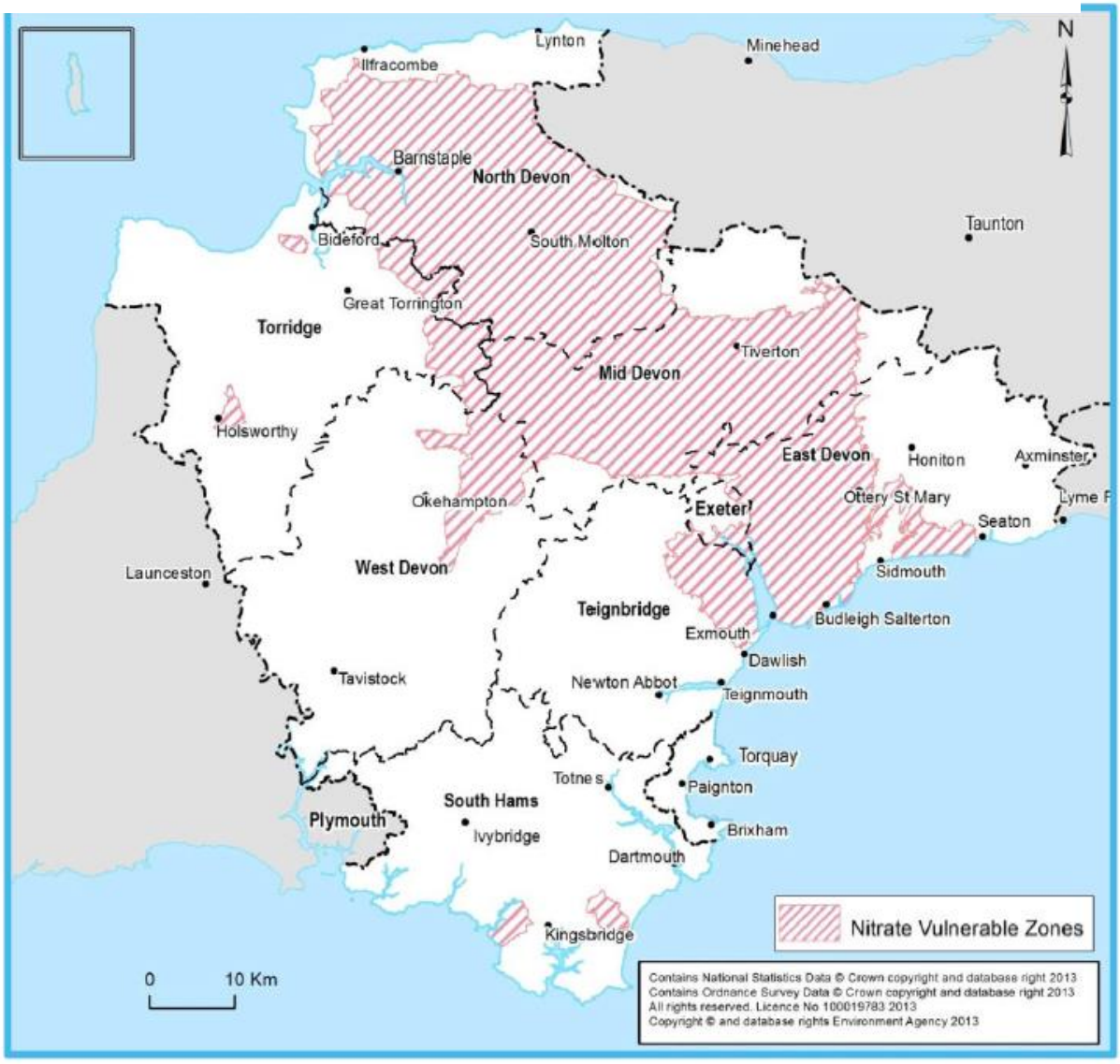
36 The coast is well used by local residents and visitors alike. The relatively high density of recreational and commercial activity (more so to the west than the east) means that this narrow

strip of land is highly vulnerable to damage and degradation. The coast is an asset that is widely used and enjoyed and requires a co-ordinated approach to its management and protection to ensure it retains its environmental value and visitor appeal and for it to remain vibrant and prosperous. The many players in coastal management within this area include national government, government agencies, the Crown, Duchy of Cornwall, commercial interests including ports, fishing (commercial and recreational) and tourism, large and small landowners, local authorities, influential charities such as the National Trust, RSPB and Devon Wildlife Trust, chambers of commerce, community based groups, research and academic institutions including schools and many more.

### Water Quality

37 The main reasons for poor groundwater chemical status are high or rising nitrate concentrations, with some failures for pesticides and other chemicals. Large parts of the Greater Exeter area 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 A3.4** displays nitrate vulnerable zones within Greater Exeter.

**Figure A3.4: Nitrate Vulnerable Zones (State of the Environment Report 2015)**




38 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 rivers in the plan area are the Exe, Otter, Axe, Teign, Creedy and Culm. The largest is the River Exe, flowing 80km from Exmoor, through Tiverton and Exeter and reaching the sea at Exmouth. Adequate quantity, quality and timing of water flows is required to sustain ecosystems and the valuable clean water they provide.

39 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). The ecological status or potential for surface freshwaters, estuaries and coastal water bodies varies across Greater Exeter. In the most part, surface water quality is moderate to good across the plan area, with a small incidence of poor quality affecting the central and eastern part of the plan area and, most notably, 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.

40 Groundwater quality varies across Devon. The majority of the county has poor chemical status with pockets of good status for instance around the Yarty and Axe in East Devon. Generally in the plan area 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. Surface water sources therefore provide the majority of the supply from reservoirs and river intakes. The most significant reservoirs for supply of drinking water are Wimbleball for Exeter and East Devon and Roadford for southern parts of the county. Drinking Water Safeguard Zones have been designated where the land use is causing pollution of the raw water. This affects the River Exe catchment between Exeter and Oakfordbridge which is at risk from pesticides. Groundwater bodies that fall into this category are near Kenton and between Ottery St Mary and Otterton[13]. Human health is not at risk from these sources because SWW provide extra treatment.

### Flood Risk

41 Some areas within Greater Exeter are at risk from both fluvial (river), pluvial (surface water) and coastal (tidal) flooding. Development within these areas also has the potential to exacerbate flooding elsewhere. The greatest risk of fluvial flooding comes from the River Exe and its tributaries. However, other main rivers and ordinary watercourses across Greater Exeter also present a risk of flooding including the River Otter, River Sid, River Axe, River Creedy, River Culm, and River Teign.

42 Within the plan area, Exeter, Exmouth, Sidmouth and Teignmouth have the highest numbers of properties at risk from surface water flooding. Many other localised areas across the Districts are also at high risk, often associated with minor watercourses through urbanised areas.

43 The Exe Estuary Strategy (Managing Flood and Coastal Erosion Risk for the Exe Estuary, Environment Agency 2014) concluded that it would be necessary to defend most of the developed coastline, although some of the defences might need to be moved or altered over time.

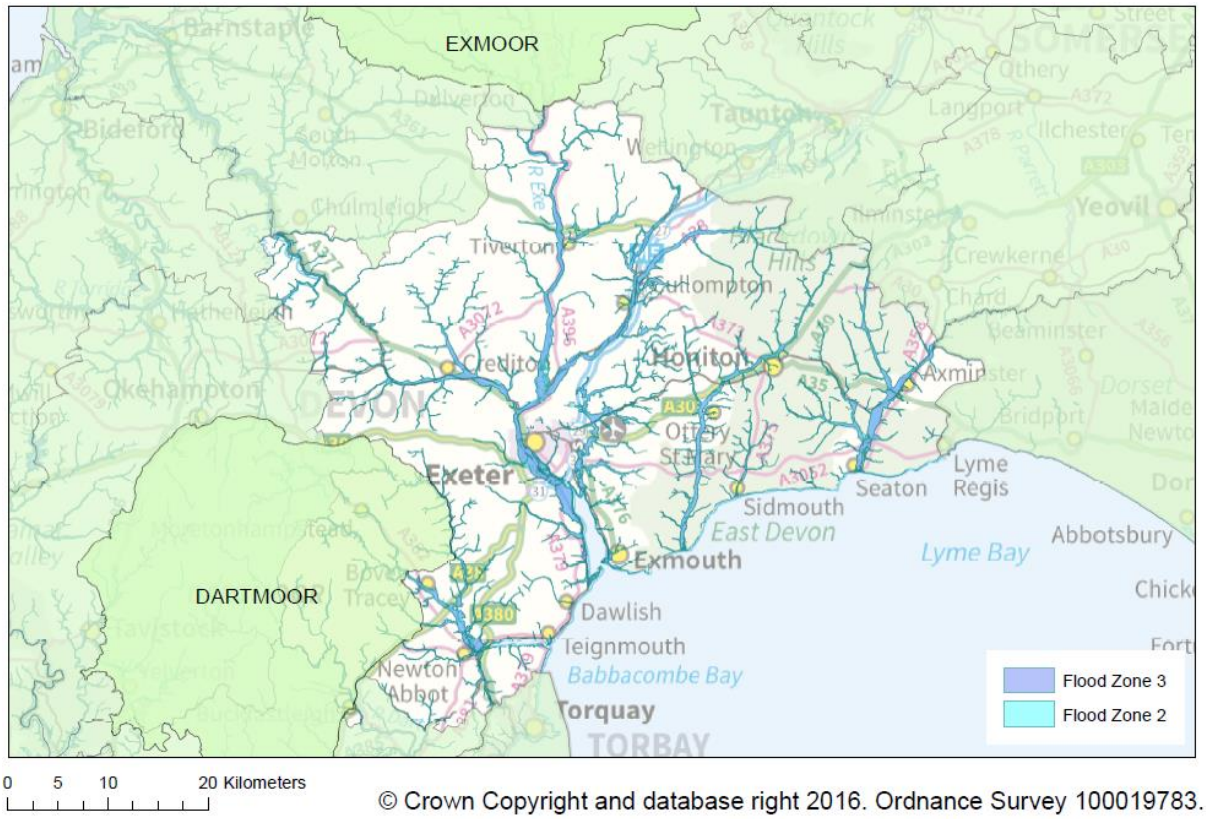
44 The extent of the flood risk zones are shown in **Figure A3.5**[14]. This shows all areas within flood zone 2 or flood zone 3[15].

[13] Environment Agency . Available at: http://maps.environmentagency.gov.uk/wiyby/wiybyController?topic=drinkingwater&layerGroups=default&lang=_e&ep=map&scale=5&x=292304.45833333314&y=102695.04166666593#x=257002&y=98693&lg=3,&scale=3.

[14] Flood Zone Maps (Environment Agency)

[15] Preliminary Flood Risk Assessment Report (DCC, 2011); Climate Change information for Local Flood Risk Management Strategies – South West River Basin District Map. (EA, DEFRA & Local Government Association, 2011); Managing flood and coastal erosion risk for the Exe Estuary (Environment Agency, May 2014); River Basin Management Plan (Env Agency, 2015); Devon Local Flood Risk Management Strategy – 2014-2020 (DCC, June 2014)

**Figure A3.5: Distribution of Flood Zone 2 and Flood Zone 3 within Greater Exeter**




45 The Environment Agency has produced climate change allowances to support the NPPF. This includes advice on peak river flow by river basin district. **Table A3.1** shows the Environment Agency's[16] predicted peak river flow allowances for the South West River Basin, which is of relevance in terms of both flood risk assessments and strategic flood risk assessments. These predictions are to be made use of with consideration for the flood zone and the appropriate flood risk vulnerability classification to decide which allowances applies to certain types of development or plans.

**Table A3.1: Peak river flow allowances by river basin district (using 1961 to 1990 baseline)**

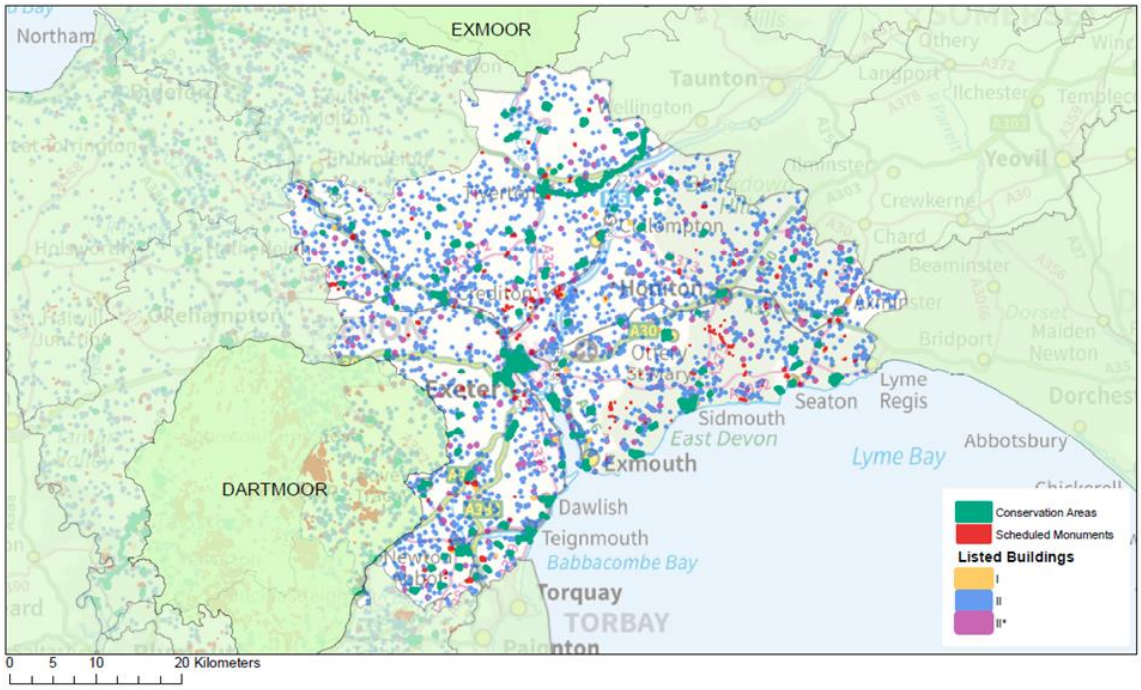
| River basin district | Allowance category | Total potential change anticipated for the '2020s' (2015 to 2039) | Total potential change anticipated for the '2050s' (2040 to 2069) | Total potential change anticipated for the '2080s' (2070 to 2115) |
|---|---|---|---|---|
| South West | Upper end (90th percentile) | 25% | 40% | 85% |
| | Higher central (70th percentile) | 20% | 30% | 40% |
| | Central (50th percentile) | 10% | 20% | 30% |

[16] Environment Agency (February 2017) *Flood risk assessments: climate change allowances* Online at: https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances

### Historic Environment

46 There are over 8,000 Listed Buildings or structures in the Greater Exeter area; over 3,000 in East Devon, over 2,500 in Mid-Devon, over 1,000 in Teignbridge and over 1,800 in Exeter. The Greater Exeter Study Area contains a high proportion of the Listed Buildings designated in Devon. 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. The area's Listed Buildings and structures are largely concentrated in historic city, district and local centres but are widely distributed throughout both urban and rural areas and make a very significant contribution to the quality of streetscape and countryside. Listed buildings often have associated curtilage buildings or settings and designed landscapes and views[17]. The distribution of designated heritage assets within Greater Exeter is displayed below in **Figure A3.6**.

**Figure A3.6: Distribution of historic environment designations across Greater Exeter**

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47 Apart from the statutorily listed buildings in the area it is also important to understand the historic and architectural significance of the hundreds of un-designated historic buildings that are recorded on the Devon County Historic Environment Record or on formal or informal local lists maintained by the local planning authorities. To date only Mid Devon has formally adopted a local list in accordance with procedures set out national guidelines. This list identifies 169 heritage assets[18]. A consultation on the East Devon Draft Local List Guide ran from February 2019 to 19th March 2019[19]. At present, there is a total of 153 Conservation Areas in the Greater Exeter area (41 in East Devon, 51 in Mid-Devon, 40 in Teignbridge and 21 in Exeter). A conservation area is an area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance. The main attributes that define the special character of an area are its physical appearance and history, i.e. the form and features of buildings and the spaces between them, their former uses and historical development. In similarity to the location of Listed Buildings, Conservation Areas are largely situated in and around central urban areas and the historic cores of village settlements comprising a patchwork of positive heritage assets. The

[17] Historic Environment Records (HER; Exeter Urban Database; Historic England's National Heritage List of Designated Assets
[18] https://www.middevon.gov.uk/media/114799/register_of_heritage_assets_jan_15.pdf
[19] https://democracy.eastdevon.gov.uk/documents/s1163/Item%2007%20Local%20list%20guide.pdf

majority of Conservation Areas in the sub-region have been established over the past 10-30 years. The local planning authorities in the Greater Exeter Area all identify the conservations areas designated within their District but there is notable variation in the level of information available regarding approved conservation area appraisals and management plans; Exeter provides appraisals and management plans for all 20 of its conservation areas, Teignbridge has appraisals for all, and management plans for the highest priority designations., East Devon offers 29 appraisals and 4 management plans, and Mid Devon has 17 appraisals and 12 management plans. 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.

48 A Registered Historic Park and Garden is a designed landscape considered to be of national importance and included on the national Register. There are 22 Registered Historic Parks and Gardens in the Greater Exeter area (8 in East Devon, 2 in Exeter, 3 in Mid Devon and 9 in Teignbridge). This represents roughly half the total in Devon. These include designed urban landscapes such as civic parks and cemeteries and the often extensive landscaped gardens and parkland of grand rural houses. The Devon Gardens Trust has also compiled a Devon Gazetteer of Historic Parks & Gardens to be considered for inclusion in the national Register. The gazetteer contains 87 designed landscapes (24 in East Devon, 23 in Exeter, 18 in Mid Devon and 22 in Teignbridge).

49 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 208 Scheduled Monuments (SAMs) in Greater Exeter. By far the biggest contribution to this figure comes from East Devon where there is a total of 112 SMs followed by 49 in Mid Devon and 28 in Teignbridge. Exeter has only 19 SAMs. However, many 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. The Greater Exeter area contains only one nationally designated Protected Wreck, the Church Rocks Wreck, which lies in shallow water off Teignmouth.

50 In addition to the designated sites listed above, there are a significant number of heritage assets across Greater Exeter which do not benefit from statutory protection. These are archaeological sites and buildings of historic interest that are recorded on the Devon County Historic Environment Record (HER) and/or on local lists maintained by the local planning authorities. There are 33,487 non-designated heritage assets in the Greater Exeter area (15,923 in East Devon, 2,307 in Exeter, 8,444 in Mid Devon and 6,813 in Teignbridge). These assets may range in date from Palaeolithic hand axes of up to a quarter of a million years ago, right up to Cold War defensive structures of the later 20th century. They range in scale from find spots of single Roman coins, to extensive well-preserved examples of medieval field systems. Some of these heritage assets may be of equivalent significance to designated assets but have not yet been Listed, Registered or Scheduled. Others may be of regional, county or more local significance.

51 Historic landscape character mapping has been produced for the Greater Exeter area. This identifies the contribution that different historical eras have made to the evolution of the landscape that we see today. This influence is best considered alongside wider Landscape interest. However, the Greater Exeter area includes discrete areas of particular historic landscape significance, such as intact medieval field systems, later reclamation landscapes and historic parkland that warrant particular consideration. The Greater Exeter area formerly had much more extensive historic landscape features such as field boundaries, orchards and water meadows, which should be considered alongside planning for enhancement of the natural environment, green infrastructure provision and sustainable water management.

52 Collectively, Heritage Assets are a vitally important component of the environment and local distinctiveness across the plan area. These assets are highly valued and their conservation or development is guided by NPPF and appropriate planning policies in each local authority area. In addition to commemorating cultural history the historic environment plays an important role in attracting tourism and investment to Greater Exeter. There are potentially very significant synergies to be developed between heritage assets and access to and enjoyment of the wider environment. In particular heritage assets can also be green infrastructure assets and should also be considered alongside 'green play', health and wellbeing, and environmental education strategies.

### Brownfield Land

53 Brownfield land (also referred to as Previously Developed Land) is land that has previously been built-on or developed and which frequently will be in a despoiled state. The supply of brownfield land assessed as being suitable for redevelopment is shown in the following table. The 83ha identified as being potentially suitable for redevelopment still makes up a relatively small proportion of overall potential land supply. **Table A3.2** summarises the distribution of brownfield land across the four districts within Greater Exeter.

**Table A3.2: Brownfield Land in Greater Exeter (LPA Pilot Registers 2016[20])**

| | East Devon | Exeter | Mid Devon | Teignbridge | Greater Exeter Total |
|---|---|---|---|---|---|
| Number of Sites on Register | 30 | 28 | 14 | 38 | 110 |
| Total Area of Sites (ha) | 26 | 19 | 10.8 | 64.8 | 120.6 |

54 Greater Exeter has not seen the scales of past development and industrial activity that characterises some of the major urban areas of the United Kingdom and as a consequence it does not have the widespread legacy of underused brownfield land that exists in some areas. There are some exceptions, including localised concentrations and also smaller brownfield sites across the plan area. The legacy of past industrial and commercial activity, leaving behind brownfield land, is most significant in respect of:

- Past mineral working sites: the greatest concentration being Ball Clay extraction sites north of Newton Abbot. However, many working minerals sites will have associated restorations plans in place;
- In some older parts of urban areas: e.g. in Exeter City around and north of St Davids station;
- Major infrastructure developments: such as currently non-operational land at Dunkeswell and Smeatharpe airfields (East Devon).

55 There are, as well, many smaller areas of brownfield land, dotted across the plan area where businesses or past activities have ceased to operate or otherwise land has been left in a despoiled state. In villages and rural areas, however, the presence and frequently the negatives associated with brownfield land, diminish in number and scale.

56 Relatively high land values in the plan area mean that brownfield land, where suitable for redevelopment, will often be brought back into productive use quite quickly. However, where not suitably located for redevelopment or there are expensive reclamation costs or other constraints such as complex patterns of multiple land ownership brownfield land can remain untouched for

[20] https://www.teignbridge.gov.uk/planning/local-plans-and-policy/brownfield-register/; https://www.middevon.gov.uk/residents/planning-policy/brownfield-land-register/; https://eastdevon.gov.uk/media/3437869/2019eddcbrownfieldlandregisterfinalpdfweb.pdf; https://exeter.gov.uk/planning-services/registers/brownfield-land-register/;

many years. It can also be the case that it may not suit an owner's interest to seek a new use for their brownfield land.

57 The Greater Exeter planning authorities have pilot registers of brownfield sites that are seen as suitable for redevelopment. Details of site numbers and areas on the registers are set out below, data was correct at October 2016.

58 It is stressed that Brownfield Registers are not and do not seek to be a definitive record of all Brownfield land in the plan area. An actual record of all brownfield sites does not exit and it would be an enormously long exercise to seek to identify and map out every area of brownfield land. If such an exercise were undertake it would record vastly more brownfield land than the table shows.

59 The registers do, however, give an overview of development potential of land by District and plan area. The registers indicate a range, albeit it is not huge, of sites that could come forward for residential development with most by number and area being in Mid Devon though East Devon and Teignbridge levels are not far behind. It should be noted that differing recorded levels might reflect, to some degree, differing approaches to register completion rather than absolute comparative numbers and areas of brownfield land.

### Land Contamination

60 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 inspection. Known former land uses that have potential to cause contamination include: gasworks, slaughterhouses, brickworks, foundaries, railway land, landfill sites, tanneries, MOD land, sewage treatment plants, petrol filling stations and timber treatment yards.

61 During a ten year period from 2001, in East Devon, over 700 potentially contaminated sites were listed on the basis of their former uses. However over the same timescale no sites were determined as 'contaminated land', although several are subject to ongoing investigation and works by landowners. Two of the council's (Exeter and East Devon) priorities are to encourage voluntary remediation and promote the re-use of brownfield land, using the Local Plan, planning process and regeneration proposals[21].

62 In Teignbridge, parts of the district are underlain by geology which may contain significant concentrations of naturally occurring contamination, such as arsenic and lead. There are no entries in the formal register of contaminated land but there are a number of sites that are probably polluted.

63 Data relating to contaminated land in Mid Devon is not currently available. Statutory guidance is clear that normal levels of contaminants in soil should not be considered to cause land to qualify as contaminated land, unless there is a particular reason to consider otherwise

### Minerals and Resources

64 There are four main groups of minerals worked in the county/plan area[22].

#### *Nationally Important Industrial Minerals*

65 One important industrial mineral found in the plan area is ball clay within the Bovey Basin in south Devon. It provides an important resource for the international ceramics industry, pharmaceuticals and fertilisers. 84% of Britain's ball clay is exported. Ball clay deposits in the Bovey Basin of Teignbridge contain the most important UK source of deposits and accounted for 50% of UK production in 2008.

[21] Contaminated Land Strategy 2014 (ECC); Contaminated Land Strategy 2019 (EDCC)
[22] Devon Minerals Plan, 2016

*Aggregates*

66 The plan area is well served by aggregate quarries with a spread of operational ones in East Devon, Mid Devon and Teignbridge as shown below. At the end of 2015, Devon had crushed rock reserves of 115 million tonnes, giving a land bank of 49 years. Sand and gravel reserves amounted to 7 million tonnes with a land bank of 12.5 years.

67 The Devon Minerals Plan (2016) emphasizes that the Budleigh Salterton Pebble Beds will remain the main source of sand and gravel due to the high quality and versatility of the resource in comparison to alternatives. Two new areas have been proposed at Straitgate Farm, Ottery St Mary and West of Penslade Cross, Uffculme for sand and gravel supply.

*Building Stone*

68 Only a small proportion of the wide range of stone quarries used in Devon are now being worked. There were nine active building stone quarries in the county (at 2015) with only two in the greater Exeter area at Westleigh, Burlescombe (Mid Devon) and Stoneycombe, Kingskerswell (Teignbridge) both for limestone.

69 Planning permissions have been granted at Dunscombe Manor and Beer Quarry in East Devon for recommencement of working for building stone in connection with maintenance of Exeter Cathedral, but neither has yet been implemented. Devon Minerals Plan (Proposed Adoption Version) (Policy M15) will encourage the reopening or development of building stone quarries for small-scale extraction. These are likely to be in rural locations, 'small-scale' is regarded as annual production of up to 10,000 tonnes.

*Other Minerals*

70 There are a range of other mineral extracted and used in the plan area, including chalk and clay for use in the manufacture of bricks and pottery and there is limited potential for extraction and use of energy minerals.

71 Chalk – The outcrop of chalk within the county is limited to the eastern part of the Greater Exeter area, falling within East Devon and Blackdown Hills AONB.

72 Marine aggregates – marine dredged materials make only a minor contribution in Devon which is significantly different from the wider country where these form an important element of aggregates supply. Small quantities are taken from the Bristol Channel for locations in North Devon outside the plan area.

73 The distribution of minerals throughout the Greater Exeter area is displayed in **Figure A3.7** and quarries and their locations are summarised in **Table A3.3**.

**Figure A3.7: Distribution of mineral deposits across Greater Exeter**

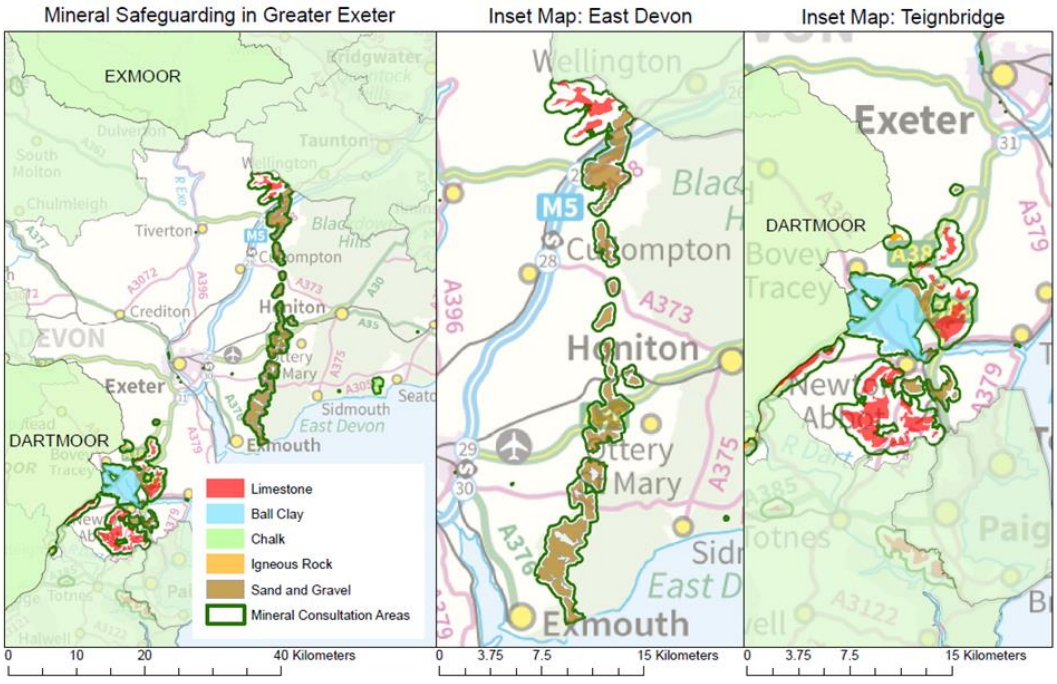


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**Table A3.3: Devon Local Aggregate Assessment 2006-2015 (DCC, Aug. 2016)**

| Ref No | Quarry | District | Mineral |
|---|---|---|---|
| 2 | Babcombe Copse | Teignbridge | Sand & Gravel |
| 4 | Blackhill | East Devon | Sand & Gravel |
| 8 | Linhay Hill | Teignbridge | Limestone |
| 11 | Rockbeare Hill | East Devon | Sand & Gravel |
| 12 | Stoneycombe | Teignbridge | Limestone |
| 13 | Town Farm | Mid Devon | Sand & Gravel |
| 14 | Venn Ottery | East Devon | Sand & Gravel |
| 16 | Westleigh | Mid Devon | Limestone |
| 17 | Whitecleaves | Teignbridge | Dolerite |
| 18 | Zig Zag | Teignbridge | Sand & Gravel |

## Climate Change

74 Climate change is the effect of direct and indirect human activity "that alters the composition of the global atmosphere and which is in addition to natural climate variability observed over comparable time periods"[23]. United Nations Framework Convention on Climate Change (UNFCCC) (Article 1:2, p.7). The potential impacts and implications of climate change may include more extreme weather events, flooding, coastal erosion and loss of species and habitats through a combination of the temperature and sea level rise projected.

75 The provision of renewable energy is an important element of addressing climate change in the Greater Exeter area. Solar power represents the largest contributor to non-domestic renewable energy generation in the Greater Exeter Area. Mid Devon currently has a higher percentage of domestic heat met from renewable heat generation and higher percentage electricity met from renewable electricity generation than other authorities in Greater Exeter. There are major disparities in the distribution of commercial renewable energy production schemes in the area

[23] United Nations Framework Convention on Climate Change (UNFCCC) (Article 1:2, p.7)

with many schemes located alongside major transport corridors such as the M5 Motorway and very few within protected areas.

76 The many highly valued and protected landscapes of the Greater Exeter area act as constraints to the installation of large-scale energy infrastructure, such as wind turbines or ground-mounted solar panels.

77 Reducing $CO_2$ emissions in the atmosphere is a national target to reduce climatic impact. This is driven by the Climate Change Act (2008), which sets a legally binding target of at least a 34% reduction in UK emissions by 2020 and at least an 80% reduction by 2050, against a 1990 baseline. In June 2019, the UK set a new target of net-zero greenhouse emissions by 2050. The table below shows per capita $CO_2$ emissions for the plan area by district covering the period from 2005 to 2014. Emissions for the Greater Exeter area have clearly reduced over the period from 2005 to 2014. However, individual districts are marginally higher than national and regional levels (at 2014) with the exception of Exeter, showing the largest reduction between 2005 and 2014 of 3.3 tonnes $CO_2$ per person.

78 The $CO_2$ emission per capita across the UK and districts in Greater Exeter between 2005 and 2014 is summarised in **Table A3.4** In 2014 (the latest reporting period), per capita emissions for plan area (city/district average) stood at 6.2 tonnes $CO_2$ per person compared to 6.0 tonnes nationally, 5.8 tonnes regionally and 6.3 tonnes at the county level. At the national level, the main drivers of the decrease in emissions in 2014 were a decrease in the use of coal for electricity generation and a reduction in the use of natural gas for space heating, which may have off-set the lengthening commuting patterns seen in the GESP area.

**Table A3.4: $CO_2$ emissions per capita 2005-2014 (tonnes $CO_2$ per person) (DECC)[24]**

| Area | 2005 per capita emissions ($tCO^2$) | 2010 per capita emissions ($tCO^2$) | 2014 per capita emissions ($tCO^2$) |
|---|---|---|---|
| East Devon | 7.7 | 7.0 | 6.1 |
| Exeter | 7.6 | 5.4 | 4.3 |
| Mid Devon | 10.3 | 8.8 | 7.7 |
| Teignbridge | 8.2 | 7.5 | 6.6 |
| Greater Exeter | 8.5 | 7.2 | 6.2 |
| Devon | 8.5 | 7.4 | 6.3 |
| South West | 8.2 | 7.0 | 5.8 |
| England | 8.5 | 7.3 | 6.0 |
| UK | 8.8 | 7.5 | 6.3 |

### Waste

79 Devon's households (373,000 tonnes in 2012/13) and businesses (455,000 tonnes in 2009) 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 in 2010). There has been a strong shift away from land filling of this waste towards recycling and energy recovery, with households now recycling around 55% of their waste (2012/13).

80 The Exeter Energy from Waste Facility at Marsh Barton received its first consignment of waste in April 2014. It will treat up to 60,000 tonnes of residual, non-recyclable waste from households across Exeter, East Devon and Teignbridge.

81 It is predicted that household and business waste will grow over the period to 2031. Recycling is expected to increase beyond present levels, and there is adequate existing capacity available for the sorting, bulking, composting and recycling of this waste.

82 The Devon Waste Plan identifies Exeter, Newton Abbot and Barnstaple as the foci for strategic waste development in terms of waste management facilities. (Policy W3 refers) This means strategic recycling, recovery and disposal capacity will be located in these centres.

[24] UK local authority and regional carbon dioxide emissions national statistics 2005-2014, DECC, June 2016

83 Recycling rates of household waste in Devon have seen great improvement since 2004/5, including the Greater Exeter plan area, as shown in **Table A3.5**. Slight reductions between 2011/12 and 2014/15 are attributed to reduced budgets for householder education and a significant reduction in paper waste as a consequence of digital media[25]. A reduction in the rate in Exeter in 2018/19 compared to 2017/18 can be attributed to an increase in the amount of material rejected from the Exeter Material Recycling Facility due to changing market conditions and operational reasons.

**Table A3.5: Historical Recycling Rates (%) in Plan Area/Devon – Devon County Council, (2013); Local Authority Collected Waste Statistics – Local Authority Data**

| Area | 2004/2005 | 2011/2012 | 2014/2015 | 2017/18 | 2018/19 |
|---|---|---|---|---|---|
| East Devon | 16.4 | 48.5 | 46.3 | 54.2 | 59.1 |
| Exeter | 20.7 | 36.2 | 33.8 | 30.8 | 27.1 |
| Mid Devon | 17.8 | 49.2 | 48.2 | 51.8 | 53.5 |
| Teignbridge | 26.9 | 57.3 | 53.7 | 55.4 | 56.3 |
| Devon | 32.7 | 55.3 | 55.4 | 54 | 56 |

### Amenity/light Pollution

*East Devon*

84 The latest light pollution map for the East Devon District shows that it is the 28th darkest District out of 326 within England. The majority of the District is comprised of areas in the two darkest light categories (35.7% in 0.25-0.5 Nanowatts/cm$^2$/sr and 36.5% in <0.25 Nanowatts/cm$^2$/sr). There are higher levels of light pollution within the District around the settlements of Honiton and Axminster (8-16 Nanowatts/cm$^2$/sr) as well as in the area around Exeter International Airport to the west of Exeter City (16-32 Nanowatts/cm$^2$/sr).

*Exeter*

85 The latest light pollution map for Exeter City show that it has greater levels of light pollution than other Districts within the GESP 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 (21.1% in 16-32 Nanowatts/cm$^2$/sr and 29.1% in 8-16 Nanowatts/cm$^2$/sr) and 9.5% of the District is within the brightest light category (>32 Nanowatts/cm$^2$/sr). The darkest area of the District is located in the north beyond the extent of Exeter City where there are areas of land in the 3rd and 2nd darkest light categories (0.5-1 Nanowatts/cm$^2$/sr and 0.25-0.5 Nanowatts/cm$^2$/sr).

*Mid-Devon*

86 The most recent light pollution map for the Mid-Devon District shows that it has lower levels of light pollution than the other Districts within the GESP and is the 10th darkest District out of 326 within England. The highest levels of light pollution in the District are located at the settlements of Tiverton and Cullompton, where there are area of land in the 2nd and 3rd brightest light categories (16-32 Nanowatts/cm$^2$/sr and 8-16 Nanowatts/cm$^2$/sr). However, the vast majority of the District is comprised of land in the darkest and 2nd darkest light categories (60.9% in <0.25 Nanowatts/cm$^2$/sr and 27.4% in 0.25-0.5 Nanowatts/cm$^2$/sr).

*Teignbridge*

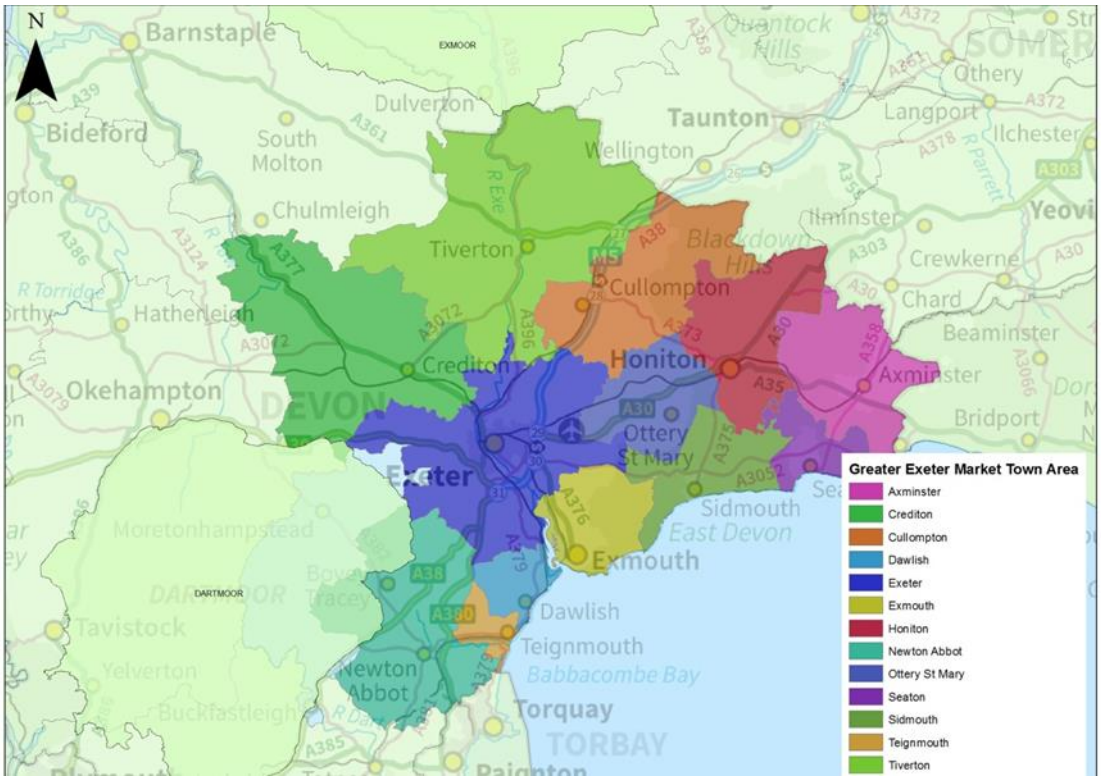
87 The latest light pollution map for the Teignbridge District shows that it is the 40th darkest District out of 326 within England. The majority of the District is comprised of land in the darkest and 2nd darkest light categories (43.2% in 0.25-0.5 Nanowatts/cm$^2$/sr and 27.8% in <0.25 Nanowatts/cm$^2$/sr. The greatest levels of light pollution in the District are located at Newton Abbot and the surrounding settlements to the north and east where there are areas of land in the 2nd and 3rd brightest light categories (16-32 Nanowatts/cm$^2$/sr and 8-16 Nanowatts/cm$^2$/sr).

## Social Baseline Information

[25] Devon Waste Plan 2014 (DCC); Devon Waste & Resource Management Strategy Review & DEFRA (2015) Local Authority Collected Waste Statistics – Local Authority Data

88 The only city within Greater Exeter is Exeter itself. The city acts as the region's main employment and economic centre and sees residents from all across the area commute in for work and leisure such as shopping. The largest towns in Greater Exeter include Exmouth, Newton Abbot and Tiverton. The Greater Exeter area is also host to a large number of villages. Exeter is connected to the major towns through road and rail, though due to the rural geography of Greater Exeter, the connectivity of many smaller villages and parishes is poor. **Figure A3.8** shows the market town areas across Greater Exeter.

**Figure A3.8: Distribution of market towns across Greater Exeter**




## Age

89 **Table A3.6** displays that Exeter has the highest share of residents of working age (16-64) compared to the other Districts. This can be attributed to the labour supply available in Exeter and also the presence of the University of Exeter.

90 The age profile of the population is significant as it has a direct effect on the local economy. An above average number of residents aged 65 and over and a below average number of working age population results in reduced labour force availability in comparison with other areas of the country.

### Table A3.6: Population distribution by age (Mid-year estimate, 2017)

| Ages | East Devon | Exeter | Mid Devon | Teignbridge | Greater Exeter | Devon |
|---|---|---|---|---|---|---|
| Under 16 | 21,800 | 18,900 | 13,900 | 20,200 | 74,800 | 120,900 |
| Age 16 - 64 | 76,900 | 88,400 | 47,100 | 75,900 | 288,300 | 461,700 |
| Over 65+ | 42,700 | 20,400 | 18,700 | 34,200 | 116,000 | 196,800 |
| Total | 141,400 | 127,700 | 79,700 | 130,300 | 479,100 | 779,400 |

### Ethnicity

91 According to mid-year estimates from 2011, the majority of Greater Exeter's population is white with 97% (438,796) of the population falling under this classification. **Table A3.7** highlights ethnicity by district. Whilst these figures indicate that Greater Exeter, much like the rest of Devon, is not particularly diverse in terms of ethnicity, there are more ethnic minorities within the urban areas.

### Table A3.7: Ethnicity by District (Mid-year estimate, 2011)

| Ethnicity | Mid Devon | Teignbridge | East Devon | Exeter | Greater Exeter | Devon |
|---|---|---|---|---|---|---|
| White | 76,696 | 122,163 | 130,347 | 109,590 | 438,796 | 728,073 |
| Mixed | 484 | 925 | 904 | 1,938 | 4,251 | 6,520 |
| Asian | 428 | 893 | 930 | 4,595 | 6,846 | 8,710 |
| Black | 94 | 117 | 146 | 667 | 1,024 | 1,413 |
| Other | 48 | 122 | 130 | 983 | 1,283 | 1,683 |

### Deprivation

92 The Indices of Deprivation 2019[26] 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.

93 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.

94 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. The authorities that make up Greater Exeter are ranked out of the 326 local authorities in England in **Table A3.8**.

[26] https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019

**Table A3.8: LSOA ranking by district**

| Local Authority | 2010 | 2015 | 2019 |
|---|---|---|---|
| East Devon | 209 | 246 | 238 |
| Exeter | 139 | 165 | 193 |
| Mid Devon | 155 | 156 | 162 |
| Teignbridge | 175 | 177 | 186 |

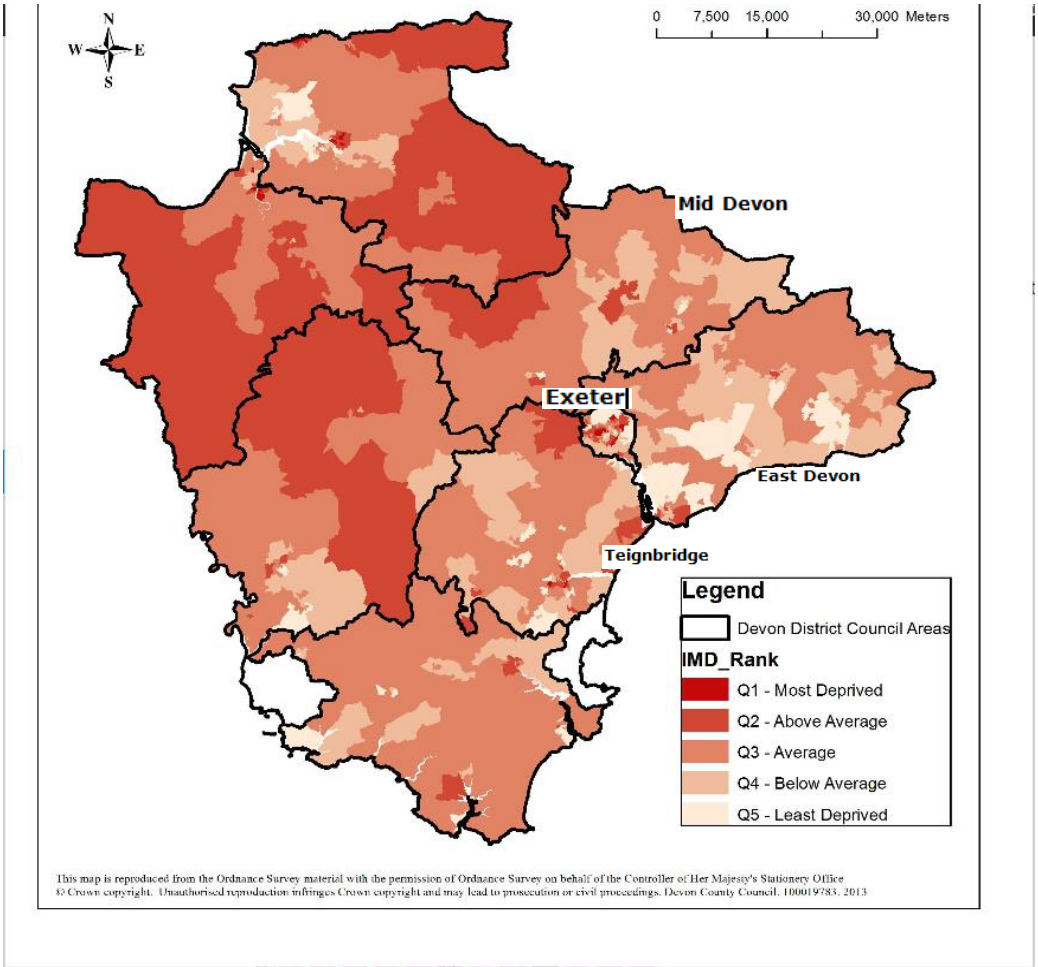
95 There has been a significant decrease in the level of deprivation in East Devon and Exeter during the period 2010-2019. Deprivation levels in Mid Devon and Exeter have stayed relatively the same. In comparison to the rest of Devon, ranking is better within the Greater Exeter area with Torridge being ranked 67, North Devon 123 and West Devon 139.

96 Overall, the Greater Exeter area would not be considered deprived. Deprivation however, does exist in the region. This deprivation is largely concentrated to small pockets within urban locations. This contrasts with the rest of Devon, where a majority of deprivation is evident in rural communities. Areas that experience some deprivation within the Greater Exeter area include Tiverton, Cullompton, Newton Abbot, Teignmouth and Dawlish, alongside some particularly deprived places such as the Withycombe Ward in Exmouth which falls within the 20% most deprived parts of the UK. The most deprived parts of Greater Exeter exist within Exeter itself (with 9 areas within the 20% most deprived parts of the UK), though overall, Greater Exeter is less deprived than the rest of Devon. 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.

97 **Figure A3.9** displays the levels of deprivation present compared to the UK average within the four Districts and compared to the rest of Devon in the period 2010 to 2015[27].

[27] http://www.devonhealthandwellbeing.org.uk/jsna/overview/archive/socio-economic-deprivation/indices-of-deprivation-2015/

**Figure A3.9: Distribution of deprivation across Greater Exeter**




## Crime and Community Safety

98 Crime in the Greater Exeter Area is relatively low. Overall, Devon has seen a decrease in recorded crime of 8.1% in 2015 since the previous year. There are however hotspots of crime within the Greater Exeter area with 6 areas being highlighted as the most deprived in terms of crime; these are found within Barnstable, Exeter, Ilfracombe and Tiverton. These areas are highest in crime measured across four major crime areas including violence, burglaries, theft and criminal damage. Other areas with a relatively higher crime rate include Exmouth, Dawlish and Newton Abbot. Overall, the Greater Exeter area is not deprived in terms of crime. However, there is a noticeable correlation between urban areas that are more generally deprived and their subsequent crime rates.

99 Cyber-crime is a growing area which has seen an 8% increase in Devon and Cornwall between 2015 and 2016 (as record in the ONS Crime in England and Wales tables), with over 6,000 recorded offences which is a rate of 4 per 1000 population, which is consistent with the national average. Elements of this include bank account fraud, computer viruses, harassment and stalking and child sexual offences. There are no specific figures for the Greater Exeter Area, but it appears that the Devon and Cornwall rate of cyber-crimes are consistent with the national level.

100 Although crime rate is relatively low, fear of crime is commonly quite pronounced across the Greater Exeter Area. The type of fear varies across the county but noise, domestic violence, anti-social behaviour and drug and alcohol abuse are all prevalent topics for concern. This fear is not

necessarily supported by actual figures and may correlate to differing views on acceptable behaviour[28].

### Education

101 The population of Greater Exeter has an above average level of education when compared to both Devon and England. In terms of education and skills deprivation, the most deprived areas are located in main urban centres and the least deprived to the south of Greater Exeter. East Devon has no areas that are least deprived in terms of education and skills.

102 The availability of an appropriately skilled labour force can be an important factor for attracting business investment and acts as useful evidence when persuading employers to locate their operation within the area. Therefore, the skill set of the local population can have an impact upon the make-up of Greater Exeter's economy. Overall, Exeter and East Devon perform better in terms of education and skills and there are some clear disparities in terms of those with no qualifications with Mid Devon having a significantly higher proportion of unqualified people compared to Exeter which is very low.

**Table A3.9: Qualifications within Greater Exeter (Jan 2018-Dec 2018)[29].**

| Qualification | East Devon (%) | Exeter (%) | Mid Devon (%) | Teignbridge (%) | Great Britain (%) |
|---|---|---|---|---|---|
| NVQ4 and above | 35.8 | 40.6 | 40.3 | 46.4 | 39.3% |
| NVQ3 and above | 60.2 | 68.2 | 66.0 | 63.7 | 57.8% |
| NVQ2 and above | 80.5 | 80.9 | 83.4 | 84.1 | 74.9% |
| NVQ1 and above | 90.1 | 88.5 | 91.6 | 90.6 | 85.4% |
| Other qualifications | - | 7.1 | - | - | 6.8% |
| No qualifications | 6.5 | - | - | - | 7.8% |

103 It is visible in **Table A3.9** that Exeter, Mid Devon and Teignbridge have a higher proportion of adults who have attained qualification levels equivalent to NVQ level 4 and above compared to Great Britain as a whole. Only East Devon has a lower proportion of adults (16-64) achieving NVQ level 4 and above compared to Great Britain as a whole. For Exeter, Mid Devon and Teignbridge, an estimate for the amount of adults who have no qualifications is not available as the sample size is considered too small. For East Devon, the amount of adults who have no qualifications is lower than the proportion of adults who have no qualifications in Great Britain as a whole.

### Health and Wellbeing

104 The Greater Exeter area, much like the rest of Devon, has relatively good health. It has a significantly higher proportion of the population in very good health when compared to the rest of England. The average for England for those in good health is above the Greater Exeter average; however Greater Exeter has less people in fair and bad health than nationally[30]. Some main challenges identified in terms of health and wellbeing across Greater Exeter include:

- An ageing population which is also growing faster than the national average increasing demand for health and care services
- New towns such as Cranbrook and new housing developments in existing towns with a young population structure are very different to the rest of Devon, and there are a different set of challenges relating to health-related behaviours, child health and sexual health. Community development and preventive approaches will be vital in these areas

[28] Joint Strategic Needs Assessment Devon Overview (DCC and Public Health Devon 2010). ONS Crime in England and Wales: Experimental tables.
[29] https://www.nomisweb.co.uk/
[30] Self-Assessment of Health by District (Office for National Statistics, 2015); Joint Strategic Needs Assessment Devon Overview (DCC and Public Health Devon 2010)

- A sparse and predominantly rural population, creating additional challenges around access to health and care services and the need for sophisticated models of home-based care, outreach and work to reduce social isolation.
- Patterns of deprivation marked by isolated pockets and hidden need within communities and higher levels of rural deprivation, with groups experiencing health inequalities likely to be geographically dispersed.
- Average earnings below the national average and house prices and cost of living above the national average contribute to a number of issues including food poverty, homelessness, mental health and wellbeing, and fuel poverty.

105 Generally good health across the Greater Exeter area is correlated with an above average life expectancy of 83.6 years for women and 79.7 for men, when compared with the national statistic of 82.8 for women and 79.1 for men. However, more deprived areas within Greater Exeter have life expectancy reduced by more than 3 years below than the regional's average. The proportion of residents in varying degrees of health across Greater Exeter compared to the rest of Devon and England is summarised in **Table A3.10.**

**Table A3.10: Self-assessment of health by District (Mid-year estimate, 2011)**

| Health | East Devon | Exeter | Mid Devon | Teignbridge | Greater Exeter | Devon | England |
|---|---|---|---|---|---|---|---|
| Very Good Health | 58,004 | 58,775 | 36,263 | 55,819 | 208,861 (46%) | 344,059 (46%) | 34% |
| Good Health | 47,716 | 39,301 | 27,554 | 43,342 | 157,913 (35%) | 259,032 (35%) | 43% |
| Fair Health | 19,960 | 14,075 | 10,398 | 18,237 | 62,670 (13%) | 104,498 (14%) | 18% |
| Bad Health | 5,285 | 4,331 | 2,785 | 5,268 | 17,669 (4%) | 30,137 (4%) | 5% |
| Very Bad Health | 1,492 | 1,291 | 750 | 1,554 | 5,087 (1%) | 8,673 (1%) | 1% |

106 At the time of writing, the UK including the GESP area is in the midst of the coronavirus pandemic. While the south west region as a whole has been less badly affected than some other areas of the UK (at the time of writing), the medium and long-term impacts of the public health crisis will take time to become known.

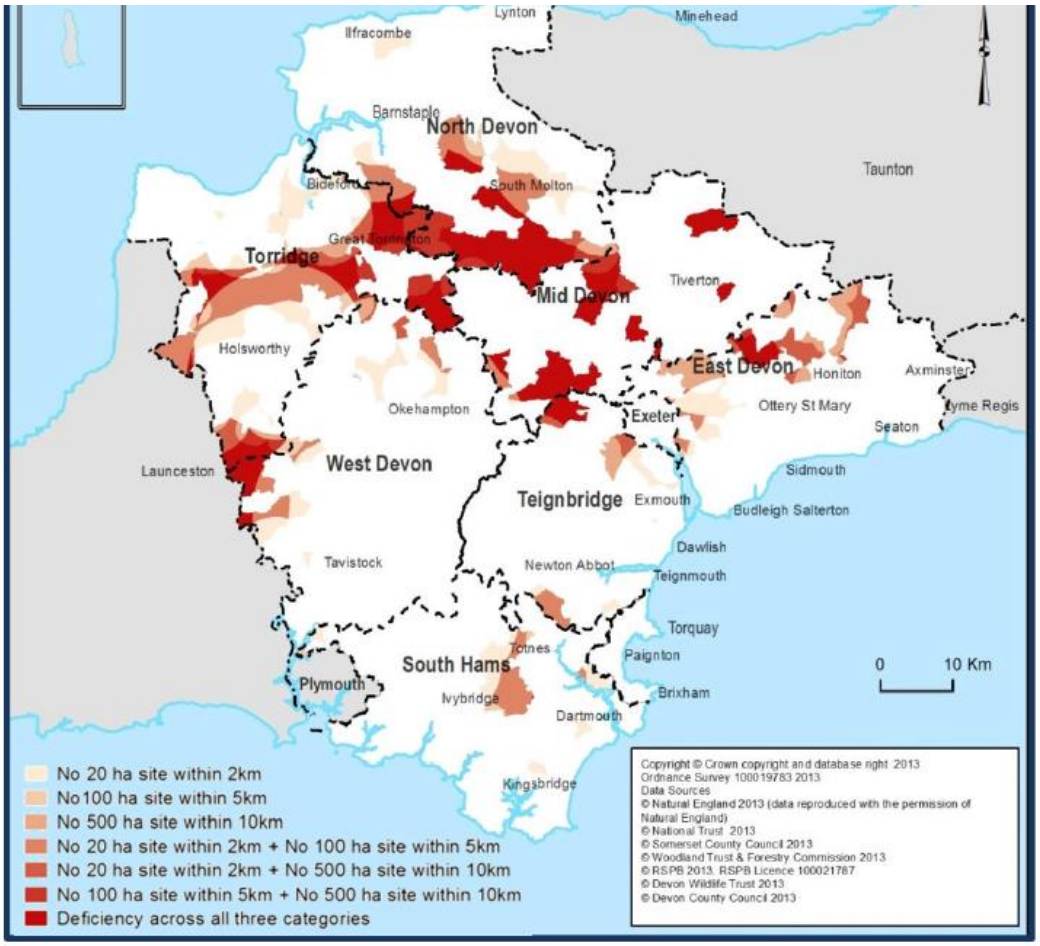
### Access to Open Space

107 Greater Exeter has an abundance of diverse and valued green networks, wildlife and quality landscapes. However, access to open space and green infrastructure can vary for different people and for different parts of the plan area.

108 The population of Devon and Torbay is better connected to the natural environment (defined as the green open spaces in and around towns and cities, as well as the wider countryside and coastline) than the population of England as a whole[31]. However, whilst many areas benefit from good public access, there are areas which are deficient when compared to Natural England standards (Devon County Council's PRoW Team). The following map in **Figure A3.10** shows the distance between homes and accessible natural greenspaces of various sizes. In Greater Exeter, the area most deficient is Mid Devon.

[31] Devon State of the Environment Report (2015)

**Figure A3.10: Areas deficient in Public Rights of Way (lowest 20% by density) and do not meet Natural England Standards (Devon State of the Environment Report**



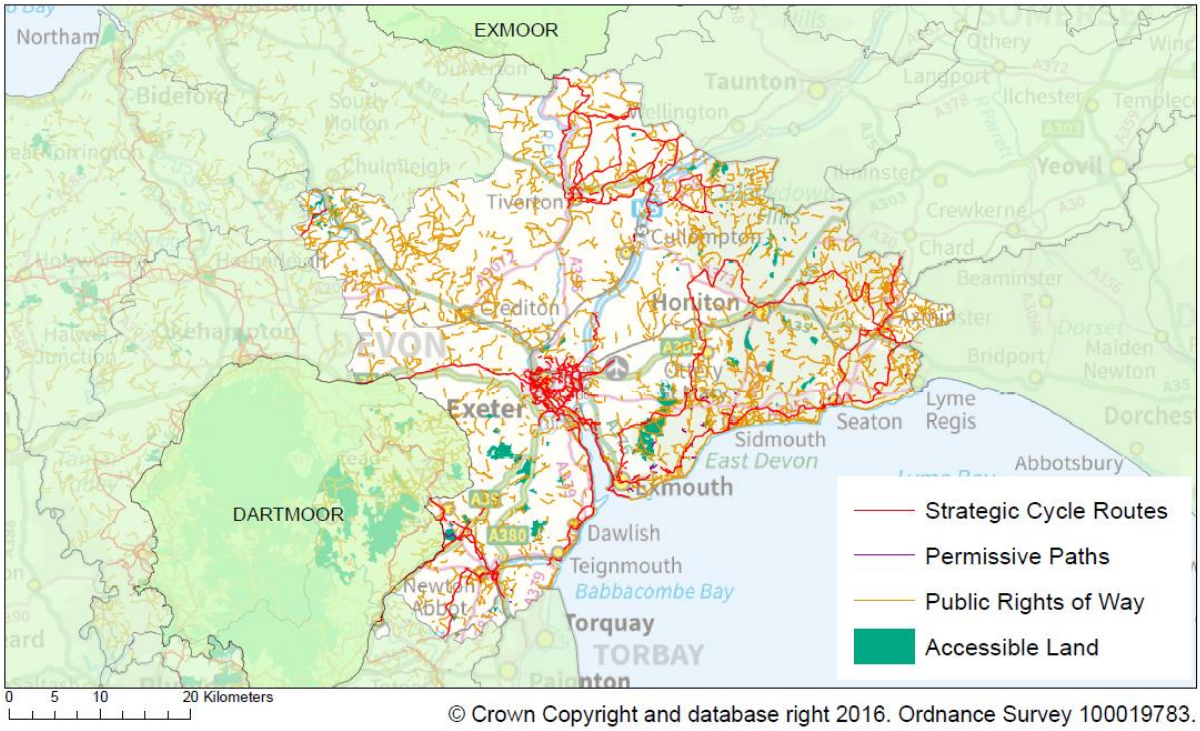

109 There are a number of quality, quantity and accessibility deficits for different open space typologies across the Greater Exeter area, however the majority of these are relatively localised issues. To date, there has been no consistent assessments of open space across the four authorities who each measure it in different ways. Key strategic issues regarding open space tend to be focused around quality and quantity of sports pitches, protection of open spaces (in particular sports pitches) from loss to other uses and access to natural and semi-natural greenspaces.

110 Space for People research shows that less than 17% of the population of England has access to local woodland within 500m of their home. Across Devon this figure is lower than the national average at less than 9% (Woodland Indicators by Local Authority 2016).

111 The Public Right of Way (PRoW) network and areas of accessible land as shown on **Figure A3.** 11 provides opportunities for walking and access to open space across most parts of the Greater Exeter area. Strategic cycle routes are concentrated around the larger settlements, namely Newton Abbot, Exeter, Tiverton, Cullompton and Honiton and also extend along the majority of the coastline in the south of the plan area. Areas less accessible by Strategic Cycle Routes are

mainly concentrated around the north west of the Greater Exeter area, around Crediton and lineally along the A377[32].

**Figure A3. 11: Recreation and Access Routes (DCC 2016)**




[32] DNLP (2016) Source: Devon State of the Environment Report

### Housing growth for districts within Greater Exeter

112 Adopted plans for all four districts make provision for 48, 653 homes to be built in the Greater Exeter area. To support this growth around 360ha of employment land is allocated/proposed. This growth will occur over the next 15 and 20 years, with Adopted Plan end dates ranging between 2026 and 2033. **Table A3.11** shows planned growth for each district[33].

### Table A3.11: Housing growth for districts within Greater Exeter

| East Devon Local Plan housing projections from 2013-2031 | Exeter Core Strategy 2006-2026 | Mid Devon Local Plan Review 2013-2033 | Teignbridge Local Plan 2013-2033 | Greater Exeter |
|---|---|---|---|---|
| 16,393 | 12,000 | 7,860 | 12,400 | 48,653 |

### Housing Delivery

113 Housing completions are monitored and reported by the local authorities in their annual monitoring reports. This information has been drawn together to identify the level of housing delivery across the Greater Exeter area over recent years. Completions across all districts have fluctuated over recent years as shown in **Table A3.12**. Over 8,494 homes have been delivered in the area over the last five years (2011/12 – 2015/16).

114 The table below identifies whether the Greater Exeter authorities have been achieving the annual delivery target set out within their Local Plans. It should be noted that all Local Plans other than Mid Devon have been adopted.

115 Figures presented in green indicate a delivery rate which exceeds the annual delivery target. Figures presented in red indicate housing completions have not met the annual delivery target. Where no figures are given, they are unavailable.

### Table A3.12: Housing completions by Local Authority

| | 2006/07 | 2007/08 | 2008/09 | 2009/10 | 2010/11 | 2011/12 | 2012/13 | 2013/14 | 2014/15 | 2015/16 | 2016/17 | 2017/18 | 2018/19 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| East Devon | 374 | 284 | 224 | 393 | 565 | 321 | 467 | 824 | 1029 | 1027 | 724 | 866 | 929 |
| Exeter | 891 | 491 | 236 | 270 | 432 | 555 | 87 | 382 | 483 | 618 | 543 | - | - |
| Mid Devon | 429 | 427 | 384 | 268 | 265 | 212 | 321 | 320 | 316 | 288 | 304 | 502 | - |
| Teign bridge | 270 | 220 | 313 | 310 | 349 | 308 | 458 | 819 | 632 | 622 | 685 | 711 | 697 |
| Greater Exeter | 1964 | 1422 | 1157 | 1241 | 1611 | 1396 | 1333 | 2345 | 2520 | 2555 | 2473 | - | - |

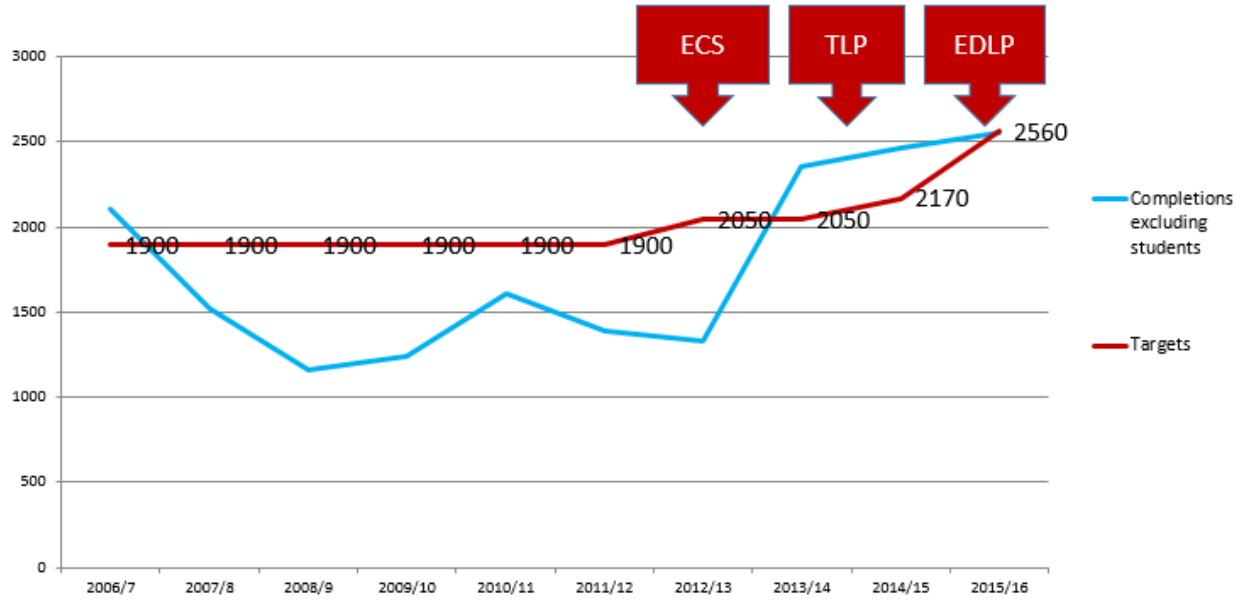
[33] https://exeter.gov.uk/media/2899/amr-2015-16.pdf; http://eastdevon.gov.uk/media/2711847/hmu-to-year-end-31-march-2018.pdf; https://www.middevon.gov.uk/media/343289/web-version.pdf; https://www.teignbridge.gov.uk/media/7769/tdc-amr-2018-report.pdf

116 Based on the information presented above, over 10,000 homes have been built since the adoption/progression of the various Local Plans covering the area. This suggests that of the 48,700 planned homes identified in Local Plans, in the region of 38,000 remain to be delivered in the plan periods. (Completions monitoring data was impacted by the ruling that purpose built student living accommodation could not be counted towards the housing supply, felt most keenly in Exeter).

117 **Figure A3.12** shows the relationship between housing completions, plan making and the wider economy. The red boxes show approximately when the Exeter Core Strategy, Teignbridge and East Devon Local Plans were adopted.

118 There is a need for good plan making (e.g. land availability) to ensure housing delivery. Equally, when the wider economy softens or goes into recession, commercial volume house builders also reduce development. The Government's Housing White Paper 2017 (Fixing our Broken Housing Market), recognises the need for encouraging a diverse range of housing supply in order to maintain and increase house building. This includes providing land opportunities for small and medium house builders, encouraging new entrants such as developers using modern methods and tenures such as 'build to let', and encouraging custom and self-builders who may be less disincentivised by an economic slowdown than speculative developers.

**Figure A3.12: Housing completions within Greater Exeter**




## Housing Stock

119 The majority of properties in the Greater Exeter area are larger detached dwellings making up 32%. This larger stock exist largely in more rural parts of Greater Exeter, while the stock in more urban areas such as Exeter tends to be more predominately semi-detached (25%) and terraced (33%). **Table A3.13** provides a summary of the housing stock within the districts of Greater Exeter.

120 A large majority of this housing stock is privately owned with particular areas seeing 88% private ownership. Of 40 local authority areas with the lowest proportion of social housing, the Greater Exeter area has 2 of the lowest in East Devon and Teignbridge. Although it varies depending on where in the Greater Exeter area is being discussed, properties are more likely to be owned outright with certain areas ranging between 40% and 48.4% home ownership, considerably higher than the national average.

**Table A3.13: Housing stock by district in 2011 (ONS)**

| Stock | East Devon | Exeter | Mid Devon | Teignbridge | Greater Exeter |
|---|---|---|---|---|---|
| Detached House | 24,567 (44%) | 6,926 (14%) | 13,079 (37%) | 21,165 (38%) | 65,737 (32%) |
| Semi-Detached | 16,399 (26%) | 13,072 (25%) | 9,700 (29%) | 13,883 (25%) | 53,054 (26%) |
| Terraced | 12,484 (20%) | 16,707 (33%) | 7,811 (23%) | 13,082 (24%) | 50,084 (24%) |
| Purpose Built Flat | 6,067 (10%) | 10,363 (20%) | 2,133 (6%) | 4,874 (9%) | 23,437 (11%) |
| Flat in Converted or Shared House | 3,057 (5%) | 3,002 (6%) | 720 (2%) | 2,919 (5%) | 10,418 (5%) |
| Flat in Commercial Building | 969 (2%) | 571 (1%) | 358 (1%) | 719 (1%) | 2,617 (1%) |
| Total | 63,543 | 50,641 | 33,801 | 55,642 | 205,347 |

### Housing Condition

121 Much of the private rented housing sector within Greater Exeter is relatively poor. On the other hand, council housing stock is essentially sound but a significant number of properties need upgrading.

122 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 slightly above average living environment. Mid Devon also has above average living environment, surpassing the rest of Devon, as do Teignbridge and Exeter though both achieve less than Devon overall. East Devon has only an average level of living environment.

### Affordability

123 There are a number of reasons as to why the housing market in Greater Exeter is so expensive and residents struggle to afford homes:

- A general imbalance between housing supply and demand results in a lack of availability / affordability.
- Limited supply of existing affordable homes creates an acute housing problem.
- Significant in migration from older people with financial ability to afford homes in the Greater Exeter area reduces available stock.
- Average earnings for Devon residents is lower than the national average
- High proportion of larger houses, with higher house prices.

124 **Figure A3.13** overleaf displays the ratio of lower quartile house prices to earnings for districts within Greater Exeter. All of the Greater Exeter authorities have worse affordability than England as a whole, the higher prices referred to above combining with incomes below the England average. Affordability in England has worsened somewhat over the period 2009 – 2015, and this trend has been closely matched by changes in East Devon, Mid Devon and Teignbridge. Exeter has shown some improvement in affordability over that time.

125 **Table A3.14** displays the lowest 10% of house prices in the years 2015-2017 for Districts within Greater Exeter. A tenth of all house sales within the district were below the figure in displayed in the table. This gives an indication of the affordability of housing within each of the districts compared to Devon as a whole.

126 It is apparent that housing is the most affordable in Teignbridge and least affordable in Exeter when compared to Devon as a whole, which is to be expected given the demand to live within city boundaries close to labour supplies and facilities/services. Teignbridge is the only District within Greater Exeter to see a decrease in the threshold for the cheapest 10% of housing. Across the East Devon, Exeter and Mid Devon the threshold has increase for the cheapest 10% of housing

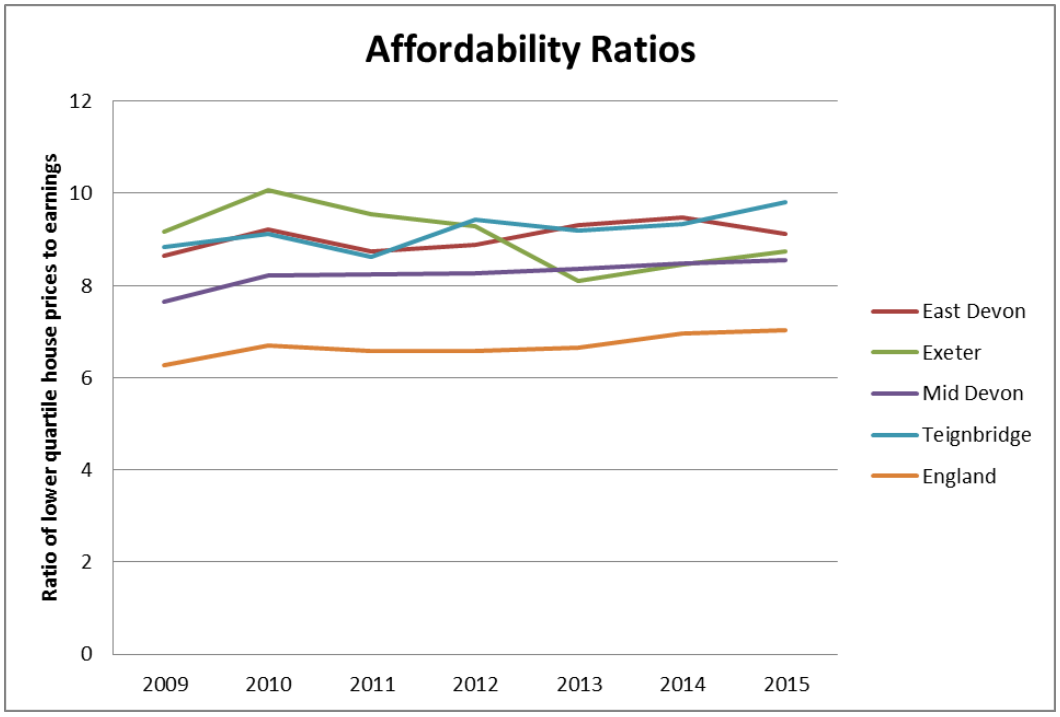
indicating that affordability has decreased in these areas. The most significant decrease in affordability indicated is apparent in Exeter where the threshold for the cheapest 10% of housing has almost doubled during the period 2015-2017.

**Table A3.14: Cheapest 10% of house prices during 2015-2017 (ONS[34])**

| Year | East Devon (£) | Exeter (£) | Mid Devon (£) | Teignbridge (£) | Devon (£) |
|---|---|---|---|---|---|
| 2017 | 145,00 | 342,695 | 145,000 | 134,955 | 150,000 |
| 2016 | 142,233 | 216,000 | 139,950 | 142,600 | 159,000 |
| 2015 | 14,000 | 184,00 | 132,000 | 162,300 | 145,999 |

127 With income levels across the Greater Exeter area being relatively low, and property prices being high, it makes it difficult for residents to afford their own home. Each district that makes up Greater Exeter has worse affordability than the national average. Average house prices in Greater Exeter are between 8 and 10 times the areas average income compared to the national average of around 7.

**Figure A3.13: Affordability Ratios by District**

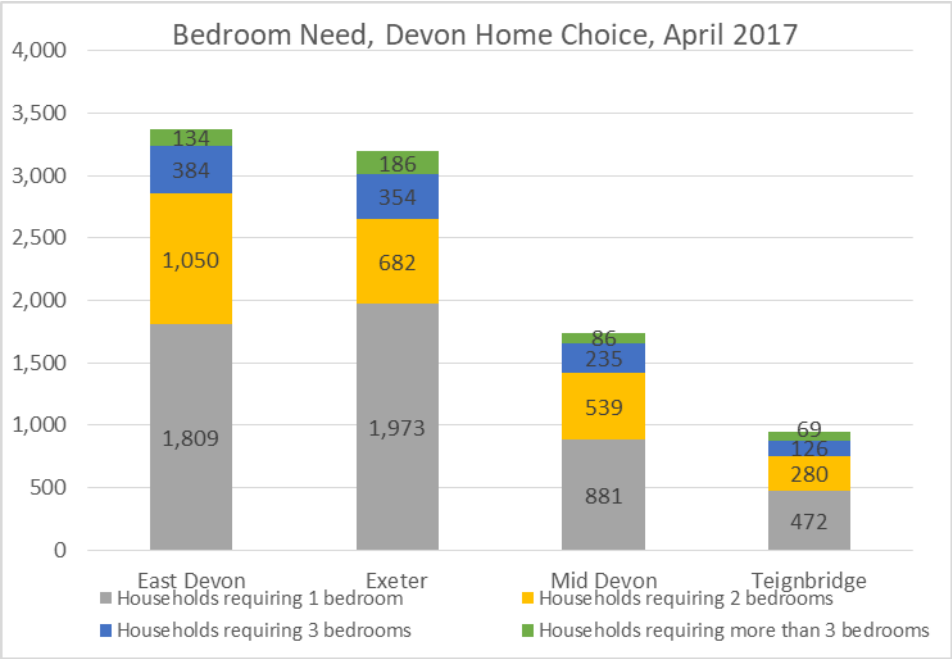



## Affordable Housing Need

128 **Figure A3.14** below demonstrates bedroom need by Greater Exeter council district, as of 3 April 2017. Exeter, East Devon and Mid Devon are all stock holding authorities, with Teignbridge as the exception. It is important to note that in the data below, Exeter and Teignbridge do not record Band E households (those considered to be able to meet their own need through market housing). There appears to be a strong pattern showing need for smaller properties.

[34] https://www.devon.gov.uk/factsandfigures/data-table/?postId=cheapest-10-percent-house-prices

**Figure A3.14: Bedroom need within Greater Exeter**




### Demand for Custom and Self Build Housing

129 Recent legislation (the Self Build and Custom Housebuilding Act 2015) required Local Authorities to maintain a register of people who have registered an interest in buying a self-build plot. The register is also to be used for plan making purposes. The local registers provide a proxy for the level of demand, although some authorities have advertised their registers more widely than others. **Table A3.15** below provides the number of people on the self-build register in the period April 2016 to August 2017.

**Table A3.15: Need for self-build housing in Greater Exeter**

| Number of people on Local Authority Self Build registers – April 2016 to August 2017 | |
|---|---|
| Teignbridge | 238 |
| Exeter | 25 |
| East Devon | 74 |
| Mid Devon | 29 |
| Total | 366 |

130 No consistently available information is presently produced to show how this demand is being met.

## Economic Baseline Information

131 The Greater Exeter economy is formed around a strong city centre at its core and a surrounding strong rural economy. The area provides unique and competitive advantages through its environment and the quality of life it offers and is well suited to leading innovations in so called 'Nature-tech' industries. The Innovation Exeter Strategy (KPMG 2016) which covers the Greater Exeter area identifies the assets of the sub-region and aims to accelerate growth and safeguard the future of this growth through various measures. The key innovation assets which have been identified in the Innovation Exeter Strategy are:

- University of Exeter

- Exeter College
- Met Office
- North Wyke Farm (agricultural research centre)
- Royal Devon and Exeter NHS Foundation Trust
- Exeter 10,000 project (health research)
- The Innovation Centre
- Exeter Science Park
- Sky Park

132 These innovation assets and other businesses are heavily concentrated within the city of Exeter and the western end of East Devon. These areas perform far better in terms of workplace earnings, value added and proportion of skilled and professional job opportunities than East Devon, Mid Devon and Teignbridge.

133 There is much more potential to be realised which could help to develop a stronger and more resilient economy. In particular, there is potential to increase the retention of people aged from 25-39, the age group which is often considered to be the biggest driver of innovative growth. The retention of post-university students is a key part of this. As shown in **Table A3.16**, the proportion of people aged 25-29 moving out of the Greater Exeter area is significantly higher than that of Bristol. This is indicative of a proportion of students leaving the area after university as well as residents going to university elsewhere in the country and not returning.

**Table A3.16: Population by age band 2014[35]**

| | Exeter | Bristol |
|---|---|---|
| 20-24 | 16,682 | 46,481 |
| 25-29 | 10,046 | 43,308 |
| Net change | 6,324 | 3,173 |
| Percentage change | 40% | 7% |

### Employment Land Availability and Delivery

134 Across Greater Exeter, a total of around 330 hectares is allocated/proposed for employment development. This includes significant employment land proposals in East Devon's West End area (5ha at Cranbrook, 25ha at Science Park and 40ha at Skypark), within the city of Exeter (c. 20 hectares), and within Newton Abbot and Cullompton. An additional proposal to allocate land for commercial development at Junction 27 of the M5 is included in the submission version of the Mid Devon Local Plan Review (November 2016).

135 Since the adoption of each Councils' most recent plans, very little land which has been allocated/proposed for employment use has been completed within Greater Exeter. Where it has come forward, particularly in the cases of Skypark and Science Park, this has been as a result of significant public sector grant funding, which has invested in upgrading access at Junction 29 of the M5, remediation works, installation of all site infrastructure including roads, broadband and utilities and the actual delivery of some buildings. This is not out of keeping with the trends being experienced throughout the country, as we are coming out of a "double dip" economic recession and, it is likely that this has played a significant part in the lack of delivery.

136 The development of proposed employment land at Matford, Exeter has also been achieved but, in this case, non-traditional employment uses were allowed to enable delivery in the form of car showrooms.

137 Although almost 260 hectares of allocated/proposed employment land remains without permission for employment use, 100 hectares of the 360 hectares identified within Greater Exeter has been

[35] ONS mid-year population estimates

delivered/secured planning permission. This is over 25% and this growth has been supplemented by additional growth on unallocated sites.

138 The amount of employment land across Greater Exeter has continued to increase with completions on other sites totalling over 40 hectares since 2009. East Devon has seen the most completions on unallocated sites (c. 27.5ha) with Mid Devon and Teignbridge experiencing the lowest (4.5ha and 3.6ha respectively).

139 As is evident by the lack of employment land completions on allocated/proposed sites, the delivery of employment land is challenging. It is often reliant on the necessary infrastructure and services being in place in order to make its development of employment land viable. The four main factors in delivery are:

- Broadband connectivity: parts of the Greater Exeter area do not have superfast broadband (defined by the EU as speeds of 24MPS or above) and this has an impact on how effectively businesses can operate. There are plans in place to improve this through the "Connecting Devon and Somerset Programme". The entire programme is worth £94m and it will extend fibre optic broadband to 90% of premises across Devon and Somerset by the end of this year, and 100% of area will have super-fast broadband by 2020.
- Grid infrastructure: Western Power Distribution has simply not been investing in the network at the necessary pace. The renewable sector is now suffering as a result as there is limited capacity to export electricity to the grid. In addition, supply is also an issue. In order to connect strategic sites, it is necessary to get these identified in Western Power's delivery programme and, once identified, improvements can take a number of years. Often new sites are delayed or abandoned due to lack of potential to connect.
- Highways and access: this is often regarded as a delivery constraint and improvements can be very expensive in comparison to employment land values.
- Remediation costs: previously developed sites can have significant remediation costs which add to development costs and reduce site viability. This usually means other elements of the development are compromised.
- Overall viability as a result of constraints

### Wages

140 It is visible in **Table A3.17** that, across all districts within Greater Exeter, the average full-time gross weekly pay for workers is lower than the average for Great Britain. However, in East Devon, Exeter and Mid Devon, there has been a more significant increase in weekly earnings between 2018 and 2019 compared to Great Britain, with the largest increase of 11% occurring in East Devon. Teignbridge has the lowest average weekly pay compared to Great Britain as a whole and also saw the smallest increase (+0.3%) between 2018 and 2019, compared to an increase of 2.9% for Great Britain.

**Table A3.17: Average Gross Weekly Pay for all Full Time Workers for 2019 (ONS[36])**

| | East Devon | Exeter | Mid Devon | Teignbridge | Great Britain |
|---|---|---|---|---|---|
| Average FT gross weekly pay (£) | 550 | 570.6 | 545.1 | 520.6 | 587 |
| Annual change from 2018-2019 (%) | +11 | +8.4 | +7.8 | +0.3 | +2.9 |

[36] https://www.nomisweb.co.uk/datasets/asher

### Employment Density

141 The job density in an area gives an indication of the level of employment available in an area and whether there are people commuting into the area for work. Job density for all Districts within the Greater Exeter during 2017 is displayed in **Table A3.18**. It is visible that Exeter has a job density of over 1 and a higher job density that all other Districts within Greater Exeter, which reflects the expected distribution of employment in the region where many people live outside the city boundaries but commute to work within the city.

**Table A3.18: Employment Density for 2017 (ratio of total jobs to population aged 16-64)**

| | East Devon | Exeter | Mid Devon | Teignbridge | Great Britain |
|---|---|---|---|---|---|
| Density | 0.79 | 1.19 | 0.78 | 0.78 | 0.86 |

### Business Density

142 **Table A3.19** summaries business density across Greater Exeter compared to Devon and the UK. Business density is the number of businesses per 1,000 working age residents in a defined area. The average business density for Greater Exeter is 65. This figure is slightly below Devon's average of 67 but higher than the national average of 60.

143 East Devon has the highest business density with 72, followed by Mid Devon with 69 and Teignbridge with 68, all of whom are above national average. The only district to fall below the national average is Exeter with 50 businesses per 1,000 working age residents. This is likely to be because the size of businesses within the city are larger than those in the surrounding rural areas and is perhaps related to the large student population. The presence of a large number of small businesses does not necessarily indicate a better/stronger economy and there is an argument that it may indicate fragility rather than strength in a local economy.

### Table A3.19: Business density (ONS, Business Demography 2009)

| | East Devon | Exeter | Mid Devon | Teignbridge | Greater Exeter | Devon | UK |
|---|---|---|---|---|---|---|---|
| Business density per 1000 working age residents | 72 | 50 | 69 | 68 | 65 | 67 | 60 |

### Productivity

144 Economic growth can be achieved either by:

- Increasing the number of people who are in work or the number of hours each person works; or
- Increasing the value of the goods or services that each person in work produces per day or per hour.

145 Increasing productivity is a challenge and a priority for the Greater Exeter area. This objective must be balanced with an awareness of the risks associated with seeking to increase economic productivity, which could have potential for negative or neutral consequences, for example, environmental impacts, increased unemployment (possibly more likely for low skilled workers), or a risk of increased productivity not translating into increased wages (but rather profits).

146 **Table A3.20** displays the gross value added during 2016 for all the districts within Greater Exeter.

### Table A3.20: Total gross value added during 2016 for districts within Greater Exeter[37]

| | East Devon | Exeter | Mid Devon | Teignbridge |
|---|---|---|---|---|
| Value added(£millions) | 2,413 | 4,082 | 1,330 | 2,413 |

### Enterprise Births, Deaths and Survival

147 The amount of business start-ups provides an indication of the health of the local economy in an area. The count of enterprise births for districts within Greater Exeter is displayed in **Table A3.21**. During the period 2015-2017, all districts maintained a similar amount of business starts ups per year, with East Devon seeing an overall increase during the period.

### Table A3.21: Count of births of New Enterprises for 2015-2017 between 2015-2017

| Year | East Devon | Exeter | Mid Devon | Teignbridge |
|---|---|---|---|---|
| 2015 | 535 | 525 | 325 | 575 |
| 2016 | 585 | 545 | 330 | 615 |
| 2017 | 590 | 500 | 325 | 575 |

148 The enterprise death count across the districts within Greater Exeter also provides an insight into the health of the local economy and is displayed in **Table A3.22**, whilst the enterprise survival rate from 2015 onwards in the Greater Exeter districts is summarised in **Table A3.23**.

[37] https://www.ons.gov.uk/economy/grossvalueaddedgva/datasets/regionalgrossvalueaddedbalancedbylocalauthorityintheuk

### Table A3.22: Enterprise deaths from 2015-2017 within Greater Exeter

| Year | East Devon | Exeter | Mid Devon | Teignbridge |
|---|---|---|---|---|
| 2015 | 505 | 460 | 265 | 455 |
| 2016 | 480 | 500 | 250 | 505 |
| 2017 | 545 | 490 | 310 | 500 |

### Table A3.23: Enterprise Survival in 2015 (ONS)

| District | 1 Year Survival (%) | 2 year survival (%) |
|---|---|---|
| East Devon | 93.5 | 78.5 |
| Exeter | 87.6 | 71.4 |
| Mid Devon | 90.8 | 81.5 |
| Teignbridge | 93.0 | 75.7 |

### Economic Inactivity

### Table A3.24: Inactivity rate for Oct 2018-Sep 2019 (ONS)

| | East Devon | Exeter | Mid Devon | Teignbridge | South West | Great Britain |
|---|---|---|---|---|---|---|
| Inactivity (%) | 13.4 | 19.5 | 10 | 16 | 18.0 | 21.1 |

149 Inactivity is defined as people not in employment who have not been seeking work within the last 4 weeks and/or are unable to start work within the next 2 weeks.

150 **Table A3.24** displays the percentage of economically inactive residents out of the population aged 16-64 across all of the four districts within Greater Exeter. It is visible that in all districts there were a lower percentage of economically inactive residents compared to the national level. Economic inactivity was highest in the District of Exeter during the period 2018-2019 and higher than the overall level of economically inactive residents in the South West as a whole. The lowest level of economic inactivity amongst the working population occurred in Mid Devon.

### Table A3.25: Students as percentage of economic inactivity (ONS, National Population Surveys)

| | East Devon | Exeter | Mid Devon | Teignbridge | Greater Exeter | Devon | South West | UK |
|---|---|---|---|---|---|---|---|---|
| Jul10 – Jun11 | 20.8% | Info not available | Info not available | Info not available | Unable to calculate | 19.1% | 21.2% | 24.4% |
| Jul11 – Jun12 | Info not available | 49.6% | Info not available | Info not available | Unable to calculate | 27.1% | 23.6% | 25.3% |
| Jul12 – Jun13 | Info not available | 49.6% | Info not available | 30% (Apr 12 – Mar 13) | Unable to calculate | 25.2% | 24.1% | 25.6% |
| Jul13 – Jun14 | Info not available | 54.5% | Info not available | 35.3% | Unable to calculate | 27.2% | 25.8% | 26.5% |
| Jul14 – Jun15 | Info not available | 42.0% | Info not available | Info not available | Unable to calculate | 26.1% | 23.0% | 26.2% |
| Jul15 – Jun16 | Info not available | 52.9% | Info not available | 33.5% (Jan 15 – Dec 15) | Unable to calculate | 26.7% | 24.7% | 26.1% |

151 Although comprehensive data across the 4 Districts that make up the Greater Exeter area is unavailable, the above figures in **Table A3.25** do demonstrate how the higher economic inactivity rate in Exeter is attributable to its high number of students, which is approximately double the figure of the national average.

### Job Types and Distribution

152 **Table A3.26** provides a summary of the proportion of residents within Greater Exeter, the South West and at National Level that area employed in employment groups 1-3, whilst **Table A3. 27** provides a summary of the proportion of residents in elementary employment within the same areas.

**Table A3.26: Percentage of District's employees employed as Managers, Directors, Senior Officials, Professional Occupations and Associate Professional and Technical – Oct 2018-Sep. 2019**

| | East Devon | Exeter | Mid Devon | Teignbridge | South West | Great Britain |
|---|---|---|---|---|---|---|
| Employment group 1-3 (%) | 38.2 | 47 | 44.3 | 44 | 46.3 | 47.4 |

**Table A3. 27: Percentage of District's employees employed in Elementary Employment ONS Annual Population Survey Oct. 2018-Sep. 2019**

| | East Devon | Exeter | Mid Devon | Teignbridge | South West | Great Britain |
|---|---|---|---|---|---|---|
| Elementary occupation (%) | 11.5 | 14.1 | - | 14.5 | 10.2 | 10.2 |

### Full Time/Part Time Working

153 **Table A3.28** summarises the proportion of residents that are in full time and part time employment within the districts of Greater Exeter compared to the wider region.

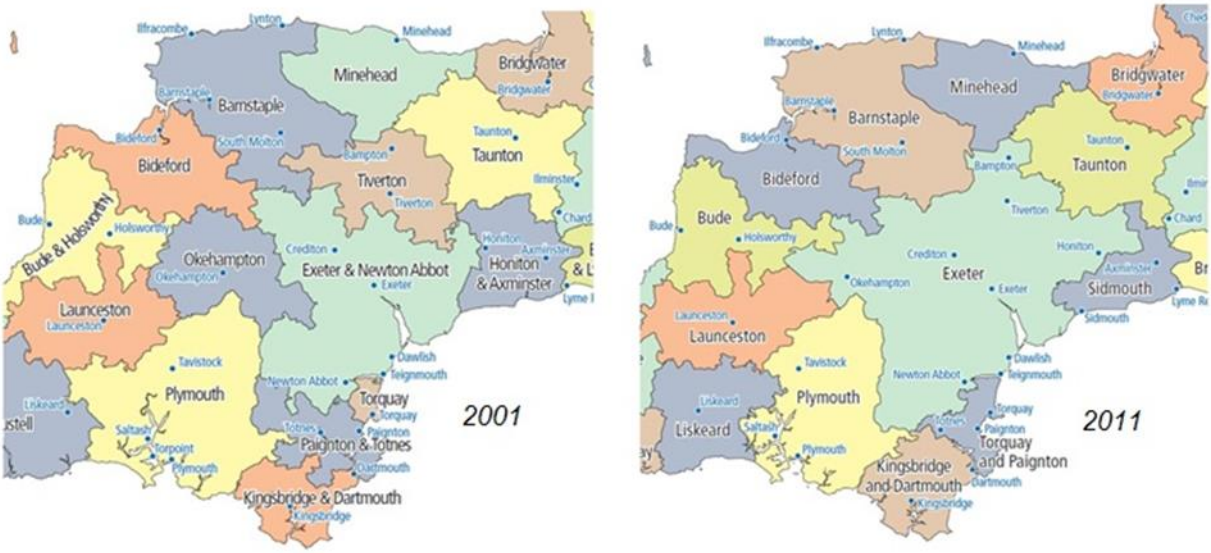
**Table A3.28: Full time and part time employment split (ONS Annual Population Survey - Resident Based, 2017 provisional)**

| | East Devon | Exeter | Mid Devon | Teignbridge | Devon |
|---|---|---|---|---|---|
| Full time | 26,900 | 60,000 | 15,200 | 28,300 | 196,600 |
| Part time | 17,100 | 31,200 | 8,900 | 16,800 | 117,800 |

### Travel to Work Areas (TTWAs)

154 The Exeter TTWA has grown rapidly since 2001, as shown in **Figure A3.15**. The 2011 Census shows the TTWA for Exeter to be very closely aligned with the boundaries of the Greater Exeter area, demonstrating the growing role of Exeter as the economic centre of the Greater Exeter sub-region. The increase in the size of the travel to work area is a positive sign of the strength of the city's economy, but also the relative weaknesses of the employment available in the rural towns. Increases in commuting distances are not desirable outcome, and generally has negative impacts, such as on quality of life, congestion and emissions from transport.

**Figure A3.15: Exeter Travel to Work Area 2001 and 2011 (ONS)**




155 Analysing the data more carefully shows some trends occurring in and around the Exeter TTWA:

- Strong outward flows of labour going from Mid Devon, East Devon and Teignbridge into Exeter.
- Teignbridge and Mid Devon have the highest levels of out-commuting, reflecting the more significant job opportunities within the city as well as around the boundary with East Devon where there are a number of large employers, notably the airport, which supports both airport and non-airport related sectors.
- Most of the labour flows occur within the Greater Exeter sub-region and the majority of residents within the plan area also work within the plan area. The most significant external relationship is between Teignbridge and Torbay.
- Exeter is the only authority to employ more of its residents within its boundaries than those who commute out of the city for work (NOMIS April 2015-March 2016).
- The Exeter TTWA is largest for those aged between 25-49, with those aged 35-49 travelling the greatest distances to work. 16-24 year olds tend to travel lesser distances to work.
- Full time females travel greater distances than full time males. As may be expected, part-time workers travel shorted distances than full time workers with travel focused more on smaller local centres such as Tiverton, Newton Abbot, Teignmouth, Budleigh Salterton and Axminster as well as on Exeter.
- The distances that people are likely to travel increases with their level of qualification, i.e. those with higher qualifications travel further to work than those with lower qualifications.

156 The TTWA reflects the growing role of Exeter as the economic centre within Greater Exeter, with an increasing concentration of professional services and highest skilled jobs (predominantly but not exhaustively associated with the university, financial and legal services). These types of job opportunities tend to be located within Southernhay, around the Meteorological Office and the university campus, as well as some of the outer lying industrial estates. Earnings by workplace (as opposed to residents) are highest in Exeter. People are therefore increasingly attracted to working in the city (particularly between the ages of 25-49) for career opportunities and higher paid jobs. At the same time they are living in more rural and coastal locations and travel longer distances to get to work.

157 However, within the Travel to Work area, the strength of draw towards Exeter varies. Intuitively, this draw is at its strongest close to the city, with the attraction decreasing with distance. However, the draw to Exeter for some towns, for example Crediton and Exmouth, is particularly

strong. **Table A3.29** below shows the relative number and proportions from the largest towns in the Greater Exeter area.

**Table A3.29: Comparative Draw to Exeter based on Location of usual residence and place of work by method of travel to work (MSOA)[38]**

| Town | Population | | TTW Trips to Exeter | Working in Exeter (%) |
|---|---|---|---|---|
| | Total | Working Age | | |
| Exeter | 11,7773 | 52,447 | 42,492 | 89 |
| Crediton | 7,600 | 3,420 | 1,068 | 31 |
| Exmouth | 34,432 | 14,282 | 3,818 | 27 |
| Cullompton | 7,643 | 3,580 | 896 | 25 |
| *Dawlish* | *13,161* | 5,116 | 1,215 | 24 |
| Teignmouth | 14,749 | 5,140 | 987 | 19 |
| Honiton | 11,483 | 4,927 | 933 | 19 |
| Sidmouth | 11,550 | 3,480 | 537 | 15 |
| *Kingsteignton** | *8,306* | 3,826 | 530 | 14 |
| Tiverton | 21,335 | 8,999 | 1,050 | 12 |
| *Newton Abbot** | *28,738* | 12,644 | 1,288 | 10 |
| Seaton | 8,413 | 2,342 | 175 | 7 |
| Axminster | 5,761 | 3,242 | 172 | 7 |

158 The total commuting to Exeter from the above towns of 12,670 represents only half (49.7%) of the total of those living in Greater Exeter and commuting into Exeter. This points to some significant challenges in terms of both access from rural areas and in providing sustainable transport choices for areas that will be difficult to pick up at their point of origin by public transport.

### Tourism

159 Tourism is a big contributor to the Greater Exeter economy, with visitors drawn to the area for its coastal areas, outstanding environment, rich heritage and visitor and cultural attractions. **Table A3.30** displays the quantities of tourism trips and spending within the districts of Greater Exeter whilst **Table A3.31** displays the proportion of people employed in tourism across the four districts. Approximately a third of total visitor trips to Devon are made to Greater Exeter (31%), with slightly more of these coming from overseas trips (32.5%) than UK trips (31%). In relation to total nights spent within Devon, approximately a third of these are spent in Greater Exeter (32%), with a higher proportion of overseas nights (38%) than UK nights (31%). With regard to spending by tourists, Greater Exeter received 28% of spending within Devon by UK visitors, but 36% of spending by overseas visitors.Greater Exeter receives more than a third of Devon's day visitors (38%) and more than a third of their spend (37%)[39].

[38] Census 2001 and 2011

[39] South West Regional Tourist Board; Local Authority Databases 2014

160 Within the Greater Exeter area there is a great disparity between tourism within the different authority areas. Teignbridge and East Devon have higher numbers of UK trips, UK visitor nights and UK spend. Mid Devon and Exeter fall significantly behind. Exeter has the highest levels in relation to overseas trips and overseas nights and therefore, overseas spend. Mid Devon has significantly lower figures than other areas with regard to both UK and overseas tourism. With regard to tourism day trips, the trend is repeated.

**Table A3.30: Tourism – Trips/Nights/Spend (Information on tourist accommodation based on SWRTB and Local Authority databases 2014)**

| | East Devon | Exeter | Mid Devon | Teignbridge | Greater Exeter (Greater Exeter as % of Devon) | Devon |
|---|---|---|---|---|---|---|
| UK trips | 461,000 | 402,000 | 183,000 | 553,000 | 1,599,000 31% | 5,121,000 |
| Overseas Trips | 41,000 | 52,000 | 17,000 | 34,400 | 144,400 32.5% | 444,000 |
| Total Trips | 502,000 | 454,000 | 200,000 | 587,400 | 1,743,400 31% | 5,565,000 |
| UK Nights | 1,776,000 | 1,347,000 | 667,000 | 2,310,000 | 6,100,000 31% | 19,687,000 |
| Overseas Nights | 295,000 | 542,000 | 115,000 | 229,400 | 1,181,400 38% | 3,120,000 |
| Total Nights | 2,071,000 | 1,889,000 | 782,000 | 2,539,400 | 7,281,400 32% | 22,807,000 |
| UK Spend | £92,911,000 | £76,981,000 | £31,557,000 | £109,257,000 | £310,706,000 28% | £1,097,452,000 |
| Overseas Spend | £16,779,000 | £35,152,000 | £5,881,000 | £12,044,000 | £69,856,000 36% | £192,454,000 |
| Total Spend | £109,690,000 | £112,133,000 | £37,438,000 | £121,301,000 | £380,562,000 29.5% | £1,289,906,000 |
| Tourism Day Visits | 4,137,000 | 1,630,000 | 1,712,000 | 3,695,000 | 11,174,000 38% | 29,715,000 |
| Tourism Day Visit Spend | £139,316,000 | £61,183,000 | £54,203,000 | £123,692,000 | £378,394,000 37% | £1,103,981,000 |
| Overall Spend | £249,006,000 | £173,316,000 | £91,641,000 | £244,993,000 | £758,956,000 33% | £2,303,887,000 |

**Table A3.31: Percentage employed in tourism (Information on tourist accommodation based on SWRTB and Local Authority databases 2014)**

| % employed in tourism | East Devon | Exeter | Mid Devon | Teignbridge | Greater Exeter | Devon |
|---|---|---|---|---|---|---|
| 2009 | 5% | 3% | 3% | 4% | 3.75% | 4% |
| 2010 | 5% | 3% | 3% | 5% | 4% | 5% |
| 2011 | 6% | 5% | 3% | 6% | 5% | 7% |
| 2012 | 6% | 3% | 4% | 6% | 4.75% | 5% |
| 2013 | 6% | 2% | 3% | 5% | 4% | 5% |
| 2014 | 5% | 2% | 3% | 5% | 3.75% | 5% |

### Retail

161 Across Greater Exeter there are a number of key town centres which offer a range of shopping and leisure facilities. Alongside the city centre of Exeter there are: Honiton, Exmouth, Sidmouth, Seaton, Ottery St Mary and Axminster in East Devon; Tiverton, Cullompton and Crediton in Mid Devon; and Newton Abbot, Teignmouth, Dawlish, Ashburton, Bovey Tracey, Buckfastleigh and Chudleigh in Teignbridge.

162 Previous retail studies have been carried out for all four authorities but were commissioned at different points and therefore their relevance and usability varies. Teignbridge's evidence is now the oldest, having been published in 2010, East Devon published updates to their 2008 study in 2011 and Mid Devon published their study in 2012. A retail study covering Exeter and the west end of East Devon is currently being undertaken and is due to be published shortly.

163 A need was identified to update and bring together the retail evidence for all four authorities in order for effective baseline data and future requirements to be identified. The Greater Exeter Town Centre and Retail Study: Part One[40] was commissioned in August 2016 and has been carried out on behalf of all four authorities by GVA. It has gathered data and undertaken a detailed assessment of such issues as town centre health, shopping patterns for convenience and comparison goods and assessments of the need for new retail floorspace in the main settlements in each of the four administrative areas and was published in December 2018.

### Car Ownership

164 The percentage of households with no access to a car has steadily reduced over the past 20 years within Greater Exeter. This increase should not, however, be taken as an indication of an increase in the use of the car.

165 Levels of car ownership have increased the least in Exeter. This is not unexpected, given the accessibility of services and facilities within a city area along with good public transport links. This has been accompanied by a steady increase in the average number of cars per household.

166 **Table A3.32** displays on the percentage of car ownership in the four districts within Greater Exeter during the period 1991-2011.

**Table A3.32: Percentage car ownership (Census 2011)**

| | 1991 | 2001 | 2011 |
|---|---|---|---|
| East Devon | 77.2 | 82.2 | 84.1 |
| Exeter | 67.4 | 72.4 | 72.9 |
| Mid Devon | 79.4 | 83.1 | 85.7 |
| Teignbridge | 77.2 | 81.9 | 83.9 |

[40] https://www.gesp.org.uk/evidence/

## Business Trips

### *Number of Business Trips*

167 Business trip numbers have steadily fallen nationally over the past 20 years according to **Table A3.33**. It is unlikely that this represents a decrease in economic activity and more likely that this is a result of the use of enhanced digital connectivity, enabling people to work from home. This is demonstrated by the doubling of the proportion of people working from home from 1991 to 2011 (National Census Travel to Work data).

**Table A3.33: Number of business trips (National Traffic Survey Data, 2015)**

| Purpose | 1995/97 | 1998/00 | 2002 | 2004 | 2008 | 2011 | 2014 |
|---|---|---|---|---|---|---|---|
| Business | 38 | 37 | 35 | 35 | 30 | 28 | 32 |
| All Trips | 1,094 | 1,073 | 1,043 | 1,039 | 981 | 954 | 922 |
| Percentage | 3.5% | 3.4% | 3.3% | 3.4% | 3.2% | 3.0% | 3.3% |

### *Method of Travel to Work*

168 Although as a nation the number of travel to work trips per person is falling, the proportion made by car has increased. Numbers by rail have also increased, although proportions for all other sustainable modes have either reduced or, for cycling, stayed constant.

169 In terms of gross numbers, between 1991 and 2011 the population of working age in the Greater Exeter area has increased by a third, from 161,000 to 215,000. Over this period cycling, rail and working from home have increased at a greater rate than the population increase. Car driving and walking have largely followed the change in overall population (albeit increasing at a slightly slower rate). Whilst gross numbers have not decreased, bus usage has dropped proportionately across Greater Exeter. **Table A3.34** displays the proportion of commutes taken by different transport modes across Greater Exeter compared to the UK.

**Table A3.34: Modal split for travel to work (National Traffic Survey Data, 2015)**

| | East Devon | Exeter | Mid Devon | Teignbridge | Greater Exeter | National |
|---|---|---|---|---|---|---|
| Driving car or van | 58.2% | 45.1% | 57.8% | 62.1% | 55.8% | 59% |
| walking | 11.1% | 22.1% | 11.3% | 10.1% | 13.7% | 10% |
| Bus/Mini Bus/Coach | 2.6% | 9.1% | 2.2% | 2.7% | 4.2% | 6% |
| Work from home | 16.8% | 8.4% | 20.8% | 14.6% | 15.2% | 11% |
| Bicycle | 2.1% | 6.2% | 1.1% | 1.6% | 2.8% | 3% |
| Passenger in Car/Van | 4.7% | 5.2% | 4.4% | 5.0% | 4.8% | 5% |
| Train | 2.3% | 1.9% | 0.6% | 2.2% | 1.8% | 4% |
| Other | 2.6% | 2.0% | 1.9% | 1.8% | 2.1% | n/a |

## Shopping Trips

170 **Table A3.35** displays the proportion of shopping trips taken by different transport modes within Greater Exeter. In 2014, 66% of shopping trips were made by car/van, either travelling as the driver or as a passenger. 22% were made on foot and 11% were made by public transport. Whilst only 11% of shopping trips are made by public transport, the proportions of trips by public transport are significantly higher than the comparable splits for travelling to work (3%), perhaps suggesting that public transport accessibility plays an important role in the strength of local retail centres.

171 Whilst overall, the numbers of business trips have fallen, national evidence shows how van traffic has grown faster than car traffic in recent years. In 2014 van traffic reached its highest level and the proportion of traffic accounted for by vans has increased over the past 30 years from 9% in 1984 to 14% in 2014.

**Table A3.35: Modal split of shopping trips (National Traffic Survey, 2014)**

| | Walk | Car/van driver | Car/van passenger | Public transport | Other | All modes |
|---|---|---|---|---|---|---|
| 2002 | 25% | 42% | 21% | 11% | 1% | 100% |
| 2006 | 25% | 42% | 21% | 11% | 1% | 100% |
| 2011 | 23% | 44% | 20% | 11% | 1% | 100% |
| 2014 | 22% | 45% | 21% | 11% | 2% | 100% |

172 Information is not available at an appropriate level to identify the number of shopping trips made within Greater Exeter or the modal split.

### Education Trips

173 **Table A3.36** provides compares the transport modes used for education trips within Greater Exeter compared to the national averages. Overall, in 2013, a higher proportion of children walked to school in Greater Exeter than the national average and a much lower proportion were driven, particularly to primary schools. The numbers using public transport were well below the national average for both primary and secondary trips.

174 The proportion of secondary school children cycling to school in Greater Exeter was 150% of the national average, with levels in Exeter more than double the national average. This trend is not replicated across all of Greater Exeter and the more favourable modal splits for Exeter schools are likely to be driven by the shorter distances of pupils to the schools.

**Table A3.36: Education trips modal split (National Traffic Survey, 2014)**

| | Primary | | | | Secondary | | | |
|---|---|---|---|---|---|---|---|---|
| Location | Walk | Cycle | Car | PT | Walk | Cycle | Car | PT |
| National | 46% | 1% | 46% | 6% | 37% | 2% | 23% | 36% |
| Greater Exeter | 59% | 1% | 36% | 3% | 45% | 3% | 15% | 36% |
| Exeter | 68% | 2% | 26% | 3% | 60% | 9% | 17% | 14% |

### Leisure Trips

175 Like commuting and business trips, the number of leisure trips per person has also fallen at a rate consistent with the overall fall in total trips between 1995 and 2014 (taken from the National Traffic Survey 2014).

176 The number of trips generated by visiting friends at private home has fallen by 35%, whilst the number of trips generated by visiting friends elsewhere has remained unchanged, although with the fall in total leisure trips, it accounts for a higher proportion.

177 The number of trips generated by entertainment/public activity has increased by 25-30% and having only accounted for less than 1 in 7 leisure trips in 1995, by 2014 it accounted for more than 1 in 5 of all leisure trips. There has been a 40% decrease in trips generated by sport/participation. Whilst there has been a 15% fall in trips generated by holiday stays, this is proportionate to the fall rate of all trips.

178 Greater Exeter has experienced a 40% increase in day trips, resulting in a 50% increase in terms of day trips as a proportion of all leisure trips.

179 The breakdown in different categories casts light on how leisure related trips are changing. In particular, there are substantially fewer trips to see friends, either at home or elsewhere. This 30% fall may be driven by changing social interaction through online social media.

180 Whilst day trip activity has increased as a proportion of all leisure trips, trips associated with sport participation have fallen dramatically.

### Rail

181 All Districts within the Greater Exeter area are served by rail connections and the use of the majority of stations across Greater Exeter has significantly increased since 2000. There has been an increase in rail trips of 5.7m journeys per annum between 2000/01 and 2014/15 from railway stations in Greater Exeter. As an average figure calculated across Greater Exeter, the use of stations (and thus rail journeys) has increased by 105% (Office of Rail Regulation 2015).

182 The use of stations within East Devon has increased by an average of 54%, with the use of stations at Axminster, Exton and Whimple increasing by more than 80% each. The use of stations within Exeter has increased significantly and by an average of 383%. The highest increase is found at Exeter St Thomas, whose use has increased by over 1349%. The use of stations within Mid Devon has increased by an average of 460%. This figure is, however, skewed by the enormous increases in the use of Copplestone and Newton St Cyrus stations (1527% and 1095% respectively). However, even omitting these figures, the average increase in the use of the remaining stations within Mid Devon is approximately 100%. The use of stations within Teignbridge has increased by an average of 127.8% with the most marked increase at Dawlish Warren of 240%. This may be linked to its popularity with tourists.

183 **Table A3.37** shows station usage (total entries and exits) summarised over the past 15 years.

**Table A3.37: Railway station usage within Greater Exeter (Office of Rail Regulation, 2015)**

| | 2000/1 | 2004/5 | 2009/10 | 2014/15 | % Increase since 2000 |
|---|---|---|---|---|---|
| **EAST DEVON** | | | | | |
| Axminster | 208,879 | 181,825 | 211,204 | 386,226 | 85% |
| Exmouth | 578,218 | 623,832 | 722,922 | 927,182 | 60% |
| Exton | 12,299 | 10,583 | 15,834 | 23,073 | 88% |
| Feniton | 58,778 | 57,541 | 60,048 | 70,534 | 20% |
| Honiton | 241,650 | 256,356 | 292,400 | 391,860 | 62% |
| Lympstone Commando | 68,465 | 55,875 | 60,558 | 54,972 | 20% |
| Lympstone Village | 67,241 | 63,325 | 77,700 | 99,052 | 47% |
| Whimple | 36,700 | 34,779 | 59,354 | 68,896 | 88% |
| **EXETER** | | | | | |
| Digby & Sowton | 87,639 | 134,804 | 271,316 | 571,510 | 552% |
| Exeter Central | 1,031,718 | 1,045,697 | 1,512,286 | 2,343,636 | 127% |
| Exeter St David's | 1,449,186 | 1,632,285 | 2,152,786 | 2,509,220 | 73% |
| Exeter St Thomas | 35,673 | 64,295 | 103,488 | 213,848 | 499% |
| Pinhoe | 6,132 | 12,959 | 38,326 | 88,872 | 1349% |
| Polsoe Bridge | 39,728 | 43,788 | 70,038 | 116,552 | 193% |
| St James' Park | 27,126 | 27,477 | 46,754 | 64,586 | 138% |
| Topsham | 98,174 | 127,903 | 186,056 | 231,122 | 135% |
| **MID DEVON** | | | | | |
| Copplestone | 828 | 356 | 8,164 | 13,476 | 1527% |
| Crediton | 16,243 | 22,478 | 36,784 | 52,492 | 223% |
| Eggesford | 13,245 | 14,152 | 22,858 | 29,106 | 120% |
| Lapford | 6,740 | 2,104 | 1,878 | 2,704 | -60% |
| Morchard Road | 4,454 | 3,442 | 6,482 | 11,882 | 167% |
| Newton St Cyrus | 210 | 702 | 1,784 | 2,510 | 1095% |
| Tiverton Parkway | 178,153 | 202,588 | 354,648 | 447,284 | 151% |
| **TEIGNBRIDGE** | | | | | |

| | | | | | |
|---|---|---|---|---|---|
| Dawlish | 272,539 | 281,659 | 400,922 | 556,796 | 104% |
| Dawlish Warren | 46,278 | 69,763 | 114,376 | 157,212 | 240% |
| Newton Abbot | 569,090 | 720,606 | 940,862 | 1,141,040 | 100% |
| Starcross | 50,332 | 69,175 | 83,066 | 100,178 | 100% |
| Teignmouth | 291,219 | 318,532 | 451,154 | 566,620 | 95% |

### Bus Use

184 It is visible in **Table A3.38** that over the past 7 years the use of public transport bus services in Devon has remained fairly constant, varying between the highest level of 37.5 passenger journeys per head of population during the year of 2014/15 and the lowest level of 34.1during 2015/16. Devon bus use is slightly lower than that within the wider area of the South West, which has also remained fairly constant over the past 7 years. Devon performs well in relation to the general year by year decrease over England, from 88.8 passenger journeys per head of population in 2009/10 to 82.7 in 2015/16.

185 Although bus use has remained fairly constant, public transport use in Devon is far lower than the English average.

186 It has not been possible to source information relating to Greater Exeter.

**Table A3.38: Passenger journeys per head of population (Dept. for Public Transport Public Service Vehicle Survey, 2016)**

| | Devon | South West | England |
|---|---|---|---|
| 2009/10 | 34.5 | 38.7 | 88.8 |
| 2010/11 | 36 | 39.2 | 88.2 |
| 2011/12 | 35.9 | 39.5 | 87.8 |
| 2012/13 | 36.2 | 37.9 | 85.8 |
| 2013/14 | 37.1 | 39.1 | 86.7 |
| 2014/15 | 37.5 | 39.8 | 85.6 |
| 2015/16 | 34.1 | 39.7 | 82.7 |

### Walking and Cycling

187 Based on information collected from Census and the Annual Population Survey 2014/15, the proportion of full time workers who cycle to work across Greater Exeter (1.25%) is comparable with levels across England (1.3%), as shown in **Table A3.39**. The proportion is significantly higher within the urban area of Exeter (2.7%), where more than double the English average cycle to work. This high level within Exeter skews the overall Greater Exeter figures, as levels of cycling to work in all other Districts is lower than the English average.

188 The proportion of full time workers within Greater Exeter who walk to work is significantly above the national average. The figures follow similar patterns to those for cycling, with a significantly higher proportion of residents of Exeter walking to work than in any other District. 7.3% of the full time working residents walk to work within this urban location in comparison to the English average of 3.1% or Devon average of 3.9%. This high figure again skews the overall level for Greater Exeter.

**Table A3.39: Full time workers who walk or cycle to work (2011 Census and Annual Population Survey 2014/15)**

| | East Devon | Exeter | Mid Devon | Teignbridge | Greater Exeter | Devon | England |
|---|---|---|---|---|---|---|---|
| % of adults in full time work who cycle to work | 0.8% | 2.7% | 0.8% | 0.7% | 1.25% | 1.1% | 1.3% |
| % of adults in full time work who walk to work | 2.9% | 7.3% | 3.1% | 2.7% | 4.0% | 3.9% | 3.1% |

# Appendix 4
# Detailed matrices for GESP spatial development strategy

## Strategy Options

***Option 1:*** Minimum provision (total homes - 53,260; additional homes - 19,870)

***Option 2:*** Mid-range (total homes - 58,586; additional homes - 25,196)

***Option 3:*** Transformational (total homes - 66,575; additional homes - 33,185)

| SA Objective | Option1 | Option 2 | Option 3 | Justification |
|---|---|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | - | -- | -- | All options considered would provide a high level of development in the GESP area over the plan period. It is expected that each option has the potential to result in adverse effects in terms of biodiversity across the GESP area. This is particularly expected to be the case for Option 2 and Option 3 which would result in significantly higher levels of new growth with an increase of 10% and 35% respectively. New housing development may have adverse impacts in terms of species disturbance, habitat loss and fragmentation. There is however potential for new development to allow for the enhancement of habitats through the incorporation of new green infrastructure and other mitigation measures. Furthermore the re-use of brownfield land and the sites at urban locations in a manner which is sensitive to potential biodiversity sensitivities at these locations, may limit the loss of countryside land to urbanisation. However, these options do not present the pattern in which development is to be distributed. It is expected that the higher land take required and the increased number of new residents supported (with the potential for resultant recreation pressures) through Option 2 and Option 3 in particular has the potential to result in adverse impacts on important biodiversity sites. Nationally and internationally important biodiversity sites in the plan area include Dawlish Warren SAC and NNR, Exe Estuary SPA, East Devon Heaths SPA and SAC, Sidmouth to West Bay SAC, Lyme Bay and Torbay SAC, South Dartmoor Woods SAC, South Hams SAC and the River Axe SAC.<br><br>As such a minor negative effect is expected in relation to this SA objective for Option 1 and a significant negative effect is expected for Option 2 and Option 3. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | -? | --? | --? | All options considered would provide a high level of development in the GESP area over the plan period. It is expected that each option has the potential to result in adverse effects in terms of landscape character across the GESP area as a result of land take required to support new growth. This is particularly expected to be the case for Option 2 and Option 3 which would result in significantly higher levels of new growth with an increase of 10% and 35% respectively. Higher levels of growth across the plan area have the potential to require larger amounts of countryside to be developed to the detriment of rural character. There is potential for the achievement of high densities of new growth which is delivered in a manner which is considerate of local character to improve the townscapes of larger cities such as Exeter, however |

| SA Objective | Option 1 | Option 2 | Option 3 | Justification |
|---|---|---|---|---|
| | | | | any impact on the character of surrounding natural landscape is likely to be limited. Furthermore these options do not present the pattern in which development is to be distributed. Important landscapes in the plan area and surroundings include East Devon and Blackdown Hills AONBs to the east within the plan area and Dorset AONB outside of the plan area in this direction. Part of the Dartmoor National Park is within the south west of the plan area and beyond the plan area's northern boundary Exmoor National Park covers most of the land. Additionally much of the south of the plan area and some of the area towards Exeter at the Exe estuary falls within the Teignbridge Coastal Protection Area South, the Teignbridge Coastal Protection Area North or the East Devon Coastal Protection Area. These important designated landscapes are likely to be particularly sensitive to the change which a high level of development is likely to result in.<br><br>As such a minor negative effect is expected in relation to this SA objective for Option 1 and a significant negative effect is expected for Option 2 and Option 3. The effect in relation to each option with regards to landscape character is likely to be influenced in part by the design of new development, which is unknown at this stage and therefore all effects recorded are uncertain. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br><br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | -? | --? | --? | All options considered would provide a high level of development in the GESP area over the plan period. It is expected that each option has the potential to result in adverse effects in terms of the setting of the historic environment the GESP area, particularly in relation to Option 2 and Option 3 which would result in significantly higher levels of new growth at 10% and 35% higher than Option 1 respectively. New housing development may have adverse impacts in terms of the setting of heritage assets such as listed buildings, conservation areas and scheduled monuments, although development which is designed to be considerate of such assets may present opportunities for enhancements. Furthermore the re-use of brownfield land in particular, has the potential to result in improvements of local character and the settings of heritage assets. However, these options do not present the pattern in which development is to be distributed. It is expected that the higher land take required through Option 2 and Option 3 in particular has the potential to result in adverse impacts important heritage assets. Within the plan area land at the city of Exeter, towards the Exe estuary by Newton Abbot and Teignmouth, as well as Tiverton, Sidmouth, Exmouth and Crediton all contain high concentrations of heritage assets which may be affected by new development.<br><br>As such a minor negative effect is expected in relation to this SA objective for Option 1 and a significant negative effect is expected for Option 2 and Option 3. |
| **4. CLIMATE CHANGE MITIGATION** | -? | +/-? | +/--? | The delivery of new growth in the plan area has the potential to result in an increased number of journeys being made on a day to day basis by residents, which is likely to increase the overall level of greenhouse gas emissions. However, this will be most dependent on the location of new development as well as the |

| SA Objective | Option 1 | Option 2 | Option 3 | Justification |
|---|---|---|---|---|
| To minimise greenhouse gas emissions. | | | | spatial distribution of new development where delivering critical mass through new growth may support the delivery of new services and facilities or the upgrading of existing provisions. While delivering high levels of growth has the potential to secure higher levels of funding from "infrastructure deals" with national government, Option 2 has been identified as the option at which high levels of funding could be secured without resulting in the most adverse impacts in terms of increases in greenhouse gas emissions.<br><br>All options are expected to have a negative effect in relation to this SA objective. Considering the higher number of journeys which would be made through Option 3, the negative effect is likely to be significant. The negative effect expected for Option 2 and Option 3 is likely to be combined with a minor positive effect considering that these options present the greatest opportunity to secure government funding to help mitigate the adverse impacts of delivering new growth. The effect identified for each option is uncertain considering that they will be dependent in part on the spatial distribution of growth which is not addressed through these options. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | - | - | - | All options considered would provide a high level of development in the GESP area over the plan period. It is expected that each option has the potential to result in adverse effects in terms of a high amount of land take across the GESP area to support new growth. This would increase the area of impermeable surfaces in the area. While Option 2 and Option 3 would result in a higher level of new growth at 10% and 25% more than Option 1 respectively, all options are likely to require a larger amount of greenfield land take. It is expected that all options could deliver a pattern of growth as to avoid a high number of sites being located within areas of high flood risk, considering the large area of land in the plan area, which lies within Flood Zone 1 and outside of Critical Drainage Areas.<br><br>As such a minor negative effect is expected in relation to this SA objective for all options. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | -- | -- | -- | All options considered would provide a high level of development in the GESP area over the plan period. It is expected that each option has the potential to result in adverse effects in terms of the high amount of land take across the GESP area to support new growth. While Option 2 and Option 3 would result in a higher level of new growth at 10% and 25% above Option 1 respectively, all options are likely to require a larger amount of greenfield land take. There are areas of Grade 1 and Grade 2 agricultural land present in the plan area along many of the more significant water courses, including areas around Exeter and the Exe estuary towards Teignmouth and Newton Abbot. There are also a number of MSAs within the plan area. As such development in close proximity has the potential to adversely impact upon mineral extraction at land by Teignmouth and Newton Abbot, as well as by Exmouth north towards Willand and by Seaton. While all options may present the opportunity for the re-use of brownfield land in the plan area, which is |

| SA Objective | Option 1 | Option 2 | Option 3 | Justification |
|---|---|---|---|---|
| | | | | likely to result in a more efficient pattern of land use, none the options considered identify the specific distribution of growth over the plan period.<br><br>As such a significant negative effect is expected in relation to this SA objective for all options. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or degradation. | -- | -- | -- | For all options considered it is likely that levels of water consumption will be most affected by the design and onsite practices at developments, as well as the level of new growth. The amount of new growth over the plan period also can be used to establish potential impacts on water quality considering the assumption that higher levels of growth will require more growth to occur across the plan area and potentially at sensitive sites. It is likely that nearby waterbodies may be impacted upon during construction. Further impacts on water quality are likely to be dependent upon the location of new development where there are capacity issues at the local sewage treatment works (STWs) to treat wastewater. However, South West Water has advised that all potential locations within the GESP area can be connected to existing STW (some of which will require expansion), with no impact on the output water quality. The Exe Estuary SPA is considered to be particularly sensitive to any change in water quality and as such the potential for new growth to affect this water course has been considered in the appraisal of the options considered.<br><br>Considering the high level of development to be achieved over the plan period, all options are likely to deliver new growth to include some development which would be adjacent to a waterbody which follows directly into the Exe Estuary SPA. This includes development within Exeter through which the River Exe flows, as well as its many tributaries to the south of the plan area. The options considered do not set out any preferred distribution of growth as to avoid potentially sensitive locations in the plan area. As such a significant negative effect is expected in relation to this SA objective for all options. |
| **8. HOMES**<br><br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | + | ++ | ++ | All options will contribute to delivering the required number of houses over the plan period. The number of new homes to be delivered is in line with the government's standard housing need method. Given that the options considered do not address the distribution of growth across the plan period, there has been no consideration for the ability of the various options to best address the issues of local affordability within the plan area. In general it is expected that delivering a higher level of growth will result in a more affordable housing market. Option 1 has been assessed as being likely to have improvements in housing affordability of 20%, while Option 2 and Option 3 could have affordability improvements of 28% and 34% respectively. The higher levels of housing delivery supported through Option 2 and Option 3 are likely to result in a higher number of subsidised homes being developed in the GESP area, further permitting a wider range of families and individuals to access the homes they need. Furthermore these options could support the delivery of a wider range of housing types to meet local needs, including self-build units. As the options |

| SA Objective | Option1 | Option 2 | Option 3 | Justification |
|---|---|---|---|---|
| | | | | considered do not address the size of sites to be supported they are not expected to impact upon the achievement of faster build out rates might otherwise be supported through an approach which includes higher numbers of smaller sites as part of the spatial strategy.<br><br>As such a minor positive effect is expected in relation to this SA objective for Option 1 and a significant positive effect is expected for Option 2 and Option 3. |
| **9. HEALTH**<br><br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ? | ? | ? | The delivery of new growth in the plan area has the potential to impact upon access to healthcare facilities and open spaces which allow for more active lifestyles. However, this will be most dependent on the location of new development as well as the spatial distribution of new development where delivering critical mass through new growth may support the delivery of new services and facilities or the upgrading of existing provisions.<br><br>The options considered would deliver varying levels of housing over the plan period but would not affect the distribution of growth and therefore an uncertain effect is expected in relation to this SA objective. |
| **10. WELLBEING**<br><br>To support positive, safe and healthy communities. | +/-? | ++/-? | ++/--? | Delivering new development in areas which are currently identified through the Index of Multiple Deprivation (IMD) 2015 as experiencing higher levels of deprivation has the potential improve access to services and facilities and high quality and affordable homes. While none of the options would specifically target development at areas which are experiencing high levels of deprivation delivering a high level of growth is likely to help improve accessibility to affordable and high quality homes which is an important indicator of deprivation. A minor positive effect is therefore expected for Option 1 in relation to this SA objective and a significant positive effect is expected for Option 2 and Option 3.<br><br>Air quality and noise will also have an impact on the overall level of wellbeing which residents experience at a given location. This will be impacted upon by the number of journeys undertaken by motor vehicles. As such the higher levels of growth in the plan area through Option 2 and Option 3 are likely to particularly adverse impacts on this issue. The location of new development will have an additional impact in terms of air quality and noise with consideration for how it is related to AQMAs and Exeter airport. A noise contour of 57db and above has been established around the airport. Considering that the options would not have an impact on the spatial distribution of growth in the plan area and the areas of sensitivity identified in relation to these issues are relatively small, effects relating to air quality as well as noise are uncertain to a degree. |

| SA Objective | Option 1 | Option 2 | Option 3 | Justification |
|---|---|---|---|---|
| | | | | Delivering high levels of growth has the potential to secure higher levels of funding from "infrastructure deals" with national government. This funding may provide opportunities to mitigate effects in relation to air quality by limiting the potential for congestion through infrastructure improvements and promoting more sustainable modes of transport. Option 2 has been identified as the option at which high levels of funding could be secured without resulting in the most adverse impacts in terms of increases of air pollution.<br><br>Overall, the effects expected in relation to this SA objective for all options are likely to be mixed, with the positive effects likely to be combined with an uncertain negative effect. The negative effect expected for Option 1 and Option 2 is likely to be minor and negative effect for Option 3 is likely to be significant considering the higher amount of growth supported and the more limited possibility of mitigating adverse impacts through the securing of central government infrastructure funding. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | ? | ? | ? | The delivery of new growth in the plan area has the potential to impact upon access to services and facilities. However, this will be most dependent on the location of new development as well as the spatial distribution of new development where delivering critical mass through new growth may support the delivery of new services and facilities or the upgrading of existing provisions.<br><br>The options considered would deliver varying levels of housing over the plan period but would not affect the distribution of growth and therefore an uncertain effect is expected in relation to this SA objective. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | + | ++ | ++ | Delivering new homes in the plan area over the plan period is likely to have additional benefits in terms of economic growth. Construction employment would support local economic prosperity. Furthermore the affordability benefits which delivering a higher level of growth can be used to secure, are likely to help permit/encourage a younger, more educated workforce to stay or move into the area, with added benefits in terms of productivity. Helping to raise local productivity is furthermore likely to help promote the objectives of Local Enterprise Partnership's Productivity Strategy.<br><br>The higher levels of growth supported through Option 2 and Option 3 is likely to be of added benefit in terms of helping to improve local productivity and securing a more educated workforce in the plan area. For these reasons a minor positive effect is expected in relation to this SA objective for Option 1 and a significant positive effect is expected for Option 2 and Option 3. |

| SA Objective | Option1 | Option 2 | Option 3 | Justification |
|---|---|---|---|---|
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and town centres. | ? | ? | ? | The delivery of new growth during the plan period has the potential to impact upon access to city and town centres in the GESP area. However, this will be most dependent on the location of new development as well as the spatial distribution of new development where new growth in close proximity to existing centres is likely to increase footfall in these areas. Benefits may also be achieved where sustainable transport improvements are supported by new development. However, where to access town centre locations I specifically being considered, this is likely to be most dependent upon the spatial distribution of new growth, in that delivering growth in a pattern to achieve a suitable level of critical mass may support the provision of new or improved services.<br><br>The options considered would deliver varying levels of housing over the plan period but would not affect the distribution of growth and therefore an uncertain effect is expected in relation to this SA objective. |
| **14. CONNECTIVITY AND TRANSPORT**<br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | - | +?/- | +?/- - | The delivery of a high level of new growth in over the plan period is likely to have adverse impacts in terms of increased levels of congestion as additional residents need to commute and travel to services and facilities. This is likely to be detrimental to the level of accessibility residents benefit from. The delivery of new transport infrastructure is likely to help mitigate the potential impacts of new development on the transport network. This is likely to be supported through the securing of "infrastructure deals" with national government to bridge any funding gap in the plan area. Option 2 is likely to best meet the level of growth required to secure such a deal without providing a level of delivery at which the mitigation that could be secured would not address any adverse impacts in their entirety.<br><br>A negative effect is therefore expected in relation to this SA objective for all options. The negative effect is significant for Option 3 considering the high level of growth supported and the strain this number of new homes would place on existing transport infrastructure in the plan area. The negative effect expected for Option 2 and Option 3 is likely to be combined with an uncertain minor positive effect, given that there may be potential for secure funding from central government to help mitigate adverse impacts. |

### Distribution Scenarios

***Scenario 1:*** Proportionate growth of all settlements in the settlement hierarchy

***Scenario 2***: Exeter and major town urban intensification

***Scenario 3:*** Mainly rural distribution

***Scenario 4:*** Public transport infrastructure corridors and hubs

***Scenario 5:*** Concentrate on areas with the least affordable housing

***Scenario 6:*** Locate development away from international wildlife sites

***Scenario 7:*** Market-led

| SA Objective | Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Justification |
|---|---|---|---|---|---|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | +/-- | +/-- | -- | +/-- | +/-- | ++/- | +/-- | The various scenarios considered would distribute a high level of development across the GESP area over the plan period. It is expected that each option has the potential to result in adverse effects in terms of biodiversity across the GESP area, for example, as a result of species disturbance, habitat loss and fragmentation. New development may allow for the enhancement of habitats through the incorporation of new green infrastructure and other mitigation measures. While the level of development supported through each scenario does not differ, impacts on the various biodiversity designations in the plan area and surroundings can be gauged by considering the proximity of potential development locations to such features.<br><br>**Scenario 1:** Delivering growth to the settlements in the settlement hierarchy in a proportionate manner has the potential to result in impacts on the natural environment depending on the specific sites chosen for growth. While this scenario would result in all settlements in the hierarchy accommodating some level of new growth, this growth is to be proportionate to settlement size and therefore the larger settlements in the plan area would accommodate the highest level of growth. Some of the larger settlements in the plan area, towards the south in particular, including Exeter, Exmouth, Newton Abbot, Axminster, Sidmouth and Seaton are in close proximity to national or international biodiversity sites. This includes |

| SA Objective | Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Justification |
|---|---|---|---|---|---|---|---|---|
| | | | | | | | | Dawlish Warren SAC and NNR, Exe Estuary SPA, East Devon Heaths SPA and SAC, Sidmouth to West Bay SAC, Lyme Bay and Torbay SAC, South Dartmoor Woods SAC, South Hams SAC and the River Axe SAC. Considering that this scenario would allow for the highest levels of growth at the larger settlements of the plan area it may support higher levels of development at brownfield land at these locations. This approach may support the development of sites which are less sensitive in terms of biodiversity and furthermore may allow for opportunities for the incorporation of green infrastructure which is likely to provide new habitats and improve habitat connectivity. An overall mixed minor positive and significant negative effect is therefore expected in relation to this SA objective for Scenario 1.<br><br>**Scenario 2:** Focussing growth at Exeter and the major towns of the plan area is likely to have similar effects on the international and national biodiversity designations identified through Scenario 1. Scenario 2 would reduce the level of growth which is provided at the more rural settlements but would provide much of the new growth towards the southern portion around settlements such as Exeter, Newton Abbot and Teignmouth of the plan area where there is a concentration of international and national biodiversity sites. It is noted that this approach may help to limit the loss of greenfield land at more rural locations many of which are sensitive in terms of proximity to locally designated biodiversity sites. This approach may also present opportunities for the incorporation of new green infrastructure at the larger settlements. It may allow for the increased use of brownfield land considering the urban character of the areas where much of the new growth would be provided. An overall mixed minor positive and significant negative effect is therefore expected in relation to this SA objective for Scenario 2.<br><br>**Scenario 3:** By allowing for a mainly rural distribution of growth in the plan area this scenario would limit development at the larger settlements. While many of the larger settlements in the GESP area are constrained by national or international biodiversity designated biodiversity sites, Scenario 3 would result in a wider distribution of growth. As such a higher number of national, international and local designated biodiversity sites in particular would be likely to be adversely affected by new development. This approach is less |

| SA Objective | Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Justification |
|---|---|---|---|---|---|---|---|---|
| | | | | | | | | likely to make use of brownfield land which, in general, is in greater supply at urban locations considering the more developed character present there. The resultant higher amount of land take at greenfield locations is also likely to be detrimental to biodiversity in the plan area. Scattered rural development may furthermore not provide the scale of growth at a given location to provide opportunities for the incorporation of significant elements of green infrastructure. A significant negative effect is therefore expected in relation to this SA objective for Scenario 3.<br><br>**Scenario 4:** Allowing for new growth mostly along the public transport infrastructure corridors and hubs in the plan area will see much of the development occurring at the main settlements of the plan area. This approach would however focus growth more towards the west, with much of the new growth occurring along the train lines and bus services which extend from Exeter in particular. As such while many of the effects on the national and international biodiversity sites identified through Scenario 1 and Scenario 2 are likely to result through Scenario 4, impacts on Lyme Bay and Torbay SAC and Sidmouth to West Bay SAC may be reduced by limiting the level of growth to be delivered at Sidmouth and Seaton. This approach may however have significantly adverse impacts in terms of level of growth which would be provided in close proximity to the Exe Estuary SPA. It is expected that this scenario would provide similar opportunities to Scenario 1 and Scenario 2 for the re-use of brownfield and incorporation of new green infrastructure at the more urban locations of the plan area which may help to limit greenfield land take and provide habitats and habitat connectivity. An overall mixed minor positive and significant negative effect is therefore expected in relation to this SA objective for Scenario 4.<br><br>**Scenario 5:** By concentrating new growth over the plan period in the areas which have the greatest issues in terms of housing affordability, the highest levels of development would be likely to occur in close proximity to Exeter, as well as in the area surrounding Teignmouth and Newton Abbot. As such this approach could result in adverse impacts on the Dawlish Warren SAC and NNR, Exe Estuary SPA and East Devon Heaths SPA and SAC by Exeter as well as South Dartmoor Woods SAC, South Hams SAC and Lyme Bay and |

| SA Objective | Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Justification |
|---|---|---|---|---|---|---|---|---|
| | | | | | | | | Torbay SAC in the area surrounding Newton Abbot and Teignmouth. Scenario 5 would allow for a limited amount of new growth in the less developed rural settlements of the plan area where there is potential for adverse impacts on locally designated sites and loss of potentially sensitive greenfield sites, however this would be less than that supported through Scenario 3. Focussing much of the new growth towards Exeter in particular may allow for the re-use of brownfield land considered the more developed character of this area and the incorporation of green infrastructure to support habitat connectivity at the urban areas. An overall mixed minor positive and significant negative effect is therefore expected in relation to this SA objective for Scenario 5.<br><br>**Scenario 6:** This approach would specifically locate new development as to limit the potential for adverse impacts on international wildlife sites. This would be achieved by delivering new growth mainly to the north of the plan area. As such development to the south west where designated sites such as Dawlish Warren SAC and NNR, Exe Estuary SPA, East Devon Heaths SPA and SAC are located would be avoided. However, Scenario 6 would include a high level of growth to the south east by Seaton meaning that there is potential for adverse impacts on Sidmouth to West Bay SAC and Lyme Bay and Torbay SAC. Furthermore by distributing a high level of growth to the north of plan area this approach may result in a higher level of greenfield land take resulting given that brownfield land, which is likely to be more prevalent at some of the southern locations considering their more developed character, would not accommodate new growth. Areas to the north including Tiverton and Crediton are also in close proximity to national and local biodiversity designations such as Tidcombe Lane Fen SSSI, Grand Western Canal Country Park LNR and Shobrooke Park County Wildlife Site. An overall mixed significant positive and minor negative effect is therefore expected in relation to this SA objective for Scenario 6.<br><br>**Scenario 7:** The delivery of growth through a market-driven approach only would see a high level of development occurring at new settlements to the east of Exeter and to the east of Cullompton, as well as within the Bicton area of the East Devon AONB. More modest expansions to some of the |

| SA Objective | Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Justification |
|---|---|---|---|---|---|---|---|---|
| | | | | | | | | larger towns including Newton Abbot, Axminster, Honiton, Ottery St Mary, Crediton, Tiverton, Exmouth and Exeter would also occur with some small-scale growth at a number of smaller villages. Development at the southern settlements of Newtown Abbot, Exmouth and Axminster has the potential to impact upon international and national biodiversity designations including South Hams SAC, Exe Estuary SPA, East Devon Pebblebed Heaths SAC, East Devon Heaths SPA and the River Axe SAC. This approach is also likely to result in a high level of greenfield land take with a limited number of brownfield regeneration opportunities. The large scale of development proposed may mean that opportunities for the incorporation of new green infrastructure at new developments (including at the periphery of existing larger settlements) may be good. An overall mixed minor positive and significant negative effect is therefore expected in relation to this SA objective for Scenario 7. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | -? | -? | --? | --? | --? | --? | --? | The potential for distribution of growth over the plan area to have impacts on landscape has been considered at a high level in relation to the relationship of potential new development locations with important landscapes and coastal areas. These include East Devon and Blackdown Hills AONBs to the east within the plan area and Dorset AONB outside of the plan area in this direction. Part of the Dartmoor National Park is within the south west of the plan area and beyond the plan area's northern boundary Exmoor National Park covers most of the land. Additionally much of the south of the plan area and some of the area towards Exeter at the Exe estuary falls within the Teignbridge Coastal Protection Area South, the Teignbridge Coastal Protection Area North or the East Devon Coastal Protection Area.<br><br>It is expected that all scenarios would require some development to be delivered at greenfield land in the plan area considering the finite supply of brownfield land and the high level of growth which needs to be delivered over the plan period. Scenario 1 and most notably Scenario 2 are particularly focussed on delivering new growth towards the existing larger settlements. While there may be potential for the regeneration of a higher number of brownfield sites through these options considering the more |

| SA Objective | Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Justification |
|---|---|---|---|---|---|---|---|---|
| | | | | | | | | developed character of the locations involved, it is likely that the development of greenfield sites needed could have adverse impacts on existing local character. While the re-use of brownfield land is likely to present opportunities for the improvement of townscape and urban character, beneficial effects are unlikely to extend to include those relating to landscapes or seascapes in the natural environment. Scenarios 1 and 2 could also result in adverse impacts on the Coastal Protection Areas in close proximity to Exeter and in the Newton Abbot and Teignmouth area. Impacts on the character of the AONBs or National Parks within or in close proximity to the plan area are considered less likely given the focus on urban growth and the potential for re-use of brownfield at these more developed locations.<br><br>Four of the remaining scenarios (3 to 6) would result in a higher level of growth occurring away from the larger settlements of the plan area. This approach is likely to have adverse impacts on the rural character of the less developed locations in the GESP area. Scenario 3 in particular would distribute development to a high number of locations, which is likely to result in a greenfield land take at a large number of development sites. Locations for growth within the East Devon and Blackdown Hills AONBs as well as the Dartmoor National Park would also be included within this approach to growth. Similarly Scenario 4 could include a high level of growth within the Coastal Protection Areas to the south west of the plan area and the within Dartmoor National Park. Scenario 5 could result in development in locations which are similar to Scenario 4 as well as development which could potentially impact upon the setting of Exmoor National Park which is located just outside of the plan area to the north. Scenario 6 would have the potential to have effects on the setting of Exmoor National Park and would also deliver new growth at the edge of East Devon and Blackdown Hills AONBs.<br><br>Scenario 7 would focus much of the growth over the plan period at larger settlements but would also allow for some growth at a number of the smaller villages. This scenario is expected to provide few brownfield regeneration opportunities which might otherwise have benefits for local landscape character. This scenario could have significant impacts on the character of |

| SA Objective | Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Justification |
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| | | | | | | | | parts of the East Devon AONB, Blackdown Hills AONB and Dartmoor National considering the locations set out for development within or at the edges of these designations. This would include the development of a new village at Bicton within the East Devon AONB.<br><br>As such a minor negative effect is expected in relation to this SA objective for Scenario 1 and Scenario 2 and a significant negative effect is expected for Scenario 3, Scenario 4, Scenario 5, Scenario 6 and Scenario 7. The effect for each scenario is uncertain given that any effect on important landscapes will depend in part on the design of new development which comes forward. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br><br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | --? | +/--? | --? | --? | --? | --? | --? | The larger settlements of the plan area (most notably the city of Exeter, the area towards the Exe estuary by Newton Abbot and Teignmouth, as well as Tiverton, Sidmouth, Exmouth and Crediton) contain the highest concentrations of heritage assets. As such, development at these locations may potentially result in impacts on the highest number of features such as listed buildings, conservation areas and local listings.<br><br>All scenarios apart from Scenario 3 would deliver a high level of growth to at least some of the larger settlements of the plan area and therefore a significant negative effect is expected for these six scenarios in relation to this SA objective. Scenario 3 would focus development in line with a rural growth approach. This approach would require development to be distributed to a higher number of locations in the GESP area. Given that some heritage assets including scheduled monuments and registered parks and gardens such as Manhead Park and Ugbrooke Park are located in more rural locations, this wider distribution of growth has the potential for the setting of more heritage assets to be affected by new development. Furthermore at these rural locations the existing less-developed character may contribute to the setting of local assets, meaning that new development may have particularly adverse impacts when compared to development within an urban setting. Therefore, a significant negative effect is also expected in relation to this SA objective for Scenario 3. However, concentrating the highest levels of growth within the largest settlements is |

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| | | | | | | | | likely to result in the most opportunities to make use of brownfield land which may benefit the character of these locations dependent upon the manner in which new development is delivered. Furthermore allowing for higher density urban redevelopment sites is also likely to have an overall benefit to the urban environment. As Scenario 2 would be likely to achieve the highest concentration of growth in urban locations, and would furthermore limit the potential for development which could adversely affect areas of particularly sensitive rural character, a minor positive effect is expected in combination with the significant negative effect identified for this SA objective.<br><br>Conversely Scenario 7 would result in the majority of development occurring on greenfield sites which are likely to be more viable for developers. As well as resulting in the expansion of many of the larger towns, Scenario 7 would see much of the development occur as expansions to some smaller towns. Development at the smaller settlements could have particular impacts in terms of the existing less developed character which contributes to the setting of assets at these locations. Furthermore, this scenario would result in new settlements being developed to the east of Exeter and to the east of Cullompton, as well as within the Bicton area of the East Devon AONB. These locations contain a number of heritage assets, including Listed Buildings, as well as Bicton Registered Park and Garden, the settings of which may be adversely affected by new development of this scale. The effects identified in relation to this SA objective for all scenarios are uncertain. Effects will be dependent to some extent on the design of new development which may support mitigation and enhancement measures related to the character of a given area. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas | +/- | ++ | -- | ++ | +/- | +/-- | ++/- | **Scenario 1:** Delivering growth to the settlements in the settlement hierarchy in a proportionate manner would provide higher levels of growth within the larger settlements of the plan area. By focussing much of the new growth at Exeter and the larger settlements this approach would provide the majority of new residents with access to sustainable transport links. The majority of the larger settlements benefit from access to the rail network |

| SA Objective | Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Justification |
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| emissions. | | | | | | | | which extend from stations at Exeter through Exmouth towards Newton Abbot, through Crediton towards the north west, through Tiverton Parkway towards the north east and towards the east via Honiton and Axminster. Growth at these more developed locations is also likely to encourage travel by more active modes of transport considering the shorter journey times to services and facilities and employment opportunities. Promoting modal shift in the plan area is expected to help limit any increase in greenhouse gas emissions as a result of new development. This approach would, however, also deliver a level of growth to the more rural settlements on the settlement hierarchy at which sustainable transport links are poorer and there is likely to be greater dependency on travel by private car. As such an overall mixed minor positive and minor negative effect is expected in relation to this SA objective for Scenario 1.<br><br>**Scenario 2:** Focussing growth at Exeter and the major towns of the plan area is likely to provide a higher number of new residents with access to sustainable transport links as well as the strategic road network. By providing the highest proportion of new growth at the more developed areas of the plan area this approach could help to encourage travel by more active modes of transport considering the shorter journeys which would be required to services and facilities and employment opportunities. By significantly limiting the level of growth at the more rural locations of the plan area, Scenario 2 would furthermore limit the potential for dependency on travel by private vehicle. It is expected that promoting modal shift in the plan area would help to limit any potential for increases in greenhouse gas emissions which might result due to new development. A significant positive effect is therefore expected in relation to this SA objective for Scenario 2.<br><br>**Scenario 3:** Allowing for a mainly rural distribution of growth in the plan area would limit development at the larger settlements. As such a majority of new residents would have to travel longer distances to access services and facilities and employment opportunities. Many of these locations are isolated from sustainable transport links. By allowing for a wider distribution of growth in the plan area this approach would also be less likely to deliver the criteria mass at rural locations to support significant improvements to |

| SA Objective | Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Justification |
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| | | | | | | | | sustainable transport links in the plan area. It is likely that this approach would not directly promote modal shift in the GESP area and conversely could result in increased dependency on travel by private vehicle. As such this approach may result in significant increases in greenhouse gas emissions in the plan area. A significant negative effect is therefore expected in relation to this SA objective for Scenario 3.<br><br>**Scenario 4:** Allowing for new growth mostly along the public transport infrastructure corridors and hubs in the plan area will see much of the development occurring at the main settlements of the plan area. Additional growth would be supported along the main sustainable transport links in the plan area, most notably along the rail and bus services which extend from Exeter. This approach would not only provide a majority of new residents with access to sustainable transport links but it would also result in many new residents being in close proximity to services and facilities and employment opportunities in the larger settlements which may encourage travel by active modes of transport in particular. Scenario 4 may also help to strengthen the existing public transport services in the plan area by securing their viability through increased number of trips, which is likely to support more significant improvements to these services. Considering the aim of Scenario 4, it is unsurprisingly expected to help promote modal shift in the plan area which is likely to help limit any potential increase in greenhouse gas emissions as a result of new development. A significant positive effect is therefore expected in relation to this SA objective for Scenario 4.<br><br>**Scenario 5:** By concentrating new growth over the plan period in the areas which have the greatest issues in terms of housing affordability, the highest levels of development would be likely to occur in close proximity to Exeter, as well as in the area surrounding Teignmouth and Newton Abbot. Some development would also be supported in the rural areas. Concentrating new growth by Exeter in particular is likely to help support a public transport led strategy and may also encourage an uptake of travel by active modes of transport, considering the close proximity of services and facilities and employment opportunities. Development which is provided at more rural |

| SA Objective | Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Justification |
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| | | | | | | | | locations in particular is likely to provide new residents with a poor level of access to sustainable transport services and is likely to result in an increase in the number of journeys being made by private vehicle. As such this approach is expected have variable impacts in terms of promoting shift and limiting the potential for new development to result in an increase in greenhouse gas emissions in the GESP area. An overall mixed minor positive and minor negative effect is therefore expected in relation to this SA objective for Scenario 5.<br><br>**Scenario 6:** This approach would locate new development as to limit the potential for adverse impacts on international wildlife sites. This would be achieved by delivering new growth mainly to the north of the plan area. This approach would make use of existing sustainable transport links along the Tarka rail corridor which would take in Crediton, Tiverton and Cullompton. As such a portion of new residents would have access to sustainable transport links, as well as nearby services and facilities and employment opportunities at these relatively large settlements. The development of smaller villages in the area would, however, include some areas which provide poor access to existing sustainable transport links. This option would fail to provide residents in close proximity to the largest settlement in the plan area at Exeter. As such this option could also result in an increase in the number of journeys being made from more rural locations by private vehicle to Exeter to access services and facilities and employment opportunities thereby limiting the potential for a significant level of modal shift to be achieved. An overall mixed minor positive and significant negative effect is therefore expected in relation to this SA objective for Scenario 6.<br><br>**Scenario 7:** The delivery of growth through a market-driven approach only would see a high level of development occurring at new settlements to the east of Exeter and to the east of Cullompton, as well as within the Bicton area of the East Devon AONB. More modest expansions to some of the larger towns would also occur with some small-scale growth at a number of smaller villages. New settlements to the east of Exeter and to the east of Cullompton would be of a scale to provide new services and facilities and |

| SA Objective | Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Justification |
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| | | | | | | | | support a degree of self-sufficiency, thereby limiting the need for residents to travel by private vehicle and the emission of greenhouse gases. The new settlement to the east of Cullompton would be particularly well-related to the railway line between Exeter and Taunton, meaning there may be potential to provide infrastructure to connect to this service. Given that this approach would include only sites of 500 dwellings or more it is likely that new development as extensions to existing settlements could help to support the viability of public transport links. Residents would also benefit from access to services and facilities within settlements. Expansions of many of the larger settlements including Axminster, Newtown Abbot and Crediton would provide residents with access to existing rail services. Service provision is likely to be weaker at the smaller settlements of the plan area, although it is noted that this type of growth could help to support services and facilities at more rural locations. The smaller size and more isolated location of the new settlement at Bicton within the East Devon AONB means that the accessibility of existing and the delivery of new services and facilities is less likely at this location. Delivery of development along the A30 through the Blackdown Hills AONB would also be relatively isolated from existing services and facilities meaning that higher levels of greenhouse gases may be emitted as residents need to use cars more regularly. This growth is also not likely to be of a scale to support the delivery of all services which would help to make a development more self-contained. An overall mixed significant positive and minor negative effect is therefore expected in relation to this SA objective for Scenario 7. |
| **5. CLIMATE CHANGE ADAPTATION**<br>To adapt to the possible effects of climate change. | - | - | - | - | - | - | -- | **Scenario 1:** Delivering growth to the settlements in the settlement hierarchy in a proportionate manner would mean that much of the new growth could be provided at locations of a more developed character where there may be increased opportunities to make use of brownfield land. As such this approach may result in a less significant increase in impermeable surfaces in the plan area than an approach which makes use of a higher number of less developed rural locations. This approach would include significant development at Exeter which includes large areas of Flood Zone 2 and 3 along the River Exe. There are also areas of Flood Zone and 3 at |

| SA Objective | Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Justification |
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| | | | | | | | | Teignmouth and Newton Abbot where the River Teign passes by these settlements. There are also a number of Critical Drainage Areas at locations in close proximity to where development would be delivered along the River Exe and the River Culum by Cullompton. A minor negative effect is therefore expected in relation to this SA objective for Scenario 1.<br><br>**Scenario 2:** Focussing growth at Exeter and the major towns of the plan area is likely to have similar effects in terms of potential increases in flood risk to Scenario 1. Scenario 2 would reduce the level of growth which is provided at the more rural settlements but would provide much of the new growth towards the southern portion around settlements such as Exeter, Newton Abbot and Teignmouth of the plan area. As such while this scenario may result in a smaller increase in impermeable surfaces in the plan area due to the development of greenfield land, the inclusion of higher levels of growth at Exeter, Newton Abbot and Teignmouth may mean that new development is more constrained in terms of areas of higher flood risk. This option would also include a higher level of growth to the eastern and central portions of the plan area by Honiton, Ottery St Mary and Axminster all of which contain or are in close proximity to land which falls within a Critical Drainage Area. A minor negative effect is therefore expected in relation to this SA objective for Scenario 2.<br><br>**Scenario 3:** By allowing for a mainly rural distribution of growth in the plan area this scenario would limit development at the larger settlements. This approach would distribute development across a wider number of locations. It is also likely to result in the development of a higher number of greenfield land sites considering the mostly undeveloped character of more rural locations. This would increase the area of impermeable surfaces in the plan area. The smaller amount of development to be delivered at each location may mean that there is greater potential for development to be delivered in a manner which avoids increasing local flood risk, however the higher number of sites required and the wider distribution of development may mean that some of this development has to occur within an area of high flood risk or a Critical Drainage Area. This last point is considerate of the finite number of sites which are likely to come forward. A minor negative |

| SA Objective | Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Justification |
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| | | | | | | | | effect is therefore expected in relation to this SA objective for Scenario 3.<br><br>**Scenario 4:** Allowing for new growth mostly along the public transport infrastructure corridors and hubs in the plan area will see much of the development occurring at the main settlements of the plan area. As such this scenario has the potential result in opportunities to make use of brownfield land at these locations. As such there may be reduced need to make use of greenfield land for development, which otherwise may result in an increase in impermeable surfaces in the plan area. This approach would see much of the new growth occurring to the west and central portions of the plan area by Exeter, Newton Abbot, Teignmouth, Dawlish, Cullompton and Ottery St Mary all of which contain areas of high flood risk or a Critical Drainage Area. A minor negative effect is therefore expected in relation to this SA objective for Scenario 4.<br><br>**Scenario 5:** By concentrating new growth over the plan period in the areas which have the greatest issues in terms of housing affordability, the highest levels of development would be likely to occur in close proximity to Exeter, as well as in the area surrounding Teignmouth and Newton Abbot. These areas may present increased opportunities for the re-use of brownfield land considering their more developed character thereby limiting the potential for any increase in impermeable surfaces but may also result in development occurring with areas of identified high flood risk or Critical Drainage Areas. Scenario 5 would allow for a limited amount of new growth in the less developed rural settlements of the plan area where there is less likely to be opportunities for the re-use of brownfield land. A minor negative effect is therefore expected in relation to this SA objective for Scenario 5.<br><br>**Scenario 6:** This approach would specifically locate new development as to limit the potential for adverse impacts on international wildlife sites. This would be achieved by delivering new growth mainly to the north of the plan area. This would take in land by Cullompton to the north which contains a Critical Drainage Area. Scenario 6 would also allow for some growth by Axminster and by Honiton both of which contain sizeable areas of land within Flood Zone 2 and 3 and development could potentially be constrained by |

| SA Objective | Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Justification |
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| | | | | | | | | Critical Drainage Areas dependent upon the precise location of sites which come forward. Distributing a high level of growth to the north of plan area may result in a higher level of greenfield land take resulting given that brownfield land which is likely to be more prevalent at some of the more urban locations to the south would not accommodate new growth. As such this approach may result in an increase in impermeable surfaces in the plan area. A minor negative effect is therefore expected in relation to this SA objective for Scenario 6.<br><br>**Scenario 7:** Focussing much of the new development at new settlements to the east of Exeter and to the east of Cullompton with some modest development at the some of the larger towns and some smaller towns also seeing small scale growth would provide limited opportunities for the redevelopment of brownfield land. The majority of new development would occur at relatively large greenfield sites (500 dwellings or 5 ha of employment land and larger) due to their viability for developers. This scenario may therefore result in a sizeable increase in impermeable surfaces in the plan area. The inclusion of higher levels of growth to the south of the plan area as expansions to Exeter and Newton Abbot in particular may mean that new development is more constrained in terms of areas of higher flood risk. The delivery of a new settlement to the east of Cullompton may also be constrained by the area of higher flood risk surrounding the River Culm. This area and the areas towards Axminster, Feniton and Dawlish contain sizeable portions of land which fall within Critical Drainage Areas. The large amount of development which would be delivered at any of the sites included through this scenario may mean that avoiding all areas at risk of flooding may prove to be more difficult. A significant negative effect is therefore expected in relation to this SA objective for Scenario 7. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their | +/- | +/-- | -- | +/-- | +/-- | +/-- | -- | **Scenario 1:** This scenario would deliver growth to the settlements in the settlement hierarchy in a proportionate manner and as such would allow for the highest levels of growth at the larger settlements of the plan area. This approach may allow for larger amounts of brownfield land to be developed considering the existing developed character of these areas. As such |

| SA Objective | Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Justification |
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| loss or degradation. | | | | | | | | Scenario 1 may promote a more efficient use of land in certain parts of the GESP area. This scenario would result in a certain amount of development occurring around Exeter and to the south of the city around the mouth of the River Exe where areas of Grade 1 agricultural land are present. Some growth would also be supported at Cullompton and towards Tiverton where additional areas of Grade 1 agricultural land are present. As such this scenario is also expected to result in the development of some higher value soils. By allowing for growth by the settlements of Seaton, Teignmouth, Newton Abbot and Exmouth this scenario could also have a detrimental impact on the potential for minerals extractions within MSAs at these locations. An overall mixed minor positive and minor negative effect is therefore expected in relation to this SA objective for Scenario 1.<br><br>**Scenario 2:** Focussing growth at Exeter and the major towns of the plan area is likely to have some similar effects to those identified for Scenario 1 in terms of achieving efficient land use. Scenario 2 would reduce the level of growth which is provided at the more rural settlements but would provide much of the new growth towards the southern portion around settlements such as Exeter, Newton Abbot and Teignmouth of the plan area where there are areas of Grade 1 and Grade 2 agricultural land. This option would also allow for a higher level of growth by Cullompton and by Tiverton at which there are a number of areas of Grade 1 agricultural land. The higher level of growth by Seaton, Exmouth, Teignmouth and Newton Abbot has the potential to result in detrimental impacts on the potential extraction of minerals at MSAs at these locations. It is however noted that this approach has the potential to provide increased opportunities to make use of brownfield land which can often be more prevalent at larger settlements considering their more development character. As such Scenario 2 could potentially promote a more efficient use of land in the plan area in terms of the re-use of previously developed land. It is however expected that concentrating development at a smaller number of larger settlements may have more significant adverse impacts in terms of loss of higher value agricultural soils and access to minerals. An overall mixed minor positive and minor negative effect is therefore expected in relation to this SA |

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| | | | | | | | | objective for Scenario 2.<br><br>**Scenario 3:** By allowing for a mainly rural distribution of growth in the plan area this scenario would limit development at the larger settlements. As such it is expected that this would limit the potential for re-use of brownfield. Distributing growth at a wider number of locations in the plan area is also likely to mean that some areas of higher quality agricultural land and areas within MSAs would have to come forward for development. Areas of Grade 1 and Grade 2 agricultural soils are present along parts of the River Exe, River Creedy and River Otter. There are also MSAs within the plan area at the land around Teignmouth and Newton Abbot, Exmouth and Otter St Mary, Seaton and to the north of the plan area. A significant negative effect is therefore expected in relation to this SA objective for Scenario 3.<br><br>**Scenario 4:** Allowing for new growth mostly along the public transport infrastructure corridors and hubs in the plan area will see much of the development occurring at the main settlements of the plan area. As such this approach may allow for the achievement of a more efficient pattern of land use by providing opportunities for the increased use of brownfield land within the more developed areas of the GESP area. This considered there are areas of Grade 1 and Grade 2 agricultural land along the route of the A377, parts of the M5 to the north of Exeter and by Cullompton, and towards the mouth of the River Exe. These areas would all support some level of growth through Scenario 4. This scenario also has the potential to adversely affect the MSAs by Exmouth, the land by Teignmouth and Newton Abbot and to the north of the plan area along the M5. An overall mixed minor positive and significant negative effect is therefore expected in relation to this SA objective for Scenario 4.<br><br>**Scenario 5:** By concentrating new growth over the plan period in the areas which have the greatest issues in terms of housing affordability, the highest levels of development would be likely to occur in close proximity to Exeter, as well as in the area surrounding Teignmouth and Newton Abbot. Development at these areas and at Exeter in particular is likely to provide opportunities for the re-use of brownfield land considering their more |

| SA Objective | Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Justification |
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| | | | | | | | | developed character. Scenario 5 would allow for a limited amount of new growth in the less developed rural settlements of the plan area where the potential for use of brownfield land is likely to be less prevalent. Furthermore allowing for a high level of growth in the area surrounding Exeter and Ottery St Mary may result in the development of some soils which are Grade 1 or Grade 2. This scenario would also support growth at the land surrounding Newton Abbot and Teignmouth where two MSAs are present. An overall mixed minor positive and significant negative effect is therefore expected in relation to this SA objective for Scenario 5.<br><br>**Scenario 6:** This approach would specifically locate new development as to limit the potential for adverse impacts on international wildlife sites. This would be achieved by delivering new growth mainly to the north of the plan area including at the settlements of Tiverton and Cullompton. Scenario 6 would also include a high level of growth to the south east by Seaton, Honiton and Axminster. Distributing a high level of growth to the north of plan area may result in a higher level of greenfield land take resulting given that brownfield land at some of the more urban locations to the south (including Exeter, the largest settlement in the plan area) would not accommodate new growth. This approach is however likely to result in a lower level of greenfield land take than Scenario 3. There are extensive areas of Grade 1 and Grade 2 agricultural land in the area surrounding Cullompton and Tiverton. Furthermore this approach could result in adverse impacts in terms of mineral extraction at the MSAs at Seaton and by Willand along the M5. An overall mixed minor positive and significant negative effect is therefore expected in relation to this SA objective for Scenario 6.<br><br>**Scenario 7:** Focussing much of the new development at new settlements to the east of Exeter and to the east of Cullompton with some modest development at the some of the larger towns and some smaller towns also seeing small scale growth would provide limited opportunities for the redevelopment of brownfield land. The majority of new development would occur at relatively large greenfield sites (500 dwellings or 5 ha of employment land and larger) due to their viability for developers. The delivery of two new sizeable settlements to the east of Exeter and to the |

| SA Objective | Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Justification |
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| | | | | | | | | east of Cullompton is expected to result in significant greenfield land take and the majority of these areas comprise Grade 3 agricultural land, with some pockets of Grade 1 and Grade 2 land interspersed. Areas identified for development through this option include land by Crediton, Tiverton, Ottery St Mary and Feniton, all of which contain sizeable areas of Grade 1 or Grade 2 agricultural land. This approach could also result in adverse impacts in terms of mineral extraction at the MSAs at Uffculme to the south of the M5, to the west of Ottery St Mary and in close proximity to Newton Abbot. A significant negative effect is therefore expected in relation to this SA objective for Scenario 7. |
| **7. WATER RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or degradation. | -- | -- | -- | -- | -- | - | -- | For all scenarios considered it is likely that levels of water consumption will be determined by the design and onsite practices at developments, rather than the location of new sites. The location of areas of new growth can be used to establish potential impacts on water quality given that nearby waterbodies may be impacted upon during construction. Further impacts on water quality may be dependent upon the location of new development where there are capacity issues at the local sewage treatment works (STWs) to treat wastewater. However, South West Water has advised that all potential locations within the GESP area can be connected to existing STW (some of which will require expansion), with no impact on the output water quality. The Exe Estuary SPA is considered to be particularly sensitive to any change in water quality and as such the potential for new growth to affect this water course has been considered in the appraisal of the scenarios considered.<br><br>All scenarios other than Scenario 6 would deliver new growth which is likely to include some development which would be adjacent to a waterbody which flows directly into the Exe Estuary SPA. This includes development within Exeter through which the River Exe flows, as well as its many tributaries to the south of the plan area.<br><br>Scenario 6 would provide growth mostly towards the north of the plan area, away from the international diversity sites to the south west. This scenario would still deliver a high level of growth at Seaton and Axminster which lie |

| SA Objective | Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Justification |
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| | | | | | | | | upon the River Axe. The high level of growth delivered by Cullompton and Tiverton has the potential to adversely impact upon water quality at the River Culm and the upper reaches of the River Exe. Similarly, development by Crediton has the potential to adversely impact upon water quality at the River Yeo and River Creedy.<br><br>As such a significant negative effect is expected in relation to this SA objective for Scenario 1, Scenario 2, Scenario 3, Scenario 4, Scenario 5 and Scenario 7. A minor negative effect is expected in relation to this SA objective for Scenario 6. |
| **8. HOMES**<br><br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | + | ++/- | +/-- | + | ++ | -- | ++/- | It is expected that all options will contribute to delivering the required number of houses over the plan period. Variation in effects relate most to ability of each scenario to deliver housing development quickly by achieving fast build out rates and to match housing deliver with the areas of most need in terms of affordability in particular.<br><br>**Scenario 1:** Delivering growth to the settlements in the settlement hierarchy in a proportionate manner would provide higher levels of growth within the larger settlements of the plan area. These areas include some of those which currently experience the greatest issues of housing affordability including towards Exeter and a secondary area between Newton Abbot and the Teignbridge coast. It would also allow for some rural growth which could help to address the provision of affordable housing at rural locations where affordability issues are also prevalent. By limiting the level of growth which is to be provided at any given settlement to a proportionate amount, this scenario would allow for development to be distributed to a relatively wide number of locations as such meaning the faster build out rates might be achieved. A minor positive effect is therefore expected in relation to this SA objective.<br><br>**Scenario 2:** Focussing growth at Exeter and the major towns of the plan area is likely to have some similar effects to those identified for Scenario 1 in terms of achieving more affordable housing in the plan area. This approach is expected to help address issues of affordability at Exeter and the area |

| SA Objective | Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Justification |
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| | | | | | | | | between Newton Abbot and the Teignbridge coast. Scenario 2 would however reduce the level of growth which is provided at the more rural settlements which is likely to mean that the affordability of rural housing would not be directly addressed. It is likely that focussing growth to a smaller number of locations where larger sites are likely to be required may provide increased opportunities for the delivery of affordable homes considering that viability issues are less likely to emerge than where a smaller number of houses would be delivered. Larger sites are however less likely to help increase the pace of development. An overall mixed significant positive and minor negative effect is therefore expected in relation to this SA objective for Scenario 2.<br><br>**Scenario 3:** By allowing for a mainly rural distribution of growth in the plan area this scenario would limit development at the larger settlements. As such while this approach could help to address the issue of affordable housing in the rural areas of the District, it would not directly address the affordability of housing in the larger settlements of Exeter, Newtown Abbot and Teignmouth. The inclusion of a large number of small and medium locations for development through this option may allow for faster build out rates to be achieved, but may also result in viability issue being more prevalent than might be the case at larger sites. An overall mixed minor positive and significant negative effect is therefore expected in relation to this SA objective for Scenario 3.<br><br>**Scenario 4:** Allowing for new growth mostly along the public transport infrastructure corridors and hubs in the plan area will see much of the development occurring at the main settlements of the plan area. Much of the growth would be delivered around Exeter and also in the area towards the Teignmouth coast and Newtown Abbot where specific affordability issues have been identified. This option would not focus development towards a smaller number of large scale locations for development meaning that issues relating to a slower build out rate would be less likely to emerge. A minor positive is therefore expected in relation to this SA objective for Scenario 4.<br><br>**Scenario 5:** This scenario would concentrate new growth over the plan |

| SA Objective | Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Justification |
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| | | | | | | | | period in the areas which have the greatest issues in terms of housing affordability, thereby directly seeking to deliver housing which is affordable and accessible to highest number of people in the plan area. This would include growth at Exeter and towards Newton Abbot and the Teignbridge coast where affordability issues are particularly prevalent. Expansion would also occur within a number of smaller villages to help address the increasingly unaffordability of rural housing in the parts of the plan area. This scenario would also be likely to support higher rates of growth given that growth would be located with the more viable areas where demand for new homes would be highest. A significant positive effect is therefore expected in relation to this SA objective for Scenario 5.<br><br>**Scenario 6:** This approach would specifically locate new development as to limit the potential for adverse impacts on international wildlife sites. This would be achieved by delivering new growth mainly to the north of the plan area. This approach would fail to address the affordability of homes within Exeter in particular. The majority of development would be provided against the grain of the market through this scenario which may slow delivery rates and in some places the higher levels of growth required may not be feasible at all. A significant negative effect is therefore expected in relation to this SA objective for Scenario 6.<br><br>**Scenario 7:** This approach would focus much of the new development at new settlements to the east of Exeter and to the east of Cullompton with some modest development at the some of the larger towns and some smaller towns also seeing small-scale growth. This approach would go some way to help address issues of affordability at Exeter and at Newton Abbot as well as at the Teignbridge coast to a lesser extent. Scenario 7 would, however, fail to include a high level of growth to the west of Exeter were affordability issues have been highlighted and would also provide a modest level of development at more rural settlements along the A377 and in the north of the plan area which is likely to mean that the affordability of rural housing in these areas would not be directly addressed. Scenario 7 would include mostly relatively large greenfield sites for development (500 dwellings or 5 ha of employment land and larger) and this may provide |

| SA Objective | Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Justification |
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| | | | | | | | | increased opportunities for the delivery of affordable homes considering that viability issues are less likely to emerge. The inclusion of mostly high value rural areas is likely to support faster housing delivery rates. It is, however, noted that the large size of most sites may mean that faster completion rates may prove challenging to achieve. An overall mixed significant positive and minor negative effect is therefore expected in relation to this SA objective for Scenario 7. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++/- | ++/- | +/-- | +/- | +/- | +/-- | ++/- | **Scenario 1:** Delivering growth to the settlements in the settlement hierarchy in a proportionate manner would provide higher levels of growth within the larger settlements of the plan area. These locations provide access to a higher number of healthcare facilities as well as a wide range of recreation facilities. It is also likely that providing a majority of residents with a good level of access to services and facilities may help to promote active travel in the area. The larger settlements in the plan area also provide access to national cycle routes at Exeter and Exmouth along the southern coast, at Tiverton towards the north and at Newton Abbot towards the Dartmoor National Park. By including some level of growth at most of the settlements in the plan area this approach could help to stimulate the provision of new healthcare facilities at a wider range of settlements in the plan area, although it is noted that some of these settlements may not provide the critical mass to support such provisions, particularly at the more rural settlements. Furthermore new growth at settlements including Exmouth, Seaton, Sidmouth, Axminster and Honiton would be provided with opportunities for recreational within the East Devon and Blackdown Hills AONBs. An overall mixed significant positive and minor negative effect is therefore expected in relation to this SA objective for Scenario 1.<br><br>**Scenario 2:** Focussing growth at Exeter and the major towns of the plan area is likely to provide a higher number of new residents with a good level of access to a wide range of recreation facilities and a high number of healthcare facilities in a similar way to Scenario 1. This option is more likely to provide funding for the delivery of new healthcare infrastructure in the larger settlements by focussing higher levels of growth at specific sites |

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| | | | | | | | | within these settlements. It is likely that this approach could also encourage travel by active modes of transport considering the close proximity of new residents to services and facilities and employment opportunities within the larger settlements. Many of the larger settlements in the plan area also provide access to national cycle routes. The larger settlements of the plan area also provide a good level of access to recreation opportunities at Dartmoor National Park as well as at East Devon and Blackdown Hills AONB. An overall mixed significant positive and minor negative effect is therefore expected in relation to this SA objective for Scenario 2.<br><br>**Scenario 3:** Allowing for a mainly rural distribution of growth in the plan area would limit development at the larger settlements. This approach may help to stimulate the provision of rural healthcare provision in the plan area, however it is likely to result in a majority of new residents having a poor level of access to the wide range of recreation facilities and the more substantial healthcare facilities (including urgent care facilities at Exeter) within the plan area's city and town centres. This approach may allow for an increased level of access to Exmoor National Park to the north of the plan area. An overall mixed minor positive and significant negative effect is therefore expected in relation to this SA objective for Scenario 3.<br><br>**Scenario 4:** Allowing for new growth mostly along the public transport infrastructure corridors and hubs in the plan area will see much of the development occurring at the main settlements of the plan area. The majority of these new residents are likely to have a good level of access to the larger settlements which provide access to a wide range of recreation facilities and more substantial healthcare facilities in the plan area. Development at these locations may help to increase the potential for active transport considering the shorter distances to services and facilities and employment opportunities. Many of the larger settlements in the plan area also provide access to national cycle routes. It is noted that some of the locations contained for development through this option are less well related to the larger settlements of the plan area. This strand of Scenario 4 may result in some residents being provided with reduced access to existing healthcare facilities, but dependent upon the scale of development to be |

| SA Objective | Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Justification |
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| | | | | | | | | delivered may help to support the provision of healthcare infrastructure at locations which are currently limited in this regard. Development supported through this option by Newton Abbot, Exmouth and Honiton would potentially provide easy access for new residents to opportunities for recreation at Dartmoor National Park and Blackdown Hills and East Devon AONBs. A mixed minor positive and minor negative effect is therefore expected in relation to this SA objective for Scenario 4.<br><br>**Scenario 5:** By concentrating new growth over the plan period in the areas which have the greatest issues in terms of housing affordability, the highest levels of development would be likely to occur in close proximity to Exeter, as well as in the area surrounding Teignmouth and Newton Abbot. Some development would also be supported in the rural areas given that in general these areas also face issues of increasingly unaffordable dwellings. Concentrating new growth by Exeter in particular is likely to help provide access to a wide range of recreation facilities as well as the most substantial healthcare facilities in the plan area. Considering the high level of service provision and employment opportunities at Exeter in particular, this strand of Scenario 5 may help to encourage travel by more active modes of transport. These locations also provide access to national cycle routes. Development by Newton Abbot is likely to provide new residents with easy access to opportunities for recreation within Dartmoor National Park. Providing growth within the rural locations is likely to provide reduced access to existing healthcare facilities in the plan area but may help to stimulate healthcare provision at these locations. An overall mixed minor positive and minor negative effect is therefore expected in relation to this SA objective for Scenario 5.<br><br>**Scenario 6:** This approach would locate new development as to limit the potential for adverse impacts on international wildlife sites. This would be achieved by delivering new growth mainly to the north of the plan area. This approach would provide a high level of growth by Crediton, Tiverton and Cullompton and along the sustainable transport links in the surrounding areas. This approach would provide some residents with reasonable access to the healthcare facilities at these relatively large settlements, but would fail |

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| | | | | | | | | to make best use of the most substantial existing healthcare provision at Exeter. Scenario 6 would also result in a portion of growth occurring at smaller villages in the area which could help to stimulate rural healthcare provision but would also result in some new residents being provided with a limited level of access to existing healthcare facilities. The provision of new growth at locations which would not have immediate access to services and facilities as well as employment opportunities is likely to mean that there would be reduced potential for travel by active modes of transport. This scenario would provide a high level of growth at Axminster, Seaton and Honiton as well as to the north of the plan area which would provide access to potential opportunities for recreation at the Blackhhill Downs and East Devon AONBs and Dartmoor National Park. An overall mixed minor positive and significant negative effect is therefore expected in relation to this SA objective for Scenario 6.<br><br>**Scenario 7:** This approach would focus much of the new development at new settlements to the east of Exeter and to the east of Cullompton with some modest development at the some of the larger towns and some smaller towns also seeing small-scale growth. Providing growth by Exeter is likely to have substantial benefits in terms of providing residents with access to a range of recreation facilities and the most substantial healthcare facilities in the plan area. The creation of larger new settlements and large-scale expansion of settlements could also support substantial new healthcare provision. Where development is provided to be accessible to the larger settlements, residents may also be encouraged to take up more active modes of transport. The potential for active travel is likely to be greater for new residents located at Exeter, Newton Abbot, Axminster and Tiverton where they would benefit from access to national cycle routes. It is likely that the areas identified for growth at more rural locations along the A30 would not benefit from immediate access to healthcare services. This is also likely to be case at the new settlement at Bicton in the East Devon AONB and the smaller size of this settlement may not support the delivery of new healthcare facilities. Some of the development set out through Scenario 7 would support opportunities for recreation within the Dartmoor National |

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| | | | | | | | | Park, East Devon AONB and Blackdown Hills AONB. New residents at Newton Abbot, Exmouth, Honiton and Axminster as well as some of those along the A30 would benefit from access to one or more of these areas. An overall mixed significant positive and minor negative effect is therefore expected in relation to this SA objective for Scenario 7. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | +/- | ++/- | +/-- | +/- | ++/- | +/-- | ++/- | Delivering new development in areas which are currently identified through the Index of Multiple Deprivation (IMD) 2019 as experience higher levels of deprivation has the potential improve access to services and facilities and high quality and affordable homes. The areas of Exeter in particular, as well as Newton Abbot, Teignmouth, Exmouth and areas by the Exe estuary fall within the 30% most deprived areas in the country.<br><br>Air quality and noise will also have an impact on the overall level of wellbeing which residents experience at a given location. This will be impacted upon by the number of journeys undertaken by motor vehicles. The location of new development will have an additional impact in terms of air quality and noise considering how it is related to AQMAs and Exeter airport for which a noise contour of 57db and above has been established. AQMAs have been identified in the plan area at Exeter, Crediton, Cullompton, Teignmouth, Newton Abbot and Dawlish.<br><br>**Scenario 1:** Delivering growth to the settlements in the settlement hierarchy in a proportionate manner would provide higher levels of growth within the larger settlements of the plan area. By focussing much of the new growth at Exeter and the larger settlements this approach would provide new development in areas at which the highest levels of deprivation have been identified. Furthermore the majority of residents would be required to undertake few journeys to access services and facilities and employment opportunities which is likely to benefit area quality. Conversely much of the new growth would be provided at locations which are in close proximity to AMQAs, meaning that there is potential for existing air quality issues to be reinforced. This approach would, however, also deliver a level of growth to the more rural settlements on the settlement hierarchy. This portion of growth could help address rural deprivation, however it will be dependent in |

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| | | | | | | | | part upon whether new growth is delivered in a manner to provide critical mass to support new services and facilities. Residents at these locations in general are likely to be required to travel on a more regular basis which in turn will have adverse impacts on local air quality. This scenario furthermore may include some growth by Exeter airport where there is potential for adverse impacts relating to noise. As such an overall mixed minor positive and minor negative effect is expected in relation to this SA objective for Scenario 1.<br><br>**Scenario 2:** Focussing growth at Exeter and the major towns of the plan area is likely to directly provide new growth as to address issues of deprivation within the most affected locations of the plan area. This approach is also likely to help encourage travel by more active and sustainable modes of transport to the benefit of air quality. These more developed locations however also include a number of AQMAs, such as at Exeter, Newtown Abbot, Teignmouth, Cullompton and Crediton. As such there is potential for existing air quality issues to be exasperated, particularly if growth is delivered in a manner which is not considerate of the potential for increased levels of congestion. This approach is less likely to address rural deprivation in the GESP area. Furthermore concentrating a particularly high level of growth at Exeter may result in some new growth occurring within close proximity to Exeter airport where noise issues may result. An overall mixed significant positive and minor negative effect is therefore expected in relation to this SA objective for Scenario 2.<br><br>**Scenario 3:** Allowing for a mainly rural distribution of growth in the plan area would limit development at the larger settlements. As such this approach would fail to address the identified issues of deprivation at the more urban locations of the plan area, most notably at Exeter. While this scenario could help to address rural deprivation and the provision of new and affordable homes in particular, the overall impact on this issue it will be dependent in part upon whether critical mass can be achieved to support the provision of new services and facilities. The wide distribution of growth at a high number of rural locations may mean that new residents may actually be housed at isolated locations which cannot support new services and facilities. |

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| | | | | | | | | A majority of new residents in Scenario 3 would have to travel longer distances to access services and facilities and employment opportunities which is likely to be detrimental to local air quality. This option is, however, considered less likely to adversely impact upon exiting identified air quality issues within the AQMAs in the plan area. While this scenario contains some indicative locations for growth to the east of Exeter, it is considered less likely that it would result in development within the 57db noise contour around Exeter airport. The lower level of growth required at this general area is likely to mean development could come forward as to avoid the affected location. An overall mixed minor positive and significant negative effect is therefore expected in relation to this SA objective for Scenario 3.<br><br>**Scenario 4:** Allowing for new growth mostly along the public transport infrastructure corridors and hubs in the plan area will see much of the development occurring at the main settlements of the plan area. Additional growth would be supported along the main sustainable transport links in the plan area, most notably along the rail and bus services which extend from Exeter. As such much of growth would be delivered in a manner which could help to address issues of deprivation at the larger settlements of the plan area. This approach would also provide a majority of new residents with access to sustainable transport links and limit the potential for additional impacts on local air quality. It is expected however that Scenario 4 could still compound existing air quality issues at the AQMAs at Exeter, Crediton, Cullompton, Teignmouth and Newton Abbot considering the high level of development to be delivered at these locations. Development supported to the east of Exeter could also result in some residents being adversely impacted upon in terms of increased noise levels within the 57bv noise contour around Exeter airport. This option is not expected to directly address the issue of rural deprivation in the plan area. An overall mixed minor positive and minor negative effect is therefore expected in relation to this SA objective for Scenario 4.<br><br>**Scenario 5:** By concentrating new growth over the plan period in the areas which have the greatest issues in terms of housing affordability, the highest levels of development would be likely to occur in close proximity to Exeter, |

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| | | | | | | | | as well as in the area surrounding Teignmouth and Newton Abbot. This approach would most directly seek to address the issue of housing affordability in the plan area which is an important indicator of deprivation in the country. Some development would also be supported in the rural areas, meaning there is potential for rural deprivation to be addressed through this scenario. It is recognised that rural development is likely to best address rural deprivation where it provides the critical mass to support the delivery of new services and facilities. Concentrating new growth by Exeter and other larger settlements at Teignmouth and Newton Abbot is likely to help support modal shift in the plan area which may limit the contribution new development makes to air pollution. These areas however contain AQMAs meaning there is potential for identified air quality issues to be exacerbated by new growth. Scenario 5 is also likely to deliver some growth to the east of Exeter which may result in some residents being adversely impacted upon by higher levels of noise in the area surrounding Exeter airport. An overall mixed significant positive and minor negative effect is therefore expected in relation to this SA objective for Scenario 5.<br><br>**Scenario 6:** This approach would locate new development as to limit the potential for adverse impacts on international wildlife sites. This would be achieved by delivering new growth mainly to the north of the plan area. As such Scenario 6 would fail to directly address the issue of deprivation, most notably at Exeter. This approach would make use of existing sustainable transport links along the Tarka rail corridor which would take in Crediton, Tiverton and Cullompton as well as allowing for some development at smaller villages in the area. As such this approach may help to address rural deprivation depending in part on whether or not new growth provides the critical mass to deliver new services and facilities. It is however expected that this option could result in an increase in the number of journeys being made from more rural locations by private vehicle to Exeter to access services and facilities and employment opportunities which may result in increased levels of congestion to the detriment of air quality. This would include the air quality at the AQMA in the city of Exeter, as well as at the AQMAs at Crediton and Cullompton. This approach is unlikely to result in |

| SA Objective | Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Justification |
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| | | | | | | | | new development within the noise contour area by Exeter airport and as such there is limited potential for new residents to be adversely affected by this issue. An overall mixed minor positive and significant negative effect is therefore expected in relation to this SA objective for Scenario 6.<br><br>**Scenario 7:** This approach would focus much of the new development at new settlements to the east of Exeter and to the east of Cullompton with some modest development at the some of the larger towns and some smaller towns also seeing small-scale growth. Providing development at or in close proximity to Exeter and the larger towns of the plan area is likely to help directly address issues of deprivation within the most affected locations. The inclusion of some growth at smaller settlements would make some contribution to help address rural deprivation in the locations identified for growth. This would depend in part on whether or not new growth provides the critical mass to deliver new services and facilities. The larger new settlements are likely to support substantial new service provision to the benefit of residents in the surrounding areas. Including growth at locations which are well-related to both larger and smaller settlements is likely to have variable impacts in terms of helping encourage travel by more active and sustainable modes of transport to the benefit of air quality. The more developed locations of the plan area, however, also include a number of AQMAs, such as at Exeter, Newtown Abbot, Cullompton and Crediton. The new settlement to the east of Cullompton would take in land which is within or in close proximity to Cullompton AQMA. As such, existing air quality issues may be intensified. This is particularly likely to result if development is not designed to be considerate of existing levels of congestion within the more developed areas. Furthermore, concentrating a particularly high level of growth at or in close proximity to Exeter may result in some development occurring within the noise contour for Exeter Airport. This would include the new settlement to the east of Exeter where residential amenity may be affected by noise pollution. An overall mixed significant positive and significant negative effect is therefore expected in relation to this SA objective for Scenario 7. |

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| **11. ACCESS TO SERVICES**<br>To provide accessible and attractive services and community facilities for all ages and interests. | ++/- | ++/- | +/-- | +/- | +/- | +/-- | ++/- | **Scenario 1:** Delivering growth to the settlements in the settlement hierarchy in a proportionate manner would provide higher levels of growth within the larger settlements of the plan area. As such a majority of new residents would be provided with a good level of access to services and facilities within the plan area. This approach is however less likely to promote rural services and facilities in the plan area by limiting development beyond the settlements within the settlement hierarchy. An overall mixed significant positive and minor negative effect is therefore expected in relation to this SA objective for Scenario 1.<br><br>**Scenario 2:** Focussing growth at Exeter and the major towns of the plan area is likely to provide a higher number of new residents with a good level of access to a wide range of services and facilities at the more substantial city and town centres. This approach would deliver a limited amount of growth within the smaller settlements of the plan area and the more rural locations. As such Scenario 2 would fail to address rural service provision and would be less likely to support service improvements at the smaller settlements in the GESP area. An overall mixed significant positive and minor negative effect is therefore expected in relation to this SA objective for Scenario 2.<br><br>**Scenario 3:** Allowing for a mainly rural distribution of growth in the plan area would limit development at the larger settlements. This approach may help to stimulate the provision of rural services and facilities in the plan area, however it is likely to result in a majority of new residents having a poor level of access to the wide range of services and facilities within the plan area's city and town centres. An overall mixed minor positive and significant negative effect is therefore expected in relation to this SA objective for Scenario 3.<br><br>**Scenario 4:** Allowing for new growth mostly along the public transport infrastructure corridors and hubs in the plan area will see much of the development occurring at the main settlements of the plan area. The majority of these new residents are likely to have a good level of access to city and town centre locations in the plan area which provide access to the |

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| | | | | | | | | widest range of services and facilities. Additional growth would be supported along the main sustainable transport links in the plan area, most notably along the rail and bus services which extend from Exeter. Many of these locations are less well related to the city and town centres of the plan area, however, it is likely that many of these new residents would be able to access services and facilities by public transport links. Furthermore development at the more rural locations of the plan area may provide opportunities to stimulate the provision of rural services and facilities. A mixed minor positive and minor negative effect is therefore expected in relation to this SA objective for Scenario 4.<br><br>**Scenario 5:** By concentrating new growth over the plan period in the areas which have the greatest issues in terms of housing affordability, the highest levels of development would be likely to occur in close proximity to Exeter, as well as in the area surrounding Teignmouth and Newton Abbot. Some development would also be supported in the rural areas given that in general there areas also face issues of increasingly unaffordable dwellings. Concentrating new growth by Exeter in particular is likely to help provide access to the wide range of services and facilities at this location. Providing growth within the rural locations is likely to provide reduced access to existing services and facilities in the plan area but may help to stimulate service provision at these locations. An overall mixed minor positive and minor negative effect is therefore expected in relation to this SA objective for Scenario 5.<br><br>**Scenario 6:** This approach would locate new development as to limit the potential for adverse impacts on international wildlife sites. This would be achieved by delivering new growth mainly to the north of the plan area. This approach would provide a high level of growth by Crediton, Tiverton and Cullompton and along the sustainable transport links in the surrounding areas. This approach would provide some residents with reasonable access to the services and facilities at these relatively large settlements, but would fail to make best use of service provision at the largest settlements of the plan area, most notably at Exeter. Scenario 6 would also result in a portion of growth occurring at smaller villages in the area which could help to |

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| | | | | | | | | stimulate rural service provision but would also result in some new residents being provided with a limited level of access to existing services and facilities. An overall mixed minor positive and significant negative effect is therefore expected in relation to this SA objective for Scenario 6.<br><br>**Scenario 7:** This approach would focus much of the new development at new settlements to the east of Exeter and to the east of Cullompton with some modest development at the some of the larger towns and some smaller towns also seeing small-scale growth. Providing growth by Exeter is likely to have substantial benefits in terms of providing residents with access to a wide range of services and facilities. The creation of larger new settlements and large-scale expansion of settlements could also support substantial new service provision. These would be accessible to new and a large number of existing residents where development is provided as an extension to existing larger settlements. It is likely that the areas identified for growth at more rural locations along the A30 would not benefit from immediate access to existing services and facilities. Development at these locations could, however, help to support some level of rural service provision. This is also likely to be case at the new settlement at Bicton in the East Devon AONB and the smaller size of this settlement may not support the delivery of substantial new services and facilities. An overall mixed significant positive and minor negative effect is therefore expected in relation to this SA objective for Scenario 7. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job | +/- | ++/- | --? | + | +/- | +/-- | ++/- | **Scenario 1:** Delivering growth to the settlements in the settlement hierarchy in a proportionate manner would provide higher levels of growth within the larger settlements of the plan area. As such a majority of new residents would be provided with a good level of access to employment opportunities within the plan area or sustainable transport links which would provide access to employment opportunities further afield. New growth at the larger settlements in the most part benefit from access to the strategic road network and other supporting infrastructure which is also likely to help creating opportunities for economic investment. This scenario would however also include some growth at smaller settlements where there are |

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| opportunities and greater productivity in Greater Exeter. | | | | | | | | likely to be a smaller number of employment opportunities. While this strand of the scenario could help to support some employment growth at the more rural settlements it is also likely to result in some residents having a reduced level of access to nearby employment opportunities. An overall mixed minor positive and minor negative effect is therefore expected in relation to this SA objective for Scenario 1.<br><br>**Scenario 2:** Focussing growth at Exeter and the major towns of the plan area is likely to provide a higher number of new residents with a good level of access to a high number of employment opportunities. Allowing for the most growth at these locations is also likely to provide opportunities for a high level of economic considering the access to the strategic road network and other infrastructure which is provided from these locations. It is noted that this scenario would be less likely to support the diversification of the rural economy in the plan area. An overall mixed significant positive and minor negative effect is therefore expected in relation to this SA objective for Scenario 2.<br><br>**Scenario 3:** Allowing for a mainly rural distribution of growth in the plan area would limit development at the larger settlements. This approach may help to stimulate the diversification of the rural economy, however this is likely to be dependent in part on the provision of new supporting infrastructure. Many of the rural locations of the plan area are likely to be unsuitable to accommodate high levels of employment growth. Considering the more isolated character of these locations, in which sustainable transport provision is often poor, this scenario is also likely to result in new residents having a poor level of access to the areas of Greater Exeter within which the highest number of employment opportunities are located. An uncertain significant negative effect is therefore expected in relation to this SA objective for Scenario 3.<br><br>**Scenario 4:** Allowing for new growth mostly along the public transport infrastructure corridors and hubs in the plan area will see much of the development occurring at the main settlements of the plan area. The majority of these new residents are likely to have a good level of access to |

| SA Objective | Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Justification |
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| | | | | | | | | employment opportunities within the plan area and access to those further afield by sustainable transport links. Allowing for growth at locations within the larger settlements and along the sustainable transport links in the plan area would include many areas which benefit from access to the strategic road network meaning that this scenario may encourage inward economic investment. A minor positive effect is therefore expected in relation to this SA objective for Scenario 4.<br><br>**Scenario 5:** By concentrating new growth over the plan period in the areas which have the greatest issues in terms of housing affordability, the highest levels of development would be likely to occur in close proximity to Exeter, as well as in the area surrounding Teignmouth and Newton Abbot. Some development would also be supported in the rural areas. It is likely that growth around the central area would tend to support employment and economic expansion in Exeter and its immediate hinterland. Allowing for some level of growth at more rural locations could help to promote some level of economic investment at rural locations but would also result in some residents having a poor level of access to existing employment opportunities. An overall mixed minor positive and minor negative effect is therefore expected in relation to this SA objective for Scenario 5.<br><br>**Scenario 6:** This approach would locate new development as to limit the potential for adverse impacts on international wildlife sites. This would be achieved by delivering new growth mainly to the north of the plan area. This approach would provide a high level of growth by Crediton, Tiverton and Cullompton and along the sustainable transport links in the surrounding areas. As such residents at these locations could benefit from access to employment opportunities at these relatively large settlements. This scenario would however result in a reduced amount of growth occurring at Exeter which is the largest settlement in the plan area. As such the large number of employment opportunities at this central area would be less accessible to new residents. It is expected that this approach would deliver new homes against the market grain and could result in wider spread feasibility issues relating to the delivery of new growth. Workers are likely to be required to live further away from the central area surrounding Exeter |

| SA Objective | Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Justification |
|---|---|---|---|---|---|---|---|---|
| | | | | | | | | resulting in increased commuting distances to this area. An overall mixed minor positive and significant negative effect is therefore expected in relation to this SA objective for Scenario 6.<br><br>**Scenario 7:** This approach would focus much of the new development at new settlements to the east of Exeter and to the east of Cullompton with some modest development at the some of the larger towns and some smaller towns also seeing small-scale growth. Many new residents would benefit from access to existing job opportunities at the larger settlements. This scenario could also result in the delivery of new high-quality employment land at the larger settlements to be delivered to encourage inward investment. These new settlements would be well related to the strategic road network at the A30 and M5 respectively, however, there is likely to be a need for new infrastructure provision to make them attractive to employers and this could take time to deliver. The provision of new infrastructure could support access to train services to the east of Cullompton along the rail line between Exeter and Taunton and employment sites at these larger settlements. This scenario would include some development within more isolated locations of the GESP area, such also along the A30 and at the smaller new settlement to be provided at Bicton within the East Devon AONB. Development at these locations would be less likely to provide new residents with access to existing employment opportunities, although development at less developed locations could help to support diversification of the rural economy. An overall mixed significant positive and minor negative effect is therefore expected in relation to this SA objective for Scenario 7. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | ++/- | ++ | -- | +/- | +/- | +/-- | ++/- | **Scenario 1:** Delivering growth to the settlements in the settlement hierarchy in a proportionate manner would provide higher levels of growth within the larger settlements of the plan area. As such a majority of new residents would be provided with a good level of access to services and facilities within the plan area. This approach is likely to help promote the vitality and viability of the highest number of city and town centres in the plan area, including those which are of a smaller scale and provide access to |

| SA Objective | Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Justification |
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| | | | | | | | | a reduced range of services and facilities. Considering the higher number of settlements at which growth would take place this approach would provide some residents with more limited access to a more substantial city or town centre. An overall mixed significant positive and minor negative effect is therefore expected in relation to this SA objective for Scenario 1.<br><br>**Scenario 2:** Focussing growth at Exeter and the major towns of the plan area is likely to provide a higher number of new residents with a good level of access to a wide range of services and facilities at the more substantial city and town centres. As such the vitality and viability of these locations are likely to be strengthened, given that new residents will be more likely to travel the shorter distances to them. A significant positive effect is therefore expected in relation to this SA objective for Scenario 2.<br><br>**Scenario 3:** Allowing for a mainly rural distribution of growth in the plan area would limit development at the larger settlements. This approach may help to stimulate the provision of rural services and facilities in the plan area, however it is likely to result in new residents having a poor level of access to the plan area's city and town centres. As such this approach is considered significantly less likely to increase footfall in the city and town centres. A significant negative effect is therefore expected in relation to this SA objective for Scenario 3.<br><br>**Scenario 4:** Allowing for new growth mostly along the public transport infrastructure corridors and hubs in the plan area will see much of the development occurring at the main settlements of the plan area. The majority of these new residents are likely to have a good level of access to city and town centre locations in the plan area. Additional growth would be supported along the main sustainable transport links in the plan area, most notably along the rail and bus services which extend from Exeter. While many of these locations are less well related to the city and town centres of the plan area, it is likely that many of these new residents would be able to access such locations by public transport links. A mixed minor positive and minor negative effect is therefore expected in relation to this SA objective for Scenario 4. |

| SA Objective | Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Justification |
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| | | | | | | | | **Scenario 5:** By concentrating new growth over the plan period in the areas which have the greatest issues in terms of housing affordability, the highest levels of development would be likely to occur in close proximity to Exeter, as well as in the area surrounding Teignmouth and Newton Abbot. Some development would also be supported in the rural areas. Concentrating new growth by Exeter in particular is likely to help ensure the vitality and viability of the largest city centre in the plan area by providing a high number of new residents with a good level of access to this location. This approach would fail to deliver a high level of growth to some of the town centres of the plan area, most notably to the north, at Crediton, Tiverton and Cullompton. As such this approach would be unlikely to help protect or enhance the vitality and viability of the town centres of these settlements. An overall mixed minor positive and minor negative effect is therefore expected in relation to this SA objective for Scenario 5.<br><br>**Scenario 6:** This approach would locate new development as to limit the potential for adverse impacts on international wildlife sites. This would be achieved by delivering new growth mainly to the north of the plan area. This approach would provide a high level of growth by Crediton, Tiverton and Cullompton and along the sustainable transport links in the surrounding areas. As such this approach could help to promote the viability of these town centre locations. This approach would also result in a portion of growth occulting at smaller villages in the area. This strand of the approach may help to promote rural service provision but would be less likely to specifically promote town centre viability. This scenario would furthermore result in a reduced amount of growth occurring at Exeter which is the largest settlement in the plan area. As such this approach would fail to address the protection and enhancement of the most notably city centre location in the GESP area. An overall mixed minor positive and significant negative effect is therefore expected in relation to this SA objective for Scenario 6.<br><br>**Scenario 7:** This approach would focus much of the new development at new settlements to the east of Exeter and to the east of Cullompton with some modest development at the some of the larger towns and some smaller towns also seeing small-scale growth. This approach could help to |

| SA Objective | Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Justification |
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| | | | | | | | | support the viability of town centres in the plan area as some new residents will be located within easy travelling distance of these areas. The new settlements to the east of Exeter and to the east of Cullompton could provide some residents with opportunities to travel short distances to the nearby existing settlements centres. Sustainable transport links could be developed to increase accessibility to these locations. This will depend in part on the design of the new developments and whether there is potential for the new settlements to act to compete with the existing town centres (and in the case of Exeter district and local centres) of the nearby settlements. It is likely that some development set out through Scenario 7 would not provide immediate access to town centres in the plan area. This would include development along much of the A30. The new settlement at Bicton within the East Devon AONB would also be relatively isolated. It is also uncertain whether this settlement would be of a scale to support substantial new service potential and ensure its long-term viability. An overall mixed significant positive and significant negative effect is therefore expected in relation to this SA objective for Scenario 7. |
| **14. CONNECTIVITY AND TRANSPORT**<br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and | +/- | ++/ -? | -- | ++ | +/- | +/-- | ++/- | **Scenario 1:** Delivering growth to the settlements in the settlement hierarchy in a proportionate manner would provide higher levels of growth within the larger settlements of the plan area. By focussing much of the new growth at Exeter and the larger settlements this approach would provide the majority of new residents with access to sustainable transport links as well as to the strategic road network. The majority of the larger settlements benefit from access to the rail network which extend from stations at Exeter through Exmouth towards Newton Abbot, through Crediton towards the north west, through Tiverton Parkway towards the north east and towards the east via Honiton and Axminster. Growth at these more developed locations is also likely to encourage travel by more active modes of transport considering the shorter journey times to services and facilities and employment opportunities. This approach would, however, also deliver a level of growth to the more rural settlements on the settlement hierarchy at which sustainable transport links are poorer and there is likely to be greater dependency on travel by private car. As such an overall mixed minor |

| SA Objective | Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Justification |
|---|---|---|---|---|---|---|---|---|
| beyond. | | | | | | | | positive and minor negative effect is expected in relation to this SA objective for Scenario 1.<br><br>**Scenario 2:** Focussing growth at Exeter and the major towns of the plan area is likely to provide a higher number of new residents with access to sustainable transport links as well as the strategic road network. By providing the highest proportion of new growth at the more developed areas of the plan area this approach could help to encourage travel by more active modes of transport considering the shorter journeys which would be required to services and facilities and employment opportunities. By significantly limiting the level of growth at the more rural locations of the plan area, Scenario 2 would furthermore limit the potential for dependency on travel by private vehicle. This approach would have to be delivered in a manner which is considerate of the potential for issues of congestion resulting at the more developed locations given the high level of growth to be delivered and the high number of residents already accommodated here. An overall mixed significant positive and uncertain minor negative effect is therefore expected in relation to this SA objective for Scenario 2.<br><br>**Scenario 3:** Allowing for a mainly rural distribution of growth in the plan area would limit development at the larger settlements. As such a majority of new residents would have to travel longer distances to access services and facilities and employment opportunities. Many of these locations are isolated from sustainable transport links and do not provide immediate access to the strategic road network. By allowing for a wider distribution of growth in the plan area this approach would also be less likely to deliver the criteria mass at rural locations to support significant improvements in sustainable transport links in the plan area. It is likely that this approach would not directly promote modal shift in the GESP area and conversely could increase dependency on travel by private vehicle. A significant negative effect is therefore expected in relation to this SA objective for Scenario 3.<br><br>**Scenario 4:** Allowing for new growth mostly along the public transport infrastructure corridors and hubs in the plan area will see much of the development occurring at the main settlements of the plan area. Additional |

| SA Objective | Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Justification |
|---|---|---|---|---|---|---|---|---|
| | | | | | | | | growth would be supported along the main sustainable transport links in the plan area, most notably along the rail and bus services which extend from Exeter. This approach would not only provide a majority of new residents with access to sustainable transport links but it would also result in many new residents being in close proximity to services and facilities and employment opportunities in the larger settlements which may encourage travel by active modes of transport in particular. Scenario 4 may also help to strengthen the existing public transport services in the plan area by securing their viability through increased number of trips, which is likely to support more significant improvements to these services. A significant positive effect is therefore expected in relation to this SA objective for Scenario 4.<br><br>**Scenario 5:** By concentrating new growth over the plan period in the areas which have the greatest issues in terms of housing affordability, the highest levels of development would be likely to occur in close proximity to Exeter, as well as in the area surrounding Teignmouth and Newton Abbot. Some development would also be supported in the rural areas. Concentrating new growth by Exeter in particular is likely to help support a public transport led strategy and may also encourage an uptake of travel by active modes of transport. Development which is provided at more rural locations in particular is likely to provide new residents with a poor level of access to sustainable transport services as well as the strategic road network and is likely to result in an increase in the number of journeys being made by private vehicle. An overall mixed minor positive and minor negative effect is therefore expected in relation to this SA objective for Scenario 5.<br><br>**Scenario 6:** This approach would locate new development as to limit the potential for adverse impacts on international wildlife sites. This would be achieved by delivering new growth mainly to the north of the plan area. This approach would make use of existing sustainable transport links along the Tarka rail corridor which would take in Crediton, Tiverton and Cullompton. The development of smaller villages in the area would, however, include some areas which provide poor access to existing sustainable transport links. This option could also result in an increase in the number of journeys being |

| SA Objective | Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Justification |
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| | | | | | | | | made from more rural locations by private vehicle to Exeter to access services and facilities and employment opportunities which may result in increased levels of congestion. An overall mixed minor positive and significant negative effect is therefore expected in relation to this SA objective for Scenario 6.<br><br>**Scenario 7:** The delivery of growth through a market-driven approach only would see a high level of development occurring at new settlements to the east of Exeter and to the east of Cullompton, as well as within the Bicton area of the East Devon AONB. More modest expansions to some of the larger towns would also occur with some small-scale growth at a number of smaller villages. New settlements to the east of Exeter and to the east of Cullompton would be of a scale to provide new services and facilities and support a degree of self-sufficiency, thereby reducing the need for residents to travel by car. Development at Exeter and to the east of this settlement would have to be delivered in a way which is considerate of congestion issues within the town. The new settlement to the east of Cullompton would be particularly well-related to the railway line between Exeter and Taunton meaning there may be potential to provide infrastructure to connect to this service. Given that this approach would include only sites of 500 swellings or more it is likely that new development as extensions to existing settlements could help to support the viability of public transport links. Residents would also benefit from access to services and facilities within settlements. Expansions of many of the larger settlements including Axminster, Newtown Abbot and Crediton would provide residents with access to existing rail services. Service provision is likely to be weaker at the smaller settlements of the plan area, although it is noted that this type of growth could help to support services and facilities at more rural locations. The smaller size and more isolated location of the new settlement at Bicton within the East Devon AONB means that the accessibility of existing and the delivery of new services and facilities is less likely at this location. Delivery of development along the A30 through the Blackdown Hills AONB would also be relatively isolated from existing services and facilities and so levels of car use may be high. This growth is also not likely to be of a scale to support |

| SA Objective | Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 | Justification |
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| | | | | | | | | the delivery of all services which would help to make a development more self-contained. An overall mixed significant positive and minor negative effect is therefore expected in relation to this SA objective for Scenario 7. |

## Appraisal of the Spatial Development Strategy included in the GESP Draft Policies and Site Options Consultation document (September 2020)

| SA Objective | SA score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | +/--? | The spatial strategy distributes a high level of development across the GESP area over the plan period which has the potential to result in adverse effects on biodiversity, for example, as a result of species disturbance, habitat loss and fragmentation. New development may allow for the enhancement of habitats through the incorporation of new green infrastructure and other mitigation measures.<br><br>The spatial strategy focusses much of the growth at Exeter and the major towns of the plan area. Some of the larger settlements, towards the south in particular, including Exeter, Exmouth, Newton Abbot, Axminster, Sidmouth and Seaton, are in close proximity to nationally or internationally designated biodiversity sites. This includes Dawlish Warren SAC and NNR, Exe Estuary SPA, East Devon Heaths SPA and SAC, Sidmouth to West Bay SAC, Lyme Bay and Torbay SAC, South Dartmoor Woods SAC, South Hams SAC and the River Axe SAC. Therefore, a potential significant negative effect is identified for this objective although effects will be determined largely by the specific sites proposed for allocation, which are appraised separately.<br><br>There is significant potential for the regeneration of brownfield land in the central strategic growth area in particular, which could reduce the impacts of development associated with habitat loss on greenfield land. Therefore, the potential significant negative effect is combined with a potential minor positive effect. |
| **1. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | -? | The spatial strategy directs most new development away from more sensitive rural landscapes and towards the larger towns in the GESP area where there may be good opportunities for redeveloping brownfield sites, particularly in the central strategic growth area, which could minimise impacts on local landscape character. However, the spatial strategy would also involve large-scale development on greenfield land, some of which is directed towards the East Devon AONB, along the rail corridor between Exeter and Axminster in the east. Overall a potential minor negative effect is identified although this is uncertain as effects will be determined largely by the specific sites proposed for allocation, which are appraised separately. |
| **2. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and | +/--? | The spatial strategy directs most new development towards the larger towns which contain the highest concentrations of heritage assets (particularly the city of Exeter, the area towards the Exe estuary by Newton Abbot and Teignmouth, as well as Tiverton, Sidmouth, Exmouth and Crediton). As such, development at these locations may potentially result in impacts on features such as listed buildings, conservation areas and local listings and a potential significant negative effect is identified although this is uncertain as effects will be determined largely by the specific sites proposed for allocation, which are appraised separately. |

| SA Objective | SA score | Justification |
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| promote high quality architecture, design and accessibility in new build development. | | |
| **3. CLIMATE CHANGE MITIGATION**<br>To minimise greenhouse gas emissions. | ++ | The spatial strategy focuses most growth at Exeter and the major towns of the plan area which is likely to provide a higher number of new residents with access to sustainable transport links as well as the strategic road network. This approach should also help to encourage travel by more active modes of transport considering the shorter journeys which would generally be required to services and facilities and employment opportunities. Promoting modal shift in the plan area will help to limit for the extent of increases in greenhouse gas emissions which will result due to the overall scale of new development. Some development is also directed to the key rail corridors that extend out from Exeter, to Axminster in the east, Newton Abbot in the south, Cullompton in the north and Crediton to the north west. This will help to encourage more people outside of the central area to travel via rail day-to-day and will potentially enhance the viability of the rail network, resulting in improved services. A significant positive effect is therefore expected in relation to this SA objective. |
| **4. CLIMATE CHANGE ADAPTATION**<br>To adapt to the possible effects of climate change. | - | The large-scale development proposed through the GESP would result in the loss of greenfield land and an increase in permeable surfaces, which could increase flood risk. By focusing most growth at Exeter and some towns of the plan area, the spatial strategy should mean that there are good opportunities to make use of brownfield sites for development which may to some extent mitigate these effects. However, the spatial strategy involves focussing development at Exeter which includes large areas of Flood Zone 2 and 3 along the River Exe. There are also areas of Flood Zone and 3 at Teignmouth and Newton Abbot where the River Teign passes by these settlements, and there are a number of Critical Drainage Areas at locations in close proximity to where development would be delivered along the River Exe and the River Culum by Cullompton as well as at Honiton, Ottery St Mary and Axminster. A minor negative effect is therefore expected in relation to this SA objective. |
| **5. LAND RESOURCES**<br>To utilise our land | +/-- | The spatial strategy focuses much of the new development proposed through the GESP at Exeter and some towns of the plan area which is likely to allow for good opportunities to develop brownfield land, thus promoting efficient land use. However, most development is still expected to take place on greenfield land and the spatial strategy will result in much of the new growth coming forwards around settlements such as Exeter, Newton Abbot and Teignmouth |

| SA Objective | SA score | Justification |
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| resources efficiently and minimise their loss or degradation. | | where there are areas of Grade 1 and Grade 2 agricultural land. The spatial strategy also directs some growth by Cullompton and by Tiverton at which there are a number of areas of Grade 1 agricultural land. An overall mixed minor positive and minor negative effect is therefore expected in relation to this SA objective. |
| **6. WATER RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or degradation. | -- | It is likely that levels of water consumption resulting from the development to be delivered through the GESP will be determined by the design and onsite practices at new developments, rather than their location. However, nearby waterbodies may be impacted upon during construction and there may be issues associated with water quality if there are capacity issues at the local sewage treatment works (STWs) to treat wastewater. However, South West Water has advised that all potential locations within the GESP area can be connected to existing STW (some of which will require expansion), with no impact on the output water quality. The Exe Estuary SPA is considered to be particularly sensitive to any change in water quality and as such the potential for new growth to affect this water course has been given particular consideration.<br><br>The spatial strategy is likely to include some development which would be adjacent to a waterbody which flows directly into the Exe Estuary SPA. This includes development within Exeter through which the River Exe flows, as well as its many tributaries to the south of the plan area. As such a significant negative effect is expected in relation to this SA objective. |
| **7. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | ++/- | The spatial strategy will deliver the required number of homes over the plan period. Delivering most growth to larger settlements, which include some of those which currently experience the greatest issues of housing affordability including towards Exeter and a secondary area between Newton Abbot and the Teignbridge coast, will have positive effects. However, the level of growth that will occur in more rural areas is low, which means that the affordability of rural housing would not be directly addressed. An overall mixed significant positive and minor negative effect is therefore expected in relation to this SA objective. |
| **8. HEALTH**<br>To support healthy and active communities where | ++ | The spatial strategy focuses most growth at Exeter and some towns of the plan area, which is likely to provide a higher number of new residents with a good level of access to a wide range of recreation facilities and a high number of healthcare facilities. It is likely that the spatial strategy could also encourage travel by active modes of transport considering the close proximity of many new residents to services and facilities and employment opportunities within the larger settlements. Many of the settlements in the plan area that would experience growth also provide access to |

| SA Objective | SA score | Justification |
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| people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | | national cycle routes and provide a good level of access to recreation opportunities at Dartmoor National Park as well as at East Devon and Blackdown Hills AONB. An overall significant positive effect is therefore expected in relation to this SA objective. |
| **9. WELLBEING**<br>To support positive, safe and healthy communities. | ++/- | By focussing most growth at Exeter and some towns of the plan area, the spatial strategy is likely to directly provide new growth to address issues of deprivation within the most affected locations of the plan area. The overall strategy is also likely to help encourage travel by more active and sustainable modes of transport, to the benefit of air quality. However, locations that would receive development also include a number of AQMAs, such as at Exeter, Newtown Abbot, Teignmouth and Cullompton. As such there is potential for existing air quality issues to be exasperated, particularly if growth is delivered in a manner which is not considerate of the potential for increased levels of congestion. The spatial strategy does not involve much development in more rural areas, meaning that it isn't expected to go far in terms of addressing rural deprivation in the GESP area. Furthermore, concentrating a particularly high level of growth at Exeter may result in some new growth occurring within close proximity to Exeter airport where noise issues may result. An overall mixed significant positive and minor negative effect is therefore expected in relation to this SA objective. |
| **10. ACCESS TO SERVICES**<br>To provide accessible and attractive services and community facilities for all ages and interests. | ++/- | By focussing most growth at Exeter and some towns of the plan area, the spatial strategy is likely to provide a higher number of new residents with a good level of access to a wide range of services and facilities at the more substantial city and town centres. Focussing other development along the main transport corridors, particularly the rail links which extend outwards from Exeter, should mean that new residents in those locations would be able to access services and facilities by public transport links, benefiting those without a car. However, the limited amount of growth to be directed to the smaller settlements of the plan area and the more rural locations means that little may be done to address rural service provision, and service improvements at the smaller settlements in the GESP area may not be supported. An overall mixed significant positive and minor negative effect is therefore expected in relation to this SA objective. |
| **11. JOBS AND LOCAL ECONOMY**<br>To foster a strong and | ++/- | Focussing growth at Exeter and some towns of the plan area is likely to provide a higher number of new residents with a good level of access to employment opportunities. Growth along the transport corridors will provide good access to jobs for people without a car, particularly via rail, and may also encourage inward investment in those areas. Delivering most growth at these locations is also likely to provide opportunities for a high level of economic growth considering the access to the strategic road network and other infrastructure which is provided from these |

| SA Objective | SA score | Justification |
|---|---|---|
| entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | | locations. The spatial strategy does less to support the diversification of the rural economy in the plan area, however, and an overall mixed significant positive and minor negative effect is therefore expected in relation to this SA objective. |
| **12. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and town centres. | ++ | Focussing most growth at Exeter and some towns of the plan area means that the spatial strategy is likely to provide a high number of new residents with a good level of access to a wide range of services and facilities at the larger urban centres. As such the vitality and viability of these locations are likely to be strengthened, given that new residents will be more likely to travel the shorter distances to them. Delivering growth along the public transport infrastructure corridors and hubs in the plan area will also enable more people to access other urban centres in the plan area via sustainable transport and may reduce congestion in those centres, benefitting their viability. A significant positive effect is therefore expected in relation to this SA objective. |
| **13. CONNECTIVITY AND TRANSPORT**<br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and | ++ | Focussing growth at Exeter and some towns of the plan area, as well as along the main rail corridors, is likely to provide a higher number of new residents with access to sustainable transport links as well as the strategic road network. By providing most new growth at the more developed areas of the plan area, the spatial strategy could help to encourage travel by more active modes of transport considering the shorter journeys which would be required to services and facilities and employment opportunities. By limiting the level of growth at the more rural locations of the plan area, the spatial strategy will furthermore limit the potential for dependency on travel by car. The spatial strategy may also help to strengthen the existing public transport services in the plan area by securing their viability through increased number of trips. The spatial strategy would not only provide more residents with access to sustainable transport links but it would also result in many new residents being in close proximity to services and facilities and employment opportunities in the larger settlements which may encourage travel by active modes of transport in particular. A significant positive effect is therefore expected in relation to this SA objective. |

| SA Objective | SA score | Justification |
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| beyond. | | |

# Appendix 5
# Assumptions applied during the SA of Site Options

**Table A5.1: SA assumptions for determining significant effects of strategic development sites (proposed for residential use in the site matrices)**

| Sustainability Objective | Assumptions | Data sources |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment.<br>• Natural habitats and biodiversity; flora and fauna<br>• Recreational and leisure opportunities compatible with conservation, and creation of multi-functional green infrastructure | It is assumed that wildlife corridors will be included on all sites, if required by HRA, and no development will be permitted on nationally or internationally designated wildlife sites. However, development sites that are within close proximity of an international, national or local designated conservation site still have the potential to affect the biodiversity or geodiversity of those sites/features, e.g. through off-site 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 for all effects (shown with '?'), as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. As a starting point for the assessment, distances of 250m and 1km (depending on the level of the designation) have been used as an indication of proximity, as there are no standard distance thresholds available and it is recognised that the distance over which effects may occur vary between habitats and species and the types of effect being considered. This level of detail is not possible to be determined with certainty as part of a strategic site options assessment.<br>• Residential development sites that are within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites (or flagged as Red or Amber in the HRA sensitivity work) may have a significant negative (--?) effect.<br>• Residential development sites that are between 250m and 1km of one or more internationally or nationally designated biodiversity or geodiversity sites (or flagged as Yellow in the HRA sensitivity work), and/or that are within 250m of a locally designated site (e.g. County Wildlife Sites, Local Nature Reserves, Regionally Important Geological Sites) and/or contain UKBAP Priority Habitats or habitats that would support protected species, may have a minor negative (-?) effect.<br>• Residential development sites that are more than 1km from any internationally or nationally designated biodiversity or geodiversity sites, and that are over 250m from a locally designated site, and that do not contain UKBAP Priority Habitats could have a negligible (0?) effect.<br>All residential site options are assumed to have opportunities for the provision of green infrastructure, as shown in the assumed characteristics in **Error! Reference source not found. Chapter 2**, however, larger sites are more likely to be able to provide a range of multi-functional green infrastructure. In some instances, existing green infrastructure may already be present on site and these assets may be lost if not incorporated into the new development.<br>Therefore, which may lead to a mixed effect overall[41]: | Priority Habitat Inventory<br>HRA sensitivity work<br>GIS data layers for:<br>County Wildlife Sites<br>County Geological Sites<br>Local Nature Reserves (LNR)<br>National Nature Reserves (NNR)<br>Special Area of Conservation (SAC)<br>Special Protection Area (SPA)<br>Ramsar sites<br>Sites of Special Scientific Interest (SSSI)<br>Aerial imagery |

[41] In all cases, if the two parts of a score are the same type of effect, e.g. both positive, then a best or worst case scenario will be recorded, i.e. a score comprising '++' and '+' would be recorded as '++', while a score comprising '-' and '--' would be recorded as '--'. Mixed effects will only be recorded where a score comprises both positive and negative effects e.g. '+/-' or '++/--'.

| Sustainability Objective | Assumptions | Data sources |
|---|---|---|
| | • Residential development sites that contain an existing green infrastructure asset[42] that could be lost as a result of new development may have a minor 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.<br>• Residential development sites providing less than 1,000 homes could have a minor positive effect (+) through the provision of local public open space.<br>• Residential development sites providing more than 1,000 homes could have a significant positive effect (++) through the provision of strategic and local scale public open space and playing pitches on site. | |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment.<br>• Landscapes and landscape character<br>• Coast | A Landscape Sensitivity Assessment for each site was provided by LPA officers from each district. Strategic scale development in more sensitive locations could have adverse impacts on the character and quality of the landscape, although effects will be uncertain as they will also depend on factors such as the design of the development.<br>• Residential sites that are in an area of low sensitivity could have a negligible (0?) effect.<br>• Residential sites that are in an area of medium/low or medium sensitivity could have a minor negative (-?) effect.<br>• Residential sites that are in an area of medium/high or high sensitivity could have a significant negative (--?) effect. | Revised Interim Landscape Sensitivity Assessment (LSA) |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development.<br>• Conservation of heritage assets within their setting, including Listed Buildings, Conservation Areas, Archaeological sites and Scheduled Monuments<br>• Safeguard cultural heritage and local character by conserving and enhancing existing | The assumed characteristics table notes that no development proposed in the GESP will be permitted on nationally or internationally designated heritage sites. Historic England's definition of the setting of a heritage asset is contained in the National Planning Policy Framework Glossary in Annex 2, which states "The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance, or may be neutral". Detailed impacts on the setting of individual historic assets are difficult to determine during a strategic level of assessment such as this SA for potential strategic development sites to be allocated in the GESP. Effects would be more able to be determined once specific proposals are developed for a site and submitted as part of a planning application.<br>Consequently, in all cases, potential effects are recorded as uncertain (?) given the absence of detailed information on the following:<br>• the significance and sensitivity of heritage assets, including how their setting contributes to their significance; and<br>• the exact scale, design and layout of the new development. | <u>GIS data layers for:</u><br>Conservation Areas<br>Listed Buildings<br>Registered Battlefields<br>Registered Parks & Gardens<br>Scheduled Monuments<br>World Heritage Sites<br>Protected Wreck Sites<br>Aerial Imagery |

[42] National Planning Practice Guidance defines green infrastructure networks as including parks, open spaces, playing fields, woodlands, but also street trees, allotments and private gardens. It can also include streams, canals and other water bodies and features such as green roofs and walls.

| Sustainability Objective | Assumptions | Data sources |
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| built environment, and creating new high quality built environment, including streets, spaces, public realm and detailing of new buildings. | In the absence of detailed assessment work on the historic environment of each of the potential sites, the following assumptions have been made as an <u>indication</u> of potential effects on heritage assets:<br>• A potential significant negative effect (--?) will be identified where a residential development site contains a statutory heritage asset (e.g. World Heritage Sites, Listed Buildings (Grades I and II*), Scheduled Monuments, Registered Parks and Gardens, Registered Battlefields and Conservation Areas).<br>• A potential minor negative effect (-?) will be identified where a residential development site contains a Grade II Listed Building and/or is within 3km of all other statutory heritage assets.<br>In addition, which may lead to a mixed effect overall[43]:<br>• Large, greenfield sites (>10 ha) could have sufficient space to accommodate a well-designed development and create a new high quality built environment. Similarly, previously developed land (>1ha) may present opportunities to enhance the overall quality of the built environment as new development would replace and potentially improve the existing development. Both of these types of sites could result in a minor positive effect (+?). | |
| **4. CLIMATE CHANGE MITIGATION**<br>To minimise greenhouse gas emissions.<br>• Development that minimises the need to travel by providing access to public transport, cycle and walking links to help reduce use of private car<br>• Energy efficient developments and buildings, which make the best use of renewable and low carbon energy generation.<br>• Multi-use green infrastructure which supports or creates | The proximity of development sites to existing centres where there is a concentration of services and facilities 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.<br>• Residential development sites more than 5km from Exeter or a Main Town could have an uncertain significant negative (--?) effect.<br>• Residential development sites between 1-5km away from Exeter or a Main Town could have an uncertain negligible (0?) effect.<br>• Residential development sites less than 1km away from Exeter or a Main Town could have an uncertain minor positive (+?) effect.<br>• Residential development sites within or adjacent to Exeter or a Main Town could have an uncertain significant positive (++?) effect.<br>Also a key factor in determining the use of the non-car based modes of transport will be the presence of nearby existing sustainable transport links[44], although the actual use of sustainable transport modes will depend on people's behaviour.<br>• Residential sites that are within 1 km of a railway station and 500 m of a bus stop with frequent services (minimum half hourly) (regardless of proximity to cycle routes) are likely | Settlement hierarchy from local Plans<br>Assumed capacity of each site (stated in the appraisal matrices)<br><u>GIS data layers for:</u><br>Railway stations<br>Bus stops<br>Bus frequency[45]<br>Local cycle routes<br>National Cycle Network |

[43] In all cases, if the two parts of a score are the same type of effect, e.g. both positive, then a best or worst case scenario will be recorded, i.e. a score comprising '+3' and '+1' would be recorded as '+3', while a score comprising '-1' and '-3' would be recorded as '- 3'. Mixed effects will only be recorded where a score comprises both positive and negative effects e.g. '+1/-2' or '+3/-3'.

[44] Where a physical barrier could prevent access to a transport link this has been accounted for in the scoring and justified in the assessment text.

[45] Devon County Council (2018) Available at: www.cartogold.co.uk/Devon/map.html#devon.

| Sustainability Objective | Assumptions | Data sources |
|---|---|---|
| transport networks. | to have a significant positive (++) effect due to distance from public transport options.<br>• Residential sites that are within either 1 km of a railway station or 500 m of a bus stop with frequent services (minimum half hourly), but not both, (regardless of proximity to cycle routes) are likely to have a minor positive (+) effect due to distance from public transport options.<br>• Residential sites that are more than 1 km from a railway station and more than 500 m from a bus stop but that have an existing cycle route within 1 km of the site could have a minor negative (-?) effect due to distance from public transport options, although this is uncertain depending on whether the nearby cycle route(s) could be used for the purposes of commuting or undertaking day to day journeys.<br>• Residential sites that are not within 1 km of a railway station but are within 500 m of a bus stop with infrequent services (more than half hourly), (regardless of proximity to cycle routes) are likely to have a minor negative (-) effect due to distance from public transport options.<br>• Residential sites that are more than 1 km from a railway station and 500 m from a bus stop and that do not have an existing cycle route within 1 km are likely to have a significant negative (--) effect due to distance from public transport options.<br><br>New transport links such as bus routes or cycle paths may be provided as part of new developments and the effects of this are considered under this objective. This is alongside other services and facilities including employment which would be provided in greater quantities depending on the scale of the site proposals. As set out in the characteristics of strategic residential development sites in **Chapter 2**, all sites are assumed to include active travel (i.e. providing cycle and walking links) but larger sites are more likely to provide sustainable transport links. All residential site options are also assumed to have opportunities for the provision of green infrastructure (the effects of which are captured under SA objective 1), and the opportunities for green infrastructure to support or create transport networks is assumed within this objective to be covered by the provision of active travel links.<br>Therefore (which could result in mixed effects overall):<br><br>• Residential development sites providing less than 1,000 homes could have an uncertain significant negative (--?) effect.<br>• Residential development sites providing between 1,000 homes and 3,999 homes could have an uncertain negligible (0?) effect.<br>• Residential development sites of 4,000+ could have an uncertain minor positive (+?) effect.<br><br>The location or scale of residential development will not affect the energy efficiency of the development; this would depend largely on the detailed proposals for sites and their design, which are not known at this stage. Opportunities to connect with district heating or provide on-site energy generation will be considered through the GESP policies. | |
| **5. CLIMATE CHANGE** | The development of new housing on greenfield land is more likely to increase the area of | GIS data layers for: |

| Sustainability Objective | Assumptions | Data sources |
|---|---|---|
| **ADAPTATION**<br>To adapt to the possible effects of climate change.<br>• Flood risk and the threat to people and property, and coastal change and adaptation. | impermeable surfaces and could therefore increase overall flood risk, although it is recognised that other standards relating to incorporation of Sustainable Drainage Systems (SuDS) will apply.<br>NPPF Paragraph 164 requires that any development in an area at risk of flooding '*incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate'*.<br>The effects of new development on this SA objective are therefore dependent to some extent on its design, for example whether it incorporates SuDS, which is unknown and cannot be assessed at this stage.<br>Where residential 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. National Planning Practice Guidance identifies which types of land uses are considered to be appropriate in Flood Zones 2, 3a and 3b. Residential properties are classed as a 'more vulnerable use', which is suitable in areas of flood zone 1 and 2 but would require an exception test in flood zone 3a, and is unsuitable in flood zone 3b.<br>A sequential approach should be followed to steer new development to areas with the lowest probability of flooding (i.e. flood zone 1) and local planning authorities will need to undertake a flood risk sequential test when allocating sites. Where there are no reasonably available sites in flood zone 1, local planning authorities in their decision making should take into account the flood risk vulnerability of land uses and consider reasonably available sites in flood zone 2. Only where there are no reasonably available sites in flood zones 1 or 2 should the suitability of sites in flood zone 3 (areas with a high probability of river or sea flooding) be considered, taking into account the flood risk vulnerability of land uses and applying the Exception Test if required (this would be required for residential development). Essentially, the Exception Test requires proposed development to show that it will provide wider sustainability benefits to the community that outweigh flood risk, and that it will be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall.<br>A Critical Drainage Area (CDA) is an area that has critical drainage problems and which has been notified to the local planning authority as such by the Environment Agency in line with the NPPF. In these locations, there is a need for surface water to be managed to a higher standard than normal to ensure any new development will contribute to a reduction in flooding risks in line with NPPF.<br>Therefore:<br>• Sites that are entirely or mainly (i.e. >50%) on greenfield land that is within flood zones 3a or 3b, or sites that contain a Critical Drainage Area, are likely to have an uncertain significant negative (--?) effect, dependent on the SuDS provision made and whether the design of development brought forward could avoid areas of flood risk.<br>• Sites that are either entirely or mainly on greenfield land outside of flood zones 3a and 3b, or that are entirely or mainly on brownfield land within flood zones 3a or 3b, are likely to have an uncertain minor negative (-?) effect, dependent on the SuDS provision made and whether the design of development brought forward could avoid areas of flood risk.<br>• Sites that are on brownfield land outside of flood zones 3a and 3b are likely to have a | Flood Zones<br>Critical Drainage Areas<br>Aerial imagery |

| Sustainability Objective | Assumptions | Data sources |
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| | negligible (0) effect. | |
| **6. LAND RESOURCES**<br>To utilise our land resources efficiently and minimise their loss or degradation.<br>• Soil quality<br>• Safeguard mineral resources<br>• Reuse of previously developed land<br>• Minimise waste (reuse, recycle, recover) | It is recognised that the strategic site options for the GESP are generally larger greenfield sites as there are not sufficient previously developed (brownfield) sites within the area, therefore there is not much opportunity for the reuse of previously developed land, which represents more efficient use of land in comparison to the development of greenfield sites. The development of greenfield land could result in the loss of high quality agricultural land.<br>Therefore:<br>• Sites with more than 5 ha of Grade 1[46], Grade 2 or Grade 3a agricultural land would have a significant negative (--) effect.<br>• Sites with between 1 ha and 5 ha of Grade 1 or Grade 2 or Grade 3a agricultural land would have a minor negative (-) effect.<br>• Sites with less than 1 ha of Grade 1 or Grade 2 or Grade 3 agricultural land would have a negligible (0) effect.<br>• Site with more than 5 ha of Grade 3 agricultural land according to the national GIS dataset could have a significant negative (--?) effect although this is uncertain depending on whether the land is Grade 3a or 3b (which cannot be determined from the national GIS dataset).<br>• Sites with between 1 ha and 5 ha of Grade 3 agricultural land according to the national GIS dataset could have a minor negative (-?) effect although this is uncertain depending on whether the land is Grade 3a or 3b (which cannot be determined from the national GIS dataset).<br>• Sites that comprise less than 1ha of Grade 3 agricultural land according to the national GIS dataset or comprise entirely of Grade 4 or lower agricultural quality land would have a negligible (0) effect.<br>In addition, as part of a mixed effect:<br>• Sites with up to 5ha of previously developed land would have a minor positive (+) effect<br>• Sites with more than 5ha of previously developed land would have a significant positive (++) effect<br>. In addition, as part of a mixed effect:<br>• Large residential sites (>10 ha) that are mostly (>50%) within a Minerals Safeguarding Area would have a significant negative (--) effect, as mineral resources could be sterilised. However, this will be uncertain (--?) as there could be the opportunity to extract the mineral resource prior to the development going ahead.<br>• Large residential sites (>10 ha) that are partially (<50%) within, or small residential sites (<10 ha) that are mostly (>50%) within a Minerals Safeguarding Area would have a minor negative (-) effect, as mineral resources could be sterilised. However, this will be uncertain (-?) as there could be the opportunity to extract the mineral resource prior to the development | <u>GIS data layers for:</u><br>Agricultural Land Classification<br>Mineral Safeguarding Areas<br>Aerial imagery |

[46] Where available, the East Devon District Council detailed Agricultural Land Classification was used. Where not available for the entirety of a site, the National Agricultural Land Classification was used.

| Sustainability Objective | Assumptions | Data sources |
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| | going ahead.<br>• Residential sites of any size that are within a Minerals Safeguarding Area in which evidence indicates all mineral resource have been extracted will have a negligible (0) effect.<br><br>The effects of new residential development on waste generation will depend largely on resident's behaviour and not on the site's size or location. | |
| **7. WATER RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or degradation.<br>• Water quality and quantity/supply | Levels of water consumption within new development will be determined by its design and onsite practices, rather than the location of the site, therefore effects on water supply cannot be determined. However, the location of residential development could affect water quality in nearby waterbodies during construction. The extent to which water quality is affected would depend on construction techniques and the use of sustainable drainage systems (SuDS) within the design; therefore effects are uncertain at this stage. In addition, the location of sites could affect water quality, depending on whether they are in an area where there is capacity at the local sewage treatment works (STWs) to treat additional wastewater generated by the overall scale of development proposed. However, South West Water has advised that all potential sites for the GESP can be connected to existing STW (some of which will require expansion), with no impact on the output water quality at any sites (i.e. all water quality will stay within permitted limits).<br><br>• Residential sites that contain or are adjacent to watercourses that run into the Exe Estuary SPA could result in significant negative (--?) effects on water quality although this is uncertain at this stage of assessment.<br>• Residential sites that contain or are adjacent to watercourses that do not run into the Exe Estuary, could result in moderate negative (-?) effects on water quality although this is uncertain at this stage of assessment.<br>• Residential sites that are not close to any watercourses would have a negligible (0) effect. | <u>GIS data layers for:</u><br>Rivers and lakes<br>WWF Digital River tool[47] |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter.<br>• Supply of housing (accommodating population growth and changes in household composition)<br>• Housing mix (tenure and size) | All of the residential site options are expected to have positive effects on this objective, due to the nature of the proposed development. Larger sites will provide opportunities for the development of a larger number of homes including affordable homes, as well as a good mix of tenure and size, and diversity of supply and therefore would have significant positive effects.<br><br>• Residential sites with capacity for more than 1,000 homes will have a significant positive (++) effect.<br>• Residential sites with capacity for fewer than 1,000 homes will have a minor positive (+) effect. | No data needed – just reference to the assumed capacity of each site (stated in the appraisal matrices). |

[47] WWF (2018) Digital River. Available at: www.wwf.org.uk/uk-rivers-map.

| Sustainability Objective | Assumptions | Data sources |
|---|---|---|
| • Housing delivery and diversity of supply (e.g. Housing Association affordable, volume builder and small builder open market, custom and self build)<br>• Housing affordability | | |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them.<br>• Cycle and walking networks<br>• Open space and green infrastructure in new developments and existing settlements<br>• Public recreational, play and leisure opportunities | Public health will be influenced by the proximity[48] of sites to open spaces, walking and cycle paths, easy access to which can encourage participation in active outdoor recreation and active travel:<br>• Residential sites that are within 800 m of an area of major open space and that are within 400m of a walking or cycle path will have a significant positive (++) effect.<br>• Residential sites that are within 800 m of an area of major open space or that are within 400m of a walking or cycle path (but not both) will have a minor positive (+) effect.<br>• Residential sites that are more than 800 m from an area of major open space and more than 400m from a walking or cycle path will have a minor negative (-) effect.<br>In addition, it is anticipated that larger sites will deliver significant open space and active transport links, as shown in the assumed characteristics in **Chapter 2** (which could result in mixed effects overall).<br>• Sites with capacity for 2,000+ homes will have a significant positive (++) effect.<br>• Sites with capacity for 1,000 – 1,999 homes will have a minor positive (+) effect.<br>• Sites with capacity for up to 999 homes will have a negligible (0) effect. | Assumed capacity of each site (stated in the appraisal matrices)<br>GIS data layers for:<br>Major open space<br>Public Rights of Way<br>National Trails |
| **10. WELLBEING**<br>To support positive, safe and healthy communities.<br>• Social deprivation<br>• Air quality, noise and light pollution<br>• Safe and secure environment with reduced fear of crime | Where a residential development site is within an area of higher levels of deprivation compared to Devon as a whole, the new development may have positive effects on wellbeing locally as a result of increased investment in the area and potentially the creation of new services and facilities. Any such residential site options would be likely to have a minor positive (+) effect.<br>Where new residential development is proposed within close proximity (100m) of sensitive receptors (e.g. existing houses, schools, hospitals etc.) there may be negative effects on amenity as a result of increased noise and light pollution, particularly during the construction phase. In addition, new residential development within close proximity of major roads/railways/industrial areas (as indicated on the GIS base map) may result in noise pollution affecting residents in the longer term. In addition, the Exeter Airport noise contour indicates where noise from flights taking off and landing would reach a level of 57 decibels or higher. Residential development would generally be unacceptable within the contour and acceptable outside of the contour. Therefore, which may result in mixed effects overall:<br>• Residential sites that are wholly within the Exeter Airport noise contour of 57db and above | Deprivation levels<br>GIS data layers for:<br>Exeter Airport noise contours<br>Residential allocations<br>GP surgeries<br>Schools<br>Aerial imagery<br>A roads<br>Motorways<br>Railway lines<br>AQMAs<br>Aerial Imagery |

[48] A proximity of 800m was used for open space to represent the 'acceptable' walking distance to an 'elsewhere' location' (see **Chapter 2**). A shorter proximity of 400m was used for walking and cycle paths as it is assumed that people using these paths would then continue their journey.

| Sustainability Objective | Assumptions | Data sources |
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| | would have a significant negative effect in the long term (--).<br>• Residential sites that are partially within the Exeter Airport noise contour of 57db and above would have an uncertain significant negative effect in the long term (--?), dependent on if residential development on the site could be located outside of the noise contour.<br>• Residential sites that are in close proximity (within 100m) to existing residential development, residential allocations or other sensitive receptors may have a minor negative (-) effect during the construction phase, and sites that are directly adjacent to an 'A' road, motorway or railway line, or industrial area would have a minor negative (-) effect in the longer-term.<br><br>Proximity to an Air Quality Management Area (AQMA) can also influence the effects of new residential development on air quality, as development in or near to those areas could result in an increase in car use and associated emissions, affecting the wellbeing of surrounding residents. Therefore, which may result in mixed effects overall:<br><br>• Residential sites that are within, or within 1 km of, an AQMA would have a significant negative (--) effect, as these sites would have potential to result in increased traffic within the AQMA and residents of the site could be significantly adversely affected by poor air quality within the AQMA.<br>• Residential sites that are further than 1 km from an AQMA but have been identified to have potential to result in increased traffic within an AQMA would have a minor negative (-) effect.<br>• Residential sites that are further than 1 km from an AQMA and have not been identified to have potential to result in increased traffic within an AQMA would have a negligible (0) effect.<br><br>The effects of new residential development on 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 residential development; rather they will be determined through the detailed proposals for each site. Therefore, no score is given in relation to the effects of residential site options on this part of the SA objective. | |
| **11. ACCESS TO SERVICES**<br>To provide accessible and attractive services and community facilities for all ages and interests.<br>• Access to area wide services (nursery and pre-school, primary, secondary, further and higher education; | Based on the existing Settlement Hierarchy as set out within Local Plans, residential sites that are located adjacent to Exeter or the Main Towns within the Greater Exeter area will generally have better access to a wider range of existing services and facilities compared to sites located at the Defined Villages and Undefined Villages, settlements and the countryside. New services and facilities will also be provided in association with new residential development, particularly at larger sites as shown in the assumed characteristics in **Chapter 2**. Therefore:<br><br>• Sites that are located adjacent to Exeter or a Main Town would have a significant positive (++) effect.<br>• Sites that are located adjacent to a Defined Village would have a minor positive (+) effect. | Settlement hierarchy from local Plans<br>Broadband availability[50]<br>Assumed capacity of each site (stated in the appraisal matrices)<br>GIS data layers for:<br>Primary schools<br>Secondary schools |

[50] Ofcom (2018) View broadband availability. Available at: checker.ofcom.org.uk/broadband-coverage.

| Sustainability Objective | Assumptions | Data sources |
|---|---|---|
| healthcare; etc.)<br>• Community facilities (local shops, meeting venues, public houses, places of worship)<br>• Cultural buildings and facilities (e.g. libraries, museums, cinemas)<br>• Access to high speed broadband | • Sites that are located adjacent to an undefined village or settlement would have a minor negative (-) effect.<br>• Sites that are not located adjacent to a settlement would have a significant negative (--) effect.<br><br>In addition, which could lead to mixed effects overall,<br><br>• Sites adjacent to areas where there is ultrafast broadband (>300mbps) or superfast broadband (30-300mbps) available would have a minor positive (+) effect.<br>• Sites in areas where there is standard broadband (10-30mbps) available would have a negligible (0) effect.<br>• Sites where there is <10mbps internet download speed currently available would have a minor negative (-) effect.<br><br>The effects of residential sites on the educational element of this objective will depend on the access[49] that they provide to existing schools, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils. While proximity to Exeter and the Main Towns should ensure proximity to a range of schools, the ability to walk to school has wider sustainability benefits. Therefore, which may result in a mixed effect overall:<br><br>• Sites that are within 500 m of at least one existing primary school and at least one existing secondary school may have a significant positive (++?) effect.<br>• Sites that are within 1 km of one of an existing primary and/or an existing secondary school, may have a minor positive (+?) effect.<br>• Sites that are not within 1 km of an existing school may have a minor negative (-?) effect.<br><br>In addition:<br><br>• Sites that are within 3km of a further education college or university may have a minor positive (+?) effect.<br><br>In addition, new residential development could stimulate the provision of new schools/school places, particularly larger sites, as shown in the assumed characteristics in **Chapter 2**. Therefore, which may result in a mixed effect overall:<br><br>• Larger sites (>4,000 homes) which could provide primary and secondary schools on site would have a significant positive (++) effect.<br>• Medium sites (500-3,999 homes) which could provide a primary school on site would have a minor positive (+) effect.<br>• Small sites (<500 homes) which are less likely to accommodate a new school would have a | Further education colleges<br>UCAS universities and colleges[51] |

[49] Proximities of 500m and 1km were used to distinguish between site in 'desirable' and 'acceptable' walking distance to schools (see **Chapter 2**).

[51] As defined within the school GIS dataset as well as the UCAS (2017) UK map of unis and colleges by region. Available at: www.ucas.com/file/129971/download%3Ftoken%3DmGS-b3F1.

| Sustainability Objective | Assumptions | Data sources |
|---|---|---|
| | minor negative (-) effect. | |
| **12. JOBS AND LOCAL ECONOMY**<br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter.<br>• Employment land supply to cater for businesses of all sizes<br>• Mix of employment offer<br>• Productivity of local economy and access to labour supply<br>• Access to education and skills training<br>• Protect existing tourism businesses and offer | The provision of new homes across the plan area will create job opportunities particularly during the construction phase, but this will not vary between site locations. However, as set out in the assumed characteristics in **Chapter 2**, larger sites will provide large scale mixed use employment opportunities and a business park or employment estate on site.<br>The location of residential sites will influence the achievement of this objective by determining how easily residents would be able to access job opportunities at existing and proposed employment sites. In addition, proximity to a city or large town could indicate good access to employment opportunities, as they tend to be focussed mainly at the larger settlements. Access to services is considered separately under SA Objective 11 above.<br>• Residential sites that are within 1 km of an existing or proposed employment site and that are adjacent to Exeter or a Main Town would have a significant positive (++) effect.<br>• Residential sites that are within 1 km of an existing or proposed employment site or that are adjacent to Exeter or a Main Town (but not both) would have a minor positive (+) effect.<br>• Sites that are more than 1km from an existing or proposed employment site and that are not adjacent to Exeter or a Main Town would have a significant negative (--) effect.<br>In addition, if a residential site option would result in the loss of an existing employment site, a negative effect would occur in relation to the protection of existing employment sites. Therefore (which could result in mixed effects overall):<br>• Residential sites that are currently in employment use would have a significant negative (--) effect.<br>In addition, the residential development sites will include a component of employment land depending on their size. Therefore (which could result in mixed effects overall):<br>• Sites with capacity for more than 2,000 homes will have a significant positive (++) effect.<br>• Sites with capacity for between 500-1,999 homes will have a minor positive (+) effect.<br>• Sites with capacity for fewer than 500 homes will have a negligible (0) effect.<br>In addition:<br>• Sites identified to have potential impacts on tourism business and offer will have a minor negative (-) effect.<br>Proximity to education facilities is considered separately under SA objective 11 above. | Settlement hierarchy from local Plans<br>Assumed capacity of each site (stated in the appraisal matrices)<br>GIS data layers for:<br>Employment sites<br>Employment allocations<br>Aerial imagery |
| **13. CITY AND TOWN CENTRES** | The location of new residential sites has the opportunity to support the vitality and viability of existing town centres by increasing the number of day-to-day visitors to the town centres and | Settlement hierarchy in Local Plans |

| Sustainability Objective | Assumptions | Data sources |
|---|---|---|
| To safeguard and strengthen the vitality and viability of our city and town centres.<br>• Diverse city and town centre economy<br>• Strengthen and safeguard the vitality and viability of centres<br>• Impact of new development on existing centres<br>• Access to existing centres | supporting businesses and services in those locations. However, larger sites with capacity for over 4,000 homes are assumed to provide town centre facilities[52], and if located in proximity to existing Main Towns they may also detract some visitors from the existing town centres. Therefore:<br>• Residential sites (<4000 homes) that are located adjacent to Exeter or a Main Town would have a significant positive (++) effect.<br>• Large residential sites (>4000 homes) that are located adjacent to Exeter or a Main Town would have a minor positive (+) effect.<br>• Residential sites that are not located adjacent to Exeter or a Main Town would have a minor negative (-) effect. | Assumed capacity of each site (stated in the appraisal matrices) |
| **14. CONNECTIVITY AND TRANSPORT**<br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond.<br>• Access to services – links between homes, services and businesses by active modes of transport (e.g. cycling and walking)<br>• Access to public transport (e.g. distance to and frequency of bus and rail services)<br>• Estimated car reliance and use<br>• Access to local road | Proximity[53] to sustainable transport links will influence how accessible residential sites are in relation to services and job opportunities.<br>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 residential 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 from a residential site to their place of work, for example[54].<br>• Residential sites that are within 1 km of a railway station and 500 m of a bus stop with frequent services (minimum half hourly) (regardless of proximity to cycle routes) are likely to have a significant positive (++) effect due to distance from public transport options.<br>• Residential sites that are within either 1 km of a railway station or 500 m of a bus stop with frequent services (minimum half hourly), but not both, (regardless of proximity to cycle routes) are likely to have a minor positive (+) effect due to distance from public transport options.<br>• Residential sites that are more than 1 km from a railway station and more than 500 m from a bus stop but that have an existing cycle route within 1 km of the site could also have a minor negative (-?) effect due to distance from public transport options, although this is uncertain depending on whether the nearby cycle route(s) could be used for the purposes of commuting | Assumed capacity of each site (stated in the appraisal matrices)<br>GIS data layers for:<br>Railway stations<br>Bus stops<br>Bus frequency[55]<br>Local cycle routes<br>National Cycle Network |

[52] Including shops, services, commercial space and other mixed uses including a small supermarket and a community building (see **Chapter 2**).

[53] A proximity of 1km was used for railway stations to represent the 'acceptable' walking distance to a commuting method in **Chapter 2**. A shorter distance of 500m was used for bus stops to represent the 'desirable' walking distance to a commuting method, as it is assumed that people would generally be willing to travel further to access a railway station than a bus stop, as railway stations generally provide the fastest mode of travel to more distant employment areas. In terms of access to cycle routes for commuting purposes, a straight-line distance of 1km was used in the appraisal on the assumption that links to cycle routes are likely to also use road carriageways.

[54] Where a physical barrier could prevent access to a transport link this has been accounted for in the scoring and justified in the assessment text.

[55] Devon County Council (2018) Available at: www.cartogold.co.uk/Devon/map.html#devon.

| Sustainability Objective | Assumptions | Data sources |
|---|---|---|
| network<br>• Impact on Strategic Road Network (i.e. M5 J29 - 30) | or undertaking day to day journeys.<br>• Residential sites that are not within 1 km of a railway station but are within 500 m of a bus stop with infrequent services (more than half hourly), (regardless of proximity to cycle routes) are likely to have a minor negative (-) effect due to distance from public transport options.<br>• Residential sites that are more than 1 km from a railway station and 500 m from a bus stop and that do not have an existing cycle route within 1 km are likely to have a significant negative (--) effect due to distance from public transport options.<br><br>In addition, it is anticipated that larger sites will deliver sustainable transport links, particularly in the form of new bus routes, as shown in the assumed characteristics in **Chapter 2** (which could result in mixed effects overall).<br><br>• Sites with capacity for 1,000+ homes will have a minor positive (+) effect.<br>• Sites with capacity for up to 999 homes will have a negligible (0) effect.<br><br>Access to the local road network and the impact on the strategic road network are not assessed through the SA, as these are not sustainability issues. Instead, the SA focusses on the extent that site options would provide opportunities for sustainable transport use. Note that provision of walking and cycling links within new development is covered under SA objective 4 above, and access to broadband is covered under SA objective 11 above. | |

**Table A5.2: SA assumptions for determining significant effects of strategic development sites (proposed for employments in the site matrices)**

| Sustainability Objective | Assumptions | Data sources |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment.<br>• Natural habitats and biodiversity; flora and fauna<br>• Recreational and leisure opportunities compatible with conservation, and creation of multi-functional green infrastructure | It is assumed that wildlife corridors will be included on all sites, if required by HRA, and no development will be permitted on nationally or internationally designated wildlife sites. However, development sites that are within close proximity of an international, national or local designated conservation site still have the potential to affect the biodiversity or geodiversity of those sites/features, e.g. through off-site habitat damage/loss, fragmentation, disturbance to species, air pollution, water pollution 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 for all effects (shown with '?'), as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. As a starting point for the assessment, distances of 250m and 1km (depending on the level of the designation) have been used as an indication of proximity, as there are no standard distance thresholds available and it is recognised that the distance over which effects may occur vary between habitats and species and the types of effect being considered. This level of detail is not possible to be determined with certainty as part of a strategic site options assessment.<br>• Employment sites that are within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites (or flagged as Red or Amber in the HRA sensitivity work) may have a significant negative (--?) effect.<br>• Employment development sites that are between 250m and 1km of one or more internationally or nationally designated biodiversity or geodiversity sites (or flagged as Yellow in the HRA sensitivity work), and/or that are within 250m of a locally designated site (e.g. County Wildlife Sites, Local Nature Reserves, Regionally Important Geological Sites) and/or contain UKBAP Priority Habitats or habitats that would support protected species, may have a minor negative (-?) effect.<br>• Employment development sites that are more than 1km from any internationally or nationally designated biodiversity or geodiversity sites, and that are over 250m from a locally designated site, and that do not contain UKBAP Priority Habitats could have a negligible (0?) effect.<br>All employment site options are assumed to have opportunities for the provision of green infrastructure, as shown in the assumed characteristics in **Chapter 2**, however, larger sites are more likely to be able to provide a range of multi-functional green infrastructure. In some instances, existing green infrastructure may already be present on site and these assets may be lost if not incorporated into the new development.<br>Therefore, which may lead to a mixed effect overall[56]: | Priority Habitat Inventory<br>HRA sensitivity work<br>GIS data layers for:<br>County Wildlife Sites<br>County Geological Sites<br>Local Nature Reserves (LNR)<br>National Nature Reserves (NNR)<br>Special Area of Conservation (SAC)<br>Special Protection Area (SPA)<br>Ramsar sites<br>Sites of Special Scientific Interest (SSSI)<br>Aerial imagery |

[56] In all cases, if the two parts of a score are the same type of effect, e.g. both positive, then a best or worst case scenario will be recorded, i.e. a score comprising '++' and '+' would be recorded as '++', while a score comprising '-' and '--' would be recorded as '--'. Mixed effects will only be recorded where a score comprises both positive and negative effects e.g. '+/-' or '++/--'.

| Sustainability Objective | Assumptions | Data sources |
|---|---|---|
| | • Employment sites that contain an existing green infrastructure asset[57] that could be lost as a result of new development may have a minor 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.<br>• Employment sites providing 20ha or more employment land could have a minor positive effect (+) through the retention and provision of local green infrastructure. | |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment.<br>• Landscapes and landscape character<br>• Coast | A Landscape Sensitivity Assessment for each site was provided by LPA officers from each district. Strategic scale development in more sensitive locations could have adverse impacts on the character and quality of the landscape, although effects will be uncertain as they will also depend on factors such as the design of the development.<br>• Employment sites that are in an area of low sensitivity could have a negligible (0?) effect.<br>• Employment sites that are in an area of medium/low or medium sensitivity could have a minor negative (-?) effect.<br>• Employment sites that are in an area of medium/high or high sensitivity could have a significant negative (--?) effect. | Revised Interim Landscape Sensitivity Assessment (LSA) |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development.<br>• Conservation of heritage assets within their setting, including Listed Buildings, Conservation Areas, Archaeological sites and Scheduled Monuments<br>• Safeguard cultural heritage and local character by conserving and enhancing existing built environment, and creating new high quality built environment, | The assumed characteristics table notes that no development proposed in the GESP will be permitted on nationally or internationally designated heritage sites. Historic England's definition of the setting of a heritage asset is contained in the National Planning Policy Framework Glossary in Annex 2, which states "The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance, or may be neutral". Detailed impacts on the setting of individual historic assets are difficult to determine during a strategic level of assessment such as this SA for potential strategic development sites to be allocated in the GESP. Effects would be more able to be determined once specific proposals are developed for a site and submitted as part of a planning application.<br>Consequently, in all cases, potential effects are recorded as uncertain (?) given the absence of detailed information on the following:<br>• the significance and sensitivity of heritage assets, including how their setting contributes to their significance; and<br>• the exact scale, design and layout of the new development.<br>In the absence of detailed assessment work on the historic environment of each of the potential sites, the following assumptions have been made as an <u>indication</u> of potential effects on heritage assets: | <u>GIS data layers for:</u><br>Conservation Areas<br>Listed Buildings<br>Registered Battlefields<br>Registered Parks & Gardens<br>Scheduled Monuments<br>World Heritage Sites<br>Protected Wreck Sites<br>Aerial Imagery |

[57] National Planning Practice Guidance defines green infrastructure networks as including parks, open spaces, playing fields, woodlands, but also street trees, allotments and private gardens. It can also include streams, canals and other water bodies and features such as green roofs and walls.

| Sustainability Objective | Assumptions | Data sources |
|---|---|---|
| including streets, spaces, public realm and detailing of new buildings. | • A potential significant negative effect (--?) will be identified where an employment site contains a statutory heritage asset (e.g. World Heritage Sites, Listed Buildings (Grades I and II*), Scheduled Monuments, Registered Parks and Gardens, Registered Battlefields and Conservation Areas).<br>• A potential minor negative effect (-?) will be identified where an employment site contains a Grade II Listed Building and/or is within 3km of all other statutory heritage assets.<br><br>In addition, which may lead to a mixed effect overall[58]:<br><br>• Large, greenfield sites (>10 ha) could have sufficient space to accommodate a well-designed development and create a new high quality built environment. Similarly, previously developed land (>1ha) may present opportunities to enhance the overall quality of the built environment as new development would replace and potentially improve the existing development. Both of these types of sites could result in a minor positive effect (+?). | |
| **4. CLIMATE CHANGE MITIGATION**<br>To minimise greenhouse gas emissions.<br>• Development that minimises the need to travel by providing access to public transport, cycle and walking links to help reduce use of private car<br>• Energy efficient developments and buildings, which make the best use of renewable and low carbon energy generation.<br>• Multi-use green infrastructure which supports or creates transport networks. | The proximity of employment development sites to existing centres where there is a concentration of residential areas and potential employees will affect the extent to which people are able to make use of non-car based modes of transport to commute to and from work.<br><br>• Employment development sites more than 5km from Exeter or a Main Town could have an uncertain significant negative (--?) effect.<br>• Employment development sites between 1-5km away from Exeter or a Main Town could have an uncertain negligible (0?) effect.<br>• Employment development sites less than 1km away from Exeter or a Main Town could have an uncertain minor positive (+?) effect.<br>• Employment brownfield sites within or adjacent to Exeter or a Main Town could have an uncertain significant positive (++?) effect.<br><br>Also a key factor in determining the use of the non-car based modes of transport will be the presence of nearby existing sustainable transport links[59], although the actual use of sustainable transport modes will depend on people's behaviour.<br><br>• Employment sites that are within 1 km of a railway station and 500 m of a bus stop with frequent services (minimum half hourly) (regardless of proximity to cycle routes) are likely to have a significant positive (++) effect due to distance from public transport options.<br>• Employment sites that are within either 1 km of a railway station or 500 m of a bus stop with frequent services (minimum half hourly), but not both, (regardless of proximity to cycle | Settlement hierarchy from local Plans<br>Assumed employment land capacity of each site (stated in the appraisal matrices)<br>GIS data layers for:<br>Railway stations<br>Bus stops<br>Bus frequency[60]<br>Local cycle routes<br>National Cycle Network |

[58] In all cases, if the two parts of a score are the same type of effect, e.g. both positive, then a best or worst case scenario will be recorded, i.e. a score comprising '+3' and '+1' would be recorded as '+3', while a score comprising '-1' and '-3' would be recorded as '- 3'. Mixed effects will only be recorded where a score comprises both positive and negative effects e.g. '+1/-2' or '+3/-3'.

[59] Where a physical barrier could prevent access to a transport link this has been accounted for in the scoring and justified in the assessment text.

[60] Devon County Council (2018) Available at: www.cartogold.co.uk/Devon/map.html#devon.

| Sustainability Objective | Assumptions | Data sources |
|---|---|---|
| | routes) are likely to have a minor positive (+) effect due to distance from public transport options.<br>• Employment sites that are more than 1 km from a railway station and more than 500 m from a bus stop but that have an existing cycle route within 1 km of the site could also have a minor negative (-?) effect due to distance from public transport options, although this is uncertain depending on whether the nearby cycle route(s) could be used for the purposes of commuting or undertaking day to day journeys.<br>• Employment sites that are not within 1 km of a railway station but are within 500 m of a bus stop with infrequent services (more than half hourly), (regardless of proximity to cycle routes) are likely to have a minor negative (-) effect due to distance from public transport options.<br>• Employment sites that are more than 1 km from a railway station and 500 m from a bus stop and that do not have an existing cycle route within 1 km are likely to have a significant negative (--) effect due to distance from public transport options.<br><br>New transport links such as bus routes or cycle paths may be provided as part of new employment developments and the effects of this are considered under this objective. As set out in the characteristics of strategic employment development sites in **Chapter 2**, all sites are assumed to include active travel (i.e. providing cycle and walking links) but larger sites are more likely to provide sustainable transport links. All employment site options are also assumed to have opportunities for the provision of green infrastructure (the effects of which are captured under SA objective 1), and the opportunities for green infrastructure to support or create transport networks is assumed within this objective to be covered by the provision of active travel links.<br>Therefore (which could result in mixed effects overall):<br><br>• Employment development sites providing less than 10ha of employment land could have an uncertain significant negative (--?) effect.<br>• Employment development sites providing between 10ha-20ha of employment land could have an uncertain negligible (0?) effect.<br>• Employment development sites of 20ha or more of employment land could have an uncertain minor positive (+?) effect.<br><br>The location or scale of employment development will not affect the energy efficiency of the development; this would depend largely on the detailed proposals for sites and their design, which are not known at this stage. Opportunities to connect with district heating or provide on-site energy generation will be considered through the GESP policies. | |
| **5. CLIMATE CHANGE ADAPTATION**<br>To adapt to the possible effects of climate change.<br>• Flood risk and the threat | The development of new employment development on greenfield land is more likely to increase the area of impermeable surfaces and could therefore increase overall flood risk, although it is recognised that other standards relating to incorporation of Sustainable Drainage Systems (SuDS) will apply. NPPF Paragraph 164 requires that any development in an area at risk of flooding '*incorporates sustainable drainage systems, unless there is clear evidence that this* | GIS data layers for:<br>Flood Zones<br>Critical Drainage Areas<br>Aerial imagery |

| Sustainability Objective | Assumptions | Data sources |
|---|---|---|
| to people and property, and coastal change and adaptation. | *would be inappropriate'*. The effects of new development on this SA objective are therefore dependent to some extent on its design, for example whether it incorporates SuDS, which is unknown and cannot be assessed at this stage.<br>Where employment 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. National Planning Practice Guidance identifies which types of land uses are considered to be appropriate in Flood Zones 2, 3a and 3b. Buildings used for financial, professional and other services; offices; general industry, storage and distribution are classed as 'less vulnerable uses', which are suitable in areas of flood zone 1, 2 and 3a but are unsuitable in flood zone 3b.<br>A sequential approach should be followed to steer new development to areas with the lowest probability of flooding (i.e. flood zone 1) and local planning authorities will need to undertake a flood risk sequential test when allocating sites. Where there are no reasonably available sites in flood zone 1, local planning authorities in their decision making should take into account the flood risk vulnerability of land uses and consider reasonably available sites in flood zone 2. Only where there are no reasonably available sites in flood zones 1 or 2 should the suitability of sites in flood zone 3 (areas with a high probability of river or sea flooding) be considered, taking into account the flood risk vulnerability of land uses.<br>A Critical Drainage Area (CDA) is an area that has critical drainage problems and which has been notified to the local planning authority as such by the Environment Agency in line with the NPPF. In these locations, there is a need for surface water to be managed to a higher standard than normal to ensure any new development will contribute to a reduction in flooding risks in line with NPPF.<br>Therefore:<br>• Sites that are within a Critical Drainage Area or that are entirely or mainly (i.e. >50%) on greenfield land that is within flood zone 3 could have a significant negative (--?) effect although this is uncertain depending on whether the land is flood zone 3a or 3b, which cannot be determined at this stage, and dependent on the SuDS provision made and whether the design of development brought forward could avoid areas of flood risk.<br>• Sites that are entirely or mainly on greenfield outside of flood zone 3 would have an uncertain minor negative effect (-?), dependent on the SuDS provision made.<br>• Sites that are entirely or mainly on brownfield within flood zone 3 could also have a minor negative (-?) effect although this is uncertain depending on whether the land is flood zone 3a or 3b, and dependent on the SuDS provision made and whether the design of development brought forward could avoid areas of flood risk.<br>• Sites that are on brownfield land outside of flood zone 3 are likely to have a negligible (0) effect. | |
| **6. LAND RESOURCES**<br>To utilise our land resources efficiently and minimise their | It is recognised that the strategic site options for the GESP are generally larger greenfield sites as there are not sufficient previously developed (brownfield) sites within the area, therefore there is not much opportunity for the reuse of previously developed land, which represents more | GIS data layers for:<br>Agricultural Land Classification |

| Sustainability Objective | Assumptions | Data sources |
|---|---|---|
| loss or degradation.<br>• Soil quality<br>• Safeguard mineral resources<br>• Reuse of previously developed land<br>• Minimise waste (reuse, recycle, recover) | efficient use of land in comparison to the development of greenfield sites. The development of greenfield land could result in the loss of high quality agricultural land.<br>Therefore:<br>• Sites with more than 5 ha of Grade 1[61], Grade 2 or Grade 3a agricultural land would have a significant negative (--) effect.<br>• Sites with between 1 ha and 5 ha of Grade 1 or Grade 2 or Grade 3a agricultural land would have a minor negative (-) effect.<br>• Sites with less than 1 ha of Grade 1 or Grade 2 or Grade 3 agricultural land would have a negligible (0) effect.<br>• Site with more than 5 ha of Grade 3 agricultural land according to the national GIS dataset could have a significant negative (--?) effect although this is uncertain depending on whether the land is Grade 3a or 3b (which cannot be determined from the national GIS dataset).<br>• Sites with between 1 ha and 5 ha of Grade 3 agricultural land according to the national GIS dataset could have a minor negative (-?) effect although this is uncertain depending on whether the land is Grade 3a or 3b (which cannot be determined from the national GIS dataset).<br>• Sites that comprise less than 1ha of Grade 3 agricultural land according to the national GIS dataset or comprise entirely of Grade 4 or lower agricultural quality land would have a negligible (0) effect.<br>In addition, as part of a mixed effect:<br>• Sites with up to 5ha of previously developed land would have a minor positive (+) effect<br>• Sites with more than 5ha of previously developed land would have a significant positive (++) effect<br>In addition, as part of a mixed effect:<br>• Large employment sites (>10 ha) that are mostly (>50%) within a Minerals Safeguarding Area would have a significant negative (--) effect, as mineral resources could be sterilised. However, this will be uncertain (--?) as there could be the opportunity to extract the mineral resource prior to the development going ahead.<br>• Large employment sites (>10 ha) that are partially (<50%) within, or small employment sites (<10 ha) that are mostly (>50%) within a Minerals Safeguarding Area would have a minor negative (-) effect, as mineral resources could be sterilised. However, this will be uncertain (-?) as there could be the opportunity to extract the mineral resource prior to the development going ahead.<br>• Employment sites of any size that are within a Minerals Safeguarding Area in which evidence indicates all mineral resource have been extracted will have a negligible (0) effect. | Mineral Safeguarding Areas<br>Aerial imagery |

[61] Where available, the East Devon District Council detailed Agricultural Land Classification was used. Where not available for the entirety of a site, the National Agricultural Land Classification was used.

| Sustainability Objective | Assumptions | Data sources |
|---|---|---|
| | The effects of new employment development on waste generation will depend largely on resident's behaviour and not on the site's size or location. | |
| **7. WATER RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or degradation.<br>• Water quality and quantity/supply | Levels of water consumption within new development will be determined by its design and onsite practices, rather than the location of the site, therefore effects on water supply cannot be determined. However, the location of employment development could affect water quality in nearby waterbodies during construction. The extent to which water quality is affected would depend on construction techniques, the processes undertaken on that employment land, and the use of sustainable drainage systems (SuDS) within the design; therefore effects are uncertain at this stage. In addition, the location of sites could affect water quality, depending on whether they are in an area where there is capacity at the local sewage treatment works (STWs) to treat additional wastewater generated by the overall scale of development proposed. However, South West Water has advised that all potential sites for the GESP can be connected to existing STW (some of which will require expansion), with no impact on the output water quality at any sites (i.e. all water quality will stay within permitted limits).<br>• Employment sites that contain or are adjacent to watercourses that run into the Exe Estuary SPA could result in significant negative (--?) effects on water quality although this is uncertain at this stage of assessment.<br>• Employment sites that contain or are adjacent to watercourses that do not run into the Exe Estuary, could result in moderate negative (-?) effects on water quality although this is uncertain at this stage of assessment.<br>• Employment sites that are not close to any watercourses would have a negligible (0) effect. | GIS data layers for:<br>Rivers and lakes<br>WWF Digital River tool[62] |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter.<br>• Supply of housing (accommodating population growth and changes in household composition)<br>• Housing mix (tenure and size)<br>• Housing delivery and diversity of supply (e.g. Housing Association | The location of employment development will not have a direct effect on this SA objective; therefore all of the site options will have a negligible (0) effect. | No data needed |

[62] WWF (2018) Digital River. Available at: www.wwf.org.uk/uk-rivers-map.

| Sustainability Objective | Assumptions | Data sources |
|---|---|---|
| affordable, volume builder and small builder open market, custom and self build)<br>• Housing affordability. | | |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them.<br>• Cycle and walking networks<br>• Open space and green infrastructure in new developments and existing settlements<br>• Public recreational, play and leisure opportunities | Public health will be influenced by the proximity of employment sites to open spaces, walking and cycle paths, easy access to which can encourage participation in active outdoor recreation by employees at the site during breaks and after work as well as active modes of commuting:<br>• Employment sites that are within 800 m of an area of major open space and that are within 400m of a walking or cycle path will have a significant positive (++) effect.<br>• Employment sites that are within 800 m of an area of major open space or that are within 400m of a walking or cycle path (but not both) will have a minor positive (+) effect.<br>• Employment sites that are more than 800 m from an area of major open space and more than 400m from a walking or cycle path will have a minor negative (-) effect.<br>In addition, it is anticipated that larger sites will deliver green infrastructure and active transport links, as shown in the assumed characteristics in **Chapter 2** (which could result in mixed effects overall).<br>• Sites with capacity for 20ha or more will have a minor positive (+) effect.<br>• Sites with capacity for up to 20ha will have a negligible (0) effect. | Assumed capacity of each site (stated in the appraisal matrices)<br>GIS data layers for:<br>Major open space<br>Public Rights of Way<br>National Trails |
| **10. WELLBEING**<br>To support positive, safe and healthy communities.<br>• Social deprivation<br>• Air quality, noise and light pollution<br>• Safe and secure environment with reduced fear of crime | Where an employment development site is within an area of higher levels of deprivation compared to Devon as a whole, the new development may have positive effects on wellbeing locally as a result of improved job opportunities locally. Any such employment site options would be likely to have a minor positive (+) effect.<br>Where new employment development is proposed within close proximity (100m) of sensitive receptors (e.g. existing houses, schools, hospitals etc.) there may be negative effects on amenity as a result of increased noise and light pollution, particularly during the construction phase.<br>Therefore, which may result in mixed effects overall:<br>• Employment sites that are in close proximity (within 100m) to existing residential development, residential allocations or other sensitive receptors may have a minor negative (-) effect during the construction and operational phases.<br>Proximity to an Air Quality Management Area (AQMA) can also influence the effects of new employment development on air quality, as development in or near to those areas could result in an increase in car use and the associated emissions, affecting the wellbeing of surrounding residents. There may also be emissions from the employment site itself, depending on the nature of the commercial activities onsite. Therefore, which may result in mixed effects overall: | Deprivation levels<br>GIS data layers for:<br>Residential allocations<br>GP surgeries<br>Schools<br>Aerial imagery<br>A roads<br>Motorways<br>Railway lines<br>AQMAs<br>Aerial Imagery |

| Sustainability Objective | Assumptions | Data sources |
|---|---|---|
| | • Employment sites that are within, or within 1 km of, an AQMA would have a significant negative (--) effect, as these sites would have potential to result in increased traffic within the AQMA.<br>• Employment sites that are further than 1 km from an AQMA but have been identified to have potential to result in increased traffic within an AQMA would have a minor negative (-) effect.<br>• Employment sites that are further than 1 km from an AQMA and have not been identified to have potential to result in increased traffic within an AQMA would have a negligible (0) effect.<br><br>The effects of new employment development on 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 employment development; rather they will be determined through the detailed proposals for each site. Therefore, no score is given in relation to the effects of employment site options on this part of the SA objective. | |
| **11. ACCESS TO SERVICES**<br>To provide accessible and attractive services and community facilities for all ages and interests.<br>• Access to area wide services (nursery and pre-school, primary, secondary, further and higher education; healthcare; etc.)<br>• Community facilities (local shops, meeting venues, public houses, places of worship)<br>• Cultural buildings and facilities (e.g. libraries, museums, cinemas)<br>• Access to high speed broadband. | Although access to services is less relevant to employment sites compared to residential sites, employment sites that are located at the larger settlements within the Greater Exeter area will generally provide better access to a wider range of existing services and facilities compared to sites located at smaller settlements, and these services may be used by employees at the site during breaks and before or after work. Therefore:<br><br>• Sites that are located adjacent to Exeter of a Main Town would have a minor positive (+) effect.<br>• Sites that are located adjacent to a Defined Village would have a minor negative (-) effect.<br>• Sites that are located adjacent to an undefined village or settlement, or sites that are not located adjacent to a settlement would have a significant negative (--) effect.<br><br>In addition, which could lead to mixed effects overall,<br><br>• Sites adjacent to areas where there is ultrafast broadband (>300mbps) available would have a significant positive (++) effect.<br>• Sites adjacent to areas where there is superfast broadband (30-300mbps) available would have a minor positive (+) effect.<br>• Sites in areas where there is standard broadband (10-30mbps) available would have a minor positive (+) effect.<br>• Sites where there is <10mbps internet download speed currently available would have a minor negative (-) effect. | Settlement hierarchy from local Plans<br>Broadband availability[63] |
| **12. JOBS AND LOCAL** | The employment development sites will all have positive effects due to the nature of the | Settlement hierarchy |

[63] Ofcom (2018) View broadband availability. Available at: checker.ofcom.org.uk/broadband-coverage.

| Sustainability Objective | Assumptions | Data sources |
|---|---|---|
| **ECONOMY**<br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter.<br>• Employment land supply to cater for businesses of all sizes<br>• Mix of employment offer<br>• Productivity of local economy and access to labour supply<br>• Access to education and skills training<br>• Protect existing tourism businesses and offer | development proposed, the extent of which will depend on their size. Therefore:<br>• Sites with capacity for more than 20ha of employment land will have a significant positive (++) effect.<br>• Sites with capacity for between 5ha and 20ha of employment land will have a minor positive (+) effect.<br>• Sites with capacity for less than 5ha of employment land will have an uncertain minor positive (+?) effect.<br>Sites that are within close proximity of high value employment clusters and labour supply will also have a positive effect. Therefore, as part of a mixed effect:<br>• Sites within 3km of Exeter City centre, Exeter University or Exeter Science park / Sky Park and Airport Business Park will have a significant positive (++) effect. | from local Plans<br>Assumed employment land capacity of each site (stated in the appraisal matrices) |
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and town centres.<br>• Diverse city and town centre economy<br>• Strengthen and safeguard the vitality and viability of centres<br>• Impact of new development on existing centres<br>• Access to existing centres | The achievement of this objective will not be significantly influenced by the location of employment sites. However, the location of new employment sites has the opportunity to support the vitality and viability of existing town centres by increasing the number of day-to-day visitors to the town centres and supporting businesses and services in those locations. Employment development in out of centre locations could have the opposite effect and detract from the health of centres. Therefore:<br>• Employment sites that are located adjacent to Exeter or a Main Town would have a minor positive (+) effect.<br>• Employment sites that are not located adjacent to Exeter or a Main Town would have a minor negative (-) effect. | Settlement hierarchy in Local Plans |
| **14. CONNECTIVITY AND TRANSPORT**<br>To connect people and businesses digitally and physically through the | Proximity[64] to sustainable transport links will influence how accessible employment sites are for people commuting to and from work.<br>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 | Assumed employment land capacity of each site (stated in the appraisal matrices)<br>GIS data layers for: |

[64] A proximity of 1km was used for railway stations to represent the 'acceptable' walking distance to a commuting method in **Chapter 2**. A shorter distance of 500m was used for bus stops to represent the 'desirable' walking distance to a commuting method, as it is assumed that people would generally be willing to travel further to access a railway station than a bus stop, as railway stations generally provide the fastest mode of travel to more distant employment areas. In terms of access to cycle routes for commuting purposes, a straight-line distance of 1km was used in the appraisal on the assumption that links to cycle routes are likely to also use road carriageways.

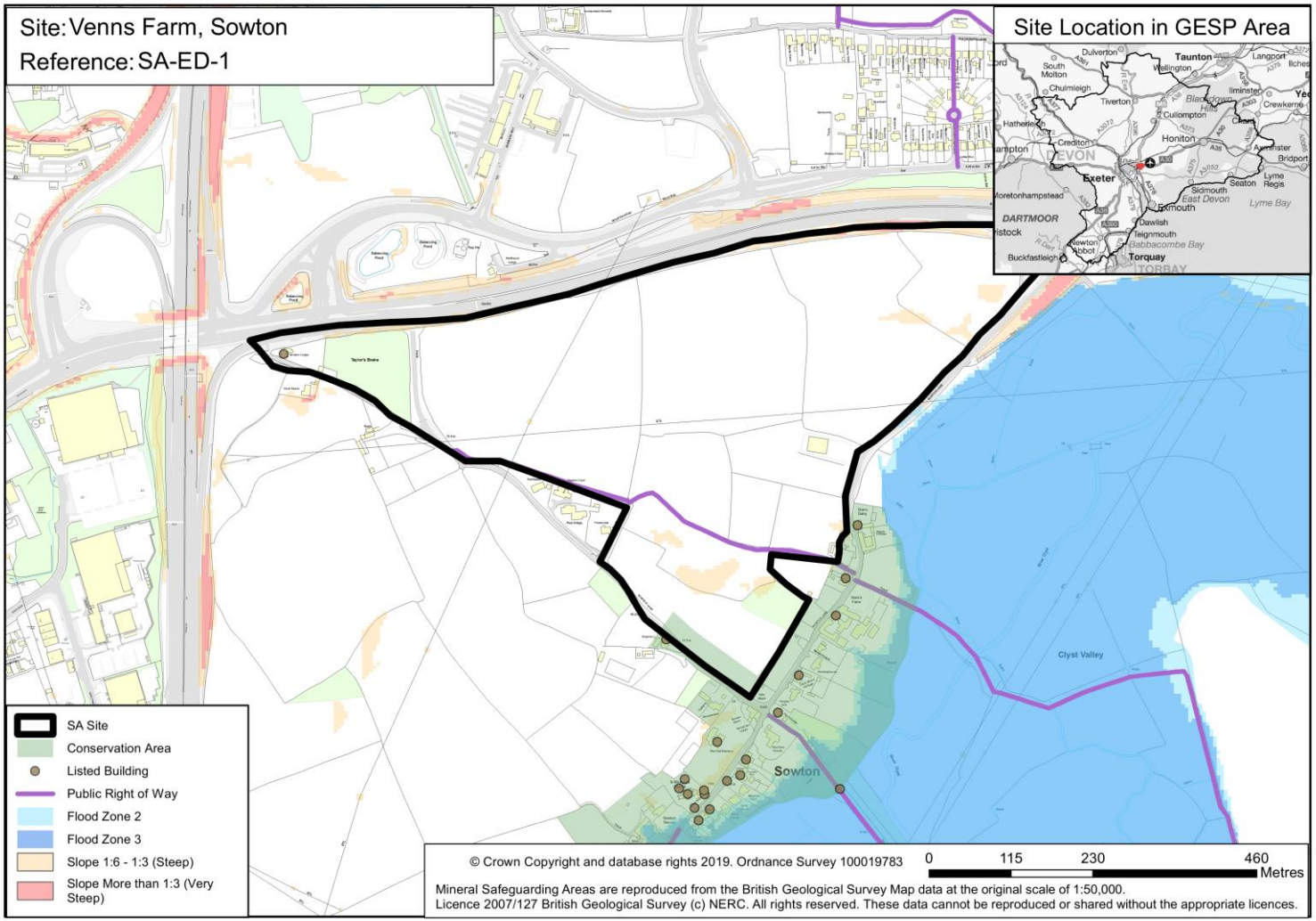
| Sustainability Objective | Assumptions | Data sources |
|---|---|---|
| provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond.<br>• Access to services – links between homes, services and businesses by active modes of transport (e.g. cycling and walking)<br>• Access to public transport (e.g. distance to and frequency of bus and rail services)<br>• Estimated car reliance and use<br>• Access to local road network<br>• Impact on Strategic Road Network (i.e. M5 J29 - 30). | the availability of cycle storage facilities at their end destination, which are not determined by the location of employment 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 from a residential site to their place of work, for example[65].<br>• Employment sites that are within 1 km of a railway station and 500 m of a bus stop with frequent services (minimum half hourly) (regardless of proximity to cycle routes) are likely to have a significant positive (++) effect due to distance from public transport options.<br>• Employment sites that are within either 1 km of a railway station or 500 m of a bus stop with frequent services (minimum half hourly), but not both, (regardless of proximity to cycle routes) are likely to have a minor positive (+) effect due to distance from public transport options.<br>• Employment sites that are more than 1 km from a railway station and more than 500 m from a bus stop but that have an existing cycle route within 1 km of the site could also have a minor negative (-?) effect due to distance from public transport options, although this is uncertain depending on whether the nearby cycle route(s) could be used for the purposes of commuting or undertaking day to day journeys.<br>• Employment sites that are not within 1 km of a railway station but are within 500 m of a bus stop with infrequent services (more than half hourly), (regardless of proximity to cycle routes) are likely to have a minor negative (-) effect due to distance from public transport options.<br>• Employment sites that are more than 1 km from a railway station and 500 m from a bus stop and that do not have an existing cycle route within 1 km are likely to have a significant negative (--) effect due to distance from public transport options.<br>In addition, it is anticipated that larger sites will deliver sustainable transport links, particularly in the form of new bus routes, as shown in the assumed characteristics in **Chapter 2** (which could result in mixed effects overall).<br>• Sites with capacity for more than 20ha of employment land will have a minor positive (+) effect.<br>• Sites with capacity for less than 20ha of employment land will have a negligible (0) effect.<br>Access to the local road network and the impact on the strategic road network are not assessed through the SA, as these are not sustainability issues. Instead, the SA focusses on the extent that site options would provide opportunities for sustainable transport use. Note that provision of walking and cycling links within new development is covered under SA objective 4 above, and access to broadband is covered under SA objective 11 above. | Railway stations<br>Bus stops<br>Bus frequency[66]<br>Local cycle routes<br>National Cycle Network |

[65] Where a physical barrier could prevent access to a transport link this has been accounted for in the scoring and justified in the assessment text.

[66] Devon County Council (2018) Available at: www.cartogold.co.uk/Devon/map.html#devon.

# Appendix 6
# Detailed matrices of Potential Site Options and Reasonable Alternatives

### SA-ED-1: Venn's Farm, Sowton

| SA-ED-1 | Venn's Farm , Sowton |
|---|---|
| **Authority Area:** East Devon | |
| **Site Area:** 31.3ha (Net 30ha) | |
| **Approximate total capacity:** 30ha employment | |
| **Site status:** Potential site option | |
| **Outline description and context:** Largely agricultural land adjoining the A30 and close to Junction 29 of the M5. The site slopes gently down eastwards, towards the River Clyst, although outside the floodplain. The site is within a defined Green Wedge and the Clyst Valley Regional Park. Sowton lies adjacent the south, and contains a large number of listed buildings and conservation area. |  |

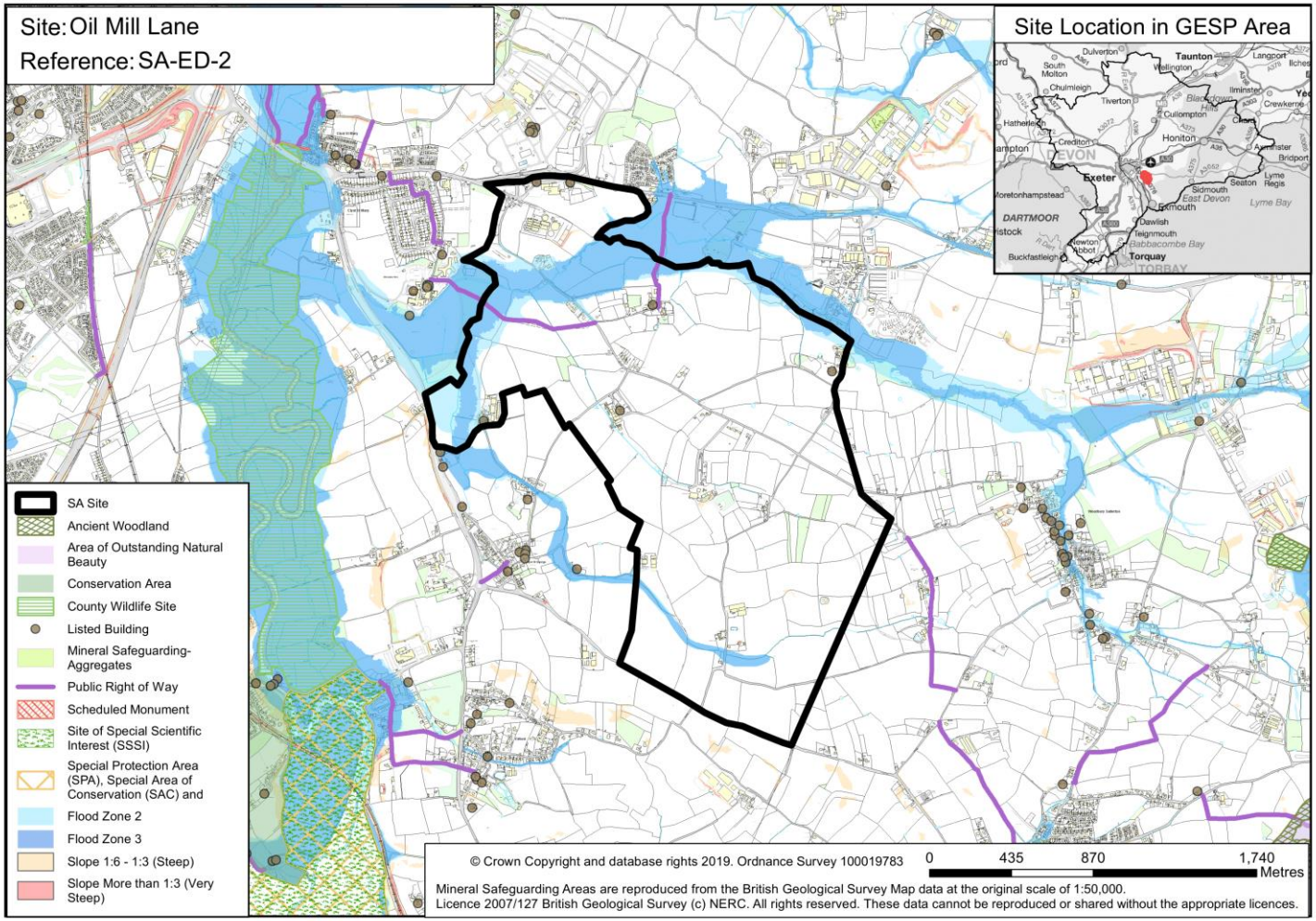
| SA Objective | SA Score | Justification |
|---|---|---|
| **14. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | +/-? | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, or within 250m of a locally designated site. The site is within the 10km recreation zones of the Exe Estuary and Pebblebed Heaths although as the site is being considered for employment this will likely reduce the overall recreational impact from development. It is also within the 5km Great Crested Newt consultation zone. The site is identified as being within the Clyst Valley Regional Park and is in close proximity to the river Clyst biodiversity corridor.<br><br>The site also supports a number of undesignated hedges, mature trees with a small copse located at the west of the site at Taylor's Brake which is an important habitat asset. Where possible these features can be retained to minimise the overall impact. However, these features could be lost to development. In addition, deciduous woodland priority habitat is located in the west of the parcel and the site is flagged as Yellow in the HRA sensitivity work with regard to Exe Estuary SPA. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 20ha of employment land, and therefore is expected to retain and provide local green infrastructure that could mitigate the biodiversity impact of development. As such, minor positive effects are also expected.<br><br>Overall, mixed minor positive and uncertain minor negative effects are expected. |
| **15. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is of medium-high landscape sensitivity with quite far reaching views to the east. There is currently a lack of development to the south of the A30 so there would be an urbanisation effect on the local environment.<br><br>As such, uncertain significant negative effects are expected. |
| **16. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/--? | Development of the site would introduce significant built development south of the A30 which would alter the current rural character of the area and approach into Sowton Village. Development would be in close proximity to various listed buildings and the Sowton conservation area to the south of the site, and would consequently encroach on Sowton Village, the area being currently designated as a green wedge in the Local Plan. There is also some potential for various undesignated heritage assets on the site although further work would be required to establish their significance. In addition, the site is within 3km of designated heritage assets, including Rockbeare Manor Registered Park and Garden and Clyst St Mary Bridge and causeway Scheduled Monument. As such, uncertain significant negative effects are expected.<br><br>With the scale of the proposal (>10ha), it seems likely that this impact can be mitigated through |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | design and layout. As such, uncertain minor positive effects are also expected.<br><br>Overall, mixed uncertain minor positive and uncertain significant negative effects are expected. |
| **17. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | ++? | The site is adjacent to Exeter. As such, uncertain significant positive effects are expected.<br><br>The site is not located within 1km of a railway station or a cycle path. However, the site is currently well accessed via public transport with an existing frequent bus route at Blackhorse into Exeter located within 500m of the site. As such, minor positive effects are expected.<br><br>As the site is expected to deliver over 20ha of employment land, it is assumed that development of the site would provide sustainable transport, walking and cycle links. As such, uncertain minor positive effects are expected.<br><br>Overall, uncertain significant positive effects are expected. |
| **18. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The land is greenfield and does not suffer from flood risk. However, development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS). Development should also ensure no deterioration in the water quality of the nearby River Clyst.<br><br>As such, uncertain minor negative effects are expected. |
| **19. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | -- | The land is greenfield and is comprised of over 14ha of Grade 2 agricultural land and around 13 ha of Grade 3a agricultural land. The remainder of the site comprises Grade 3b agricultural land and 'other' land uses. Development would result in the loss of high quality agricultural land.<br><br>The site does not contain any mineral resources.<br><br>As such, significant negative effects are expected on high quality agricultural land. |
| **20. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or degradation. | --? | Development should ensure no deterioration in the water quality of the nearby River Clyst, which is located approximately 100m to the southwest of the site and connects to the site via streams. The river runs into the Exe Estuary SPA.<br><br>As such, uncertain significant negative effects are expected. |
| **21. HOMES**<br><br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and | 0 | The site is only being considered for employment use and would therefore not provide any benefit in terms of additional homes.<br><br>As such, negligible effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| tenure, suitable to meet the needs of Greater Exeter. | | |
| **22. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | + | The site is not located within 400m of a cycle path but does contain and is located within 400m of Public Rights of Way. The site is not however located within 800m of major open space. As such, minor positive effects are expected.<br>In addition, as the site is expected to deliver over 20ha of employment land, it is assumed that development of the site would provide local green infrastructure and active transport links. As such, minor positive effects are also expected.<br>Overall, minor positive effects are expected. |
| **23. WELLBEING**<br>To support positive, safe and healthy communities. | - | While providing new jobs will have a positive impact on the health and wellbeing of workers, the site is within the Exe Estuary including Clyst St Mary, Exton and Lympstone Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees lower levels of deprivation than Devon and Mid Devon as a whole. As such, development in this area is unlikely to be significantly affected by deprivation and is less likely to have a positive effect on wellbeing locally as a result of increased investment in the area. As such, negligible effects are expected.<br>The site is adjacent to existing residential development, including the village of Sowton to the south of the site, which could be adversely affected as a result of noise and light pollution from development of the site during the construction and operational phases. As such, minor negative effects are expected.<br>The site is not within 1km of an AQMA. However, car movements to and from this site could potentially contribute to worsening air quality to the Exeter AQMA, along the Heavitree Road corridor in particular. As such, minor negative effects are expected.<br>Overall, minor negative effects are expected. |
| **24. ACCESS TO SERVICES**<br>To provide accessible and attractive services and community facilities for all ages and interests. | + | The site is located adjacent to Exeter. As such, minor positive effects are expected.<br>The site does not currently have access to superfast broadband but this could be incorporated as part of any development on the site. Standard broadband is available in the adjoining village of Sowton. As such, minor positive effects are expected.<br>Overall, minor positive effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **25. JOBS AND LOCAL ECONOMY**<br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | ++ | The site could accommodate approximately 30ha of employment land. Jobs would be created during the construction as well as the operational phases of the site. As such, significant positive effects are expected.<br>The site has good access to the Exeter labour market and is nearby existing and planned employment development being undertaken in the Exeter and East Devon Growth point. The site is within 3km of Exeter City Centre, Exeter Science Park / Sky Park and Exeter Airport Business Park. As such, significant positive effects are expected.<br>Overall, significant positive effects are expected. |
| **26. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and town centres. | + | The site is located adjacent to Exeter.<br>As such, minor positive effects are expected. |
| **27. CONNECTIVITY AND TRANSPORT**<br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | + | The site is not located within 1km of a railway station or a cycle path. However, the site is currently well accessed via public transport with an existing frequent bus route at Blackhorse into Exeter located within 500m of the site. As such, minor positive effects are expected.<br>The site has capacity for more than 20ha of employment land and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br>Overall, minor positive effects are expected. |

## SA-ED-2: Oil Mill Lane

| SA-ED-2 | Oil Mill Lane |
|---|---|
| **Authority Area:** East Devon |  |
| **Site Area:** 380.6 ha (Net 216ha) | |
| **Approximate total capacity:** 6,696 – 8,640 dwellings | |
| **Site status:** Potential site option | |
| **Outline description and context:** Area comprises predominantly agricultural land between on the A3052 and the Woodbury Road. Fairly limited landscape sensitivity. The floodplain of the Grindle Brook passes horizontally across the northern section of the site. Oil Mill Lane is the main thoroughfare which runs through the centre of the site although is a narrow rural road. Limited existing biodiversity value although has a few listed buildings which are mainly associated with farms. | |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/--? | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, or within 250m of a locally designated site. The site is within the 10km recreation zones of the Exe Estuary and Pebblebed Heaths. SANGS and other mitigation would be required to mitigate the impact on these important habitats. The site is flagged as Amber in the HRA sensitivity work with regard to Exe Estuary SPA and East Devon Pebblebed SAC/SPA. The site also supports a great many undesignated hedges, mature trees, some small copses, ponds, and streams, which could be lost to development. Where possible these features can be retained to minimise the overall impact. The site is within the 5km Great Crested Newt consultation zone. No detailed information on protected species has been analysed, but bats will be present, probably also dormice, and populations of farmland birds such as song thrush, bullfinch etc, which will depend on hedges, orchards, woods, trees, ponds as their breeding habitat. Some grassland, woodland and orchard priority habitat is located within the site. As such, uncertain significant negative effects are expected.<br><br>Existing green infrastructure on the site, including the woodland blocks, ponds and streams, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space and playing pitches on site that could mitigate the biodiversity impact of development. As such, significant positive effects also are expected.<br><br>Overall, mixed significant positive and uncertain significant negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | -? | The site is largely rural open countryside in character and so there would be an urbanisation effect on the local environment. The land is predominantly level with a gentle slope upwards towards the west, away from the river Clyst. The site is of low-medium landscape sensitivity as, although the majority of the site is within the East Devon AONB 5km buffer zone, the intervisibility between the site and AONB is likely to be low or non-existent.<br><br>As such, an uncertain minor negative effect is expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build | +?/--? | There are a total of six Grade II listed farm buildings located across the site and insensitive development would have the potential to harm their settings. Suitable mitigation will be required in terms of the provision of adequate separation distances to the dwellings (depending upon the design and scale of development proposed). Development of the site would also have to respect the settings of listed features in the nearby settlements of Clyst St George, Clyst St Mary and Woodbury Salterton. These features include Topsham Conservation Area located approximately 1.5km southwest of the site, the animal pound on Woodbury Road, 275m south east of the church and a Scheduled Monument |

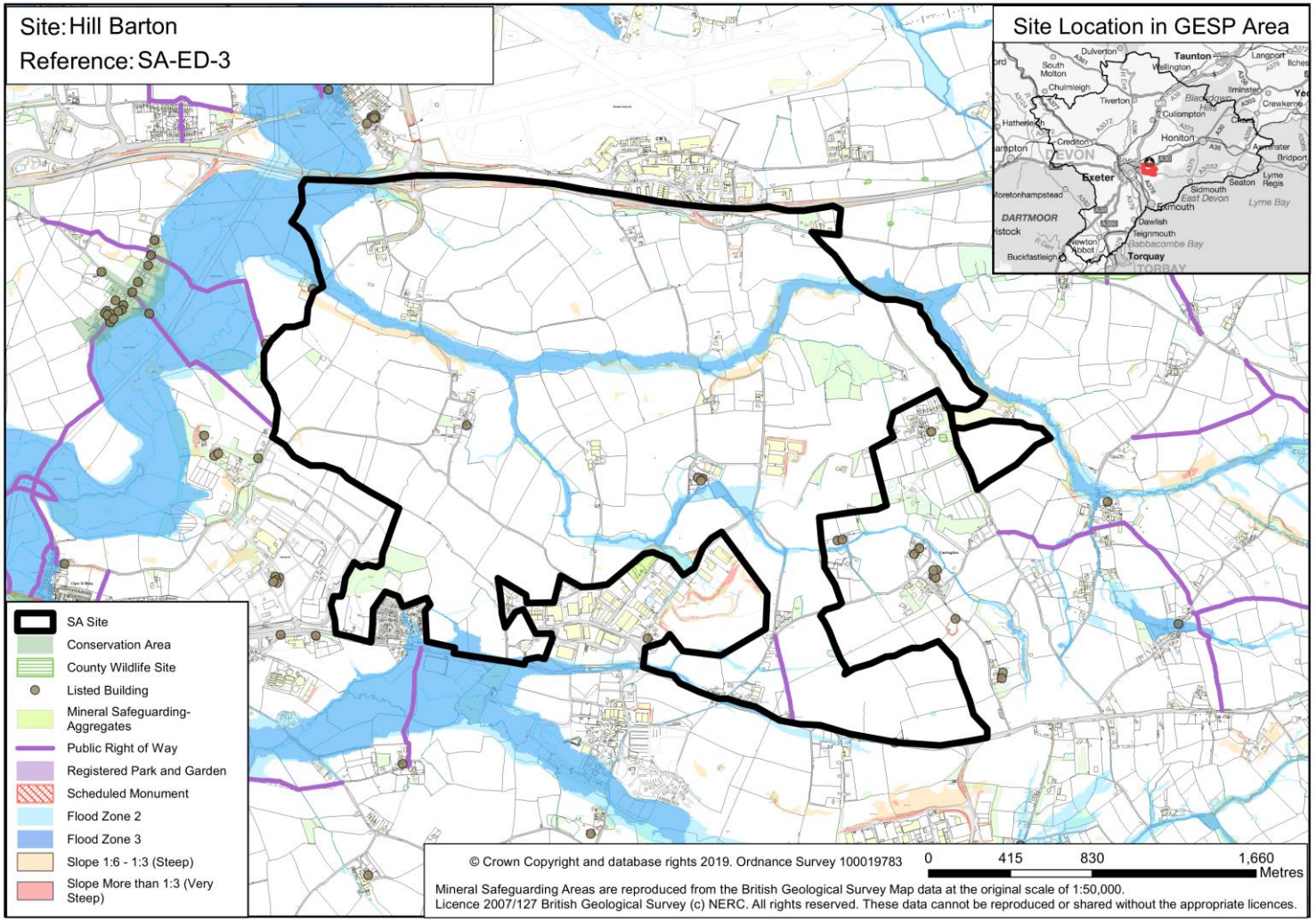
| SA Objective | SA Score | Justification |
|---|---|---|
| development. | | located approximately 500m west of the site. There is also some potential for various undesignated heritage assets on the site, although further work would be required to establish their significance. As such, uncertain significant negative effects are expected.<br><br>With the scale of the proposal (>10ha), it seems likely that this impact can be mitigated through design and layout. As such, uncertain minor positive effects are also expected.<br><br>Overall, mixed uncertain minor positive and uncertain significant negative effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | + | The site it within 1km of Exeter and as such, minor positive effects are expected.<br><br>There is an existing frequent bus service along the A3052 adjacent to the north of the site into Exeter and the southwest of the site is within 1km of cycle paths, but the remainder of the site is lacking access to public transport. The site is not within 1km of a railway station. As such, minor positive effects are expected due to the proximity of bus stops.<br><br>As the site is expected to deliver over 4,000 homes, it is assumed that development of the site would provide significant sustainable transport, walking and cycle links and services. As such, uncertain minor positive effects are expected.<br><br>Overall, minor positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The land is predominantly greenfield and a floodplain (flood zone 3) runs through the site in the north and south of the site. Development should ensure no deterioration in the water quality of the nearby Grindle Brook. In addition, development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS) and the design of development brought forward could avoid areas of flood risk.<br><br>As such, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | -- | The land is greenfield and approximately two-thirds of the site contains over 5ha of Grade 2 and more than 5ha of Grade 3 agricultural land which could be lost to development.<br><br>The site does not contain any mineral resources.<br><br>As such, significant negative effects are expected on high quality agricultural land. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or | --? | Development should ensure no deterioration in the water quality of the nearby Grindle Brook, which is located adjacent to and partially within the site and runs into the Exe Estuary SPA.<br><br>As such, uncertain significant negative effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| degradation. | | |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | ++ | Based on a density range of 31-40 dw/ha, excluding the approximate 20ha currently covered by flood zones and steep areas, there is the potential for between 6,696 – 8,640 homes, including affordable homes, if the site is fully built out. This figure is likely to reduce considerably as a result of mitigation requirements, for example, if the SANGS is expected to be provided on site. The site is of sufficient size and there would not appear to be any particular viability issues which would prevent the delivery of a wide mix of tenure and sizes and significant levels of affordable housing. This range of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom and self build providers. The site is of a sufficient size to be able to support a high number of housing starts / completions from a number of different outlets around the site, which in turn will ensure a good pace of delivery. Delivery of a large number of homes may also have some impact on local market affordability through increasing supply.<br>As such, significant positive effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site contains and is within 400m of Public Rights of Way but is not within 800m of major open space. As such, minor positive effects are expected.<br>However, as the site is expected to deliver over 2,000 homes, it is assumed that development of the site would provide significant open space and active transport links. As such, significant positive effects are expected.<br>Overall, significant positive effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | - | While providing new homes and jobs will have a positive impact on the health and wellbeing of occupants, the site is within the Exe Estuary including Clyst St Mary, Exton and Lympstone and the Broadclyst and surrounding areas to the North East of Exeter Middle Super Output Areas. These areas, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees slightly lower levels of deprivation than Devon and Mid Devon as a whole and therefore new development is less likely to have a positive effect on wellbeing locally as a result of increased investment in the area. As such, negligible effects are expected.<br>The site is adjacent to existing residential development, including the residential retirement park homes in Cat and Fiddle Park to the north of the site, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. In addition, the site is adjacent to two 'A' roads and a business park to the south of Clyst St Mary (that is also allocated for mixed-use), and the site contains Langdons Business Park. These features may result in noise pollution affecting residents of the site in the longer term. As such, minor negative effects are |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | expected.<br><br>The site is not within 1km of an AQMA. However, car movements emanating from the site could potentially contribute to worsening air quality as a result of congestion at the Clyst St Mary Roundabout and the Exeter AQMA, along the Heavitree Road corridor. As such, minor negative effects are expected.<br><br>Overall, minor negative effects are expected. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | ++ | There are currently a very limited number of facilities in the area. The site is located adjacent to Clyst St Mary (a Defined Village), which has a local shop, primary school, pub and church 1km to the west, but residents would have to travel into Topsham or Exeter for a wider range of services.<br><br>The site is within 1km of Clyst St Mary Primary School and Lady Seaward's CofE Primary School. The site is not within 1km of a secondary school, a further education college or a university. As such, uncertain minor positive effects are expected.<br><br>However, the significant site size (providing over 4,000 homes) offers opportunity to deliver a high number of facilities including a primary school and a secondary school. The area may be a good location for secondary provision as it would be well placed strategically to support other development in the area. It could potentially take the pressure off secondary provision in Exmouth, Cranbrook, Clyst Vale and Ottery St Mary. As such, significant positive effects are also expected.<br><br>The site does not currently have access to superfast broadband but this could be incorporated as part of any development on the site. Superfast broadband is available in the adjoining residential areas of Clyst St Mary and Cat and Fiddle Park. As such, minor positive effects are expected.<br><br>Overall, significant positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | ++ | The site is not located adjacent to a Main Town but is located within 1km of existing or proposed employment sites including Hill Barton Business Park, which could provide employment opportunities. As such, minor positive effects are expected.<br><br>Jobs would be created during the construction phase of the site, and additional homes would create expenditure in the area. Inclusion of employment is a probable requirement in the interests of balanced communities. Employment on the site could include a mix of supply to cater for businesses of all sizes.<br><br>It is assumed that, as the site has capacity to deliver over 2,000 homes, the site will also deliver large scale mixed use employment opportunities and a business park or employment estate. As such, |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | significant positive effects are also expected.<br><br>There is potential for an increase in tourism in the area if high quality open space is delivered with development. Development may also result in increased numbers of visitors to the nearby Crealy Adventure Park.<br><br>Overall, significant positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or a Main Town.<br><br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | + | There is an existing frequent bus service along the A3052 adjacent to the north of the site into Exeter and the southwest of the site is within 1km of cycle paths, but the remainder of the site is lacking access to public transport. The site is not within 1km of a railway station. As such, minor positive effects are expected due to the proximity of bus stops.<br><br>In addition, the site has capacity for more than 1,000 homes and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br><br>Overall, minor positive effects are expected. |

## SA-ED-3: Hill Barton

| SA-ED-3 | Hill Barton |
|---|---|
| **Authority Area:** East Devon |  |
| **Site Area:** 660.5ha (Net 365.16ha) | |
| **Approximate total capacity:** 11,320 – 14,606 dwellings | |
| **Site status:** Potential site option | |
| **Outline description and context:** A large area of rolling farmland extending from the A30 to the A3052. Fairly limited landscape sensitivity. Adjoins Hill Barton industrial area to the south. The floodplain of the Aylesbeare Stream, a tributary of the Clyst, runs from east to west through the site in a narrow partially wooded valley. A number of narrow country lanes and tracks also run through the site. The western extent of the site is within a defined Green Wedge and the Clyst Valley Regional Park. There are a number of Listed Buildings in and adjoining the site, reflecting its agricultural nature. | |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br><br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/--? | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, but lies adjacent to Farringdon School, County Wildlife Site. The site is also within 1km of two County Wildlife Sites, Beautiport Farm and Beautiport. The north western section of the site lies within Strategic Nature Area, coastal and floodplain grazing marsh. The site contains Priority habitat, Deciduous Woodland and is flagged as Amber in the HRA sensitivity work with regard to Exe Estuary SPA and East Devon Pebblebed SAC/SPA. There are no designated wildlife or biodiversity sites although the Holbrook stream is a very important biodiversity corridor. The site also supports a great many undesignated hedges, mature trees, some small woods, ponds, and streams. The site is within the 5km Great Crested Newt consultation zone and includes a number of ponds that could support Great Crested Newt.<br><br>The area around Farringdon wood is extremely sensitive and could form a major area of high biodiversity value. The site is within the 10km recreation zones of the Exe Estuary SPA and Pebblebed Heaths SPA; a Habitat Regulations Assessment will be required and this is likely to conclude that mitigation is required (likely to include a requirement for SANGS). As such, significant negative effects with uncertainty are expected.<br><br>Existing green infrastructure on the site, including the streams and woodland bands, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space and playing pitches on site that could mitigate the biodiversity impact of development. As such, significant positive effects also are expected.<br><br>Overall, mixed significant positive and significant negative effects with uncertainty are expected. |
| **2. LANDSCAPE**<br><br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The majority of the site is open rural countryside and so development would cause an urbanisation effect on the local environment. Parts of the site are of low-medium sensitivity as the intervisibility with the East Devon AONB is likely to be low or non-existent. Parts of the site are of medium landscape sensitivity as there is likely to be intervisibility with the East Devon AONB due to parts of the site being located on a local minor ridge as well as parts of the site being located within the 5km buffer zone. Parts of the site are also highly likely to have intervisibility with some of the listed buildings in the vicinity as well as Bishop's Court, including its parkland setting. As such, uncertain minor negative effects are expected.<br><br>The north-western corner of the site is of high sensitivity, as this part of the site is located within Clyst Valley Regional Park, which includes houses and historic drainage features associated with Clyst, and is |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | likely to have intervisibility with Bishop's Court. As such, uncertain significant negative effects are expected.<br><br>Overall, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br><br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/-? | The central region of the site contains four Grade II listed buildings (Higher Holbrook, Denbow Farmhouse and Barn and Denbow Thatch) and there are multiple Grade II listed buildings adjacent to the site also. There are multiple designated assets within 3km of the site including Sowton Conservation Area which is located around 700m west of the site and contains multiple listed buildings. There is also a Registered Park and Garden (Rockbeare Manor) within 3km of the site located around 1.5km north-east. There is potential for development to compromise the setting of these historic environment assets. As such, uncertain minor negative effects are expected.<br><br>There is also some potential for various undesignated heritage assets on the site although further work would be required to establish their significance.<br><br>It is likely that the site is of sufficient size (>10ha) to accommodate a well-designed development and create a new high quality built environment. It should be possible for development to respond appropriately to existing heritage assets in the area and minimise any disturbance to the historic environment. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | + | The site is within 5km of Exeter and the Main Town of Cranbrook and as such, uncertain negligible effects are expected.<br><br>The site is not located within 1km of cycle routes or railway stations. However, the site is adjacent to existing frequent bus services along the A3052 into Exeter. As such, due to the proximity to bus stops, minor positive effects are expected.<br><br>As the site is expected to deliver over 4,000 homes, it is assumed that development of the site would provide significant sustainable transport, walking and cycle links and services. As such, uncertain minor positive effects are expected.<br><br>Overall, minor positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of | -? | The site is predominantly greenfield and is mostly in an area of no significant flood risk. However, it contains a river, and as such areas fall under flood zone 2 and flood zone 3. The typography of the area suggests that there would be discharge onto downstream development. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems |

| SA Objective | SA Score | Justification |
|---|---|---|
| climate change. | | (SuDS).<br><br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | -- | Over 5ha of Grade 2 and over 5ha of Grade 3a agricultural land is located within the site. The remainder of the site predominantly comprises Grade 3b agricultural land and non-agricultural land. As such, significant negative effects are likely due to the potential loss of high quality agricultural land during development.<br><br>Although the site does not contain any previously developed land that could be reused, is noted that the site contain some agricultural developments.<br><br>The site is not located within any Mineral Safeguarding Areas.<br><br>Overall, significant negative effects are expected on high quality agricultural land. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or degradation. | --? | Development should ensure no deterioration in the water quality of Aylesbeare Stream, which runs through the centre of the site and flows into the Exe Estuary SPA.<br><br>As such, uncertain significant negative effects are expected. |
| **8. HOMES**<br><br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | ++ | Based on a density range of 31-40 dw/ha, excluding the approximate 41.4ha currently covered by flood zones and steep areas, there is the potential for between 11,320 – 14,606 homes including affordable if the site is fully built out. This figure is likely to reduce considerably as a result of mitigation requirements for example, if the SANGS is expected to be provided on site. The site is of sufficient size and there would not appear to be any particular viability issues which would prevent the delivery of a wide mix of tenure and sizes and significant levels of affordable housing. This range of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom and self-build providers. The site is of a sufficient size to be able to support a high number of housing starts / completions from a number of different outlets around the site, which in turn will ensure a good pace of delivery. Delivery of a large number of homes may also have some impact on local market affordability through increasing supply.<br><br>As such, significant positive effects are expected. |
| **9. HEALTH**<br><br>To support healthy and active communities where people can | ++ | The site is adjacent to and within 400m of Public Rights of Way but is not within 800m of major open spaces. As such, minor positive effects are expected.<br><br>However, as the site is expected to deliver over 2,000 homes, it is assumed that development of the |

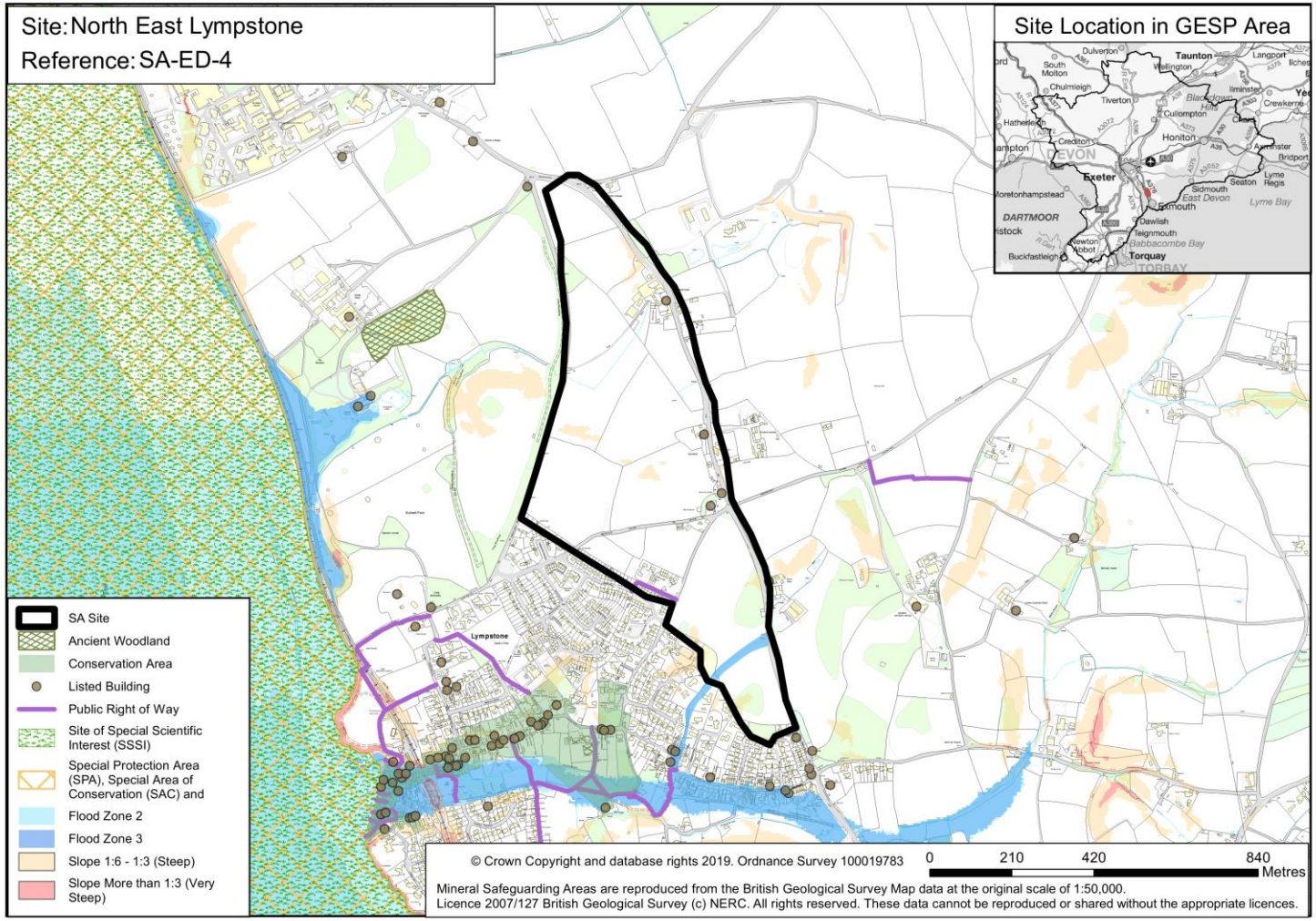
| SA Objective | SA Score | Justification |
|---|---|---|
| enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | | site would provide significant open space and active transport links. As such, significant positive effects are expected.<br><br>Overall, significant positive effects are expected. |
| **10. WELLBEING**<br><br>To support positive, safe and healthy communities. | --? | While providing new homes will have a positive impact on the health and wellbeing of occupants, the site is within the Exe Estuary including Clyst St Mary, Exton and Lympstone and the Broadclyst and surrounding areas to the North East of Exeter Middle Super Output Area. This area, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees slightly lower levels of deprivation than Devon and Mid Devon as a whole and therefore new development is less likely to have a positive effect on wellbeing locally as a result of increased availability of homes in the area. The site is also in close proximity to existing jobs which could benefit the residential development, although poor cycling opportunities to the wider area may limit active transport. As such, negligible effects are expected.<br><br>The north western corner of the site lies partially within the Exeter Airport noise contour of 57db and above. In addition, the site lies adjacent to an 'A' road. Existing residential development, including the residential retirement park homes in Cat and Fiddle Park to the southwest of the site, could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. These features may result in noise pollution affecting residents of the site in the longer term. As such, uncertain significant negative effects are expected.<br><br>The site is not within 1km of an AQMA. However, car movements emanating from the site could potentially contribute to worsening air quality as a result of congestion at the Clyst St Mary Roundabout and the Exeter AQMA, along the Heavitree Road corridor. As such, minor negative effects are expected.<br><br>Overall, uncertain significant negative effects are expected. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | ++/-- | The site is not located adjacent to any settlements. There are currently a very limited number of facilities in the area. Clyst St Mary, which is located to the south west of the site, has a local shop, pub and church but residents would have to travel into Exeter for a wider range of services. As such, significant negative effects are expected.<br><br>The site is not located within 1km of any primary or secondary schools. However, the site is within 3km of a further education college (Exeter College). As such, uncertain minor positive effects are expected.<br><br>Broadband download speeds within the site are mostly less than 10Mbps and the majority of the site is not located adjacent to areas of high speed broadband. It will be necessary to enhance broadband |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | access in the area if development comes forward. As such, minor negative effects are expected.<br><br>The site is large, providing over 4,000 homes and therefore it is expected that development would be more likely to include a primary and secondary onsite. The area may be a good location for secondary provision as it would be well placed strategically to support other development in the area. It could potentially take the pressure off secondary provision in Exmouth, Cranbrook, Clyst Vale and Ottery St Mary. As such, significant positive effects are expected.<br><br>Overall, mixed significant negative and significant positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | ++ | The site is not located adjacent to a Main Town but is located within 1km of existing or proposed employment sites including Hill Barton Business Park, which could provide employment opportunities. As such, minor positive effects are expected.<br><br>Jobs would be created during the construction phase of the site, and additional homes would create expenditure in the area. It is assumed that, as the site has capacity to deliver over 2,000 homes, the site will also deliver large scale mixed use employment opportunities and a business park or employment estate. Employment on the site could include a mix of supply to cater for businesses of all sizes. As such, significant positive effects are expected.<br><br>There is potential for an increase in tourism in the area if high quality open space is delivered with development. Development may also result in increased numbers of visitors to the nearby Crealy Adventure Park.<br><br>Overall, significant positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or a Main Town.<br><br>Therefore, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other | + | The site is not located within 1km of cycle routes or railway stations. However, the site is adjacent to existing frequent bus services along the A3052 into Exeter. As such, due to the proximity to bus stops, minor positive effects are expected.<br><br>In addition, the site has capacity for more than 1,000 homes and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br><br>Overall, minor positive effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| transport infrastructure both within the Greater Exeter area and beyond. | | |

### SA-ED-4: North East Lympstone

| SA-ED-4 | North East Lympstone |
|---|---|
| **Authority Area:** East Devon | |
| **Site Area:** 45.5ha (Net 24.6ha) | |
| **Approximate total capacity:** 763 – 984 dwellings | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:** Site consists of a series of agricultural fields bounded by mature hedgerows and trees to the north-east of Lympstone Village. Site is predominantly level and set within a 'bowl' centred on a small watercourse running through its centre. The grade I listed Nutwell court and historic parkland run adjacent to the site to the west with the Exe Estuary situated just beyond. | |



| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | --?/+ | The site is within 1km of Exe Estuary, SSSI, SPA and Ramsar site. The impact upon the Exe Estuary is expected to be large and difficult to mitigate due to its proximity. The site is also within 1km of A La Ronde County Wildlife Site and Estuary Cliffs, Lympstone County Geological Site. The site also contains Priority habitat, Traditional Orchard. The site is within the 5km Great Crested Newt consultation zone. The site is flagged as Amber in the HRA sensitivity work with regard to Exe Estuary SPA and East Devon Pebblebed SAC/SPA and is within the 10km recreation zone of the Exe Estuary and Pebblebed Heaths so SANGS and other mitigation would be required. As such, significant negative effects with uncertainty are expected.<br><br>However, the site has capacity for less than 1,000 homes, and therefore is expected to provide local public open space on site that could mitigate the biodiversity impact of development. As such, minor positive effects also are expected.<br><br>Overall, mixed minor positive and significant negative effects with uncertainty are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The entirety of the site consists of open rural countryside which would become would become urbanised as a result of development. Part of the site off Grange Close is of Medium landscape sensitivity as there is potential for intervisibility between the site and the East Devon AONB and also due to the presence of listed buildings. As such, uncertain minor negative effects are expected.<br><br>The majority of the site is of high landscape sensitivity as it is identified as a Coastal Preservation Area due to its relationship with the Exe Estuary. It also highly likely that there would be intervisibility between the site and the East Devon AONB. As such, an uncertain significant negative effect is expected.<br><br>Overall, significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/-? | The eastern extent of the site contains five Grade II listed buildings (Gulliford Farmhouse, Boundary Cottage, Gulliford Cottages, Gulliford Meeting Burial Ground and Thorn Farmhouse). There are multiple designated assets within 3km including three listed buildings around 500m to the west, two of which are Grade II* listed (Nutwell Court and Former Indoor Riding School), and multiple Grade II listed builidngs to the south, the majority of which are contained within Lympstone Conservation Area. Powderham Castle (a Registered Park and Garden) is located within 3km to the west across the River Exe. There is potential for residential development to compromise the setting of these historic environment assets. As such, uncertain minor negative effects are expected.<br><br>It is likely that the site is of sufficient size (>10ha) to accommodate a well-designed development and create a new high quality built environment. It should be possible for development to respond appropriately to existing heritage assets in the area and minimise any disturbance to the historic |

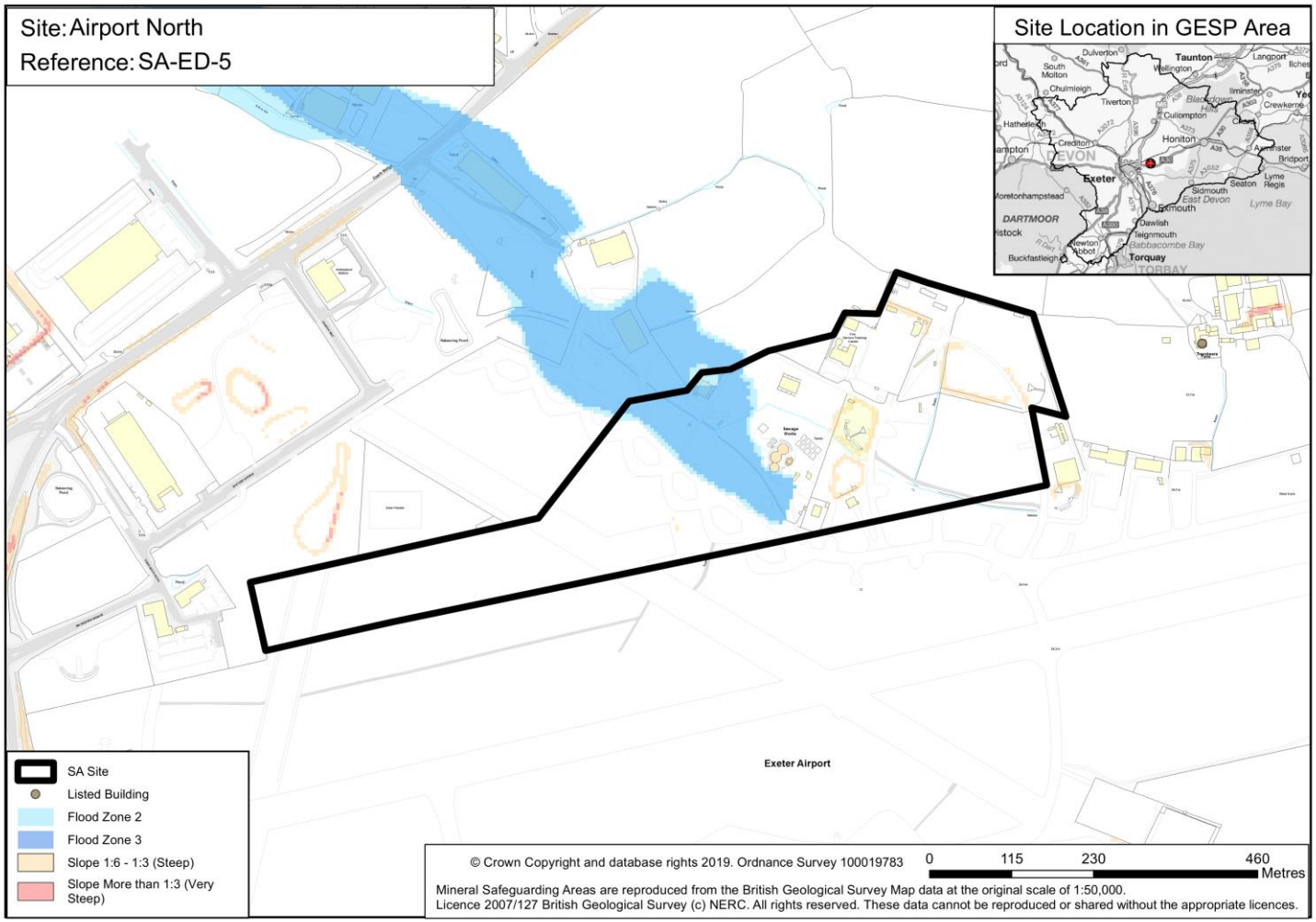
| SA Objective | SA Score | Justification |
|---|---|---|
| | | environment. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | ++/--? | The site is within 5km of the Main Town of Exmouth and as such, uncertain negligible effects are expected.<br><br>An existing bus stop is located directly adjacent to the site operating a 15 minute (frequent) service between Exeter City Centre and Exmouth. The site is also located within 1km of cycle routes and railway stations. As such, significant positive effects are expected.<br><br>However, as the site is expected to deliver less than 1,000 homes, it is assumed that development of the site would provide fewer sustainable transport, walking and cycle links, and services. As such, uncertain significant negative effects are also expected.<br><br>Overall, mixed significant positive and uncertain significant negative effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The land is greenfield and is predominantly in an area with no significant flood risk. There is a river at the centre of the site and as such, areas are on flood zone 2 and 3. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | -- | Over 5ha of Grade 1 agricultural land is located within the site. As such, significant negative effects are expected during development due to the loss of high quality agricultural land. The remainder of the site is Grade 3 agricultural land but it is not clear if this is Grade 3a or 3b.<br><br>Although the site does not contain any previously developed land that could be reused, it is noted that the site does contain some agricultural developments.<br><br>The site is not located within any Mineral Safeguarding Areas.<br><br>Overall, significant negative effects are expected on high quality agricultural land. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or degradation. | --? | Development should ensure no deterioration in the water quality of Wotton Brook, which is located 160m to the south of the site and runs directly into the Exe Estuary SPA.<br><br>As such, uncertain significant negative effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | + | Excluding the approximate 1ha currently covered by flood zones and steep areas, there is the potential for between 763 - 984 homes including affordable housing if the site fully built out. This figure is likely to reduce significantly as a result of mitigation requirements, for example, if the SANGS is expected to be provided on site. The site is of sufficient size and there would not appear to be any particular viability issues which would prevent the delivery of a wide mix of tenure and sizes and significant levels of affordable housing. This range of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom and self-build providers. Delivery of a large number of homes may also have some impact on local market affordability through increasing supply.<br>As such, minor positive effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | + | The site contains and is within 400m of Public Rights of Way but is not within 800m of major open space.<br>As such, minor positive effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | - | While providing new homes will have a positive impact on the health and wellbeing of occupants, the site is within the Exe Estuary including Clyst St Mary, Exton and Lympstone Middle Super Output Area. This area, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees slightly lower levels of deprivation than Devon and Mid Devon as a whole and therefore new development is less likely to have a positive effect on wellbeing locally as a result of increased investment in the area. As such, negligible effects are expected.<br>The site is adjacent to residential development, Lympstone which includes Lympstone CofE Primary School, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. As such, minor negative effects are expected.<br>The site is not within 1km of an AQMA. However, car movements emanating from the site could potentially contribute to worsening air quality as a result of congestion at the Clyst St Mary Roundabout and the Exeter AQMA. As such, minor negative effects are expected.<br>Overall, minor negative effects are expected. |
| **11. ACCESS TO SERVICES** | + | The site is located adjacent to Lympstone (a Defined Village), which provides a range of local facilities including a pub, shop and a church. It is likely that residents would rely on Exeter and Exmouth for a |

| SA Objective | SA Score | Justification |
|---|---|---|
| To provide accessible and attractive services and community facilities for all ages and interests. | | larger range of facilities so commuting will be required. As such, minor positive effects are expected.<br><br>The site is located within 500m Lympstone Primary School but it is not located with 1km of any secondary schools. However, the primary school is projected to be at capacity and has limited ability to expand to accommodate further large scale development. As such, uncertain minor positive effects are expected.<br><br>The site is adjacent an area where there is access to superfast broadband download speeds (80-300Mbps), which could be extended to the site if development came forward. As such, minor positive effects are expected.<br><br>The site is medium sized, providing over 500 homes. And therefore it is assumed that development would be more likely to accommodate a primary school on site. As such, minor positive effects are expected.<br><br>Overall, minor positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | --/+ | The site is not located adjacent to Exeter or a Main Town and is not within 1km of any existing or proposed employment sites. As such significant negative effects are expected.<br><br>Jobs would be created during the construction phase of the site, and additional homes would create expenditure in the area. It is assumed that, as the site has capacity to deliver up to 738 homes, the site will also deliver small scale mixed use employment opportunities and a small hub of shops and services. Employment on the site could include a mix of supply to cater for businesses of all sizes. As such, minor positive effects are expected.<br><br>There is likely to be little impact on tourism.<br><br>Overall significant negative effects and minor positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to adjacent to Exeter or a Main Town.<br><br>Therefore, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the | ++ | An existing bus stop is located directly adjacent to the site operating a 15 minute (frequent) service between Exeter City Centre and Exmouth. The site is also located within 1km of cycle routes and railway stations.<br><br>As such, significant positive effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | | |

## SA-ED-5: Airport North

| SA-ED-5 | Airport North |
|---|---|
| **Authority Area:** East Devon |  |
| **Site Area:** 22.2ha (Net 7.8ha) | |
| **Approximate total capacity:** 7.8ha employment | |
| **Site status:** Potential site option | |
| **Outline description and context:** Development of airport land on the north side of the runway for employment uses accessed via Skypark and/or Cranbrook southern expansion area. | |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | -? | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, or within 250m of a locally designated site. However, the site does lie within a SSSI IRZ.<br>The site is flagged as Yellow in the HRA sensitivity work with regard to Exe Estuary SPA and is within the 10km recreation zones of the Exe Estuary and Pebblebed Heaths, although as the site is being considered for employment this will likely reduce the overall recreational impact from development. The site is also within the Great Created Newt Consultation Zone.<br>Overall, minor negative effects with uncertainty are expected |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | Located on lowland plains, the west of this site comprises of land used in ancillary uses as part of Exeter International Airport whilst the east side contains some areas of existing employment development including a sewage works.<br>Land within the site to the northern side of Exeter International Airport is of Low-Medium landscape sensitivity as there is likely to be low or non-existent levels of inter-visibility between the site and the East Devon AONB. As such, uncertain minor negative effects are expected.<br>Land within the site south of Cranbrook New Town is of Medium-High landscape sensitivity as the site is partly located within land designated Green wedge and Clyst Vally Regional Park and is highly likely to have intervisibility with some listed buildings and some registered parks and gardens. As such, uncertain significant negative effects are expected.<br>Overall, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/-? | The site does not contain any heritage assets within its boundaries. There are designated heritage assets within 3km which include Treasebeare Farmhouse (Grade II listed) around 220m to the east, Rockbeare Manor (a Registered Park and Garden) around 2km to the east and Sowton Conservation Area around 1.8km to the south-east. There is potential for development to compromise the setting of these historic environment assets. As such, uncertain minor negative effects are expected.<br>The site contains over 1ha of previously used land, which may present opportunities to enhance the overall quality of the built environment as new development would replace and potentially improve the existing development. As such, uncertain minor positive effects are expected.<br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE** | --?/+ | The site is within 1km of the Main Town of Cranbrook and as such, uncertain minor positive effects are |

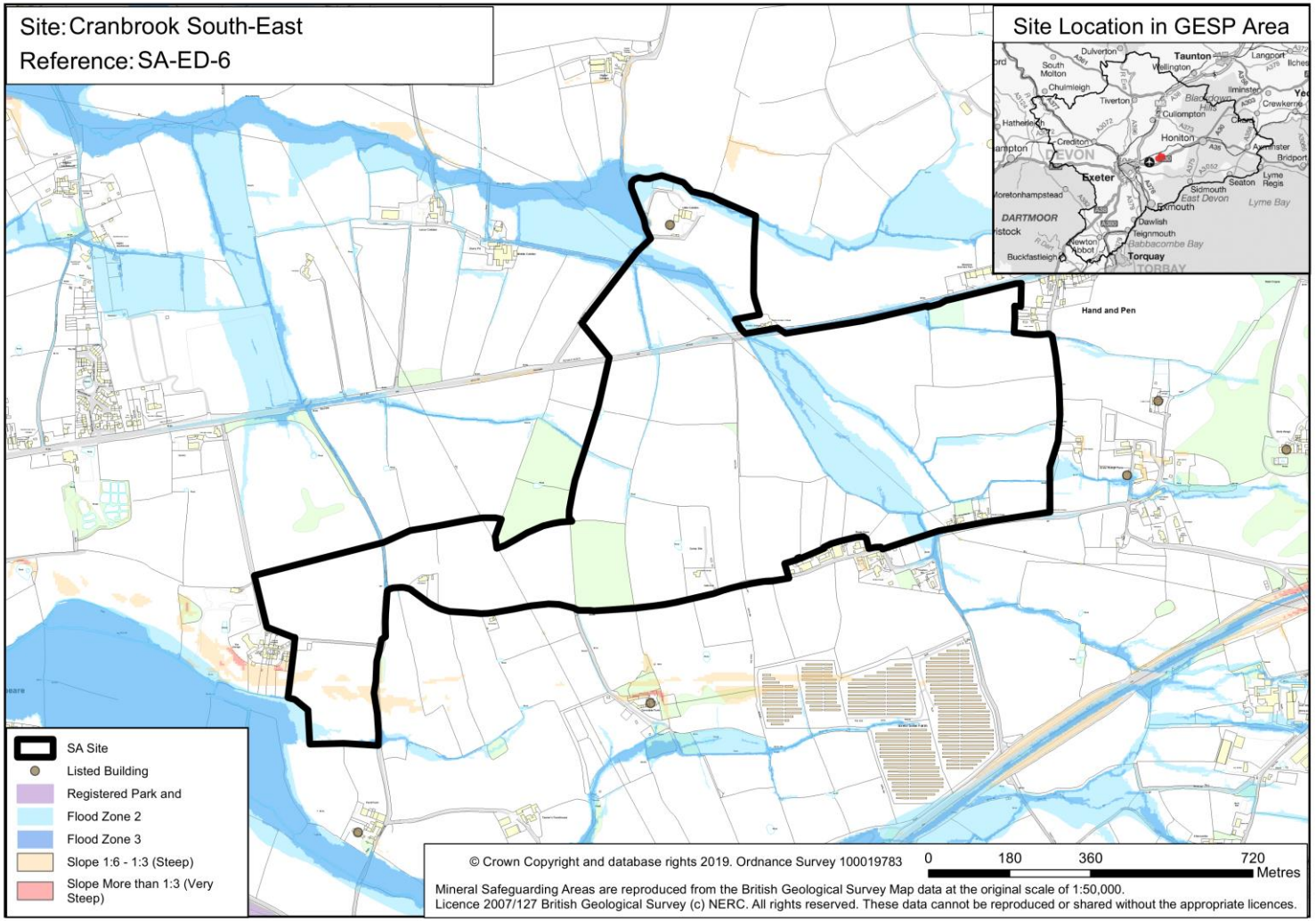
| SA Objective | SA Score | Justification |
|---|---|---|
| **MITIGATION**<br>To minimise greenhouse gas emissions. | | expected.<br>The site is not located within 1 km of existing cycle routes or railway stations. However, the site is located within 500m of existing bus stops, providing frequent services. As such, due to the proximity of bus stops, minor positive effects are expected.<br>As the site is expected to deliver under 10ha of employment land, it is assumed that development of the site would provide fewer sustainable transport, walking and cycle links, and services. As such, uncertain significant negative effects are also expected.<br>Overall, mixed minor positive and uncertain significant negative effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield in an area with no significant flood risk, with the exception of one central area of the site on flood zone 2 and 3. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br>As such, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br>To utilise our land resources efficiently and minimise their loss or degradation. | ++/--? | Over 5ha of Grade 3 agricultural land is located within the western side of the site. However, it is unclear if this is Grade 3a or 3b agricultural land. As such, uncertain significant negative effects are expected. The remainder of the site is designated as non-agricultural land.<br>Land in the west of the site does contain some development including a sewage works and a newly constructed fire training centre. Over 5ha of the site associated with previous ancillary uses of Exeter Airport is considered to be brownfield land. As such, significant positive effects are expected due to the use of previously developed land.<br>The site is not located within any Minerals Safeguarding Areas.<br>Overall, uncertain significant negative effects are expected due to development on high quality agricultural land and significant positive effects are expected due to development on previously developed land. |
| **7. WATER RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or degradation. | 0 | The site is not located adjacent to any watercourses.<br>Therefore, negligible effects are expected. |
| **8. HOMES** | 0 | The site is not considered to be suitable for accommodating housing due to its location directly |

| SA Objective | SA Score | Justification |
|---|---|---|
| To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | | adjacent to the airport with associated noise constraints.<br><br>As such, negligible effects are expected. |
| **9. HEALTH**<br><br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | - | The site is not within 800m of major open space or within 400m of walking or cycle paths.<br><br>As such, minor negative effects are expected. |
| **10. WELLBEING**<br><br>To support positive, safe and healthy communities. | --? | While providing new jobs will have a positive impact on the health and wellbeing of workers, the site is within the 'E02004134' Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees average levels of deprivation than Nationally as a whole. As such, development in this area is unlikely to be significantly affected by deprivation and is less likely to have a positive effect on wellbeing locally as a result of increased investment in the area. As such, negligible effects are expected.<br><br>The site is not within 1km of an AQMA. However, car movements emanating from the site could potentially contribute to worsening air quality as a result of congestion at the Exeter AQMA. As such, minor negative effects are expected.<br><br>The site lies partially within the Exeter Airport noise contour of 57db and above. This feature may result in noise pollution affecting residents of the site in the longer term. As such, uncertain significant negative effects are expected.<br><br>Overall, uncertain significant negative effects are expected. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | --/+ | The site is not adjacent to any settlements and therefore access is currently limited and would require routes to be created between the site and Cranbrook, which is around 600m north of the site. As such, significant negative effects are expected. It is noted however that the adjacent Skypark office park is intended to include ancillary facilities such as cafes, crèche, shops, a hotel and leisure facilities.<br><br>Superfast broadband (80-300Mbps) is available in adjacent locations and it is assumed that it would be possible to expand the network to include the site. As such, minor positive effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | Overall, mixed significant negative and minor positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | + | This employment site has the capacity for 7.8 hectares of employment land. The site is within 3km of Exeter Science Park /Sky Park and Airport Business Park.<br>As such, significant positive effects are expected due to close proximity to a high value employment cluster. |
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | + | The site is not located within 1 km of existing cycle routes or railway stations. However, the site is located within 500m of existing bus stops, providing frequent services.<br>As such, due to the proximity of bus stops, minor positive effects are expected. |

### SA-ED-6: Cranbook South-East

| SA-ED-6 | Cranbook South-East |
|---|---|
| **Authority Area:** East Devon | |
| **Site Area:** 80.8ha (Net 45.5ha) | |
| **Approximate total capacity:** 1,410 -1,819 dwellings | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:** Housing-led urban extension to Cranbrook beyond the planned extent of the Cranbrook Plan DPD | |



| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br><br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/--? | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, or within 250m of a locally designated site. However, the site is within a SSSI IRZ. The site is flagged as Amber in the HRA sensitivity work with regard to Exe Estuary SPA and East Devon Pebblebed SAC/SPA and is within the Great Crested Newt Consultation Zone. The site is also divided by multiple likely species-rich hedgerows and contains a significant number of mature trees. As such, significant negative effects with uncertainty are expected.<br><br>Existing green infrastructure on the site, including mature trees, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space and playing pitches on site that could mitigate the biodiversity impact of development. As such, significant positive effects also are expected.<br><br>Overall, mixed significant positive and significant negative effects with uncertainty are expected. |
| **2. LANDSCAPE**<br><br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The entirety of the site is located on open rural countryside and so development would have an urbanisation effect on the environment. Land on the north side of Rewe Lane within the site is of medium-low landscape sensitivity as intervisibility between the site and the East Devon AONB is likely to be low or non-existent. As such, uncertain minor negative effects are expected.<br><br>Land at little Cobden Whimple within the site is of medium landscape sensitivity as the site is framed by two streams and associated stream side planting. As such, uncertain significant negative effects are expected.<br><br>Land at Rockbeare Straight within the site is of medium-high landscape sensitivity as although the site in itself is not designated, it abuts an area designated as Green Wedge. The southern section of the site has potential for intervisibility with Rockbeare and Rockbeare Manor but the potential for intervisibility with the East Devon AONB is low. As such, uncertain significant negative effects are expected.<br><br>Overall, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br><br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build | +?/-? | The northern extent of the site contains a Grade II listed building (Little Cobden Farmhouse). There are multiple designated assets within 3km including four Grade II listed buildings in close proximity around 220m south (Carradale Farmhouse), 190m south of the south-western boundary (Ford Farmhouse) and 150m east (Strete Ralegh Farmhouse and Burnthouse Cottage). Rockbeare contains a high concentration of listed buildings around 700m west of the site and Whimple Conservation Area, located 1.3km to the north-east, also contains a high concentration of listed buildings. Additionally, |

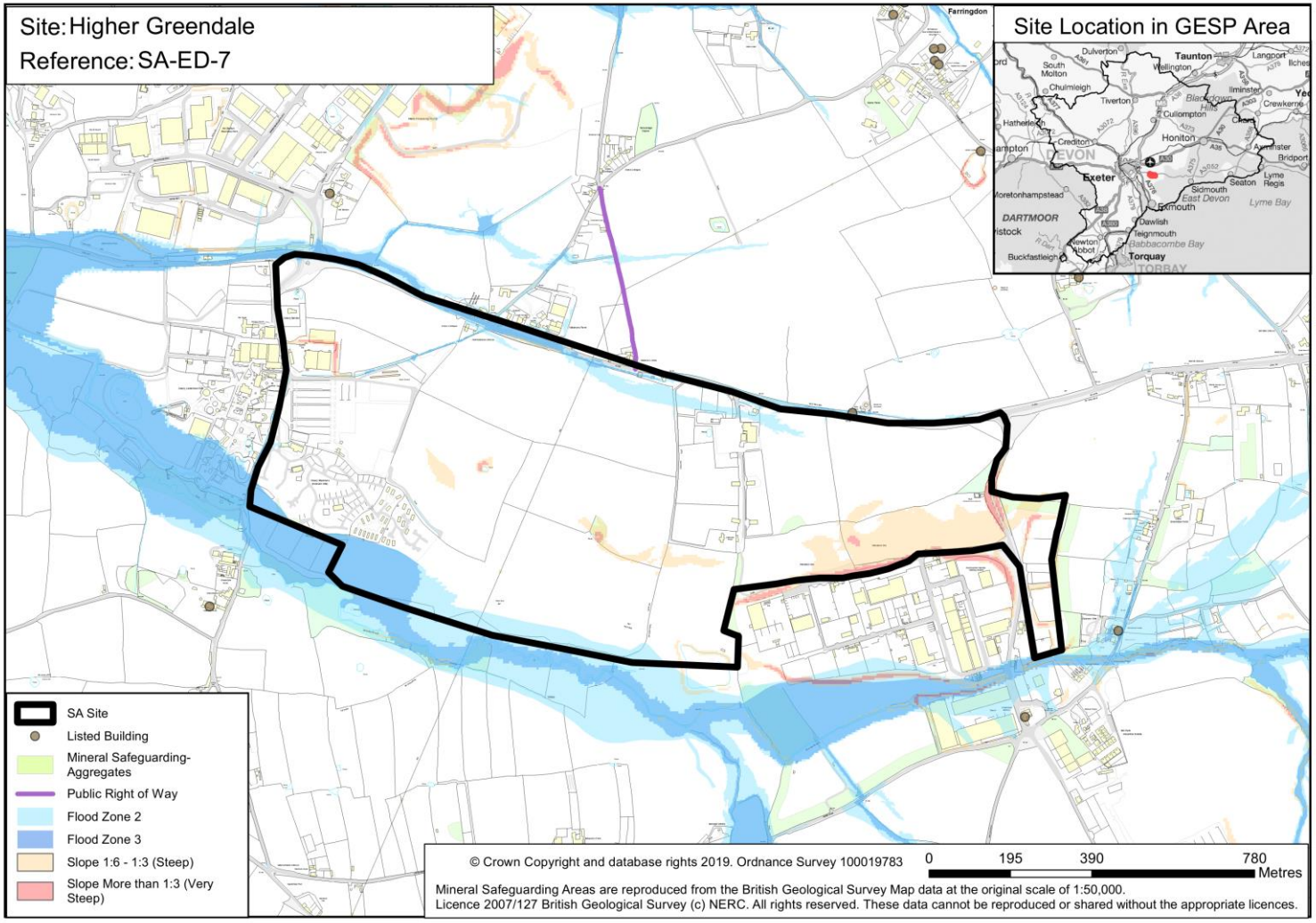
| SA Objective | SA Score | Justification |
|---|---|---|
| development. | | Rockbeare Manor (a Registered Park and Garden) is located around 400m south west of the site. There is potential for residential development to compromise the setting of these historic environment assets. As such, uncertain minor negative effects are expected.<br><br>It is likely that the site is of sufficient size (>10ha) to accommodate a well-designed development and create a new high quality built environment. It should be possible for development to respond appropriately to existing heritage assets in the area and minimise any disturbance to the historic environment. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | + | The site is within 5km of the Main Towns of Cranbrook and Ottery St Mary and as such, uncertain negligible effects are expected.<br><br>The site is not located within 1km of existing cycle routes or railway stations. The site is however adjacent to an existing bus stop served by frequent bus services. As such, due to the proximity of bus stops, minor positive effects are expected.<br><br>As the site is expected to deliver over 1,000 homes, it is assumed that development of the site would provide some sustainable transport, walking and cycle links and services. As such, uncertain negligible effects are expected.<br><br>Overall, minor positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and in an area with no significant flood risk. However, there is a river to the north and as such, part of the site is on flood zone 2 and flood zone 3. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | -- | The site is comprised of over 5ha of Grade 3a agricultural land. As such, significant negative effects are expected due to the potential for loss of high quality agricultural land during development. The remainder of the site comprises of Grade 3 (it is unclear if this is Grade 3a or 3b) and a small patch of non-agricultural land.<br><br>The site does not contain any previously developed land.<br><br>The site is not located within any Minerals Safeguarding Areas.<br><br>Overall, significant negative effects are expected due to development on high quality agricultural land. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **7. WATER RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or degradation. | -- | Development should ensure no deterioration in the water quality of Ford Stream, which is adjacent to the south of the site or Upper Cranny Brook adjacent to the north boundary of the site as they both flow into the Exe4 Estuary SPA via the River Clyst.<br>As such, uncertain significant negative effects are expected. |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | ++ | The site is likely to be able to accommodate about 1,410-1,819 homes. However this capacity is likely to reduce once account has been taken of the likely mitigation requirements, including those highlighted elsewhere in this assessment. The site would also need to ensure a viable mix of homes (tenure and sizes) including a proportion of affordable housing to contribute towards meeting needs within the area. This range of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom and self build providers. The site is of a sufficient size to be able to support a high number of housing starts / completions from a number of different outlets around the site, which in turn will ensure a good pace of delivery.<br>As such, significant positive effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | + | The site contains a major open space, Accessible Woodland, however it is not within 400m of walking and cycle paths. As such, minor positive effects are expected.<br>However, as the site is expected to deliver between 1,000-1,999 homes, it is assumed that development of the site would provide some open space and active transport links. As such, minor positive effects are expected.<br>Overall, minor positive effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | - | While providing new homes will have a positive impact on the health and wellbeing of occupants, the site is primarily within the 'E02004132' Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment, sees below average levels of deprivation than compared to Nationally as a whole. Part of the site is also within 'E02004134' Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment, sees average levels of deprivation than compared to Nationally as a whole. It is likely that large residential development of this nature will provide potential improvements to the availability of homes in the area, which will provide broad wellbeing benefits. As such, negligible effects are expected.<br>The site is adjacent to a few residential developments on the periphery of the defined village of Whimple which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. As such, minor negative effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | The site is not within 1km of an AQMA. However, car movements emanating from the site could potentially contribute to worsening air quality as a result of congestion at the Exeter AQMA, along the Heavitree Road corridor. As such, minor negative effects are expected.<br><br>Overall, minor negative effects are expected. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | --/+ | The site is not located adjacent to any settlements. Whimple Doctors Surgery is beyond a 2km walk of the centre of the site, and the proposed primary care facilities in Cranbrook town centre would also be beyond this extent. Local shops, meeting venues, public houses and places of worship are or in time are likely to be available in Cranbrook town centre, Whimple and Rockbeare, however, in all cases would be beyond a 2km walk. As such, significant negative effects are expected.<br><br>The eastern side of the site is within the site is within 1km of a primary school but the site is not within 1km of any secondary schools. As such, additional primary capacity will be required either on-site or by increasing capacity at existing schools. Cranbrook Secondary School is approximately a 3km walk from the site and has limited capacity to expand. Additional capacity would need to be created either here or in other nearby secondary schools to accommodate pupils from the site. As such, uncertain minor positive effects are expected.<br><br>The site is adjacent to areas of superfast broadband access (80-300Mbps), which it is assumed could be extended to the site if development came forward. As such, minor positive effects are expected.<br><br>The site is medium sized, providing over 500 homes, and therefore it is assumed that development would be more likely to accommodate a primary school on site. As such, minor positive effects are expected.<br><br>Overall, mixed significant negative and minor positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | --/+ | The site is not adjacent to a Main Town and is not within 1km of any existing or proposed employment sites. As such, significant negative effects are expected.<br><br>Jobs would be created during the construction phase, and additional homes would create expenditure in the area. It is assumed that, as the site has the capacity to deliver over 1,000 homes, the site will also deliver medium scale mixed use employment opportunities and a business park or employment estate as well as neighbourhood hub with shops and services. As such, minor positive effects are expected.<br><br>There is likely to little impact on tourism.<br><br>Overall, mixed significant negative and minor positive effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | + | The site is not located within 1km of existing cycle routes or railway stations. The site is however adjacent to an existing bus stop served by frequent bus services. As such, due to the proximity of bus stops, minor positive effects are expected.<br>In addition, the site has capacity for more than 1,000 homes and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br>Overall, minor positive effects are expected. |

## SA-ED-7: Higher Greendale

| SA-ED-7 | Higher Greendale |
|---|---|
| **Authority Area:** East Devon |  |
| **Site Area:** 107.1ha (Net 57.3ha) | |
| **Approximate total capacity:** 1,776 – 2,292 dwellings | |
| **Site status:** Potential site option | |
| **Outline description and context:** Roughly rectangular site, gently sloping up from west to east to the highest point at Windmill Hill. Wraps around Greendale Business Park to the south which creates noise issues on part of the site. The southern boundary slopes down to the Grindle Brook with its narrow floodplain. The landscape is rolling farmland of limited landscape sensitivity. No known significant biodiversity on the site but it is within the 10km recreational impact zones of the Exe Estuary and Pebblebed Heaths European wildlife sites, requiring mitigation to be provided. The A3052 forms the northern boundary of the site. A wide | |

| SA-ED-7 | Higher Greendale |
| --- | --- |
| range of new facilities and infrastructure would be required to service residential development here. | |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/--? | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, but is within 1km of Hogsbrook Wood, County Wildlife Site. The site is also within a SSSI IRZ. There are some undesignated hedgerows, infield trees and some ponds, which could be used by great crested newts (and the site is within the Great Crested Newt consultation zone). No wildlife or biodiversity designations are present on the site itself. However, the site is flagged as Amber in the HRA sensitivity work with regard to Exe Estuary SPA and East Devon Pebblebed SAC/SPA and is within the 10km recreation zones of the Exe Estuary and the Pebblebed Heaths. Mitigation including SANGS would be required to limit the impact upon these important habitats. As such, significant negative effects with uncertainty are expected.<br><br>Existing green infrastructure on the site, including the ponds and infield trees, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space and playing pitches on site that could mitigate the biodiversity impact of development. As such, significant positive effects also are expected.<br><br>Overall, mixed significant positive and significant negative effects with uncertainty are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is situated on open rural countryside and so development would cause an urbanisation effect of the environment. Land at Greendale Business park within the site is of medium landscape sensitivity as it is likely that there would be intervisibility between the site and the East Devon AONB due to the majority of the site being located on a local ridge. There is also likely to be some intervisibility between the site and Woodbury Salteron. As such, uncertain minor negative effects are expected.<br><br>Land between Crealy Great Adventure Park and Greendale Business Park is of High landscape sensitivity as there is highly likely to be intervisibility with the East Devon AONB due to this part of the site being situated on higher ground. As such, uncertain significant negative effects are expected.<br><br>Overall, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/-? | The site does not contain any heritage assets within its boundaries. There are multiple designated assets within 3km including a Grade II listed building adjacent to the northern boundary of the site alongside the A3052 and Higher Greendale Farmhouse and Greendale Barton, both Grade II listed buildings are around 150m away from the south-eastern boundary of the site. There is also a high concentration of Grade II listed buildings around 600m to the south in Woodbury Salterton. There are further designated assets within 3km, which include two Scheduled Monuments (Woodbury Castle and two bowl barrows on Colaton Raleigh Common) around 2.3km to the south-east of the site. Woodbury Conservation Area, which contains multiple listed buildings, is also around 2.3km south of the site. |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | There is potential for residential development to compromise the setting of these historic environment assets. As such, uncertain minor negative effects are expected.<br><br>It is likely that the site is of sufficient size (>10ha) to accommodate a well-designed development and create a new high quality built environment. It should be possible for development to respond appropriately to existing heritage assets in the area and minimise any disturbance to the historic environment. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | + | The site is within 5km of Exeter and the Main Town of Cranbrook and as such, uncertain negligible effects are expected.<br><br>The site is not located within 1km of cycle routes or railway stations. However, the site is located adjacent to bus stops along the A3052 served by frequent bus services to Exeter. As such, due to the proximity of bus stops, minor positive effects are expected.<br><br>As the site is expected to deliver over 1,000 homes, it is assumed that development of the site would provide some sustainable transport, walking and cycle links and services. As such, uncertain negligible effects are expected.<br><br>Overall, minor positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield in an area with no significant flood risk. A river runs to the south of the site and as such, areas to the south fall on flood zone 2 and flood zone 3. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | -- | The site contains over 5ha of Grade 2 agricultural land. As such, significant negative effects are expected due to the potential for loss of high quality agricultural land during development. Remaining land within the site is Grade 3 agricultural land.<br><br>Although the site does not contain any previously developed land that could be reused, it is noted that the site does contain some existing light industrial use developments.<br><br>The site is not located within any Minerals Safeguarding Areas.<br><br>Overall, significant negative effects are expected due to development on high quality agricultural land. |

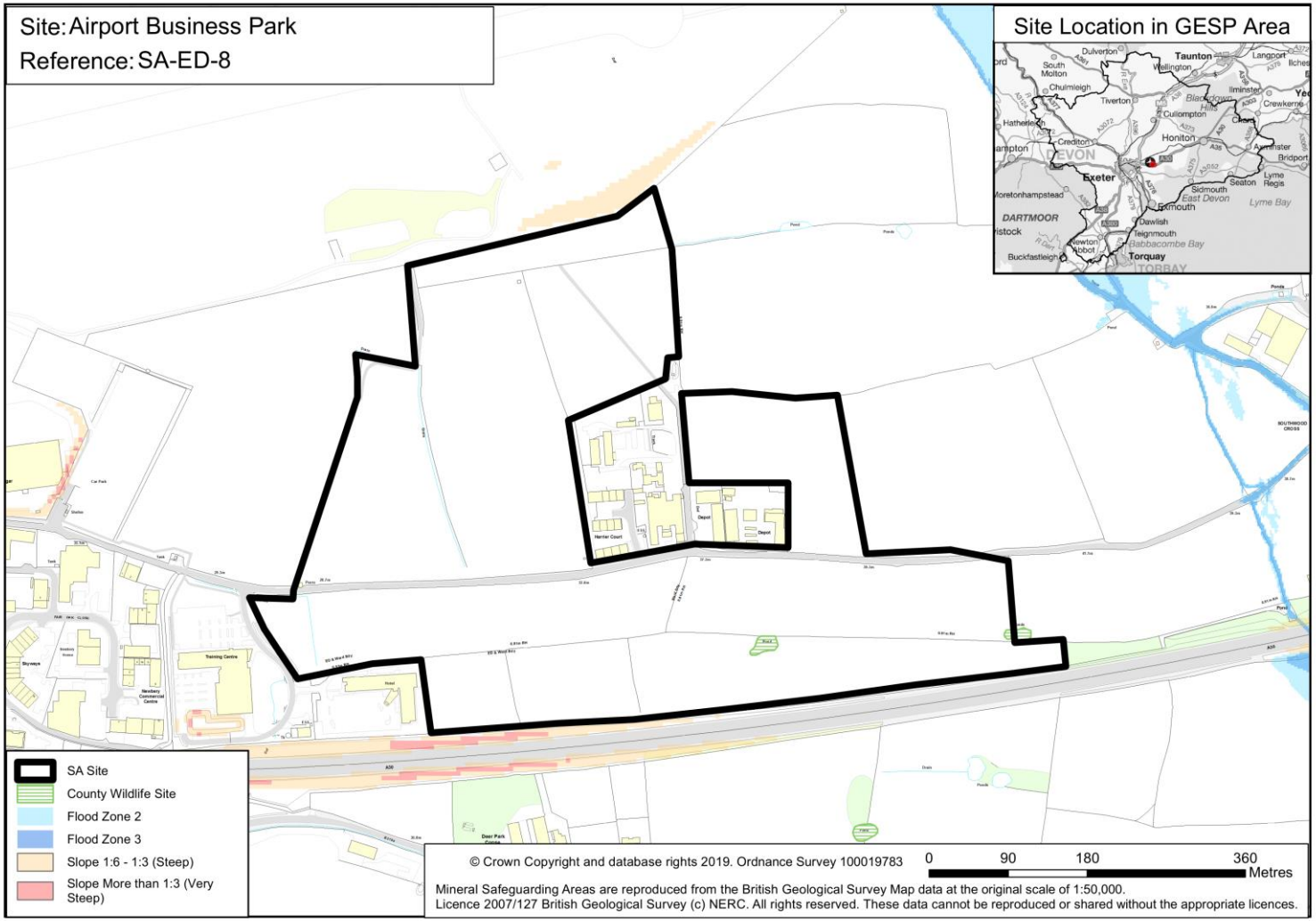
| SA Objective | SA Score | Justification |
|---|---|---|
| **7. WATER RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or degradation. | --? | Development should ensure no deterioration in the water quality of Grindle Brook, which is adjacent to the southern boundary of the site and runs directly into the Exe Estuary SPA.<br>As such, uncertain significant negative effects are expected. |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | ++ | Based on a density range of 31-40 dw/ha, excluding the approximate 21.5ha currently covered by flood zones and steep areas, there is the potential for between 1,776- 2,292 dwellings if the site fully built out. This figure is likely to reduce to some extent as a result of mitigation requirements, for example, if the SANGS is expected to be provided on site. The site is of sufficient size and there would not appear to be any particular viability issues which would prevent the delivery of a wide mix of tenure and sizes and significant levels of affordable housing. This range of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom and self-build providers. This site is of a sufficient size to be able to support a high number of housing starts / completions from a number of different outlets around the site, which in turn will ensure a good pace of delivery. Delivery of a large number of homes may also have some impact on local market affordability through increasing supply.<br>As such, significant positive effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site is adjacent to a Public Rights of Way, but is not within 800m of major open space. As such, minor positive effects are expected.<br>However, as the site has capacity for more than 2,000 homes, it is assumed that development of the site would provide significant open space and active transport links. As such, significant positive effects are expected.<br>Overall, significant positive effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | - | While providing new homes will have a positive impact on the health and wellbeing of occupants, the site is within the Exe Estuary including Clyst St Mary, Exton and Lympstone and the Newton Poppleford, Colaton Raleigh and Woodbury Middle Super Output Areas. These areas, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees lower levels of deprivation than Devon and Mid Devon as a whole and therefore new development is less likely to have a positive effect on wellbeing locally as a result of increased investment in the area. As such, negligible effects are expected.<br>The site is adjacent to an 'A' road and in close proximity to an existing employment site, Greendale Business Park. These features may result in noise pollution affecting residents of the site in the longer |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | term. As such, minor negative effects are expected.<br><br>The site is not within 1km of an AQMA. However, car movements emanating from the site could potentially contribute to worsening air quality as a result of congestion at the Clyst St Mary Roundabout and the Exeter AQMA, along the Heavitree Road corridor. As such, minor negative effects are expected.<br><br>Overall, minor negative effects are expected. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | --/+ | The site is not located adjacent to any settlements. There is currently a very limited number of facilities in the area. Woodbury Salterton has a primary school, pub and church 1km to the south and there are local shops 3km away in Woodbury and Clyst St Mary. Residents would need to travel further afield into Topsham or Exeter to access a wider range of facilities. As such, significant negative effects are expected.<br><br>The site is within 1km of Woodbury Salterton Primary School but it is not within 1km of any secondary schools. As such, uncertain minor positive effects are expected.<br><br>The area within the site has access to standard broadband download speeds of 10-30Mbps. As such, negligible effects are expected.<br><br>The site is medium sized, providing over 500 homes, and therefore it is assumed that development would be more likely to accommodate a primary school on site. As such, minor positive effects are expected.<br><br>Overall, mixed significant negative and minor positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | ++/- | The site is not adjacent to a main town but is within 1km of existing or proposed employment sites with may provide employment opportunities. As such, minor positive effects are expected.<br><br>Jobs would be created during the construction phase, and additional homes would create expenditure in the area. It is assumed that, as the site has the capacity to deliver over 2000 homes, the site will also deliver large scale mixed use employment and a business park or employment estate as well as a neighbourhood hub with shops, services and community buildings. As such, significant positive effects are expected.<br><br>There is potential for development to negatively impact on the activities of Crealy Adventure Park, which is a major tourist attraction. As such, minor negative effects are expected.<br><br>Overall, significant positive effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | + | The site is not located within 1km of cycle routes or railway stations. However, the site is located adjacent to bus stops along the A3052 served by frequent bus services to Exeter. As such, due to the proximity of bus stops, minor positive effects are expected.<br>In addition, the site has capacity for more than 1,000 homes and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br>Overall, minor positive effects are expected. |

### SA-ED-8: Airport Business Park

| SA-ED-8 | Airport Business Park |
|---|---|
| **Authority Area:** East Devon | |
| **Site Area:** 27.4ha | |
| **Approximate total capacity:** 27.4ha employment | |
| **Site status:** Potential site option | |
| **Outline description and context:** Further expansion of the Airport Business Park for employment uses along Long Lane to the south of the airport and north of the A30(T). | |



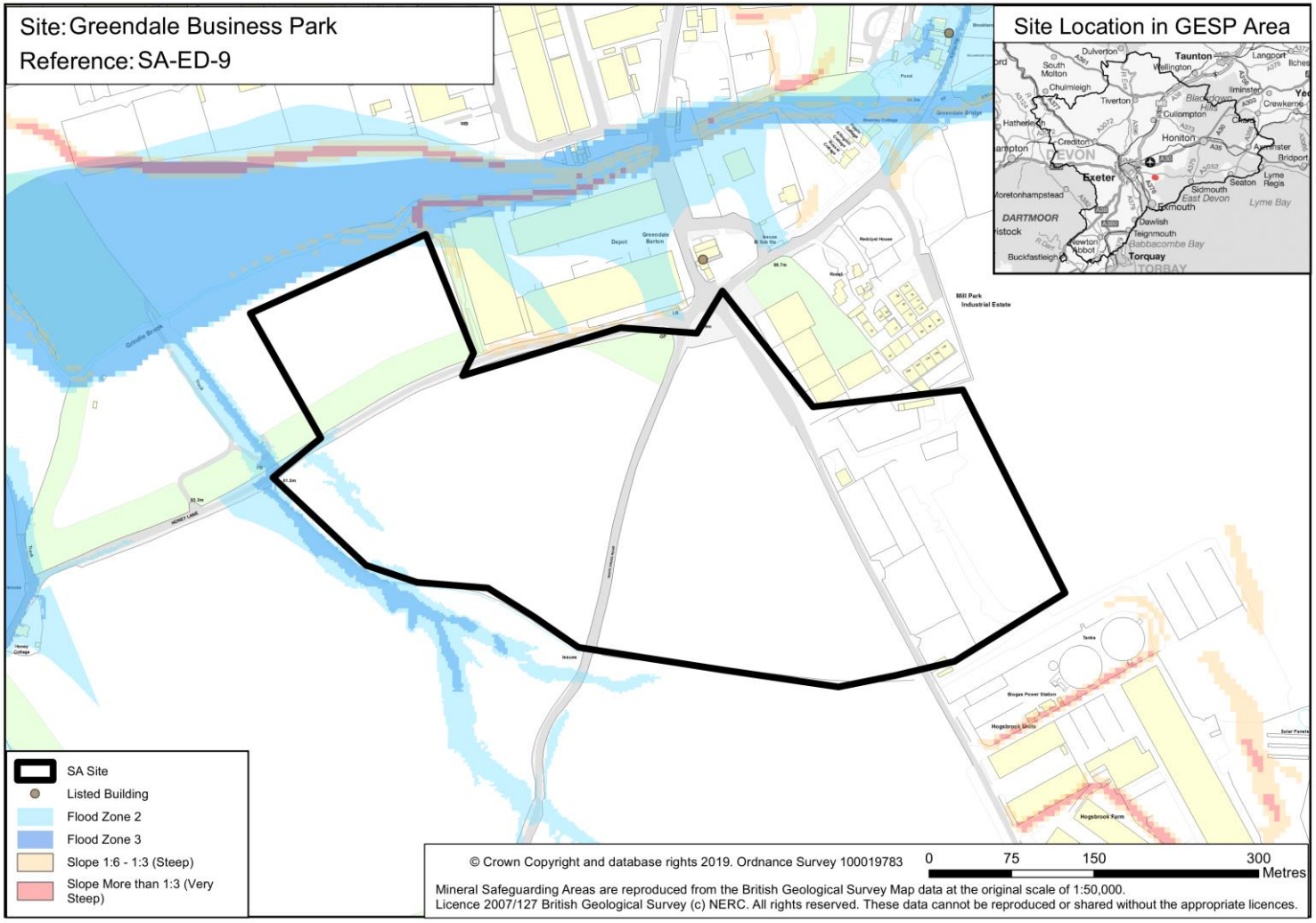
| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | +/-? | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, contains Beautiport County Wildlife Site and is within 1km of Beautiport Farm County Wildlife Site. The site is also within a SSSI IRZ. The site is flagged as Yellow in the HRA sensitivity work with regard to Exe Estuary SPA and is within the 10km recreation zones of the Exe Estuary and Pebblebed Heaths, although as the site is being considered for employment this will likely reduce the overall recreational impact from development. The site is also within the Great Crested Newt consultation zone. The site also supports multiple hedgerows and a number of mature trees which may be of landscape and ecological importance. As such, uncertain minor negative effects are expected.<br>However, the site has capacity for more than 20ha of employment land, and therefore is expected to retain and provide local green infrastructure that could mitigate the biodiversity impact of development. As such, minor positive effects are also expected.<br>Overall, mixed minor positive and uncertain minor negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | -? | The entirety of the site is located on greenfield land and so development would cause an urbanisation effect on the environment. The site is of low-medium landscape sensitivity as there is limited scope for intervisibility between the site and the AONB and also between the site and Rockbeare Manor.<br>As such, uncertain minor negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/-? | The site does not contain any heritage assets within its boundaries. There are heritage assets within 3km which including Grade II listed buildings 500m to the east (Lower Southwood Cottage and Farmhouse) and 600m to the north (Treasbeare Farmhouse), a Registered Park and Garden (Rockbeare Manor) 1km to the east. There is potential for development to compromise the setting of these historic environment assets. As such, uncertain minor negative effects are expected.<br>It is likely that the site is of sufficient size (>10ha) to accommodate a well-designed development and create a new high quality built environment. It should be possible for development to respond appropriately to existing heritage assets in the area and minimise any disturbance to the historic environment. As such, uncertain minor positive effects are expected.<br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br>To minimise greenhouse gas emissions. | --/+? | The site is within 5km of Exeter and the Main Town of Cranbrook and as such, uncertain negligible effects are expected.<br>The site is not located within 1km of existing cycle routes or railway stations and is not located within 500m of existing bus stops. As such, significant negative effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | As the site is expected to deliver over 20ha of employment land, it is assumed that development of the site would provide sustainable transport, walking and cycle links and services as well potential to include new road within the development area and connecting to the nearest settlement. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed significant negative and uncertain minor positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and is there is no significant flood risk within the area. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | -- | Over 5ha of Grade 3a agricultural land is located within the site. As such, there is potential for a significant negative effect due to the potential for loss of high quality agricultural land during development. The remainder of the site comprises of Grade 3b agricultural land.<br><br>Although the site does not contain any land considered as brownfield, it is noted that some small areas of the site have been previously developed with RAF buildings during WWII. However, it is considered that any structures and surfaces associated with this use have now blended into the landscape.<br><br>The site does is not located within any Minerals Safeguarding Areas.<br><br>Overall, significant negative effects are expected due to development on high quality agricultural land. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or degradation. | 0 | The site is not adjacent to and does not contain any watercourses.<br><br>As such, negligible effects are expected. |
| **8. HOMES**<br><br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | 0 | The site is not considered to be suitable for accommodating a strategic level of housing due to its size, location directly adjacent to the airport (with associated noise constraints), lack of additional suitable land to consider in combination with the site and otherwise isolated location away from existing settlements.<br><br>As such, negligible effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | +/- | The site is not located within 800m of major open space and is not located within 400m of walking or cycle paths. As such, minor negative effects are expected.<br>However, as the site is expected to deliver over 20ha of employment land, it is assumed that development of the site would provide local green infrastructure and active transport links. As such, minor positive effects are also expected.<br>Overall, mixed minor positive and minor negative effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | --? | While providing new jobs will have a positive impact on the health and wellbeing of workers, the site is within the 'E02004134' Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees average levels of deprivation than compared to Nationally as a whole. It is likely that a medium employment development of this nature will provide potential improvements to the availability of jobs in the area, which will provide broad wellbeing benefits. As such, negligible effects are expected.<br>The site lies partially within the Exeter Airport noise contour of 57db and above. This feature may result in noise pollution affecting residents of the site in the longer term. The site also surrounds an existing employment site, Harrier Court, which should have additional benefits. As such, uncertain significant negative effects are expected.<br>The site is not within 1km of an AQMA. However, car movements to and from this site could potentially contribute to worsening air quality to the Exeter AQMA. As such, minor negative effects are expected.<br>Overall, uncertain significant negative effects are expected. |
| **11. ACCESS TO SERVICES**<br>To provide accessible and attractive services and community facilities for all ages and interests. | --/+ | The site is not located adjacent to any settlements. As such, significant negative effects are expected.<br>The existing business park hosts gym and cafe facilities. However, the site may be required to deliver some limited ancillary services such as a convenience shop /café to support workers. The business park has access to superfast broadband (80-300Mbps), which it is assumed could be extended to the site if development came forward. As such, minor positive effects are expected.<br>Overall, mixed significant negative and minor positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support | ++ | The site has the capacity to deliver over 20ha of employment space and would be able to cater for a range of business sizes and types in this location immediately adjacent to the existing Airport Business Park and currently allocated expansion. Jobs would be created during the construction phase of the site and the site would be likely to accommodate a limited number of shops and leisure facilities. |

| SA Objective | SA Score | Justification |
|---|---|---|
| improved job opportunities and greater productivity in Greater Exeter. | | As such, significant positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | + | The site is not located within 1km of existing cycle routes or railway stations and is not located within 500m of existing bus stops. However, as the site has capacity for over 20ha of employment land, there is potential for development to accommodate active and sustainable transport links as well as roads within the development and to the nearest settlement.<br>As such, minor positive effects are expected. |

## SA-ED-9: Greendale Business Park

| SA-ED-9 | Greendale Business Park |
|---|---|
| **Authority Area:** East Devon |  |
| **Site Area:** 17.6ha | |
| **Approximate total capacity:** 17.6ha employment | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:** Mainly consists of agricultural land either side of White Cross Road, south of the Greendale Business Park, plus additional land in storage use. The land gently slopes upwards to the south east away from the Grindle Brook. | |

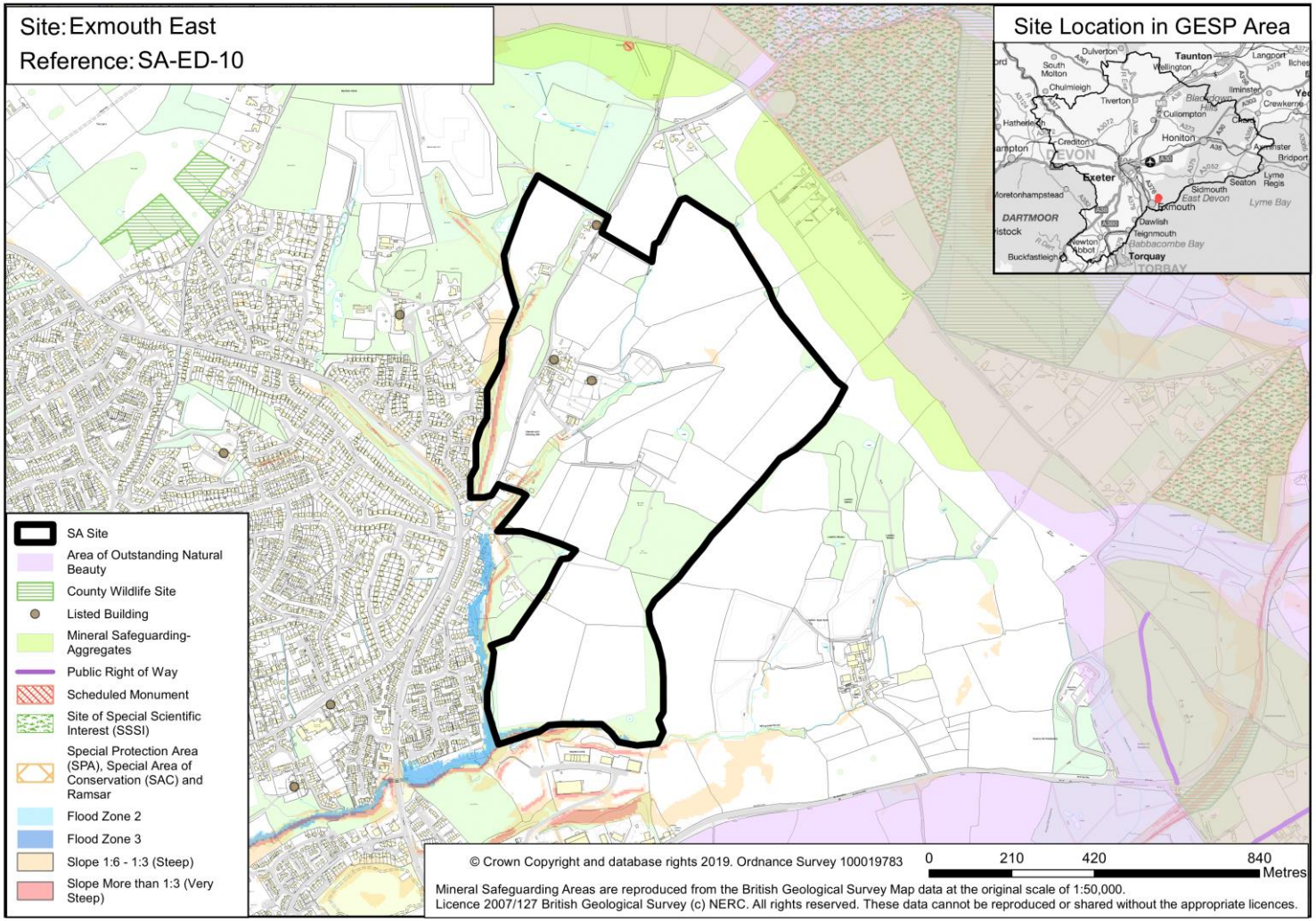
| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | -? | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, or within 250m of a locally designated site. The site is flagged as Yellow in the HRA sensitivity work with regard to Exe Estuary SPA and is within the 10km recreation zones of the Exe Estuary and Pebblebed Heaths, although as the site is being considered for employment this will likely reduce the overall recreational impact from development. It is also within the 5km Great Crested Newt consultation zone. The site supports a small copse on the site and recently planted areas of trees running along the frontage of Honey Lane. The site is also bordered by mature hedgerows.<br>Overall, uncertain minor negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | -? | The majority of the site is open rural countryside with a small area in the eastern side of the site containing some development. Further development of employment within the site would have an urbanisation effect on the environment. The site is of medium landscape sensitivity as there is potential for intervisibility between the site and the East Devon AONB and Woodbury also.<br>As such, uncertain minor negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/-? | The site does not contain any heritage assets within its boundaries. There are multiple designated assets within 3km including Grade II listed buildings located around 30m to the north (Greendale Barton) and 300m to the north-east (Higher Greendale Farmhouse) as well a high concentration of listed buildings around 550m to the south-west in Woodbury Salterton. There also are further designated assets within 3km including two Scheduled Monuments around 1.7km to the south-east (Woodbury Castle and two bowl barrows on Colaton Raleigh Common) and Woodbury Conservation area around 2km to the south-east, which contains multiple listed buildings. There is potential for development to compromise the setting of these historic environment assets. As such, uncertain minor negative effects are expected.<br>It is likely that the site is of sufficient size (>10ha) to accommodate a well-designed development and create a new high quality built environment. It should be possible for development to respond appropriately to existing heritage assets in the area and minimise any disturbance to the historic environment. As such, uncertain minor positive effects are expected.<br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br>To minimise greenhouse gas | --? | The site is not located within 5km of Exeter or a Main Town and as such an uncertain significant negative effect is expected.<br>The site is not located within 1km of existing cycle routes or railway stations. The site is located adjacent to a bus stop however this is not served by frequent bus services. As such, due to the lack of |

| SA Objective | SA Score | Justification |
|---|---|---|
| emissions. | | accessible public transport options, uncertain minor negative effects are expected.<br><br>As the site is expected to deliver over 10ha of employment land, it is assumed that development of the site would provide some sustainable transport, walking and cycle links and services. As such, uncertain negligible effects are expected.<br><br>Overall, uncertain significant negative effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and in an area with no significant flood risk. However, there is a river located to the north of the site and therefore a small area to the north is on flood zone 2 and flood zone 3. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>As such, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | --? | The entirety of the site (17ha) is comprised of Grade 3 agricultural land. However, it is unclear if this is Grade 3a or Grade 3b agricultural land. Therefore, uncertain significant negative effects are expected due to the potential loss of high quality agricultural land during development.<br><br>Although the site does not contain any previously developed land that could be reused, it is noted that around 3ha of the site consists of light industrial use development.<br><br>The site is not located within any Minerals Safeguarding Areas.<br><br>Overall, uncertain significant negative effects are expected. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or degradation. | --? | Development should ensure no deterioration in the water quality of Grindle Brook, which is adjacent to the northern boundary of the site and runs directly into the Exe Estuary SPA.<br><br>As such, uncertain significant negative effects are expected. |
| **8. HOMES**<br><br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | 0 | The site is only being considered for employment use and would therefore not provide any benefit in terms of additional homes.<br><br>As such, negligible effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | - | The site is not within 800m of major open space or within 400m of walking or cycle paths.<br>As such, minor negative effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | - | While providing new jobs will have a positive impact on the health and wellbeing of workers, the site is within the Newton Poppleford, Colaton Raleigh and Woodbury Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees lower levels of deprivation than Devon and Mid Devon as a whole. It is likely that a medium employment development of this nature will provide potential improvements to the availability of jobs in the area, which will provide broad wellbeing benefits. As such, negligible effects are expected.<br>The site lies adjacent to an existing employment site, Mill Park Industrial Estate, which should have additional benefits. However, the site is also within close proximity to existing residential development, Grindle Brook and Brooklands Caravan Park to the north east of the site, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. As such, minor negative effects are expected.<br>The site is not within 1km of an AQMA. However, car movements to and from this site could potentially contribute to worsening air quality at the Clyst St Mary roundabout and at the Exeter AQMA. As such, minor negative effects are expected.<br>Overall, minor negative effects are expected. |
| **11. ACCESS TO SERVICES**<br>To provide accessible and attractive services and community facilities for all ages and interests. | --/+ | The site is not located adjacent to any settlements that could provide services for the site. As such, significant negative effects are expected.<br>The site is adjacent to an area of superfast broadband (80-300Mbps) in Windmill Hill, which could be extended to support the site if development came forward. As such, minor positive effects are expected.<br>Overall, mixed significant negative and minor positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br>To foster a strong and entrepreneurial economy and increased access to | + | The site has the capacity to deliver over 5ha of employment space and is in a fairly good proximity to the labour supply in Exeter. Jobs would be created during the construction phase of the site. |

| SA Objective | SA Score | Justification |
|---|---|---|
| high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | | As such, minor positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | - | The site is not located within 1km of existing cycle routes or railway stations. The site is located adjacent to a bus stop however this is not served by frequent bus services. As such, due to the lack of accessible public transport options, minor negative effects are expected. |

## SA-ED-10: Exmouth East

| SA-ED-10 | Exmouth East |
|---|---|
| **Authority Area:** East Devon |  |
| **Site Area:** 77.4ha (Net 44.9ha) | |
| **Approximate total capacity:** 1,391 – 1,798 dwellings | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:** Site consisting of various agricultural fields bounded by mature trees and hedgerows. Rising upwards quite steeply to the east. There is an area of dense woodland to the south and also contains grade II* listed church located centrally in the site with Pebblebed heaths close to the northern edge. | |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/--? | The site lies within 1km of internationally designated site East Devon Heaths (SPA, SSSI and SAC). The site also lies within 1km of Dalditch County Wildlife Site. The site contains Priority habitat deciduous woodland and lies entirely within lowland heath, a Strategic Nature Area.<br><br>The site supports an area of dense woodland known as the Higher Veiges plantation as well as infield trees and ponds which could be used by great crested newts; the site is within the Great Crested Newt consultation zone. The site is flagged as Red in the HRA sensitivity work with regard to East Devon Pebblebed SAC/SPA and flagged as Amber with regard to Exe Estuary SPA. The site is also within the 10km recreation zone of the Pebblebed Heaths and within the 400m exclusion zone at the northernmost section. Housing development should be avoided in the site. A significant proportion of the site would need to be green infrastructure to minimise the recreational pressures by residents. However, the impact is still expected difficult to mitigate due to its close proximity. The site is also within the 10km recreation zone of the Exe Estuary, so SANGS and other mitigation would be required. As such, uncertain significant negative effects are expected.<br><br>Existing green infrastructure on the site, including the ponds and woodland bands, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space and playing pitches that could mitigate the biodiversity impact of development. As such, significant positive effects are also expected.<br><br>Overall, mixed uncertain significant negative and significant positive effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The whole site is located in open rural countryside and so development would have an urbanisation effect on the environment. The site is of high landscape sensitivity as there is highly likely to be intervisibility with the East Devon AONB which the site is in close proximity to.<br><br>As such, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | --?/+? | The site contains three listed buildings within in its boundaries, two of which are Grade II listed (Higher Lodge and Withycombe Barton) and one of which is Grade II* listed (Church of St. John in the Wilderness). There are also multiple designated heritage assets within 3km including a Scheduled Monument (two bowl barrows at Big Wood) around 400m north of the site, a Registered Park and Garden around 1.6km to the west (A La Ronde and The Point-in-View and Conservation Areas around 2.5km to the south-east and 2.5km to the south-west (Budleigh Salterton and Exmouth). The Dorset and East Devon Coast is also around 2km of the site and is designated as a World Heritage Site. There is potential for residential development to compromise the setting of these historic environment assets. |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | As such, uncertain significant negative effects are expected.<br><br>It is likely that the site is of sufficient size (>10ha) to accommodate a well-designed development and create a new high quality built environment. It should be possible for development to respond appropriately to existing heritage assets in the area and minimise any disturbance to the historic environment. This may involve accommodating buffering regions around heritage assets contained onsite. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain significant negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | ++? | The site is located adjacent to the Main Town of Exmouth and as such uncertain significant positive effects are expected.<br><br>The site is located within 1km of cycle routes and within 500m of bus stops served by frequent bus services. The site is not however located within 1km of a railway station. As such, due to the proximity of bus stops and cycle paths, minor positive effects are expected.<br><br>As the site is expected to deliver over 1,000 homes, it is assumed that development of the site would provide some sustainable transport, walking and cycle links and services. As such, uncertain negligible effects are expected.<br><br>Overall, uncertain significant positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and in an area with no significant flood risk. A river runs to the south of the site and as such, areas to the south of the site are on flood zone 2 and flood zone 3. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | - | The vast majority of the site is comprised of Grade 3b or non-agricultural land. However there is a small 0.15 area of Grade 3a agricultural land in the north of the site. Therefore, minor negative effects are expected.<br><br>Although the site does not contain any previously developed land that could be reused, it is noted that there is a small area (>1ha) of agricultural/residential buildings which are currently in use.<br><br>The site is not located within any Minerals Safeguarding Areas.<br><br>Overall, minor negative effects are expected due to development on high quality agricultural land. |

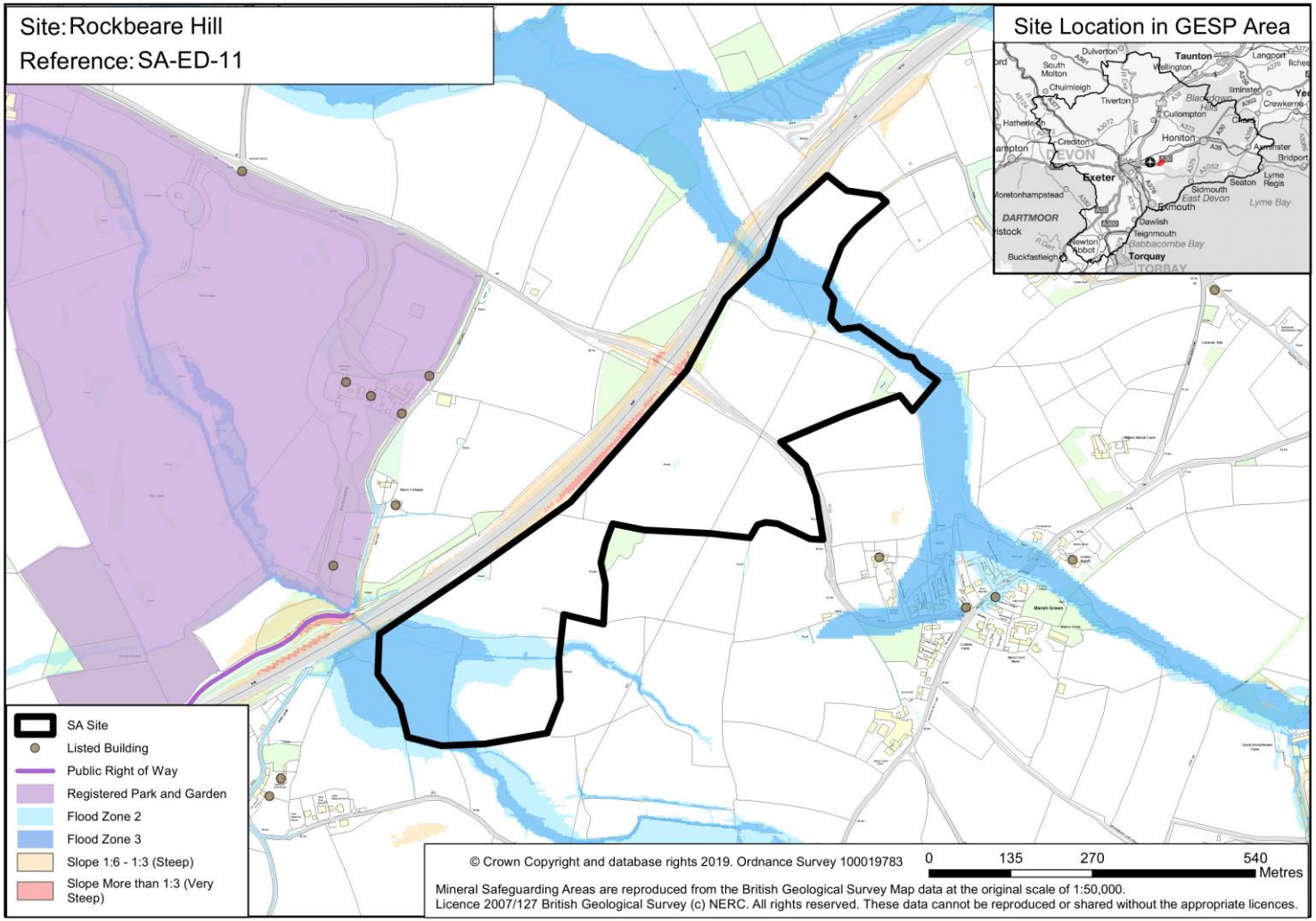
| SA Objective | SA Score | Justification |
|---|---|---|
| **7. WATER RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or degradation. | --? | Development should ensure no deterioration in the water quality of Withycombe Brook, which is located adjacent to the south west boundary of the site and runs into the Exe Estuary SPA.<br>As such, uncertain significant negative effects are expected. |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | ++ | Based on a density range of 31-40 dw/ha and excluding areas such as flood zones and steep areas there is the potential for between 1,391 – 1,798 homes if the site fully built out. This figure is likely to reduce significantly as a result of mitigation requirements. Any on-site delivery of SANGS may limit this area further. Required mitigation may limit the mix of tenure and sizes and reduce the level of affordable housing provision. This may have knock-on impacts on the speed of delivery. Delivery of a sizeable number of homes may also have a minor impact on local market affordability through increasing supply.<br>As such, significant positive effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site is within 800m of major open spaces, Withycombe Raleigh Common, East Budleigh Common and a few Accessible Woodlands. The site is also within 400m of Public Rights of Way. As such, significant positive effects are expected.<br>In addition, as the site is expected to deliver between 1,000-1,999 homes, it is assumed that development of the site would provide some open space and active transport links. As such, minor positive effects are expected.<br>Overall, significant positive effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | - | While providing new homes will have a positive impact on the health and wellbeing of occupants, the site is within the Exmouth and North Ease Exmouth Middle Super Output Area. This area, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees approximately average levels of deprivation than Devon and Mid Devon as a whole and therefore new development is less likely to have a positive effect on wellbeing locally as a result of increased availability of homes in the area. As such, negligible effects are expected.<br>The site is not within 1km of an AQMA. However, existing residential development, Brixington lies adjacent to the site to the west, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. As such, minor negative effects are expected.<br>Overall, minor negative effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **11. ACCESS TO SERVICES**<br>To provide accessible and attractive services and community facilities for all ages and interests. | ++ | The site is located adjacent to Exmouth (a Main Town), which provides a range of services and facilities. As such, significant positive effects are expected.<br>The site is within 500m of a primary school but it is not within 1km of any secondary schools. The development would require a new primary school and potentially the expansion of Brixington Primary onto a single school site, replacing the lower school which is in poor condition. Exmouth CC is at capacity and has very limited opportunities for expansion over and above what has been planned. As such, uncertain minor positive effects are expected.<br>The site is adjacent to an area where there is access to superfast broadband (80-300Mbps), which it is assumed could be extended to the site if development came forward. As such, minor positive effects are expected.<br>The site is medium sized, providing over 500 homes, and therefore it is assume that development would be more likely to accommodate a primary school on site. As such, minor positive effects are expected.<br>Overall, significant positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | ++ | The site is adjacent to Exmouth (a Main Town) and it is within 1km of existing or proposed employment sites that could provide employment opportunities. As such, significant positive effects are expected.<br>Jobs would be created during the construction phase, and additional homes would create expenditure in the area. It is assumed that, as the site has the capacity to deliver over 1,000 homes, the site will also deliver medium scale employment opportunities and a business park or employment estate as well as a neighbourhood hub with shops and services. As such, minor positive effects are expected.<br>There is likely to be little impact on tourism.<br>Overall, significant positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and town centres. | ++ | The site is located adjacent to Exmouth (a Main Town) and it will deliver less than 4,000 homes, which is a scale not expected to detract visitors from the current town centre. A new residential site could support the vitality and viability of the existing town centre by increasing the number of day-to-day visitors and supporting businesses and services there.<br>As such, significant positive effects are expected. |
| **14. CONNECTIVITY AND** | + | The site is located within 1km of cycle routes and within 500m of bus stops served by frequent bus |

| SA Objective | SA Score | Justification |
|---|---|---|
| **TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | | services. The site is not however located within 1km of a railway station. As such, due to the proximity of bus stops and cycle paths, minor positive effects are expected.<br><br>In addition, the site has capacity for more than 1,000 homes and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br><br>Overall, minor positive effects are expected. |

## SA-ED-11: Rockbeare Hill

| SA-ED-11 | Rockbeare Hill |
|---|---|
| **Authority Area:** East Devon | |
| **Site Area:** 24.4ha (Net 22.8ha) | |
| **Approximate total capacity:** 22.8ha employment | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:** Standalone employment development adjacent to the A30. | |



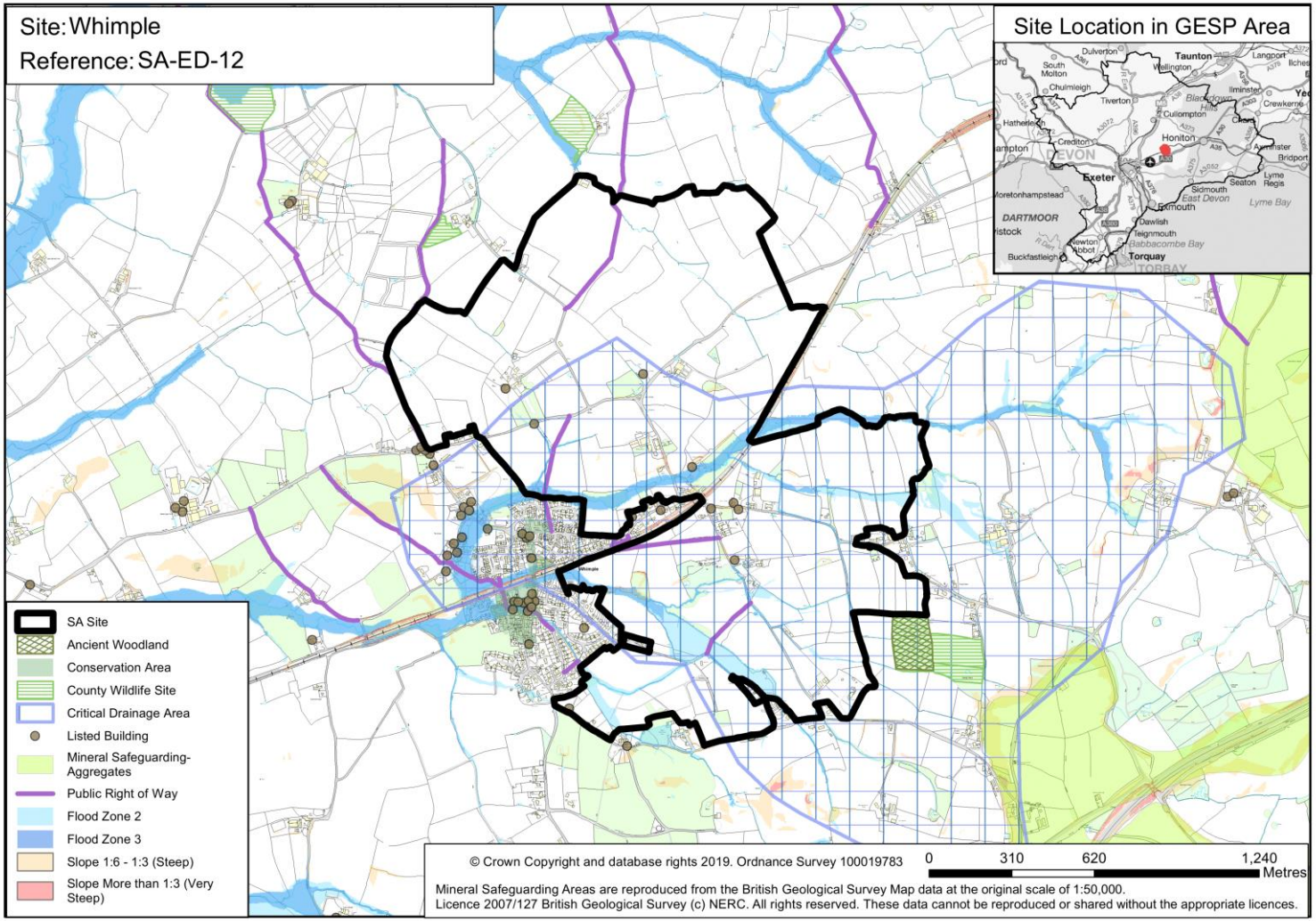
| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | +/-? | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, but lies within 1km of Beautiport Farm County Wildlife Site. The site also lies within SSSI IRZ. The site is flagged as Yellow in the HRA sensitivity work with regard to Exe Estuary SPA and is within the 10km recreation zones of the Exe Estuary and Pebblebed Heaths although as the site is being considered for employment this will likely reduce the overall recreational impact from development. It is also within the 5km Great Crested Newt consultation zone. The site supports multiple hedgerows and a number of mature trees. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 20ha of employment land, and therefore is expected to retain and provide local green infrastructure that could mitigate the biodiversity impact of development. As such, minor positive effects are also expected.<br><br>Overall, mixed uncertain minor negative and minor positive effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The entirety of the site is comprised of open rural countryside and so development would cause an urbanisation effect on the environment. The site is of medium-high landscape sensitivity as it highly likely that there will be intervisibility between the site and Rockbeare Manor to the south as well as the East Devon AONB.<br><br>As such, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/-? | The site does not contain any heritage assets within its boundaries. There are multiple listed buildings in close proximity to the site including Grade I listed Rockbeare Manor and surrounding associated listed buildings around 300m west of the site, which are contained with a Registered Park and Garden. There are further Grade II listed buildings around 250m south-west of the site, 250m east and 300m north-east. There is potential for residential development to compromise the setting of these historic environment assets. As such, uncertain minor negative effects are expected.<br><br>It is likely that the site is of sufficient size (>10ha) to accommodate a well-designed development and create a new high quality built environment. It should be possible for development to respond appropriately to existing heritage assets in the area and minimise any disturbance to the historic environment. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION** | +?/-? | The site is within 5km of the Main Towns of Cranbrook and Ottery St Mary and as such, uncertain negligible effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| To minimise greenhouse gas emissions. | | The site is not located within 1km of cycle routes or railway stations. The site is located within 500m of a bus stop however this is not served by frequent bus services. As such, due to the lack of accessible public transport options, uncertain minor negative effects are expected.<br><br>As the site is expected to deliver over 20ha of employment land, it is assumed that development of the site would provide active and sustainable transport links and roads within the development and connected to the nearest settlement. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominately greenfield and in an area with no significant flood risk. However, there is a river running through the north of the site and as such, part of the site is on flood zone 2 and flood zone 3. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | --? | The entirety of the site (24.4ha) is located on Grade 3 agricultural land. However, it is unclear whether this is Grade 3a or Grade 3b agricultural land. Therefore, uncertain significant negative effects are expected.<br><br>The site does not contain any previously developed land and is not located within any Minerals Safeguarding Areas.<br><br>Overall, uncertain significant negative effects are expected. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or degradation. | --? | Development should ensure no deterioration in the water quality of Ford Stream which is located adjacent to the northern boundary of the site and also passes through the site boundary. Ford Stream flows into the Exe Estuary SPA via adjoining rivers.<br><br>As such, uncertain significant negative effects are expected. |
| **8. HOMES**<br><br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of | 0 | The site is not considered to be suitable for accommodating a strategic level of housing due to its size, lack of additional suitable land to consider in combination with the site and otherwise isolated location away from existing settlements.<br><br>As such, negligible effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| Greater Exeter. | | |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | + | The site is within 400m of Public Rights of Way, but is not located within 800m of major open space. As such, minor positive effects are expected.<br>In addition, as the site is expected to deliver over 20ha of employment land, it is assumed that development of the site would provide local green infrastructure and active transport links. As such, minor positive effects are also expected.<br>Overall, minor positive effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | - | While providing new jobs will have a positive impact on the health and wellbeing of workers, the site is within the 'E02004134' Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees average levels of deprivation than Nationally as a whole. As such, it is likely that a medium employment development of this nature will provide potential improvements to the availability of jobs in the area, which will provide broad wellbeing benefits. As such, negligible effects are expected.<br>The site is also within close proximity of an existing residential development, including the village of Marsh Green to the east of the site, which could be adversely affected as a result of noise and light pollution from development of the site during the construction and operational phases. As such, minor negative effects are expected.<br>The site is not within 1km of an AQMA. However, car movements to and from this site could potentially contribute to worsening air quality to the Exeter AQMA. As such, minor negative effects are expected.<br>Overall, minor negative effects are expected. |
| **11. ACCESS TO SERVICES**<br>To provide accessible and attractive services and community facilities for all ages and interests. | -- | The site is not located adjacent to any settlements. Users of the site are unlikely to access services and facilities at Cranbrook due to the distance to the town centre. No other existing or proposed centres are close enough to be easily accessible by workers. As such, significant negative effects are expected.<br>The site currently only has access to broadband download speeds of less than 10Mbps. As such, minor negative effects are expected.<br>Overall, significant negative effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br>To foster a strong and entrepreneurial economy and increased access to | ++ | The site has the capacity to deliver over 20ha of employment space. The site has poor connections to Exeter and other local populations as well as the wider region at present, only being accessible from a narrow country lane. However, due to the site's size, there is potential mix of business sizes on site as |

| SA Objective | SA Score | Justification |
|---|---|---|
| high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | | well as a limited number of shops and services. Additionally, the site is also within 3km of Exeter Science Park / Sky Park and Airport Business Park.<br><br>As such, significant positive effects are expected due to the site's proximity to a high value employment cluster. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br><br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | + | The site is not located within 1km of cycle routes or railway stations. The site is located within 500m of a bus stop however this is not served by frequent bus services.<br><br>However, as the site has capacity for over 20ha employment land, there is potential for development to include active and sustainable transport links as well as roads within the development and to the nearest settlement.<br><br>As such, minor positive effects are expected. |

## SA-ED-12: Whimple

| SA-ED-12 | Whimple |
|---|---|
| **Authority Area:** East Devon |  |
| **Site Area:** 242ha (Net 145.2ha) | |
| **Approximate total capacity:** 4,360 – 5,813 dwellings | |
| **Site status:** Potential site option | |
| **Outline description and context:** Significant housing-led expansion of Whimple amounting to scale of a new settlement | |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/--? | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, but Rutton Farm and Newhayes Orchard, both County Wildlife Sites, are located within 250m of the northern boundary of the site. The site also lies adjacent to Highland Orchard and Madles Copse and within 1km of Great Barton Farm (N), all of which are County Wildlife Sites. The site also lies within a SSSI IRZ, which flags residential development of 50 dwellings or more as a potential risk.<br><br>The site contains two types of Priority habitats, which are deciduous woodland and traditional orchard. In addition, the traditional orchards are potential important feeding habitats for Nightjars which are a 'qualifying feature' of the Pebblebed Heaths SPA.<br><br>The site is flagged as Amber in the HRA sensitivity work with regard to East Devon Pebblebed SAC/SPA, so any impacts of development would need to be mitigated where appropriate. The site is also within the Great Crested Newt consultation zone. As such, uncertain significant negative effects are expected.<br><br>Existing green infrastructure on the site, including ponds and woodland bands, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space and playing pitches that could mitigate the biodiversity impact of development. As such, significant positive effects are also expected.<br><br>Overall, mixed significant positive and uncertain significant negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | -? | The entirety of the site comprises of open rural countryside and so development would cause an urbanisation effect on the environment. The site is of medium landscape sensitivity due to the presence of locally prominent hilltops and a number of orchards which contribute to the area's distinctive character.<br><br>As such, uncertain minor negative effects are expected. The sensitivity assessment for this site was based on a slightly different site boundary to that which has now been included in the SA, which contributes additional uncertainty to the potential effect identified. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built | +?/-? | The site contains multiple Grade II listed buildings within its boundaries and is located adjacent to Whimple, which contains a Conservation Area, multiple Grade II listed buildings and two Grade II* listed buildings. There is potential for development to compromise the setting of these historic environment assets, particularly in the case of Whimple Conservation Area, where delivery of highways |

| SA Objective | SA Score | Justification |
|---|---|---|
| and historic assets and promote high quality architecture, design and accessibility in new build development. | | infrastructure to support development could cause disturbance to the character of the area. As such, uncertain minor negative effects are expected.<br><br>It is likely that the site is of sufficient size (>10ha) to accommodate a well-designed development and create a new high quality built environment. It should be possible for development to respond appropriately to existing heritage assets in the area and minimise any disturbance to the historic environment. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | + | The site is within 5km of the Main Towns of Cranbrook and Ottery St Mary and as such, uncertain negligible effects are expected.<br><br>The site is not located within 1km of cycle routes. However, the site is located adjacent to Whimple train station. The site is also located adjacent to bus stops however these are not served by frequent bus services. As such, due to the proximity of a railway station, minor positive effects are expected.<br><br>As the site is expected to deliver over 4,000 homes, it is assumed that development of the site would provide significant sustainable transport, walking and cycle links and services. As such, uncertain minor positive effects are expected.<br><br>Overall, minor positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | --? | The site is predominantly greenfield and in an area with no significant flood risk. There is a river running through the centre of the site and as such, part of the site is on flood zone 2 and flood zone 3. The site contains a critical drainage area that occupies most of the south of the site.<br><br>Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain significant negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | --? | The vast majority of the site comprises of Grade 3 agricultural land. However, it is unclear whether it is Grade 3a or Grade 3b agricultural land. As such, uncertain significant negative effects are expected.<br><br>The majority of the site is greenfield but there are small pockets of land which have been previously developed and still have existing uses.<br><br>The site is not located within any Minerals Safeguarding Areas.<br><br>Overall, uncertain significant negative effects are expected due to development on high quality |

| SA Objective | SA Score | Justification |
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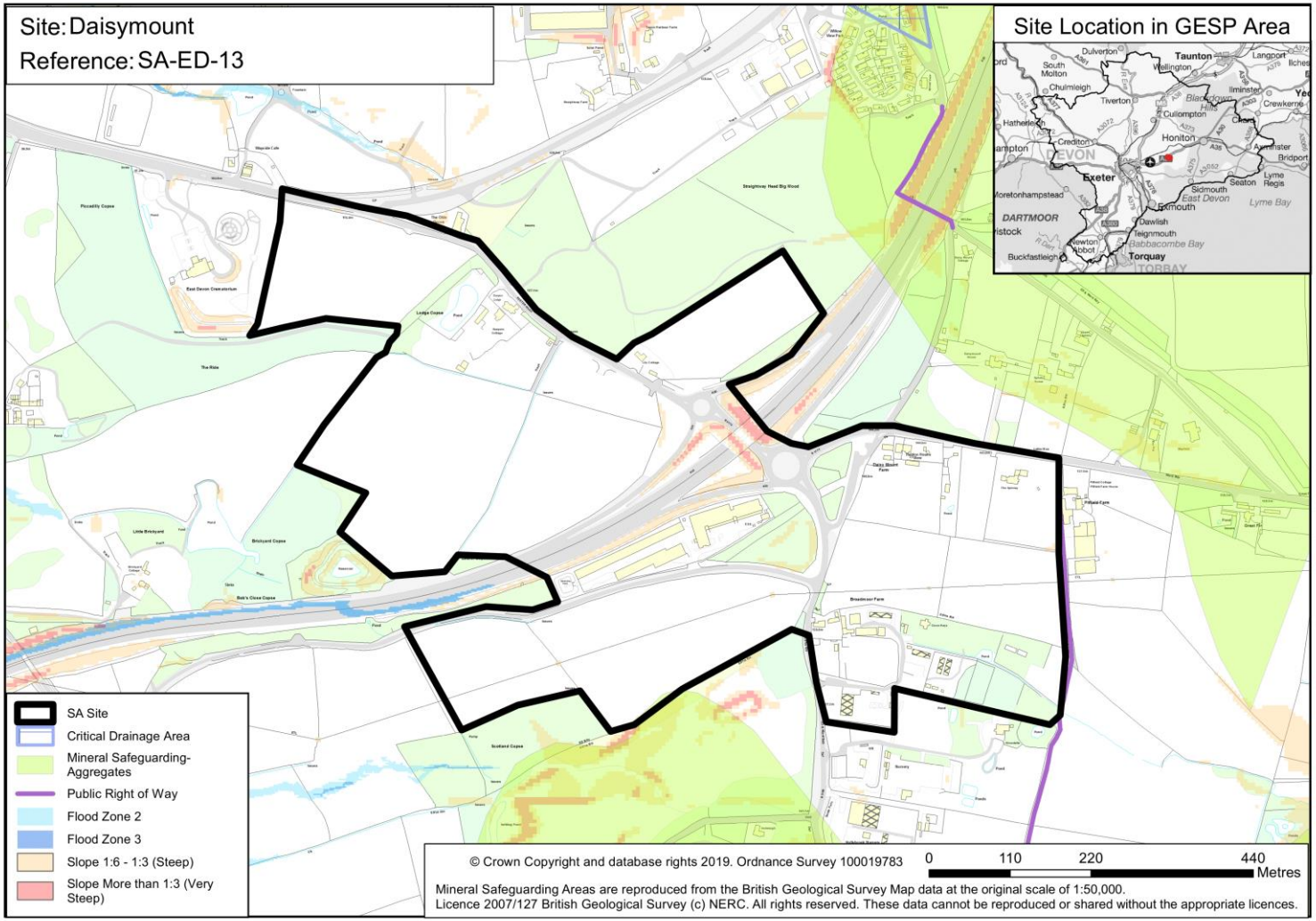
| | | agricultural land. |
| **7. WATER RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or degradation. | --? | Development should ensure deterioration in the water quality of Upper Cranny Brook which passes through the site boundaries and flows into the Exe Estuary SPA via adjoining rivers.<br>As such, uncertain significant negative effects are expected. |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | ++ | The site is likely to be able to accommodate about 4,360-5,813 homes. However this capacity is likely to reduce once account has been taken of the likely mitigation requirements, including those highlighted elsewhere in this assessment. The site would also need to ensure a viable mix of homes (tenure and sizes) including a proportion of affordable housing to contribute towards meeting needs within the area. This range of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom and self build providers. The site is of a sufficient size to be able to support a high number of housing starts / completions from a number of different outlets around the site, which in turn will ensure a good pace of delivery.<br>As such, significant positive effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site contains multiple Public Rights of Way and is within 400m of others, but it is not within 800m of major open space. As such, minor positive effects are expected.<br>However, as the site is expected to deliver over 2,000 homes, it is assumed that development of the site would provide significant open space and active transport links. As such, significant positive effects are expected.<br>Overall, significant positive effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | - | While providing new homes will have a positive impact on the health and wellbeing of occupants, the site is within the 'E02004132' Middle Super Output Area. This area, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees below average levels of deprivation than Nationally as a whole and therefore new development is less likely to have a positive effect on wellbeing locally as a result of increased availability of homes in the area. As such, negligible effects are expected.<br>Existing residential development, including the village of Whimple is surrounded by the site to the east, could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. Also, the site is crossed by the railway line. This feature may result in noise pollution affecting residents of the site in the longer term. As such, minor negative |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | effects are expected.<br><br>The site is not within 1km of an AQMA. However, car movements to and from this site could potentially contribute to worsening air quality to the Exeter AQMA, along the Heavitree Road corridor in particular. As such, minor negative effects are expected.<br><br>Overall, minor negative effects are expected. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | ++ | The site is adjacent to Whimple (a Defined Village), which provides shops, meeting venues, public houses and places of worship. Larger shops, hospitals and larger cultural facilities are located in Exeter which is accessible from this location by car and train. As such, minor positive effects are expected.<br><br>The site is within 500m of Whimple Primary School but it is not within 1km of any secondary schools. Capacity and suitability of the existing school is likely to be an issue. As such, additional primary capacity will be required on-site potentially including relocation of the existing school. Clyst Vale Community College is approximately 7km away and has limited capacity to expand. A site of this scale is likely to require new secondary provision within the site. As such, uncertain minor positive effects are expected.<br><br>The site is adjacent to an area which has access to superfast broadband (80-300Mbps) which it is assumed could be extended to the site if development came forward. As such, minor positive effects are expected.<br><br>The site is large, providing over 4,000 homes, and therefore it is assumed that development would be more likely to accommodate a primary school and secondary school on site. As such, significant positive effects are expected.<br><br>Overall, significant positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | ++/-- | The site is not adjacent to a Main Town and it is not within 1km of existing or proposed employment sites that could provide employment opportunities. As such, significant negative effects are expected.<br><br>Jobs would be created during the construction phase of the site and any new homes would create expenditure in the area. It is assumed that, as the site has the capacity to deliver over 4,000 homes, the site will provide large scale mixed use employment opportunities and a business park or employment estate as well as a town centre with shops, services and community buildings. As such, significant positive effects are expected.<br><br>There is likely to be little impact on tourism.<br><br>Overall, mixed significant negative and significant positive effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | + | The site is not located within 1km of cycle routes. However, the site is located adjacent to Whimple train station. The site is also located adjacent to bus stops however these are not served by frequent bus services. As such, due to the proximity of a railway station, minor positive effects are expected.<br>In addition, the site has capacity for more than 1,000 homes and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br>Overall, minor positive effects are expected. |

## SA-ED-13: Daisymount

| SA-ED-13 | Daisymount |
|---|---|
| **Authority Area:** East Devon | |
| **Site Area:** 45.7ha (Net 37ha) | |
| **Approximate total capacity:** 37ha employment | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:** Standalone employment development straddling the Daisymount junction of the A30. The A30 and Daisymount junction (6.61ha) have been excluded from the gross developable area. | |



| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | +/-? | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, but is within 1km of Cadhay Wood and Prickly Pear Blossoms Park, both County Wildlife Sites. The site is also within 1km of Beggar Roost Quarry County Geological Site. The site contains Priority habitat deciduous woodland. The site lies within a SSSI IRZ.<br>The site is within the 10km recreation zone of Pebblebed Heaths although as the site is being considered for employment this will likely reduce the overall recreational impact from development. It is also within the 5km Great Crested Newt consultation zone.<br>The site also supports unconfirmed wildlife areas in the form of secondary woodland and mixed woodland as well as numerous hedgerows. As such, uncertain minor negative effects are expected.<br>However, the site has capacity for more than 20ha of employment land, and therefore is expected to retain and provide local green infrastructure that could mitigate the biodiversity impact of development. As such, minor positive effects are also expected.<br>Overall, mixed minor positive and uncertain minor negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site comprises of open rural country side with the A30 passing through the centre as well as Daisymount Junction associated with the A30 being situated in the north of the site.<br>Land on the west side of Street Raleigh Farm and land on the west side of West Hill is of medium landscape sensitivity due to there being little potential for intervisibility between the site and the East Devon AONB. As such, uncertain minor negative effects are expected.<br>Land around Lily Cottage, Street Raleigh is of medium-high landscape sensitivity as the development would not be in keeping with the local landscape characteristics. Therefore, uncertain significant negative effects are expected.<br>Land around Broadmoor Farmhouse is of high landscape sensitivity as there is higher potential for intervisibility with the East Devon AONB as the site is located on a prominent ridge. Therefore, uncertain significant negative effects are expected.<br>Overall, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and | +?/-? | The site does not contain any heritage assets within its boundaries. There are heritage assets within 3km including Grade II listed buildings around 400m west (Strete Ralegh House), 620m west (Burnthouse Cottage), 450m east (Straitgate Farmhouse) and 900m south-west (Lower and Middle Allercombe Farmhouse). Further designated heritage assets within 3km include Rockbeare Manor (a Registered Park and Garden) around 2.5km to the south west of the site, Whimple Conservation Area |

| SA Objective | SA Score | Justification |
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| accessibility in new build development. | | around 1.7km north-west of the site and Belbury Castle (a Scheduled Monument) around 1.5km south-east of the site. There is potential for development to compromise the setting of these historic environment assets. As such, uncertain minor negative effects are expected.<br><br>It is likely that the site is of sufficient size (>10ha) to accommodate a well-designed development and create a new high quality built environment. It should be possible for development to respond appropriately to existing heritage assets in the area and minimise any disturbance to the historic environment. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | + | The site is within 5km of the Main Towns of Cranbrook and Ottery St Mary and as such, uncertain negligible effects are expected.<br><br>The site is not located within 1km of existing cycle paths or railway stations. However, the site is located within 500m of existing bus stops served by frequent bus services. As such, due to the proximity of bus stops, minor positive effects are expected.<br><br>As the site is expected to deliver over 20ha of employment land, it is assumed that development of the site would provide sustainable transport, walking and cycle links and services as well as new roads within the development and to the nearest settlement. As such, uncertain minor positive effects are expected.<br><br>Overall, minor positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and there is no significant flood risk within the area. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, an uncertain minor negative effect are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | --?/+ | Over 5ha of the site is comprised of Grade 3 agricultural land. However, it is unclear if it is Grade 3a or Grade 3b. As such, uncertain significant negative effects are expected. The remainder of the site is comprised of Grade 4 agricultural land.<br><br>The majority of the site is greenfield but there is land in existing use for employment south of Daisymount. The developable part of the site also includes a small area (>5ha) off the B3180 that is associated with West Hill Nursey and may be considered an area of reusable land. As such, minor positive effects are expected due to development on previously used land.<br><br>There is a very small section in the south of the site which is located within an aggregate Minerals |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | Safeguarding Area. However, it not considered that development would constrain future extraction of minerals and no objection has been raised.<br><br>Overall, uncertain significant negative effects are expected due to development on high quality agricultural land and minor positive effects are expected due to potential development on previously used land. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or degradation. | 0 | The site is not adjacent to and does not contain any watercourses.<br><br>As such, negligible effects are expected. |
| **8. HOMES**<br><br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | 0 | The site is not considered to be suitable for accommodating a strategic level of housing due to its size, lack of additional suitable land to consider in combination with the site and otherwise isolated location away from existing settlements.<br><br>As such, negligible effects are expected. |
| **9. HEALTH**<br><br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site is within 800m of major open space, Accessible Woodland, and is adjacent to and within 400m of Public Rights of Way. As such, significant positive effects are expected.<br><br>In addition, as the site is expected to deliver over 20ha of employment land, it is assumed that development of the site would provide local green infrastructure and active transport links. As such, minor positive effects are also expected.<br><br>Overall, significant positive effects are expected. |
| **10. WELLBEING**<br><br>To support positive, safe and healthy communities. | - | While providing new jobs will have a positive impact on the health and wellbeing of workers, the site is within the 'E02004132' Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees below average levels of deprivation than Nationally as a whole. As such, it is likely that a medium employment development of this nature will provide potential improvements to the availability of jobs in the area, which will provide broad wellbeing benefits. As such, negligible effects are expected.<br><br>The site is not within 1km of an AQMA. However, car movements to and from this site could potentially contribute to worsening air quality to the Exeter AQMA. As such, minor negative effects are expected. |

| SA Objective | SA Score | Justification |
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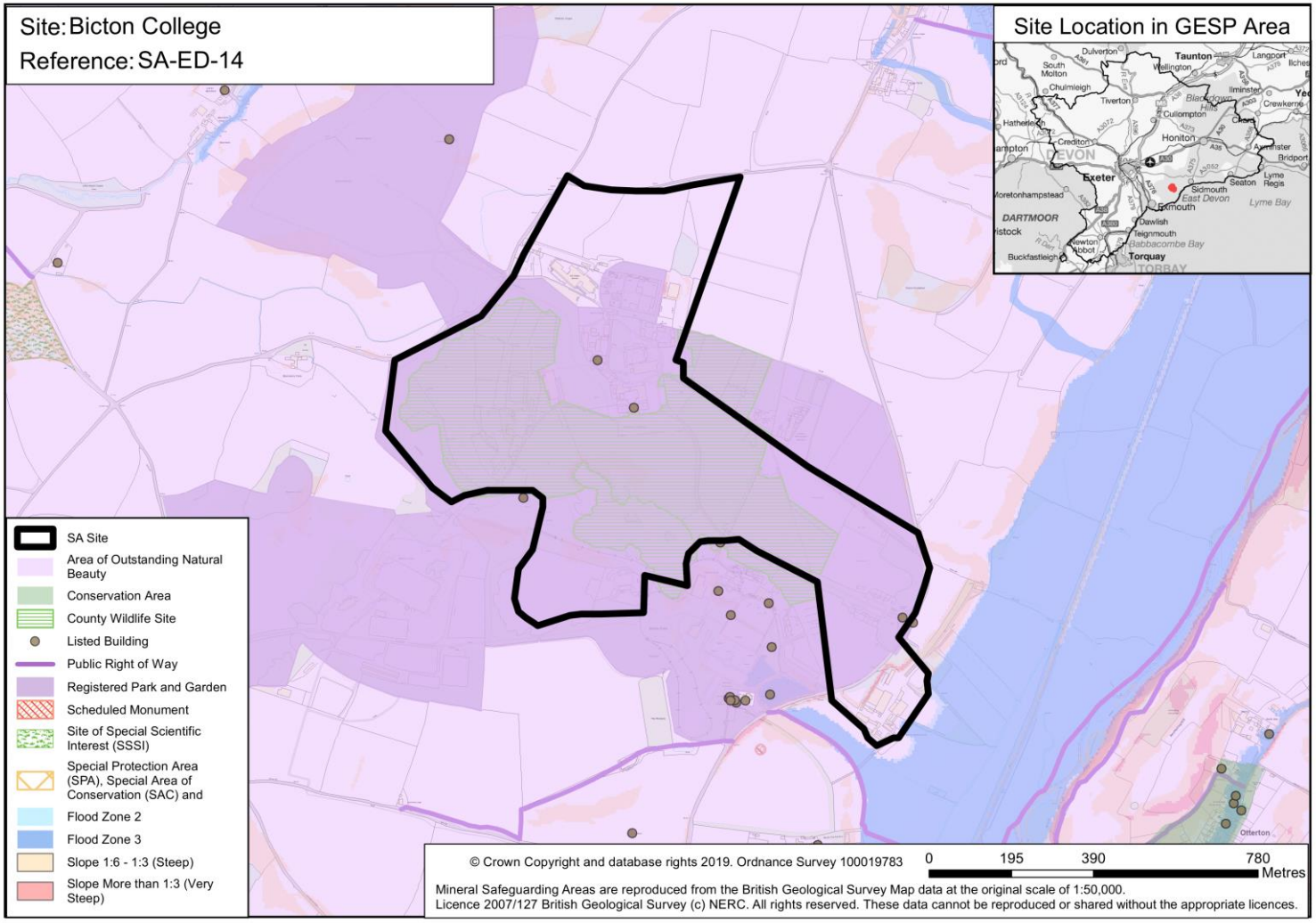
| | | Overall, minor negative effects are expected. |
| **11. ACCESS TO SERVICES**<br>To provide accessible and attractive services and community facilities for all ages and interests. | -- | The site is not located adjacent to any settlements that could provide services to the site. Users of the site are unlikely to access services and facilities at Cranbrook or Ottery St Mary due to the distance of the town centres. No other existing or proposed centres are close enough to be easily accessible by workers. As such, significant negative effects are expected.<br>Currently, the area within the site only has access to standard broadband speeds (10-30Mbps). As such, negligible effects are expected.<br>Overall, significant negative effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | ++ | The site has the capacity to deliver over 20ha of employment space, which it is assumed will offer a range of plot sizes for businesses as well as a limited number of shops and facilities on site. The site is located some distance from high value employment clusters and labour supply. The site has excellent connections to Exeter and other local populations as well as the wider region via the Strategic Road Network. Assuming super/ultrafast broadband can be achieved then this could be a productive site for the local economy, bringing jobs closer to rural populations in East Devon.<br>Jobs would be created during the construction phase of the site.<br>As such, significant positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | + | The site is not located within 1km of existing cycle paths or railway stations. However, the site is located within 500m of existing bus stops served by frequent bus services.<br>Additionally, the site has the capacity to deliver over 20ha of employment land, and therefore it is assumed that development would be more likely to accommodate active and sustainable transport links as well as new roads within the development and to the nearest settlement.<br>As such, minor positive effects are expected. |

## SA-ED-14: Bicton College

| SA-ED-14 | Bicton College |
|---|---|
| **Authority Area:** East Devon |  |
| **Site Area:** 72.9ha (Net 40.6ha) | |
| **Approximate total capacity:** 1,257 – 1,622 dwellings | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:** Large undulating area of land set within the East Devon AONB. Currently an agricultural college set within grade I registered park and gardens. Contains a range of biodiversity rich features including a lake and a variety of veteran trees. Accessed off the two lane B3178. | |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/--? | The site is within 1km of internationally and nationally designated site East Devon Heaths (SPA, SAC and SSSI). The site also contains Bicton Park and Bicton Lake, both County Wildlife Sites. The site contains two Priority habitats deciduous woodlands and coastal and floodplain grazing marsh. The site is within the 5 km great crested newt consultation zone and contains a large lake which could support great crested newt. The site is flagged as Amber in the HRA sensitivity work with regard to East Devon Pebblebed SAC/SPA and Exe Estuary SPA and is within the 10km recreation zones of the Exe Estuary and the Pebblebed Heaths so SANGS and other mitigation would be required. As such, uncertain significant negative effects are expected.<br><br>Existing green infrastructure on the site, including a lake, mature trees and woodland bands, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space and playing pitches that could mitigate the biodiversity impact of development. As such, significant positive effects are also expected.<br><br>Overall, mixed significant positive and uncertain significant negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is situated in open rural countryside and includes around 10ha of developed land as well as 4ha lake at the southern end of the site. Development within the site would cause an urbanisation effect on the environment. The site is of very high landscape sensitivity as it is located with the East Devon AONB and forms part of a registered park and garden.<br><br>As such, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | --?/+? | The majority of the site is located within Bicton Park (a Registered Park and Garden) that contains five Grade II* listed buildings, two of which are located within the site boundaries (Bicton House and Sidmouth Lodge). There are further designated heritage assets within 3km including two Conservation Areas 400m to the south east (Otterton) and 1km south (East Budleigh) and a Scheduled Monument around 2.5km to the east (High Peak Camp) that is located on the Dorset and East Devon Coast (a World Heritage Site). There is potential for development to compromise the setting of these historic environment assets. As such, uncertain significant negative effects are expected.<br><br>It is likely that the site is of sufficient size (>10ha) to accommodate a well-designed development and create a new high quality built environment. It should be possible for development to respond appropriately to existing heritage assets in the area and minimise any disturbance to the historic environment. This will likely involve accommodating buffering regions around heritage assets contained onsite. As such, uncertain minor positive effects are expected. |

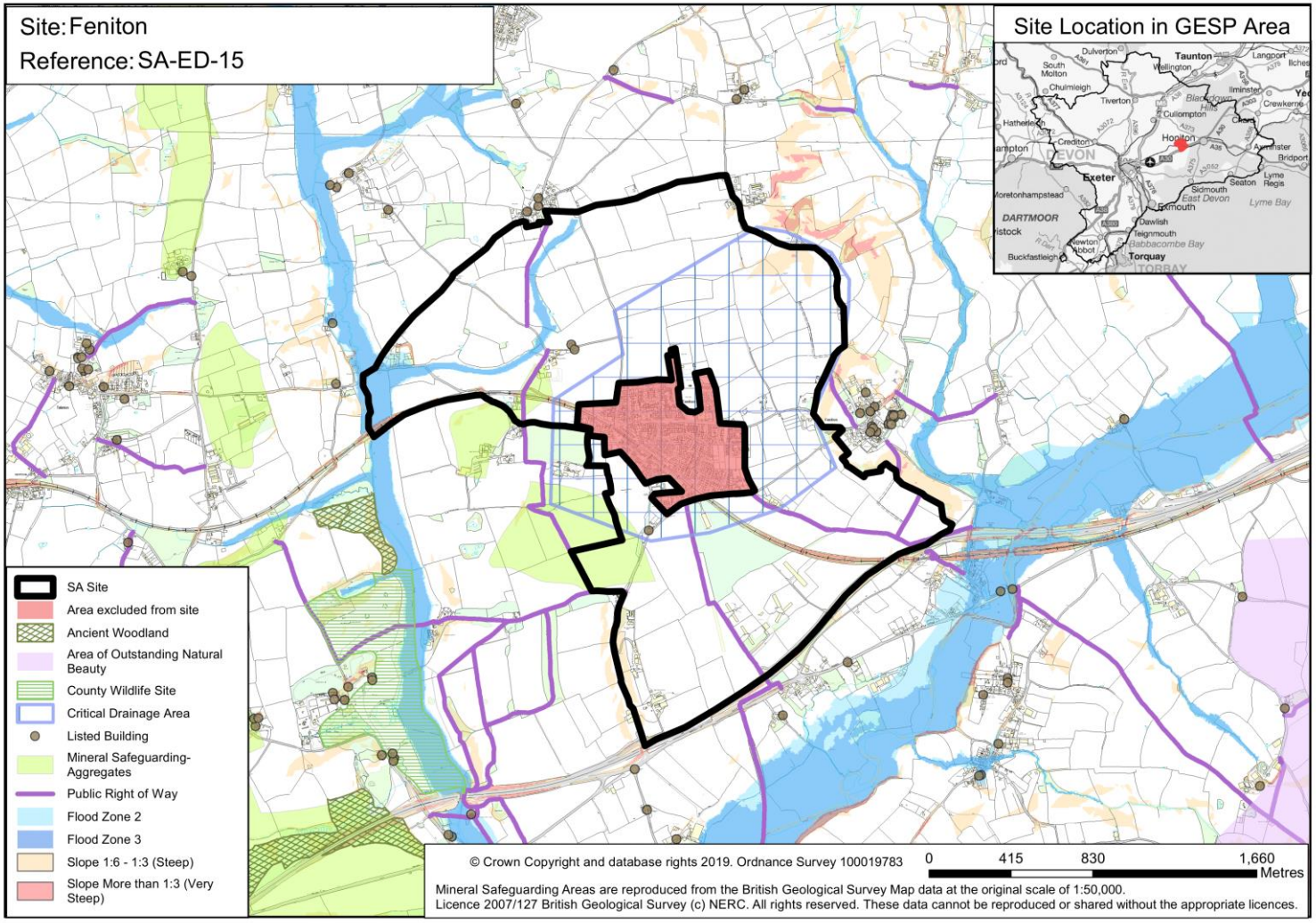
| SA Objective | SA Score | Justification |
|---|---|---|
| | | Overall, mixed uncertain significant negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br>To minimise greenhouse gas emissions. | -? | The site is located within 5km of the Main Towns of Budleigh Salterton and Sidmouth. As such, uncertain negligible effects are expected.<br>The site is not located within 1km of a railways station however the site is located within 1km of cycle routes. The site is adjacent to and contains bus stops, however these are not served by a regular bus service. As such, due to the lack of accessible public transport links in proximity to the site, uncertain minor negative effects are expected.<br>As the site is expected to deliver over 1,000 homes, it is assumed that development of the site would provide some sustainable transport, walking and cycle links and services. As such, uncertain negligible effects are expected.<br>Overall, uncertain minor negative effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and in an area with no significant flood risk. However, a river is located to the east of the site and as such, an area to the east is on flood zone 2. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br>To utilise our land resources efficiently and minimise their loss or degradation. | ++/-- | The site contains over 5ha of Grade 1 agricultural land as well as over 5ha of Grade 2 agricultural land also. As such, significant negative effects are expected due to the potential loss of high quality agricultural land during development. Remaining land within the site is Grade 3 agricultural land but it is unclear if it is Grade 3a or Grade 3b.<br>There is some land located around Bicton College which is considered to be brownfield. As such, minor positive effects are expected due to development on previously used land.<br>The site is not located within any Mineral Safeguarding Areas.<br>Overall, significant negative effects are expected due to development on high quality agricultural land and minor positive effects are expected due to development on previously used land. |
| **7. WATER RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or | 0 | The site is not located adjacent to and does not contain any watercourse.<br>As such, negligible effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| degradation. | | |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | ++ | Based on a density range of 31-40 dw/ha, and excluding areas such as flood zones, the lake and steep areas there is the potential for between 1,257 – 1,622 homes if the site fully built out. This figure is likely to reduce significantly as a result of mitigation requirements such as avoiding development in the registered park and gardens. Any on-site delivery of SANGS may limit this area further. Mitigation and the fact that a large proportion of this remainder is on brownfield land may mean the site is presented with viability issues which may limit the mix of tenure and sizes and reduce the level of affordable housing provision. This may have knock-on impacts on the speed of delivery. Taking into account mitigation reducing the overall capacity, a relatively modest number of homes is unlikely to have a significant impact on the local market affordability.<br>As such, significant positive effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site is within 800m of major open space, Colaton Raleigh Common, and within 400m of Public Rights of Way. As such, significant positive effects are expected.<br>However, as the site is expected to deliver between 1,000-1,999 homes, it is assumed that development of the site would provide some open space and active transport links. As such, minor positive effects are expected.<br>Overall, significant positive effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | - | While providing new homes will have a positive impact on the health and wellbeing of occupants, the site is within the Newton Poppleford, Colaton Raleigh and Woodbury Middle Super Output Area. This area, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees lower levels of deprivation than Devon and Mid Devon as a whole. As such, negligible effects are expected.<br>Existing development, including Bicton College lies within the site, could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. The site is crossed by a railway line. This feature may result in noise pollution affecting residents of the site in the longer term. As such, minor negative effects are expected.<br>Overall, minor negative effects are expected. |
| **11. ACCESS TO SERVICES**<br>To provide accessible and attractive services and community facilities for | --/+ | The site is not located adjacent to any settlements. There are currently a very limited number of facilities in the area. East Budleigh has a local shop, primary school, pub and church 1km to the south but residents would have to travel into Budleigh or Exmouth for a wider range of services. As such, |

| SA Objective | SA Score | Justification |
|---|---|---|
| all ages and interests. | | significant negative effects are expected.<br><br>The site is within 1km of a primary school but it is not within 1km of any secondary schools. There is currently an agricultural college and special needs school on the site. As such, uncertain minor positive effects are expected.<br><br>Currently, the area within the site only has access to standard broadband speeds (10-30Mbps). As such, negligible effects are expected.<br><br>The site is medium sized, providing over 500 homes, and therefore it is assumed that development would be more likely to accommodate a primary school on site. As such, minor positive effects are expected.<br><br>Overall, mixed significant negative and minor positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | + | The site is not adjacent to a main town but it is within 1km of existing or proposed employment sites that could provide employment opportunities. As such, minor positive effects are expected.<br><br>Jobs would be created during the construction phase of the site and any new homes would create expenditure in the area. It is assumed that, as the site has the capacity to deliver over 1,000 homes, the site will provide medium scale employment opportunities and a business park or employment estate as well as a neighbourhood hub with shops and services. As such, minor positive effects are expected.<br><br>There is potential for development to have negative impacts on tourism associated with the Bicton Park Botanical Gardens as this is where part of construction is expected to take place. As such, minor negative effects are expected.<br><br>Overall, minor positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br><br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the | -? | The site is not located within 1km of a railways station however the site is located within 1km of cycle routes. The site is adjacent to and contains bus stops, however these are not served by a regular bus service.<br><br>As such, due to the lack of accessible public transport links in proximity to the site, uncertain minor |

| SA Objective | SA Score | Justification |
|---|---|---|
| provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | | negative effects are expected. |

## SA-ED-15: Feniton

| SA-ED-15 | Feniton |
|---|---|
| **Authority Area:** East Devon |  |
| **Site Area:** 363.7ha (Net 193.9ha) | |
| **Approximate total capacity:** 6,012-7,757 dwellings | |
| **Site status:** Potential site option | |
| **Outline description and context:** Significant expansion of Feniton which would essentially amount to a new settlement in scale. | |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/--? | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, but lies within 1km of Escot Park County Wildlife Site, which has a known water vole population. Public rights of way lead directly to the County Wildlife Site from the site and as such there could be a chance of detrimental impacts through increased recreation. The site also contains numerous hedgerows and trees some of which may be of biodiversity and landscape interest. The site is also within a SSSI IRZ. The site contains Priority habitat deciduous woodland. The site is flagged as Amber in the HRA sensitivity work with regard to East Devon Pebblebed SAC/SPA and is within the Recreational Zone for Pebblebed Heaths. The site is within the 5 km great crested newt consultation zone. The site contains numerous hedgerows and trees some of which may be of biodiversity and landscape interest. As such, uncertain significant negative effects are expected.<br><br>Existing green infrastructure on the site, including woodland bands, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space and playing pitches that could mitigate the biodiversity impact of development. As such, significant positive effects are also expected.<br><br>Overall, mixed significant positive and uncertain significant negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is comprised of open rural countryside and encloses a 35ha area residential development. Development would cause an urbanisation effect on the environment. The site is of medium-high landscape sensitivity as the site is highly likely to have intervisibility with the East Devon AONB.<br><br>As such, uncertain significant negative effects are expected |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/-? | The site contains three Grade II listed buildings onsite (Sherwood Cottage, Sheridon and Sweethams), is adjacent to further Grade listed buildings on the south-western boundary and northern boundary and is in close proximity to a high concentration of Grade II listed buildings and one Grade II* (Church of St. Andrew) listed building on the eastern boundary (<300m). There are further designated heritage assets within 3km including a Registered Park and Garden (Combe House) and Conservation Area (Gittisham) around 2.5km south-east of the site, a Scheduled Monument (Henbury Fort) around 2.5km north-east and a Registered Park and Garden (Cadhay) and Conservation Area (Ottery St. Mary) around 1.6km south. There is potential for development to compromise the setting of these historic environment assets. As such, uncertain minor negative effects are expected.<br><br>It is likely that the site is of sufficient size (>10ha) to accommodate a well-designed development and create a new high quality built environment. It should be possible for development to respond appropriately to existing heritage assets in the area and minimise any disturbance to the historic |

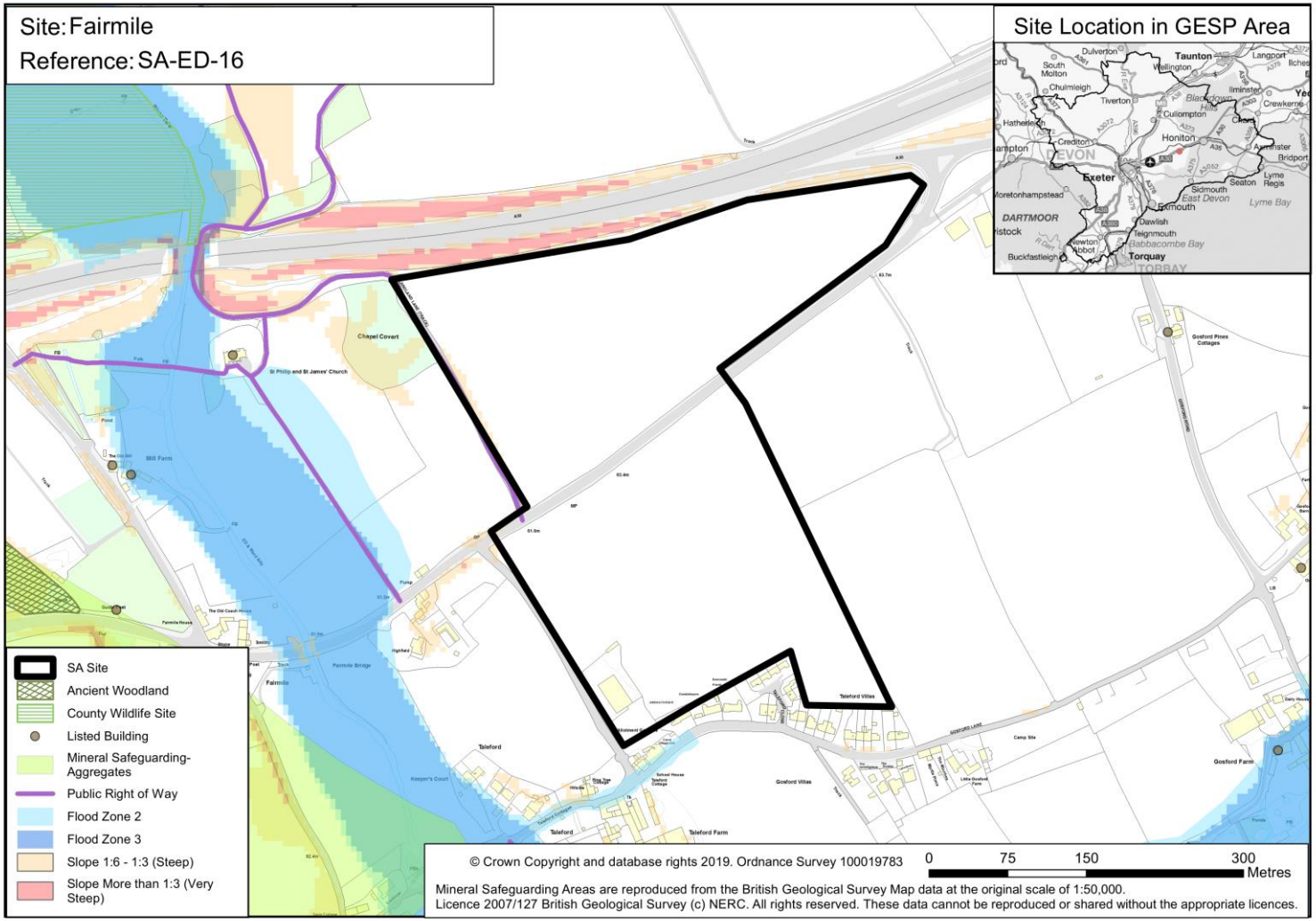
| SA Objective | SA Score | Justification |
|---|---|---|
| | | environment. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | + | The site is located within 5km of the Main Towns of Ottery St Mary and Honiton. As such, uncertain negligible effects are expected.<br><br>The site is not located within 1km of cycle paths however the site is located within 1km of Feniton railway station. The site is also located within 500m of bus stops, however these are not served by frequent bus services. As such, due to the proximity of a railway station, minor positive effects are expected.<br><br>As the site is expected to deliver over 4,000 homes, it is assumed that development of the site would provide significant sustainable transport, walking and cycle links and services. As such, uncertain minor positive effects are expected.<br><br>Overall, minor positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | --? | The site is predominantly greenfield and is located in an area with no significant flood risk. There is a river running through the north west corner of the site and as such areas of the site are on flood zone 2 and flood zone 3. The centre of the site contains a critical drainage area. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain significant negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | -- | The site is comprised of over 5ha of Grade 1 agricultural land as well as over 5ha of Grade 2 agricultural land. As such, significant negative effects are expected due to the potential loss off high quality agricultural land during development. Remaining land within the site is comprised of Grade 3a, Grade 3b, Grade 4 and non-agricultural land.<br><br>Although the site does not contain any previously developed land that could be reused, it does contain some agricultural developments.<br><br>Parts of the site (<50%) are contained within an Aggregate Minerals Safeguarding Area. As such, uncertain minor negative effects are expected as there is potential for mineral extraction to take place prior to any development.<br><br>Overall, significant negative effects are expected due to development on high quality agricultural land. |
| **7. WATER RESOURCES** | -? | Development should ensure no deterioration in the water quality of the River Tale which is located adjacent to the western boundary of the site and also has a tributary which passes through the site |

| SA Objective | SA Score | Justification |
|---|---|---|
| To utilise our water resources efficiently and minimise their loss or degradation. | | boundary. However, the river does not flow into the Exe Estuary SPA.<br><br>As such, uncertain minor negative effects are expected. |
| **8. HOMES**<br><br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | ++ | The site is likely to be able to accommodate about 6,012-7,757 homes. However this capacity is likely to reduce once account has been taken of the likely mitigation requirements, including those highlighted elsewhere in this assessment. The site would also need to ensure a viable mix of homes (tenure and sizes) including a proportion of affordable housing to contribute towards meeting needs within the area. This range of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom and self build providers. The site is of a sufficient size to be able to support a high number of housing starts / completions from a number of different outlets around the site, which in turn will ensure a good pace of delivery.<br><br>As such, significant positive effects are expected. |
| **9. HEALTH**<br><br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site contains and is within 400m of Public Rights of Way, but is not within 800m of major open space. As such, minor positive effects are expected.<br><br>However, as the site is expected to deliver over 2,000 homes, it is assumed that development of the site would provide significant open space and active transport links. As such, significant positive effects are expected.<br><br>Overall, significant positive effects are expected. |
| **10. WELLBEING**<br><br>To support positive, safe and healthy communities. | - | While providing new homes will have a positive impact on the health and wellbeing of occupants, the site is within the 'E02004132' Middle Super Output Area. This area, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees below average levels of deprivation than Nationally as a whole and therefore new development is less likely to have a positive effect on wellbeing locally as a result of increased availability of homes in the area. As such, negligible effects are expected.<br><br>Existing residential development, including the village of Feniton is surrounded by the site, could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. In addition, the site is crossed by a railway track. This feature may result in noise pollution affecting residents of the site in the longer term. As such, minor negative effects are expected.<br><br>The site is not within 1km of an AQMA. However, car movements emanating from the site could potentially contribute to worsening air quality as a result of congestion at the Clyst St Mary |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | Roundabout and the Exeter AQMA, along the Heavitree Road corridor. As such, minor negative effects are expected.<br><br>Overall, minor negative effects are expected. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | ++ | The site is located adjacent to Feniton (a Defined Village), which provides shops, meeting venues, public houses and places of worship. Larger shops, hospitals and larger cultural facilities are located in Exeter which is accessible from this location by car and train. As such, minor positive effects are expected.<br><br>The site is within 500m of Feniton Primary School but it is not within 1km of any secondary schools. The school is at capacity but may have potential to be expanded on adjacent land. Additional primary capacity will be required on-site potentially including relocation of the existing school. The Kings School in Ottery lies approximately 4.6km walk away, is at capacity and currently does not wish to expand. A site of this scale is likely to require new secondary provision within the site. As such, uncertain minor positive effects are expected.<br><br>The site is adjacent to an area that has access to superfast broadband (80-300Mbps), which it is assumed could be extended to the site if development came forward. As such, minor positive effects are expected.<br><br>The site is large, providing over 4,000 homes, and therefore it is assumed that development would be more likely to accommodate a primary and secondary school on site. As such, significant positive effects are expected.<br><br>Overall, significant positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | ++ | The site is not adjacent to a Main Town but is within 1km of existing or proposed employment sites that could provide employment opportunities. As such, minor positive effects are expected.<br><br>Jobs would be created during the construction phase of the site and any new homes will provide expenditure in the area. It is assumed that, as the site has the capacity to deliver over 4,000 homes, the site will provide large scale mixed use employment and a business park or employment estate as well as a town centre with shops, services and community buildings. As such, significant positive effects are expected.<br><br>There is likely to be little impact on tourism.<br><br>Overall, significant positive effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | + | The site is not located within 1km of cycle paths however the site is located within 1km of Feniton railway station. The site is also located within 500m of bus stops, however these are not served by frequent bus services. As such, due to the proximity of a railway station, minor positive effects are expected.<br>In addition, the site has capacity for more than 1,000 homes and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br>Overall, minor positive effects are expected. |

## SA-ED-16: Fairmile

| SA-ED-16 | Fairmile |
|---|---|
| **Authority Area:** East Devon |  |
| **Site Area:** 14ha (Net 5ha) | |
| **Approximate total capacity:** 14ha employment | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:** Standalone employment site adjacent to the Pattersons Cross junction of the A30 and the hamlets of Fairmile and Taleford. | |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | -? | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, but is within 250m of Escot Park County Wildlife Site, which has a known water vole population. The site is within the 10km recreation zone of Pebblebed Heaths although as the site is being considered for employment this will likely reduce the overall recreational impact from development. It is also within the 5km Great Crested Newt consultation zone.<br>As such, uncertain minor negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | -? | The site is comprises of open rural countryside with the A30 adjacent to the northern boundary of the site and an adjoining road passing through the centre of the site. Development within the site would cause an urbanisation effect on the environment. The site is of medium landscape sensitivity as there is potential for intervisibility with some of the listed buildings within the vicinity as well as the East Devon AONB.<br>As such, uncertain minor negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | -? | The site does not contain any heritage assets within its boundaries. The site is within 3km of multiple designated assets including six Grade II listed buildings located around 400m west of the site and five Grade II listed buildings located around 400m to the east also. Further designated heritage assets within 3km include Ottery St. Mary Conservation Area around 1km to the south and a Registered Park and Garden around 600m south. There is potential for development to compromise the setting of these historic environment assets.<br>As such, uncertain minor negative effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br>To minimise greenhouse gas emissions. | --? | The site is located within 5km of the Main Town of Ottery St Mary. As such, negligible effects are expected.<br>The site is not located within 1km of cycle routes or railway stations. The site is located adjacent to bus stops, however these are not served by frequent bus services. As such, due to the lack of accessible public transport links in proximity to the site, uncertain minor negative effects are expected.<br>As the site is expected to deliver under 10ha of employment land, it is assumed that development of the site would provide fewer sustainable transport, walking and cycle links, and services. As such, uncertain significant negative effects are also expected.<br>Overall, uncertain significant negative effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION** | -? | The site is predominantly greenfield and there is no significant flood risk within the area. Development |

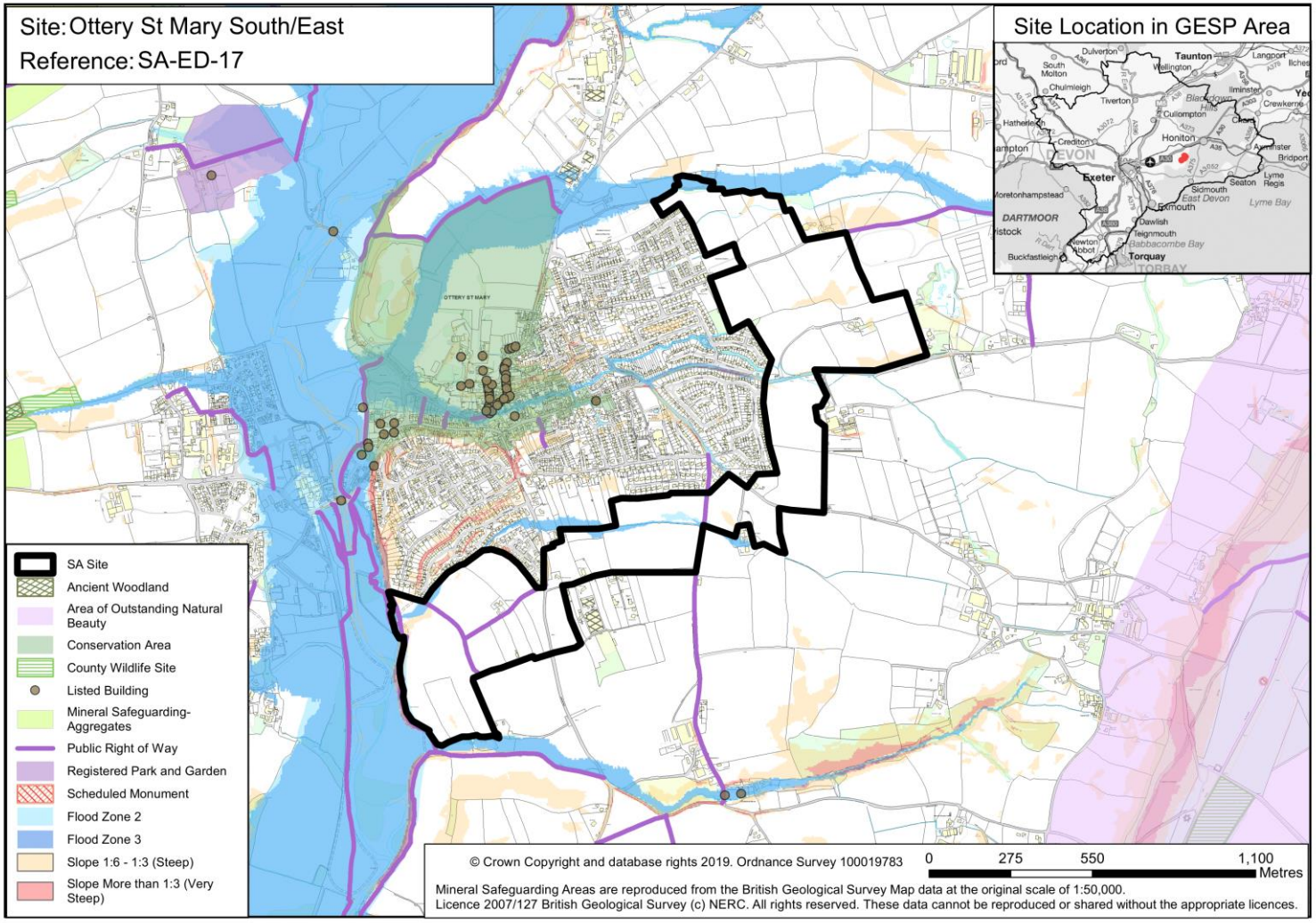
| SA Objective | SA Score | Justification |
|---|---|---|
| To adapt to the possible effects of climate change. | | of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>As such, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | -- | The site contains over 5ha of Grade 2 agricultural land. As such, significant negative effects are expected due to the potential loss of high quality agricultural land during development. The remaining are within the site is comprised of Grade 3 and Grade 4 agricultural land.<br><br>The site is entirely greenfield and does not contain any previous development.<br><br>The site is not located within any Minerals Safeguarding Areas.<br><br>Overall, significant negative effects are expected due to development on high quality agricultural land. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or degradation. | 0 | The site is not located adjacent to and does not contain any watercourses.<br><br>As such, negligible effects are expected. |
| **8. HOMES**<br><br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | 0 | The site is not considered to be suitable for accommodating a strategic level of housing due to its size, lack of additional suitable land to consider in combination with the site and otherwise isolated location away from existing settlements.<br><br>As such, negligible effects are expected. |
| **9. HEALTH**<br><br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | + | The site is adjacent to and within 400m of Public Rights of Way, but is not within 800m of major open space.<br><br>As such, minor positive effects are expected. |
| **10. WELLBEING**<br><br>To support positive, safe and healthy | - | While providing new jobs will have a positive impact on the health and wellbeing of workers, the site is within the 'E02004132' Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees below average levels of deprivation than Nationally as a |

| SA Objective | SA Score | Justification |
|---|---|---|
| communities. | | whole. As such, it is likely that a small employment development of this nature will provide potential improvements to the availability of jobs in the area, which will provide broad wellbeing benefits. The site lies adjacent to an existing employment site, which should have additional benefits. As such, negligible effects are expected.<br><br>The site is not within 1km of an AQMA. However, car movements to and from this site could potentially contribute to worsening air quality to the Exeter AQMA. As such, minor negative effects are expected.<br><br>Overall, minor negative effects are expected. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | -- | The site is not located adjacent to any settlements. Users of the site are unlikely to access services and facilities at Feniton or Ottery St Mary due to the distance of the town centres. No other existing or proposed centres are close enough to be easily accessible by workers. As such, significant negative effects are expected.<br><br>Currently, the site only has access to broadband speeds of less than 10Mbps. As such, minor negative effects are expected.<br><br>Overall, significant negative effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | + | The site has the capacity to deliver over 5ha of employment floorspace and would be able to cater for a small range of business sizes and types. The site is located a significant distance from high value employment clusters and labour supply. The site has reasonable connections to Exeter and other local populations as well as the wider region via the Strategic Road Network. However, the convoluted access to the A30 eastbound may be off-putting to employment development.<br><br>Jobs would be created during the construction phase of the site.<br><br>As such, minor positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br><br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the | -? | The site is not located within 1km of cycle routes or railway stations. The site is located adjacent to bus stops, however these are not served by frequent bus services.<br><br>As such, due to the lack of accessible public transport links in proximity to the site, uncertain minor |

| SA Objective | SA Score | Justification |
|---|---|---|
| provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | | negative effects are expected. |

## SA-ED-17: Ottery St Mary South/East

| SA-ED-17 | Ottery St Mary South/East |
|---|---|
| **Authority Area:** East Devon | |
| **Site Area:** 77.7ha (Net 43.9ha) | |
| **Approximate total capacity:** 1,360-1,755 dwellings | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:** Residential-led urban extension to the south and east of Ottery St Mary | |



| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/--? | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, or within 250m of a locally designated site. The site is flagged as Amber in the HRA sensitivity work with regard to East Devon Pebblebed SAC/SPA and is within 10km of Pebblebed Heaths SPA. The site is also adjacent to priority habitat, traditional orchard, which is a potential important feeding habitat for Nightjars, which are a 'qualifying feature' of the Pebblebed Heaths SPA. The site is within the 5 km great crested newt consultation zone. The site is adjacent to unconfirmed wildlife sites (ponds with potential breeding bird interest to the east of Littlewell Farm as well as the Ottery to Newton Poppleford Marshes along the River Otter). As such, uncertain significant negative effects are expected.<br><br>Existing green infrastructure on the site, including ponds, marshes and trees, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space and playing pitches that could mitigate the biodiversity impact of development. As such, significant positive effects are also expected.<br><br>Overall, mixed significant positive and uncertain significant negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is comprised of open rural countryside with a large (90ha) residential area to the west of the site. Development would have an urbanisation effect on the environment within the site. Land at Ridgeway, Ottery St Mary and land around Sidmouth Road is of medium-high landscape sensitivity as there is potential for intervisibility with the East Devon AONB, Ottery St Mary conservation area and Belbury Castle. The site is located on the slope falling away from the AONB where intervening vegetation might limit its visibility near the Edge of Ottery St Mary. As such, uncertain significant negative effects are expected.<br><br>Remaining land within the site is of high landscape sensitivity due to high potential for intervisibility with the East Devon AONB, Ottery St Mary conservation area and Belbury Castle these areas of the site are situated higher up on slope. As such, uncertain significant negative effects are expected.<br><br>Overall, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and | +?/-? | The site does not contain any heritage assets within its boundaries. The site is adjacent to Ottery St. Mary on its western boundary in which there is a Conservation Area 500m away from the site that contains a high concentration of Grade II listed buildings and two Grade II* listed buildings. There are also further designated assets within 3km including listed buildings within 1km to the south, one of which is Grade II* listed (front garden wall of Knightstone), a Registered Park and Garden (Cadhay) around 1.5km to the north-east and a Scheduled Monument around 2km to the south-west (Belbury |

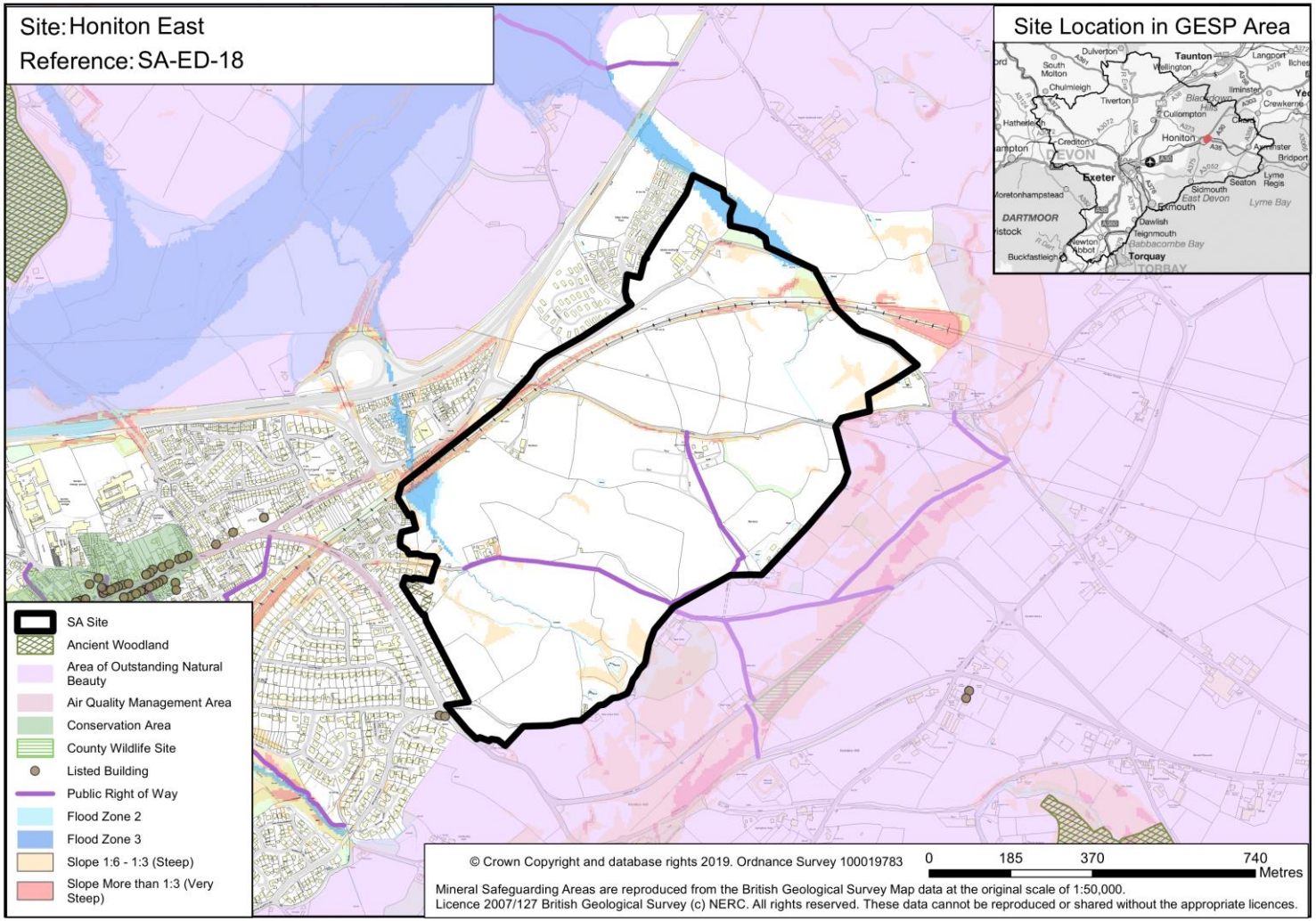
| SA Objective | SA Score | Justification |
|---|---|---|
| accessibility in new build development. | | Castle). There is potential for development to compromise the setting of these historic environment assets. As such, uncertain minor negative effects are expected.<br><br>It is likely that the site is of sufficient size (>10ha) to accommodate a well-designed development and create a new high quality built environment. It should be possible for development to respond appropriately to existing heritage assets in the area and minimise any disturbance to the historic environment. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | + | The site is adjacent to the Main Town of Ottery St Mary. As such, uncertain significant positive effects are expected.<br><br>The site is not located within 1km of a railway station however the site is located within 1km of cycle paths. The site is also located within 500m of bus stops that are served by frequent bus services. As such, due to the proximity of cycle routes and bus services, minor positive effects are expected.<br><br>As the site is expected to deliver over 1,000 homes, it is assumed that development of the site would provide some sustainable transport, walking and cycle links and services. As such, uncertain negligible effects are expected.<br><br>Overall, minor positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and in an area with no significant flood risk. There are rivers to the north of the site, the south of the site, and through the centre of the site. As such, parts of the site in the north, centre and south are on flood zone 2. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | -- | The majority of the site (>5ha) is comprised of Grade 2 agricultural land. As such, significant negative effects are expected due to the potential loss of high quality agricultural land during development. The remaining land within the site is Grade 3 agricultural land but it is unclear if it is Grade 3a or Grade 3b.<br><br>The majority of the site is greenfield apart from a few small areas of agricultural development.<br><br>The site is not located within any Minerals Safeguarding Areas.<br><br>Overall, significant negative effects are expected due to development on high quality agricultural land. |
| **7. WATER RESOURCES** | -? | Development should ensure no deterioration in the water quality of the Lower River Otter which is |

| SA Objective | SA Score | Justification |
|---|---|---|
| To utilise our water resources efficiently and minimise their loss or degradation. | | adjacent to south western boundary of the site but does not flow into the Ese Estuary SPA.<br><br>As such, uncertain minor negative effects are expected. |
| **8. HOMES**<br><br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | ++ | The site is likely to be able to accommodate about 1,360-1,755 homes. However this capacity is likely to reduce once account has been taken of the likely mitigation requirements, including those highlighted elsewhere in this assessment. The site would also need to ensure a viable mix of homes (tenure and sizes) including a proportion of affordable housing to contribute towards meeting needs within the area. This range of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom and self build providers. The site is of a sufficient size to be able to support a high number of housing starts / completions from a number of different outlets around the site, which in turn will ensure a good pace of delivery. If the site were to come forward in combination with land to the west of Ottery (SA-ED-21), the sites may struggle to deliver to their full potential within the GESP timetable as there would be a risk that they might saturate the local market.<br><br>As such, significant positive effects are expected. |
| **9. HEALTH**<br><br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | + | The site contains and is within 400m of Public Rights of Way, but is not within 800m of major open space. As such, minor positive effects are expected.<br><br>However, as the site is expected to deliver between 1,000-1,999 homes, it is assumed that development of the site would provide some open space and active transport links. As such, minor positive effects are expected.<br><br>Overall, minor positive effects are expected. |
| **10. WELLBEING**<br><br>To support positive, safe and healthy communities. | - | While providing new homes will have a positive impact on the health and wellbeing of occupants, the site is within the 'E02004136' Middle Super Output Area. This area, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees least deprived levels of deprivation than Nationally as a whole and therefore new development is less likely to have a positive effect on wellbeing locally as a result of increased availability of homes in the area. The site is also in close proximity to existing jobs which could benefit the residential development, although poor cycling opportunities to the wider area may limit active transport. As such, negligible effects are expected.<br><br>The site surrounds existing residential development, the town Ottery St Mary to the west of the site, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. As such, minor negative effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | The site is not within 1km of an AQMA. However, car movements emanating from the site could potentially contribute to worsening air quality as a result of congestion at the Ottery St Mary town centre and the Exeter AQMA, along the Heavitree Road corridor. As such, minor negative effects are expected.<br><br>Overall, minor negative effects are expected. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | ++ | The site is adjacent to Otttery St Mary (a Main Town), which provides shops, meeting venues, public houses and places of worship in the town centre. The Coleridge Medical Centre is approximately a 1.4km walk from the centre of the site, and Ottery St Mary Hospital is approximately a 2km walk of the centre of the site. As such, significant positive effects are expected<br><br>The site is within 500m of Ottery St Mary Primary School and is within 1km of a secondary school (The King's School). Capacity may be an issue until the proposed relocation of Tipton St John Primary School to Ottery takes place, however capacity may still be limited. As such, additional primary capacity may be required either on-site or by increasing capacity at an existing/proposed school. The Kings School is at capacity and currently does not wish to expand. Negotiation would be required to ensure capacity can be delivered. As such, uncertain minor positive effects are expected.<br><br>The site is adjacent to an area that has access to superfast broadband (80-300Mbps), which it is assumed could be extended to the site if development came forward. As such, minor positive effects are expected.<br><br>The site is medium sized, providing over 500 homes, and therefore it is assumed that development would be more likely to accommodate a primary school on site. As such, minor positive effects are expected.<br><br>Overall, significant positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | ++ | The site is located adjacent to Ottery St Mary (a Main Town) and it is within 1km of existing or proposed employment sites that could provide employment opportunities. As such, significant positive effects are expected.<br><br>Jobs would be created during the construction phase of the site and any new homes would provide expenditure in the area. It is assumed that, as the site has the capacity to deliver over 1,000 homes, the site will provide medium scale mixed use employment opportunities and a business park or employment estate as well as a neighbourhood hub with shops and services. As such, minor positive effects are expected.<br><br>There is likely to be little impact on tourism. |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | Overall, minor positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and town centres. | ++ | The site is located adjacent to Ottery St Mary (a Main Town) and will deliver less than 4,000 homes, which is a scale not expected to detract visitors from the current town centre. A new residential site could support the vitality and viability of the existing town centre by increasing the number of day-to-day visitors and supporting businesses and services there.<br>As such, significant positive effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | + | The site is not located within 1km of a railway station however the site is located within 1km of cycle paths. The site is also located within 500m of bus stops that are served by frequent bus services. As such, due to the proximity of cycle routes and bus services, minor positive effects are expected.<br>In addition, the site has capacity for more than 1,000 homes and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br>Overall, minor positive effects are expected. |

## SA-ED-18: Honiton East

| SA-ED-18 | Honiton East |
|---|---|
| **Authority Area:** East Devon |  |
| **Site Area:** 74.9ha (Net 39.8ha) | |
| **Approximate total capacity:** 1,234-1,593 dwellings | |
| **Site status:** Potential site option | |
| **Outline description and context:** Urban extension to the east of Honiton | |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/-? | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, but is within 250m of Collin's Field County Wildlife Site. The site also contains priority habitat, deciduous woodland and numerous hedgerows and trees, some of which could be of biodiversity significance. As such, uncertain minor negative effects are expected.<br>Existing green infrastructure on the site, including woodland bands, could also be lost to development. As such, uncertain minor negative effects are expected.<br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space and playing pitches that could mitigate the biodiversity impact of development. As such, significant positive effects are also expected.<br>Overall, mixed significant positive and uncertain minor negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is comprised of open rural countryside with the built up area of Honiton located to the west. Development would cause an urbanisation effect on the environment within the site. The site is of high landscape sensitivity as is highly likely there will be intervisibility between the site and the East Devon AONB and the Blackdown Hills AONB as the site is in very close proximity to both.<br>As such, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/-? | The site does not contain any heritage assets within its boundaries. There are multiple designated assets within 3km of the site including two Grade II listed buildings (Copper Castle and Gates) in close proximity (<100m) to the southern boundary of the site on the other side of the A35. The south-western boundary of the site is adjacent to Honiton in which there is a Conservation Area 500m away from the site that contains a high concentration of listed buildings (Grade II and Grade II*). There is also a Scheduled Monument (Dumpdon Camp) around 2.1km to the north of the site. There is potential for development to compromise the setting of these historic environment assets. As such, uncertain minor negative effects are expected.<br>It is likely that the site is of sufficient size (>10ha) to accommodate a well-designed development and create a new high quality built environment. It should be possible for development to respond appropriately to existing heritage assets in the area and minimise any disturbance to the historic environment. As such, uncertain minor positive effects are expected.<br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION** | ++ | The site is located adjacent to the Main Town of Honiton. As such, uncertain significant positive effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| To minimise greenhouse gas emissions. | | The site is not located within 1km of cycle routes however the site is located within 1km of Honiton railway station. The site is also located adjacent to bus stops served by frequent bus services. As such, due to the proximity of bus and rail links, significant positive effects are expected.<br><br>As the site is expected to deliver over 1,000 homes, it is assumed that development of the site would provide some sustainable transport, walking and cycle links and services. As such, uncertain negligible effects are expected.<br><br>Overall, significant positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and is in an area with no significant flood risk. There is a river in the south west of the site and north of the site and as such, parts of the site are on flood zone 2 and flood zone 3. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | -- | The site is comprised of over 5ha of Grade 2 agricultural land as well as over 5ha of Grade 3a agricultural land also. As such, significant negative effects are expected due to the potential loss of high quality agricultural land during development. Remaining land within the site is Grade 3b and non-agricultural land.<br><br>The site is almost entirely greenfield apart from a few agricultural and individual residential developments.<br><br>The site is not located within any Minerals Safeguarding Areas.<br><br>Overall, significant negative effects are expected due to development on high quality agricultural land. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or degradation. | -? | Development should ensure no deterioration in the water quality of the Lower River Otter, a tributary of which passes through the site's boundary. However, this river does not flow into the Exe Estuary SPA.<br><br>As such, uncertain minor negative effects are expected. |
| **8. HOMES**<br><br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of | ++ | The site is likely to be able to accommodate about 1,234-1,593 homes. However this capacity is likely to reduce once account has been taken of the likely mitigation requirements, including those highlighted elsewhere in this assessment. The site would also need to ensure a viable mix of homes (tenure and sizes) including a proportion of affordable housing to contribute towards meeting needs within the area. This range of homes may be provided by a diverse range of providers including SME |

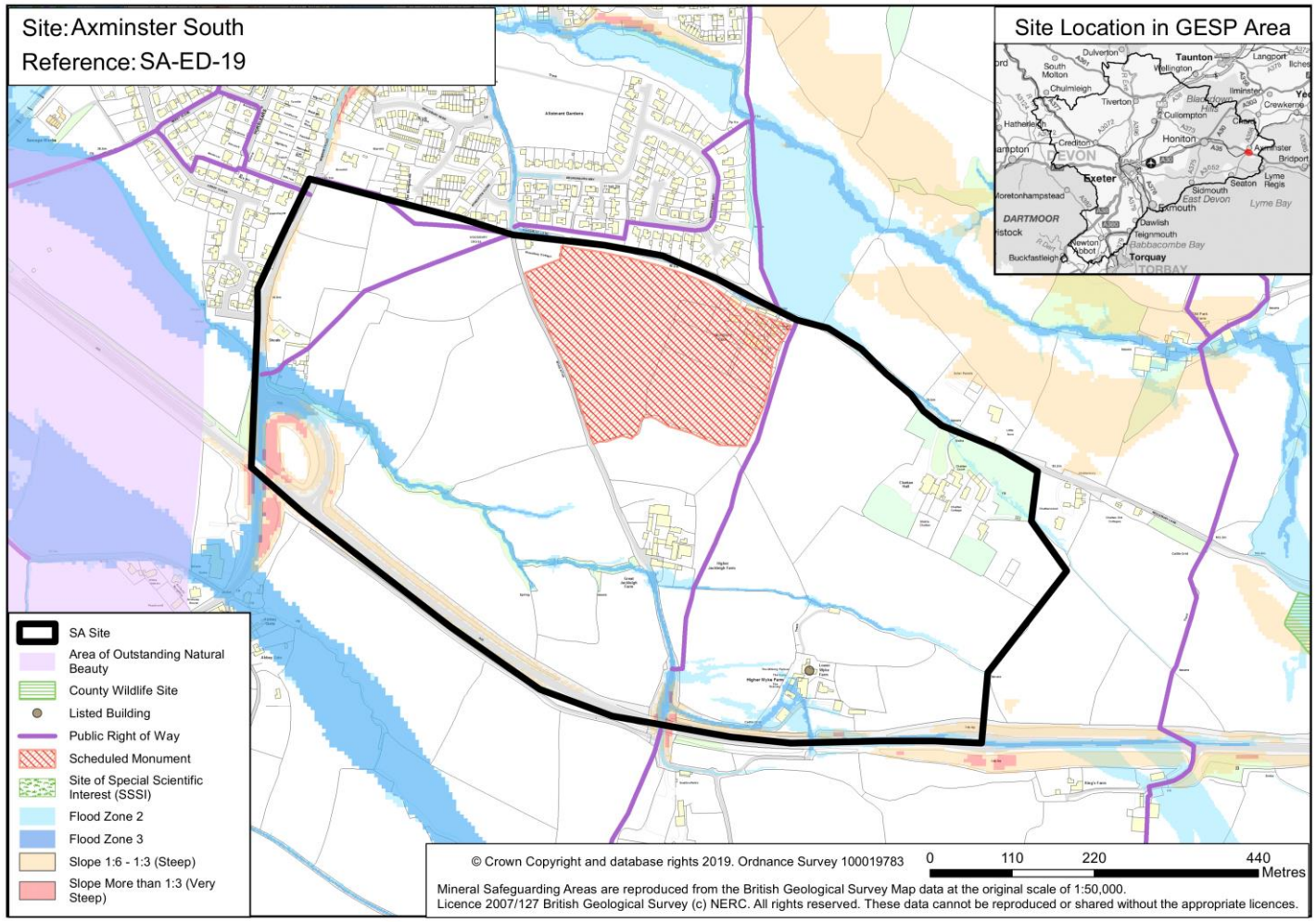
| SA Objective | SA Score | Justification |
|---|---|---|
| Greater Exeter. | | house building companies, housing associations and custom and self build providers. The site is of a sufficient size to be able to support a high number of housing starts / completions from a number of different outlets around the site, which in turn will ensure a good pace of delivery. Part of the site has been put forward as suitable for gypsy and traveller pitch development which could help meet the underserved needs of this population.<br><br>As such, significant positive effects are expected. |
| **9. HEALTH**<br><br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | + | The site contains and is within 400m of Public Rights of Way, but is not within 800m of major open space. As such, minor positive effects are expected.<br><br>However, as the site is expected to deliver between 1,000-1,999 homes, it is assumed that development of the site would provide some open space and active transport links. As such, minor positive effects are expected.<br><br>Overall, minor positive effects are expected. |
| **10. WELLBEING**<br><br>To support positive, safe and healthy communities. | -- | While providing new homes will have a positive impact on the health and wellbeing of occupants, the site is within the 'E02004130' Middle Super Output Area. This area, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees average levels of deprivation than Nationally as a whole and therefore new development is less likely to have a positive effect on wellbeing locally as a result of increased availability of homes in the area. As such, negligible effects are expected.<br><br>The site also lies adjacent to an existing residential development, the market town of Honiton to the southwest of the site, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. The site is crossed by a railway line and lies adjacent to an 'A' road. These features may result in noise pollution affecting residents of the site in the longer term. As such, minor negative effects are expected.<br><br>The site is within 1km of the East Devon AQMA therefore there is the potential for increased traffic within the AQMA and residents of the site could be adversely affected by poor air quality within the AQMA. In addition, car movements emanating from the site could potentially contribute to worsening air quality as a result of congestion at the Honiton AQMA and the Exeter AQMA, along the Heavitree Road corridor. As such, significant negative effects are expected.<br><br>Overall, significant negative effects are expected. |
| **11. ACCESS TO SERVICES** | ++ | The site is located adjacent to Honiton (a Main Town), which provides shops, meeting venues, public houses in the town centre. Larger shops, hospitals and larger cultural facilities are located in Exeter |

| SA Objective | SA Score | Justification |
|---|---|---|
| To provide accessible and attractive services and community facilities for all ages and interests. | | which is accessible from this location by a range of transport modes. As such, significant positive effects are expected.<br><br>The site is within 1km of Honiton Primary School and it is within 1km Honiton Community College also. Additional primary capacity will be required either on-site or by increasing capacity at an existing school. Honiton Community College is capable of accommodating small expansion. As such, uncertain minor positive effects are expected.<br><br>The site is adjacent to an area where there is access to superfast broadband (80-300Mbps), which it is assumed could be extended to the site if development came forward. As such, minor positive effects are expected.<br><br>The site is medium sized, providing over 500 homes, and therefore it is assumed that that site would be more likely to accommodate a primary school on site. As such, minor positive effects are expected.<br><br>Overall, significant positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | + | The site is located adjacent to Honiton (a Main Town) but it is not within 1km of any existing or proposed employment opportunities. As such, minor positive effects are expected.<br><br>Jobs would be created during the construction phase of the site and new homes would provide expenditure in the area. It is assumed that, as the site has the capacity to deliver over 500 homes, the site will provide medium scale mixed use employment opportunities and a business park or employment estate as well as a neighbourhood hub with shops and services. As such, minor positive effects are expected.<br><br>There is likely to be little impact on tourism.<br><br>Overall, minor positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | ++ | The site is located adjacent to Honiton (a Main Town) and will deliver less than 4,000 homes, which is a scale not expected to detract visitors from the current town centre. A new residential site could support the vitality and viability of the existing town centre by increasing the number of day-to-day visitors and supporting businesses and services there.<br><br>As such, significant positive effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses | ++ | The site is not located within 1km of cycle routes however the site is located within 1km of Honiton railway station. The site is also located adjacent to bus stops served by frequent bus services. As such, due to the proximity of bus and rail links, significant positive effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | | In addition, the site has capacity for more than 1,000 homes and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br><br>Overall, significant positive effects are expected. |

### SA-ED -19: Axminster South

| SA-ED-19 | Axminster South |
|---|---|
| **Authority Area:** East Devon | |
| **Site Area:** 54.2ha (Net 26.8ha) | |
| **Approximate total capacity:** 831 – 1,072 dwellings | |
| **Site status:** Potential site option | |
| **Outline description and context:** Site comprises agricultural land to the south of Woodbury lane and up to the A35. Predominantly flat although has a slight incline to the east. A scheduled monument is located at the centre of the site at Woodbury Farm. | |



| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/-? | The site is within 1km of the River Axe, SSSI and five County Wildlife Sites, Old Park, Symonds Down, King's Farm Copse, Wyke Green and Great Trill Coppice. The site is flagged as Yellow in the HRA sensitivity work with regard to River Axe SAC. The site contains priority habitat, deciduous woodland. The site is largely rural open countryside. There are various hedgerows and mature trees separating field boundaries and therefore loss of these would result in a permanent, negative impact on biodiversity. As such, uncertain minor negative effects are expected.<br><br>Existing green infrastructure on the site, including mature trees, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space and playing pitches that could mitigate the biodiversity impact of development. As such, significant positive effects are also expected.<br><br>Overall, mixed significant positive and uncertain minor negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site comprises of open rural countryside to the south of an existing residential area. Development would cause an urbanisation effect on the environment within the site. The site is of high landscape sensitivity as there is highly likely to be intervisibility with the East Devon AONB and the Blackdown Hills AONB as they are in close very close proximity (within 2km).<br><br>As such, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | --?/+? | The site contains a Scheduled Monument (Roman fort and later Romano-British settlement at Woodbury Farm) within its boundaries as well as a Grade II listed building (Higher Wyke Farmhouse). There are further designated heritage assets within 3km including Scheduled Monuments (Newenham Abbey) around 400m to the west and 1.3km south-east (Trinity Beacon) as well as Axminster Conservation Area around 900m to the north, contains multiple Grade II listed buildings and three Grade II* listed buildings. There is potential for development to compromise the setting of these historic environment assets. As such, uncertain significant negative effects are expected.<br><br>It is likely that the site is of sufficient size (>10ha) to accommodate a well-designed development and create a new high quality built environment. It should be possible for development to respond appropriately to existing heritage assets in the area and minimise any disturbance to the historic environment. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain significant negative and uncertain minor positive effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **4. CLIMATE CHANGE MITIGATION**<br>To minimise greenhouse gas emissions. | ++? | The site is adjacent to the Main Town of Axminster. As such, uncertain significant positive effects are expected.<br>The site is located adjacent to a cycle route and within 1km of Axminster railway station. The site is also located within 500m of existing bus stops, however these are not served by frequent bus services. As such, due to the proximity of cycle routes and a railway station, minor positive effects are expected.<br>As the site has a capacity of over 1,000 homes, it is assumed that development of the site would provide some sustainable transport, walking and cycle links and services. As such, uncertain negligible effects are expected.<br>Overall, uncertain significant positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and in an area with no significant flood risk. There is a river located to the west of the site and as such, parts of the site are on flood zone 2 and flood zone 3. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br>To utilise our land resources efficiently and minimise their loss or degradation. | --? | The entirety of the site is comprised of Grade 3 agricultural land. However. It is unclear if it is Grade 3a or Grade 3b agricultural land. As such, uncertain significant negative effects are expected due to the potential loss of high quality agricultural land during development.<br>The site does not contain any previously developed land.<br>The site is not located within any Minerals Safeguarding Areas.<br>Overall, uncertain significant negative effects are expected due to development on high quality agricultural land. |
| **7. WATER RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or degradation. | -? | Development should ensure no deterioration of the Lower Axe, a tributary of which passes through the site boundaries. However, this river does not flow into the Exe Estuary SPA.<br>As such, uncertain minor negative effects are expected. |
| **8. HOMES** | + | Based on a density range of 31-40 dw/ha, excluding the approximate 9.3ha currently covered by flood zones, the scheduled ancient monument and steep areas, there is the potential for between 831- 1072 |

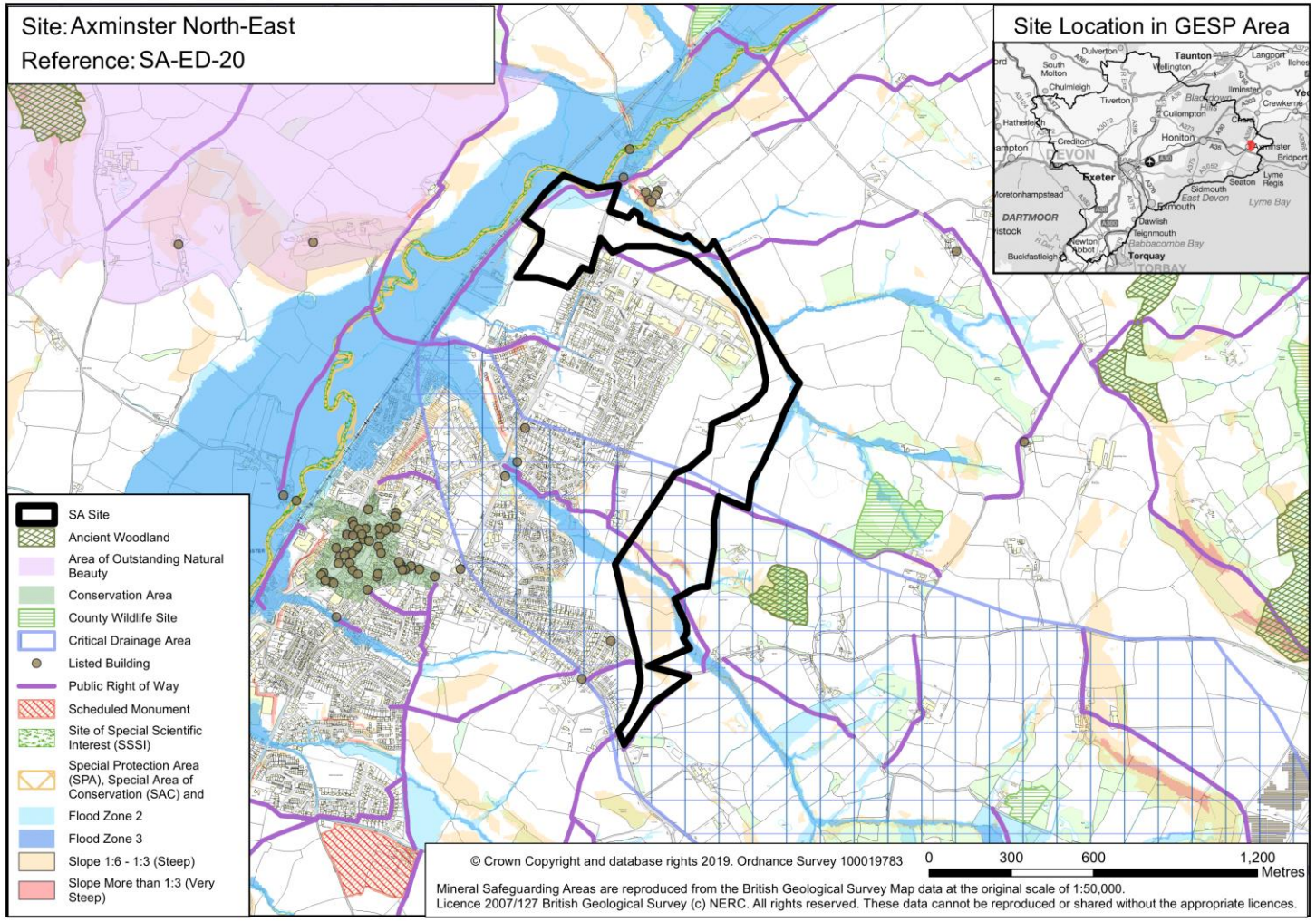
| SA Objective | SA Score | Justification |
|---|---|---|
| To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | | homes if the site fully built out. Delivery of a sizeable number of homes may also have a minor impact on local market affordability through increasing supply. As an average, house prices in Axminster are comparatively less than other areas in East Devon so additional development may offer the opportunity for more people to get on the housing ladder than if they were provided in a more expensive location. Conversely, Axminster is an area recognised in the Local Plan as having lower land values on average and recent housing developments and allocations in Axminster have indicated a slow rate of delivery linked with a limitation of demand and this will likely affect any further development here. As a result, lower land values may limit the mix of tenure and sizes and reduce the level of affordable housing provision.<br><br>As such, minor positive effects are expected. |
| **9. HEALTH**<br><br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | + | The site contains and is within 400m of Public Rights of Way. The site also lies adjacent to the National Cycle Route, but is not within 800m of major open space. As such, minor positive effects are expected.<br><br>In addition, as the site has capacity for more than 1,000 homes, it is assumed that development of the site would provide some open space and active transport links. As such, minor positive effects are expected.<br><br>Overall, minor positive effects are expected. |
| **10. WELLBEING**<br><br>To support positive, safe and healthy communities. | - | While providing new homes will have a positive impact on the health and wellbeing of occupants, the site is within the Axminster and surrounding areas Middle Super Output Area. This area, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees approximately average levels of deprivation than Devon and Mid Devon as a whole. As such, negligible effects are expected.<br><br>The site lies adjacent to an existing residential development, the market town of Axminster to the north of the site, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. The site also lies adjacent to an 'A' road. This feature may result in noise pollution affecting residents of the site in the longer term. However, the site is not within 1km of an AQMA. As such, minor negative effects are expected.<br><br>Overall, minor negative effects are expected. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | ++ | The site is located adjacent to Axminster (a Main Town), which provides a range of services and facilities that additional development would have access to, including shops, pubs, places of worship, community buildings, a library and a hospital (although inpatient beds have recently been closed). Further leisure and recreational facilities would have to be accessed by travelling into Exeter. Existing Local Plan allocations will also provide a range of social, community and open space facilities which any |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | additional development would be able to access. As such, significant positive effects are expected.<br><br>The site is within 1km of a primary school (St Mary's Catholic Primary School) and another primary school (Axminster Community Primary Academy) and secondary school (Axe Valley Academy) are just over a 1km away. It is assumed that additional primary capacity can be delivered at existing schools as well as the possibility of a new school site that would support 210 places. The secondary school could be expanded to support development. As such, uncertain minor positive effects are expected.<br><br>The site is adjacent to an area that has access to superfast broadband, which it is assumed could be extended to the site if development came forward. As such, minor positive effects are expected.<br><br>The site is medium sized, providing over 500 homes, and therefore it is assumed that the site would be more likely to accommodate a primary school on site. As such, minor positive effects are expected.<br><br>Overall, significant positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | +/- | The site is adjacent to Axminster (a Main Town) and it is within 1km of existing or proposed employment sites that could provide employment opportunities. As such, significant positive effects are expected.<br><br>Jobs would be created during the construction phase of the site and any new home would provide expenditure in the area. It is assumed that, as the site has the capacity to deliver over 1,000 homes, the site will provide medium scale mixed use employment opportunities and a business park or employment estate as well as a neighbourhood hub with shops and services. As such, minor positive effects are expected.<br><br>There is potential for development to disturb tourism associated with holiday cottages that are currently located on site. As such, minor negative effects are expected.<br><br>Overall, mixed minor positive and minor negative effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | ++ | The site is located adjacent to Axminster (a Main Town) and will deliver less than 4,000 homes, which is a scale not expected to detract visitors from the current town centre. A new residential site could support the vitality and viability of the existing town centre by increasing the number of day-to-day visitors and supporting businesses and services there.<br><br>As such, significant positive effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT** | + | The site is located adjacent to a cycle route and within 1km of Axminster railway station. The site is also located within 500m of existing bus stops, however these are not served by frequent bus services. |

| SA Objective | SA Score | Justification |
|---|---|---|
| To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | | As such, due to the proximity of cycle routes and a railway station, minor positive effects are expected.<br><br>In addition, the site has capacity for more than 1,000 homes and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br><br>Overall, minor positive effects are expected. |

## SA-ED-20: Axminster North East

| SA-ED-20 | Axminster North East |
|---|---|
| **Authority Area:** East Devon | |
| **Site Area:** 41.9ha (Net 20.7ha) | |
| **Approximate total capacity:** 642 – 828 dwellings | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:** Site comprises agricultural land forming an extension to the existing Axminster Local Plan allocation. Extends around Axminster from the River Axe in the north, around Millwey Rise industrial estate along to Lyme Road to the east. Eastern part of the site includes two small tributaries of the River Axe, coming to a point at Evil Lane. | |



| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | --?/+ | The site lies adjacent to internationally and nationally designated site the River Axe (SAC and SSSI). The site is also within 1km of four County Wildlife Sites, Chubb's Farm, Sector Wood, Coaxdon Quarry and Old Park. The site is flagged as Yellow in the HRA sensitivity work with regard to River Axe SAC and contains priority habitat, deciduous woodland. There are mature trees and hedgerows bordering the fields. As such, uncertain significant negative effects are expected.<br><br>Existing green infrastructure on the site, including woodland bands, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for less than 1,000 homes, and therefore is expected to provide local public open space that could mitigate the biodiversity impact of development. As such, minor positive effects are also expected.<br><br>Overall, mixed minor positive and uncertain significant negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is comprised of open rural countryside with a development that is predominantly residential to the west. Development within the site would cause an urbanisation effect on the environment. Land east of Axminster within the site is of medium-high landscape sensitivity as the site is located within the East Devon AONB 5km buffer zone and is likely to have a visual relationship with these protected landscapes. As such, uncertain significant negative effects are expected.<br><br>Remaining land within the site is of high landscape sensitivity as the site is located within the East Devon AONB 5km buffer zone and is highly likely to have a visual relationship with these protected landscapes. The site is also likely to interrupt the setting of nearby listed buildings. As such, uncertain significant effects are expected.<br><br>Overall, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/-? | The site does not contain any heritage assets within its boundaries. There are multiple designated assets within 3km of the site includin a Grade II* listed building (Weycroft Manor and Well House) within 500m of the northern boundary of the site, which is adjacent to six Grade II listed buildings (buildings associated with Weycroft Manor). Other designated heritage assets within 3km include Axminster Conservation Area around 700m to the west, which contains multiple Grade II listed buildings and three Grade II* listed buildings, and two Scheduled Monuments 1km to the south-west (Roman fort and later Romano-British settlement at Woodbury Farm) and 1.8km south-west (Newenham Abbey). There is potential for development to compromise the setting of these historic |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | environment assets. As such, uncertain minor negative effects are expected.<br><br>It is likely that the site is of sufficient size (>10ha) to accommodate a well-designed development and create a new high quality built environment. It should be possible for development to respond appropriately to existing heritage assets in the area and minimise any disturbance to the historic environment. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | ++?/--? | The site is located adjacent to the Main Town of Axminster. As such, uncertain significant positive effects are expected.<br><br>The site is not located within 1km of a railway station, however the site is crossed by a cycle route. The site is also located within 500m of bus stops however these are not served by frequent bus services. As such, due to the lack of accessible public transport options, uncertain minor negative effects are expected.<br><br>As the site is expected to deliver under 1,000 homes, it is assumed that development of the site would provide fewer sustainable transport, walking and cycle links, and services. As such, uncertain significant negative effects are also expected.<br><br>Overall, mixed uncertain significant positive and uncertain significant negative effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | --? | The site is predominantly greenfield and in an area with no significant flood risk. There is a river in the north and the south of the site and as such, areas of the site are on flood zone 2 and flood zone 3. The south of the site contains a critical drainage area. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain significant negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | --? | The site is comprised of over 5ha of Grade 3 agricultural land. However, it is unclear if it is Grade 3a or Grade 3b. As such, uncertain significant negative effects are expected due to the potential for loss of high quality agricultural land during development.<br><br>The site does not contain any previous development.<br><br>The site is not located within any Minerals Safeguarding Areas.<br><br>Overall, uncertain significant negative effects are expected due to development on high quality agricultural land. |

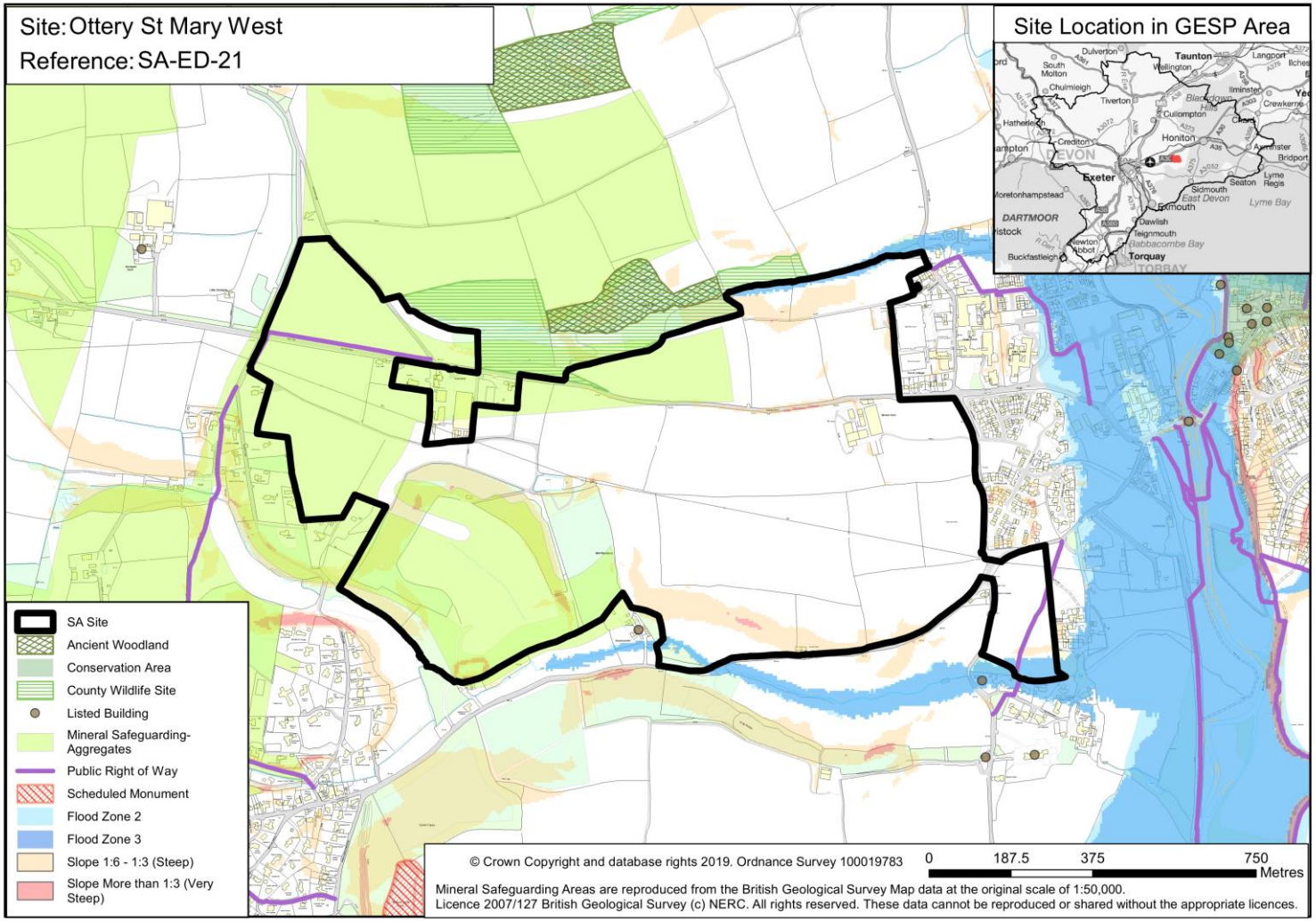
| SA Objective | SA Score | Justification |
|---|---|---|
| **7. WATER RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or degradation. | -? | Development should ensure no deterioration in the water quality of Mill Brook, a tributary of the Lower Axe, which passes through the centre of the site. However, this river does not flow into the Exe Estuary SPA.<br>As such, uncertain minor negative effects are expected. |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | + | Based on a density range of 31 – 40 dw/ha, excluding the approximate 7.5ha currently covered by flood zones and steep areas, there is the potential for between 641 - 828 homes if the site fully built out. Delivery of a sizeable number of homes may also have a minor impact on local market affordability through increasing supply. As an average, house prices in Axminster are comparatively less than other areas in East Devon so additional development may offer the opportunity for more people to get on the housing ladder than if they were provided in a more expensive location. Conversely, recent housing developments and allocations in Axminster have indicated a slow rate of delivery linked with a limitation of demand and this will likely affect any further development here. As a result, lower land values may limit the mix of tenure and sizes and reduce the level of affordable housing provision.<br>As such, minor positive effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | + | The site contains and is within 400m of Public Rights of Way. The national cycle route also runs through the north western section of the site; however the site is not within 800m of major open space.<br>As such, minor positive effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | - | While providing new homes will have a positive impact on the health and wellbeing of occupants, the site is within the Axminster and surrounding areas Middle Super Output Area. This area, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees approximately average levels of deprivation than Devon and Mid Devon as a whole. As such, negligible effects are expected.<br>The site is not within 1km of an AQMA. However, the site lies adjacent to an existing residential development, the market town of Axminster to the west of the site, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. The site is crossed by an 'A' road and lies adjacent to a railway line. These features may result in noise pollution affecting residents of the site in the longer term. As such, minor negative effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | Overall, minor negative effects are expected. |
| **11. ACCESS TO SERVICES**<br>To provide accessible and attractive services and community facilities for all ages and interests. | ++ | The site is located adjacent to Axminster (a Main Town), which provides a range of services and facilities that additional development would have access to, including shops, pubs, places of worship, community buildings, a library and hospital (although inpatient beds have recently been closed). Further leisure and recreational facilities would have to be accessed by travelling into Exeter. Existing Local Plan allocations will also provide a range of social, community and open space facilities which any additional development would be able to access. As such, significant positive effects are expected.<br>The site is within 500m of Axminster Community Primary Academy and it is also within 1km St Mary's Catholic Primary School and Axe Valley Academy. It is assumed that additional primary capacity can be delivered at existing schools as well as the possibility of a new school site that would support 210 places. The secondary school could be expanded to support development. As such, uncertain minor positive effects are expected.<br>The site is adjacent to an area that has access to superfast broadband (80-300Mbps), which it is assumed could be extended to the site if development came forward. As such, minor positive effects are expected.<br>The site is medium sized, providing over 500 homes, and therefore it is assumed that the site would be more likely to accommodate a primary school on site. As such, minor positive effects are expected.<br>Overall, significant positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | ++ | The site is adjacent to Axminster (a Main Town) and it is within 1km of existing or proposed employment sited that could provide employment opportunities. As such, significant positive effects are expected.<br>Jobs would be created during the construction phase of the site and any new homes would provide expenditure in the area. It is assumed that, as the site has the capacity to deliver over 500 homes, the site will provide small scale mixed use employment opportunities and a small cluster of shops and services. As such, minor positive effects are expected.<br>There is likely to be little impact on tourism.<br>Overall, significant positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and | ++ | The site is located adjacent to Axminster (a Main Town) and will deliver less than 4,000 homes, which is a scale not expected to detract visitors from the current town centre. A new residential site could support the vitality and viability of the existing town centre by increasing the number of day-to-day |

| SA Objective | SA Score | Justification |
|---|---|---|
| town centres. | | visitors and supporting businesses and services there.<br><br>As such, significant positive effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | -? | The site is not located within 1km of a railway station, however the site is crossed by a cycle route. The site is also located within 500m of bus stops however these are not served by frequent bus services.<br><br>As such, due to the lack of accessible public transport options, uncertain minor negative effects are expected. |

## SA-ED-21: Ottery St Mary West

| SA-ED-21 | Ottery St Mary West |
|---|---|
| **Authority Area:** East Devon | |
| **Site Area:** 114.3ha (Net 53.7ha) | |
| **Approximate total capacity:** 1,664 – 2,148 dwellings | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:**<br>Residential-led urban extension to the west of Ottery St Mary. | |



| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/--? | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, but the northern section of the site lies within Cadhay Bog County Wildlife Site and is within 1km of Cadhay Wood County Wildlife Site, both of which contain Ancient Woodland. The site contains priority habitat deciduous woodland. The site is flagged as Amber in the HRA sensitivity work with regard to East Devon Pebblebed SAC/SPA, mitigation will likely be required (likely to include a requirement for SANGS). The lowland mixed deciduous woodland at Cadhay Bog and Cadhay Wood are also potential important feeding habitat for Nightjars which are a 'qualifying feature' of the Pebblebed Heaths SPA. The site also includes a significant amount of plantation woodland surrounding a former quarry which may be of ecological interest. The site is also bordered and crossed by numerous hedgerows and trees some of which may be of biodiversity and landscape significance. The site is within the 5 km great crested newt consultation zone. As such, uncertain significant negative effects are expected.<br><br>Existing green infrastructure on the site, including the streams and woodland bands, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space and playing pitches that could mitigate the biodiversity impact of development. As such, significant positive effects are also expected.<br><br>Overall, mixed significant positive and uncertain significant negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is comprised of open rural countryside with the Settlement of West Hill located to the south west. Development within the site would cause an urbanisation effect on the environment. The site is of high landscape sensitivity as there is highly likely to be intervisibility between the site and the East Devon AONB, Ottery St Mary conservation area and Belbury Castle. This is due in part to the site being located on the slopes of a prominent ridge.<br><br>As such, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/-? | The site does not contain any heritage assets within its boundaries. There are multiple designated assets within 3km including two Grade II listed buildings within 100m of the southern boundary of the site (Foxenhole Mills and Salston Lodge) as well as further Grade II listed buildings 170m south (Lodge opposite entrance to Salston Hotel and Salston Hotel) and 330m north-west (Straitgate Farmhouse). Further designated heritage assets within 3km include Ottery St. Mary Conservation Area, which contains a high concentration of listed buildings, a Scheduled Monument (Belbury Castle) 450m to the south and a Registered Park and Garden (Cadhay) 600m to the north-east. There is potential for development to compromise the setting of these historic environment assets. As such, uncertain minor |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | negative effects are expected.<br><br>It is likely that the site is of sufficient size (>10ha) to accommodate a well-designed development and create a new high quality built environment. It should be possible for development to respond appropriately to existing heritage assets in the area and minimise any disturbance to the historic environment. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | ++? | The site is located adjacent to the Main Town of Ottery St Mary. As such, uncertain significant positive effects are expected.<br><br>The site is not located within 1km of a railway station however the site is located within 1km of cycle routes. The site is also located within 500m of bus stops served by frequent bus services. As such, due to the proximity of bus stops and cycle routes, minor positive effects are expected.<br><br>As the site is expected to deliver over 1,000 homes, it is assumed that development of the site would provide some sustainable transport, walking and cycle links and services. As such, uncertain negligible effects are expected.<br><br>Overall, uncertain significant positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and in an area with no significant flood risk. There is a river north of the site and in the south of the site. As such, areas of the site are on flood zone 2 and 3. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain minor negative effects can be expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | --? | The entirety of the site is comprised of Grade 3 agricultural land. However, it is unclear if it is Grade 3a or Grade 3b. As such, uncertain significant negative effects are expected due to the potential for loss of high quality agricultural land during development.<br><br>The majority of the site is greenfield apart from some agricultural development and two private residencies.<br><br>The site is partially (<50%) located within an Aggregate Mineral Safeguarding Area. However, there is potential for minerals to be extracted prior to any development going ahead. As such, uncertain minor negative effects are expected.<br><br>Overall, uncertain significant negative effects are expected due to development on high quality |

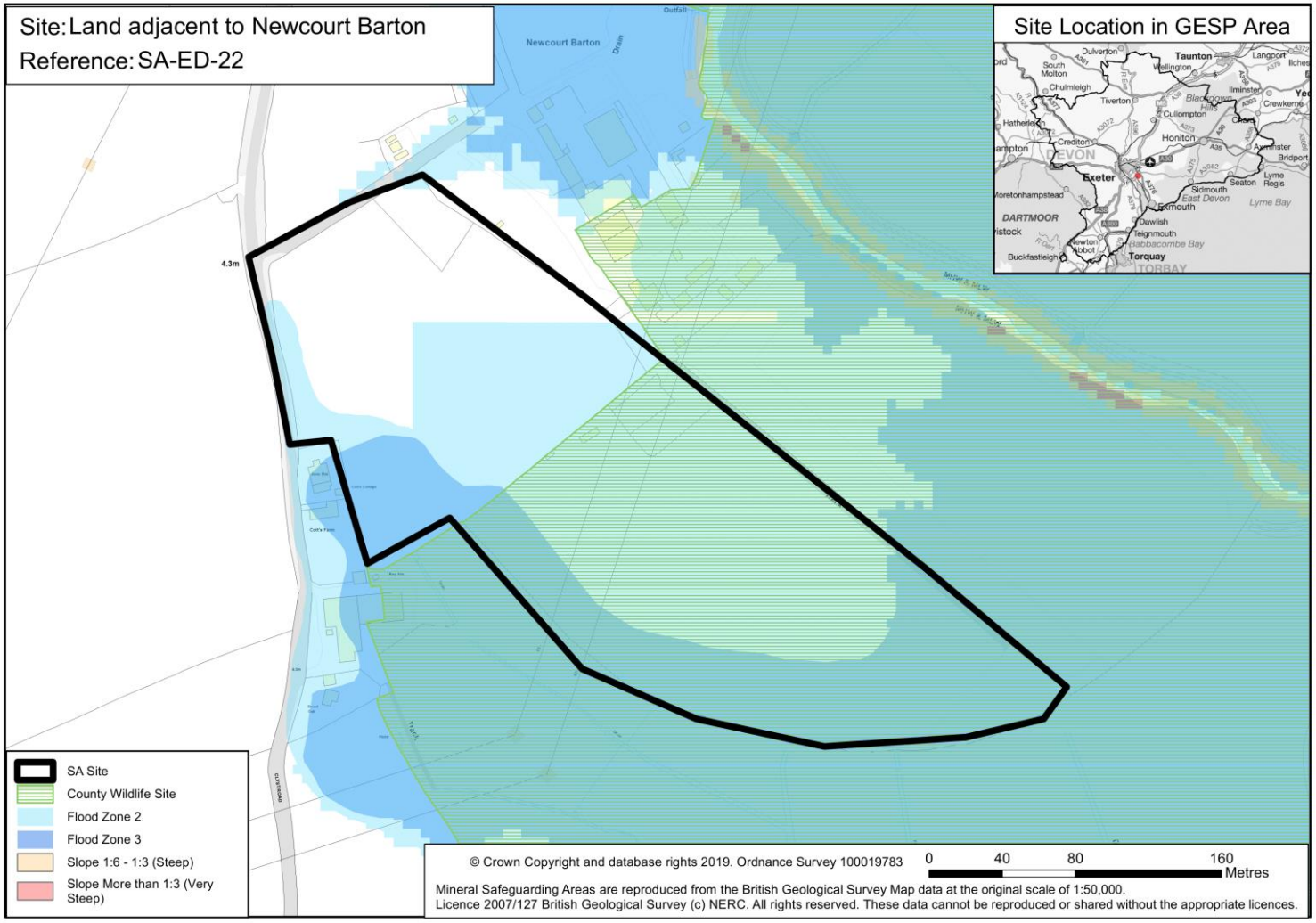
| SA Objective | SA Score | Justification |
|---|---|---|
| | | agricultural land. |
| **7. WATER RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or degradation. | -? | Development should ensure no deterioration in the water quality of the Lower River Otter which is adjacent to and passes through the southern boundary of the site. However, this river does not flow into the Exe Estuary SPA.<br>As such, uncertain minor negative effects are expected. |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | ++ | The site is likely to be able to accommodate about 1,664-2,148 homes. However this capacity is likely to reduce once account has been taken of the likely mitigation requirements, including those highlighted elsewhere in this assessment. The site would also need to ensure a viable mix of homes (tenure and sizes) including a proportion of affordable housing to contribute towards meeting needs within the area. This range of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom and self-build providers. The site is of a sufficient size to be able to support a high number of housing starts / completions from a number of different outlets around the site, which in turn will ensure a good pace of delivery. If the site were to come forward in combination with land to the south/east of Ottery (SA-ED-17), the sites may struggle to deliver to their full potential within the GESP timetable as there would be a risk that they might saturate the local market.<br>As such, significant positive effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site contains and is within 400m of Public Rights of Way. The site is also within 400m of the national cycle route, but is not within 800m of major open space. As such, minor positive effects are expected.<br>However, as the site has capacity for more than 2,000 homes, it is assumed that development of the site would provide significant open space and active transport links. As such, significant positive effects are expected.<br>Overall, significant positive effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | - | While providing new homes will have a positive impact on the health and wellbeing of occupants, the site is within the 'E02004132' Middle Super Output Area. This area, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees below average levels of deprivation than Nationally as a whole and therefore new development is less likely to have a positive effect on wellbeing locally as a result of increased availability of homes in the area. As such, negligible effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | The site borders an existing residential development, the town of Ottery St Mary to the east of the site, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. As such, minor negative effects are expected.<br><br>The site is not within 1km of an AQMA. However, car movements emanating from the site could potentially contribute to worsening air quality as a result of congestion at the Exeter AQMA, along the Heavitree Road corridor. As such, minor negative effects are expected.<br><br>Overall, minor negative effects are expected. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | ++ | The site is located adjacent to the Main Town of Ottery St Mary, which provides shops, meeting venues, public houses and places of worship in the town centre. Improvement to walking, cycling andf public transport links would be necessary as the western end of the site is just beyond walking distance of the majority of services. Larger shops, hospitals and larger cultural facilities are located in Exeter which is accessible from this location by a range of transport modes. As such, significant positive effects are expected.<br><br>The site is within 500m of The King's school (a secondary school) but it is not within 1km of any primary schools. Ottery St Mary's Primary school is about 1.5m from the eastern boundary of the site. Capacity may be an issue until the proposed relocation of Tipton St John Primary School to Ottery takes place, however capacity may still be limited. As such, additional primary capacity may be required either on-site or by increasing capacity at an existing/proposed school. The Kings School is at capacity and currently does not wish to expand. Negotiation would be required to ensure capacity can be delivered. As such, uncertain minor positive effects are expected.<br><br>The site is adjacent to an area that has access to superfast broadband (80-300Mbps), which it assumed could be extended to the site if development came forward. As such, minor positive effects are expected.<br><br>The site is medium sized, providing over 500 homes, and therefore it is assumed that development would be more likely to accommodate a primary school on site. As such, minor positive effects are expected.<br><br>Overall, significant positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support | ++ | The site is adjacent to Ottery St Mary (a Main Town) and it is within 1km of existing or proposed employment sites that could provide employment opportunities. As such, significant positive effects are expected.<br><br>Jobs would be created during the construction phase of the site and any new homes would provide |

| SA Objective | SA Score | Justification |
|---|---|---|
| improved job opportunities and greater productivity in Greater Exeter. | | expenditure in the area. It assumed that, as the site has the capacity to deliver over 2,000 homes, the site will provide large scale mixed use employment opportunities and business park or employment estate as well as a neighbourhood hub with shops, services and community buildings. As such, significant positive effects are expected.<br><br>There is likely to be little impact on tourism.<br><br>Overall, significant positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | ++ | The site is located adjacent to Ottery St Mary (a Main Town) and will deliver less than 4,000 homes, which is a scale not expected to detract visitors from the current town centre. A new residential site could support the vitality and viability of the existing town centre by increasing the number of day-to-day visitors and supporting businesses and services there.<br><br>As such, significant positive effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | + | The site is not located within 1km of a railway station however the site is located within 1km of cycle routes. The site is also located within 500m of bus stops served by frequent bus services. As such, due to the proximity of bus stops and cycle routes, minor positive effects are expected.<br><br>In addition, the site has capacity for more than 1,000 homes and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br><br>Overall, minor positive effects are expected. |

## SA-ED-22: Land adjacent to Newcourt Barton

| SA-ED-22 | Land adjacent to Newcourt Barton |
|---|---|
| **Authority Area:** East Devon | |
| **Site Area:** 6.4ha | |
| **Approximate total capacity:** 6.4ha employment | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:** This gently sloping site lies to the east of Clyst Road, adjacent to existing employment development at Newcourt Barton. The northern part of the site is in agricultural use; the southern part is Clyst Marshes. This is a small site originally assessed as over 5 hectares and submitted for employment. | |



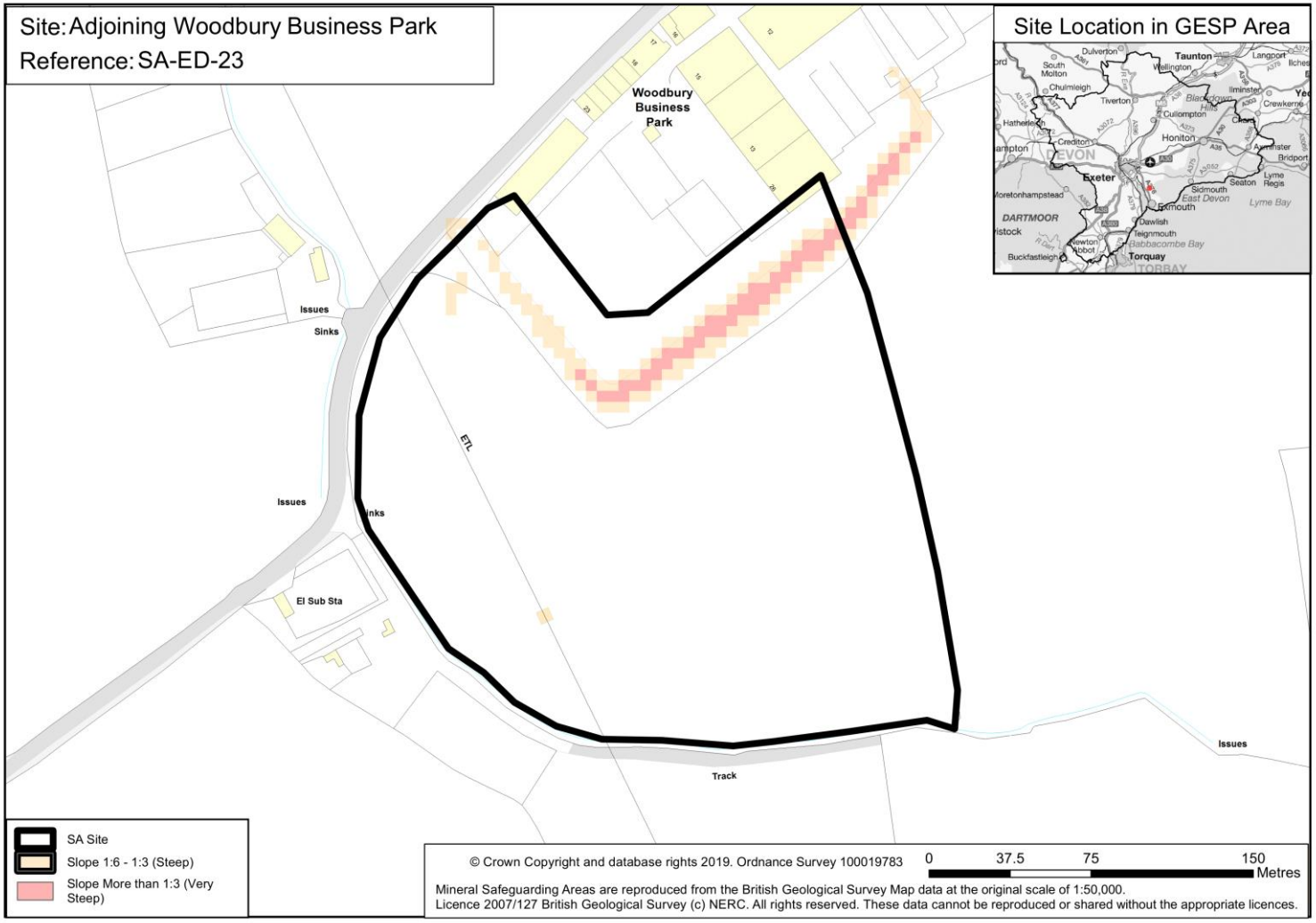
| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | -? | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, but lies within Clyst Marshes County Wildlife Site (over 50% of the site) and is not suitable for development. The site is also within 1km of Old Rydon Close County Wildlife Site. The site is entirely within Strategic Nature Area, coastal and floodplain grazing marsh. The site is flagged as Yellow in the HRA sensitivity work with regard to Exe Estuary SPA and is within the 10km recreation zones of the Exe Estuary and Pebblebed Heaths although as the site is being considered for employment this will likely reduce the overall recreational impact from development. It is also within the 5km Great Crested Newt consultation zone.<br>As such, uncertain minor negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is comprised of open rural countryside and so development would cause an urbanisation effect on the environment within the site. The site is medium-high landscape sensitivity as it is located within a Green Wedge designation and forms part of the Clyst Valley.<br>As such, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | -? | The site does not contain any heritage assets within its boundaries. There are limited heritage assets in close proximity to the site but there are designated assets within 3km including Topsham Conservation Area, which contains a high concentration of Grade II and Grade II* listed buildings and is located around 1.5km to the south. There are also seven Grade II listed buildings 1km to the north east and five more around 1.2km to the north. Additionally, there is a Scheduled Monument 1.2km north of the site (Clyst St Mary Bridge and causeway). There is potential for development to compromise the setting of these historic environment assets.<br>As such, uncertain minor negative effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br>To minimise greenhouse gas emissions. | --? | The site is located within 5km of Exeter City. As such, uncertain negligible effects are expected.<br>The site is not located within 1km of cycle paths or within 500m of bus stops. The site is however located within 1km of Newcourt railway station. However, the site is separated from the station by the M5 motorway which could limit access. As such, due to the lack of accessible public transport links, uncertain minor negative effects are expected.<br>As the site is expected to deliver under 10ha of employment land, it is assumed that development of the site would provide fewer sustainable transport, walking and cycle links, and services. As such, uncertain significant negative effects are also expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | Overall, uncertain significant negative effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and in an area with no significant flood risk. There is a river to the east of the site and as such, part of the site is on flood zone 2 and flood zone 3. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br>To utilise our land resources efficiently and minimise their loss or degradation. | -- | The entirety of the site (>5ha) is located on Grade 1 agricultural land. As such, significant negative effects are expected due to the potential loss of high quality agricultural land during development.<br>The site does not contain any previously developed land aside from a small area of agricultural development.<br>The site is not located within any Mineral Safeguarding Areas.<br>Overall, significant negative effects are expected due to development on high quality agricultural land. |
| **7. WATER RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or degradation. | --? | Development should ensure no deterioration in the water quality of the River Clyst which is adjacent to the eastern boundary of the site and runs into the Exe Estuary SPA.<br>As such, uncertain significant negative effects are expected. |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | 0 | The land within flood zone 2/3 and the Country Wildlife Site is not suitable for Development. The remainder of the site (which has been submitted for employment purposes) is only about 2.5 hectares in area.<br>As such, negligible effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to | - | The site is not within 800m of major open space or 400m of walking and cycle routes.<br>As such, minor negative effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| enjoy and experience them. | | |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | - | While providing new jobs will have a positive impact on the health and wellbeing of workers, the site is within the Exe Estuary including Clyst St Mary, Exton Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees significantly lower levels of deprivation than Devon as a whole. As such, development in this area is unlikely to be significantly affected by deprivation and is less likely to have a positive effect on wellbeing locally as a result of increased investment in the area. The site is adjacent to existing employment development, which should have additional benefits. As such, negligible effects are expected.<br>The site is not within 1km of an AQMA. However, car movements to and from this site could potentially contribute to worsening air quality to the Exeter AQMA, along the Heavitree Road corridor in particular. As such, minor negative effects are expected.<br>Overall, minor negative effects are expected. |
| **11. ACCESS TO SERVICES**<br>To provide accessible and attractive services and community facilities for all ages and interests. | -- | The site is not located adjacent to any settlements. Topsham is around 1km to the south and provides a full range of shops and leisure facilities. However, there are currently insufficient pedestrian/cycle routes linking the site to services in Topsham. As such, significant negative effects are expected.<br>The site currently only has access to standard broadband speeds (10-30Mbps). As such, negligible effects are expected.<br>Overall, significant negative effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | +? | The site has the capacity to deliver less than 5ha of employment space and suffers from poor access to road networks. Whilst the site is adjacent to existing industrial units (that are generally fully occupied), the site has no ability to contribute to strategic scale transformational growth. Jobs would be created during the construction phase of the site.<br>Overall, uncertain minor positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br>As such, minor negative effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | -? | The site is not located within 1km of cycle paths or within 500m of bus stops. The site is however located within 1km of Newcourt railway station. However, the site is separated from the station by the M5 motorway which could limit access.<br><br>As such, due to the lack of accessible public transport links, uncertain minor negative effects are expected. |

## SA-ED-23: Adjoining Woodbury Business Park

| SA-ED-23 | Adjoining Woodbury Business Park |
|---|---|
| **Authority Area:** East Devon |  |
| **Site Area:** 5.3ha (Net 4.8ha) | |
| **Approximate total capacity:** 4.8ha employment | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:** Single agricultural field adjacent to existing Woodbury Business Park. Bounded by mature trees and hedgerows. Rising gently upwards to the east. | |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | -? | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, or within 250m of a locally designated site. The site is flagged as Yellow in the HRA sensitivity work with regard to Exe Estuary SPA and is within the 10km recreation zones of the Exe Estuary and Pebblebed Heaths, although as the site is being considered for employment this will likely reduce the overall recreational impact from development. It is also within the 5km Great Crested Newt consultation zone.<br>As such, uncertain minor negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | -? | The site is comprised of open rural countryside with light industrial use land to the north, a small of section (>5ha) of which crosses the boundaries of the site. Development would cause an urbanisation effect on the environment within the site. The site if of low-medium landscape sensitivity as there is little potential for intervisibility between the site and the East Devon AONB.<br>As such, uncertain minor negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | -? | The site does not contain any heritage assets within its boundaries. There are multiple designated assets within 3km including two Grade II listed buildings (Venmoor Farmhouse and surrounding farm buildings) located around 150m to the north of the site as well as a high concentration of Grade II listed buildings and one Grade II* listed building 700m to the north-east within Woodbury Conservation Area. Further designated heritage assets within 3km include a Scheduled Monument 2.7km to the east (four bowl barrows at Four Firs of Woodbury Common and a Registered Park and Garden 2.7km to the south (A La Ronde and The Point-in-View. There is potential for development to compromise the setting of these historic environment assets.<br>As such, uncertain minor negative effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br>To minimise greenhouse gas emissions. | --? | The site is located within 5km of the Main Town of Exmouth. As such, uncertain negligible effects are expected.<br>The site is not located within 1km of cycle routes or railway stations. The site is located within 500m of a bus stop, however this is not served by frequent services. As such, due to the lack of accessible public transport links, minor negative effects are expected.<br>As the site is expected to deliver under 10ha of employment land, it is assumed that development of the site would provide fewer sustainable transport, walking and cycle links, and services. As such, uncertain significant negative effects are also expected. |

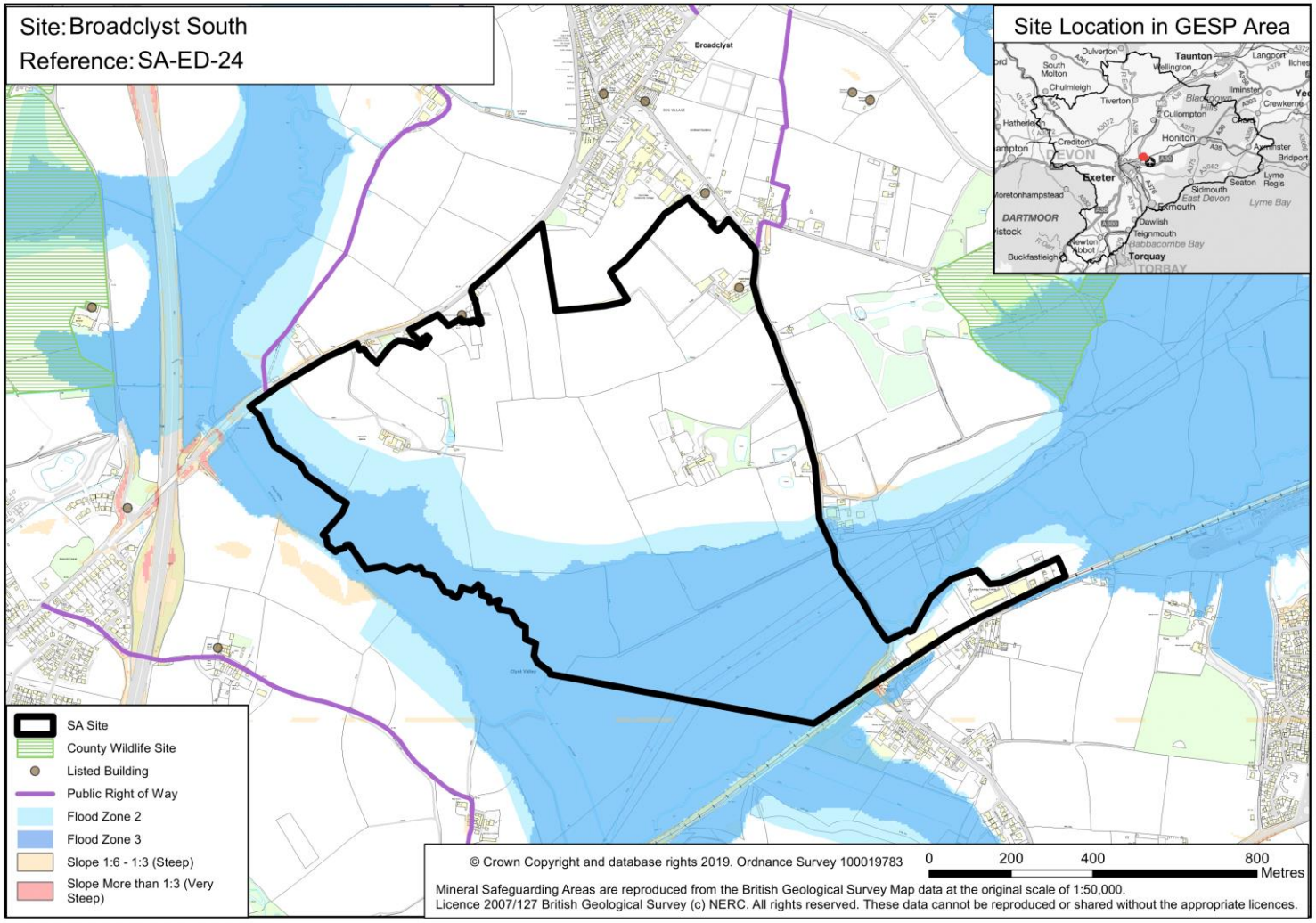
| SA Objective | SA Score | Justification |
|---|---|---|
| | | Overall, uncertain significant negative effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and is there is no significant flood risk within the area. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br>To utilise our land resources efficiently and minimise their loss or degradation. | --? | The entirety of the site (>5ha) is comprised of Grade 3 agricultural land. However, it is unclear if it is Grade 3a or Grade 3b. As such, uncertain significant negative effects are expected due to the potential for loss of high quality agricultural land during development.<br>The site does not contain any previously developed land.<br>The site is not located within any Minerals Safeguarding Areas.<br>Overall, uncertain significant negative effects are expected due to development on high quality agricultural land. |
| **7. WATER RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or degradation. | 0 | The site is not adjacent to and does not contain any watercourse.<br>As such, negligible effects are expected. |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | 0 | The site is only being considered for employment use and would therefore not provide any benefit in terms of additional homes.<br>As such, negligible effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to | + | The site is within 400m from Public Rights of Way, but is not within 800m of major open space.<br>As such, minor positive effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| enjoy and experience them. | | |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | 0 | While providing new jobs will have a positive impact on the health and wellbeing of workers, the site is within the Exe Estuary including Clyst St Mary, Exton and Lympstone Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees lower levels of deprivation than Devon and Mid Devon as a whole. Therefore, development in this area is unlikely to be significantly affected by deprivation and is less likely to have a positive effect on wellbeing locally as a result of increased investment in the area. The site is adjacent to existing employment site, Woodbury Business Park, which could have additional benefits.<br>As such, negligible effects are expected. |
| **11. ACCESS TO SERVICES**<br>To provide accessible and attractive services and community facilities for all ages and interests. | --/+ | The site is not located adjacent to any settlements which could provide services to the site. The closest settlement is Woodbury, which is around 1km north east of the site.<br>The site is adjacent to an area that has access to superfast broadband (80-300Mbps), which it is assumed could be extended to the site if development came forward. As such, minor positive effects are expected.<br>Overall, mixed significant negative and minor positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | +? | The site has the capacity to deliver less than 5ha of employment space and is adjacent to an existing small scale industrial business park at Woodbury. The site is not in close proximity to existing labour markets. Jobs would be created during the construction phase of the site.<br>As such, uncertain minor positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br>To connect people and businesses | - | The site is not located within 1km of cycle routes or railway stations. The site is located within 500m of a bus stop, however this is not served by frequent services.<br>As such, due to the lack of accessible public transport links, minor negative effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | | |

## SA-ED-24: Broadclyst South

| SA-ED-24 | Broadclyst South |
|---|---|
| **Authority Area:** East Devon | |
| **Site Area:** 114.6ha (Net 39.3ha) | |
| **Approximate total capacity:** 1,217 – 1,571 dwellings | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:** New village to the south of Broadclyst with the potential to deliver community aspiration for a road link between the B3181 and Station Road. | |



| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/--? | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, but is within 1km of two County Wildlife Sites, Hellings Park Fen and Poltimore. The site contains two priority habitats, deciduous woodland and coastal and floodplain grazing marsh. The site is flagged as Amber in the HRA sensitivity work with regard to Exe Estuary SPA and East Devon Pebblebed SAC/SPA and is within the 10km recreation zones of the Exe Estuary and Pebblebed Heaths; mitigation is likely to include a requirement for SANGS. It is also within the 5km Great Crested Newt consultation zone. The site is also divided by multiple likely species-rich hedgerows and contains a significant number of mature trees. As such, uncertain significant negative effects are expected.<br><br>Existing green infrastructure on the site, including woodland bands, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space and playing pitches that could mitigate the biodiversity impact of development. As such, significant positive effects are also expected.<br><br>Overall, mixed significant positive and uncertain significant negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is comprised of predominantly estate wooded farmland in the north and sparsely settled farmed valley floors in the south. Development would result in urbanisation of the environment within the site. The site is considered to be of high landscape sensitivity as there is potential for intervisibility between development at the site and the East Devon AONB as the site is located on a prominent ridge.<br><br>As such, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/-? | The northern half of the site contains one Grade II listed building (Heathfield Farmhouse) and is also adjacent two others (Kerswell House and Coggins). There are multiple designated assets within 3km including a high concentration of listed buildings 850m to the north contained within Broadclyst Conservation Area as well as a Scheduled Monument 1.2km to the north (Manorial settlement incorporating a medieval undercroft). Development could compromise the setting of these historic environment assets. There is also potential for intervisibility between development at the site and Belbury Castle. As such, uncertain minor negative effects are expected.<br><br>It is likely that the site is of sufficient size (>10ha) to accommodate a well-designed development and create a new high quality built environment. It should be possible for development to respond appropriately to existing heritage assets in the area and minimise any disturbance to the historic environment. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **4. CLIMATE CHANGE MITIGATION**<br>To minimise greenhouse gas emissions. | + | The site is within 1km of the Main Town of Cranbrook. As such, uncertain minor positive effects are expected.<br>The site is not located within 1km of railway stations or cycle routes. However, the site is located adjacent to bus stops served by frequent bus services. As such, due to the proximity of bus stops, minor positive effects are expected.<br>As the site is expected to deliver over 1,000 homes, it is assumed that development of the site would provide some sustainable transport, walking and cycle links and services. As such, uncertain negligible effects are expected.<br>Overall, minor positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br>To adapt to the possible effects of climate change. | --? | The site is predominantly greenfield. The north of the site is predominantly in an area with no significant flood risk. There is a river to the west of the site, and therefore the south of the site is predominantly flood zone 2 and flood zone 3. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br>As such, uncertain significant negative effects are expected. |
| **6. LAND RESOURCES**<br>To utilise our land resources efficiently and minimise their loss or degradation. | -- | The site is comprised of over 5ha of Grade 1 agricultural land as well as over 5ha of Grade 2 and Grade 3a agricultural land also. As such, significant negative effects are expected due to the potential for loss of high quality agricultural land during development. Remaining areas within the site are comprised of Grade 3b and non-agricultural land.<br>The site is almost entirely greenfield apart from small areas of land associated with existing dwellings.<br>The site is not located within any Mineral Safeguarding Areas.<br>Overall, significant negative effects are expected due to development on high quality land. |
| **7. WATER RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or degradation. | --? | Development should ensure no deterioration in the water quality of the River Clyst which is adjacent to the western boundary of the site and flows into the Exe Estuary SPA.<br>As such, uncertain significant negative effects are expected. |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially | ++ | The site is likely to be able to accommodate about 1,217-1,571 homes. However this capacity is likely to reduce once account has been taken of the likely mitigation requirements, including those highlighted elsewhere in this assessment. The site would also need to ensure a viable mix of homes |

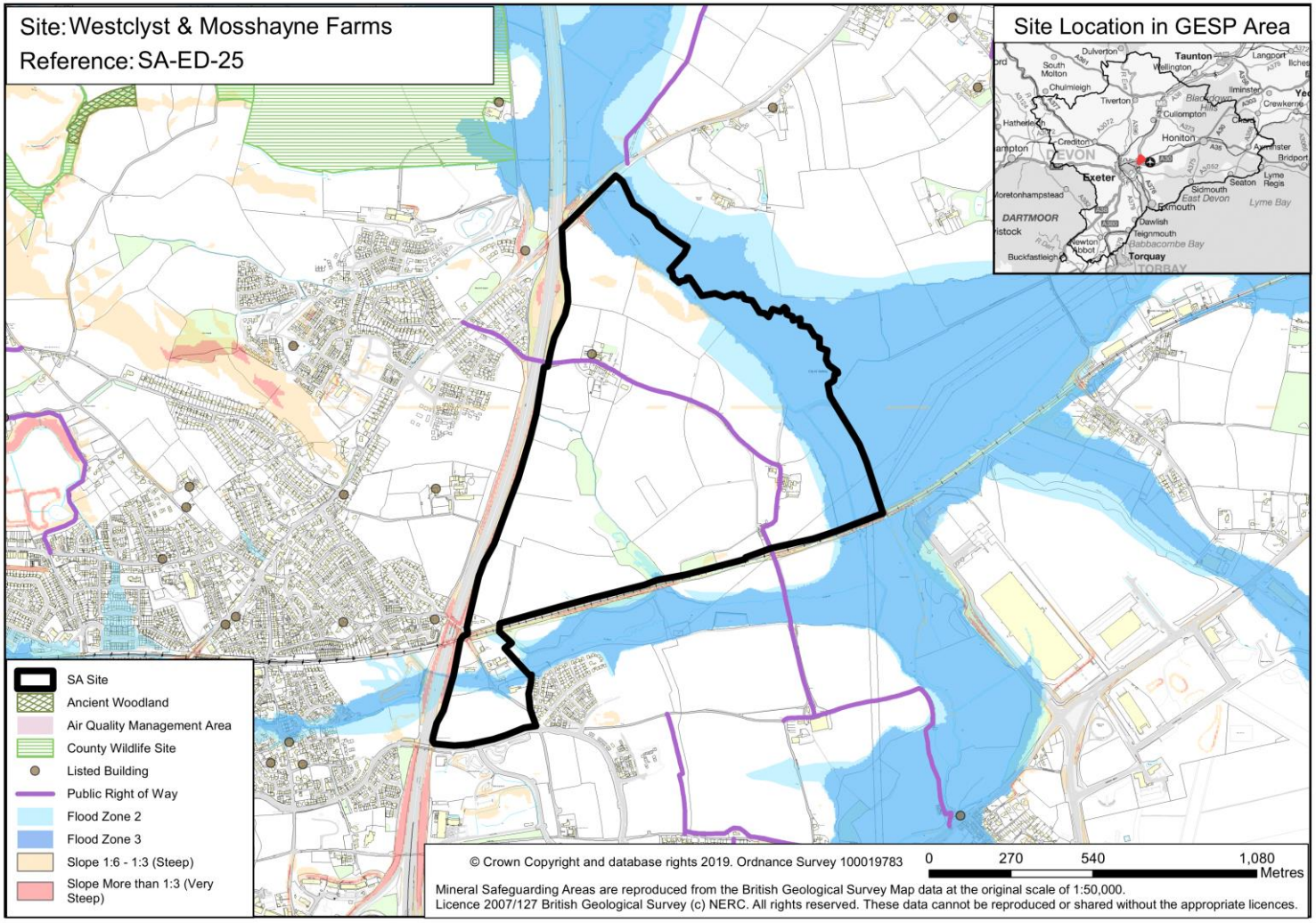
| SA Objective | SA Score | Justification |
|---|---|---|
| accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | | (tenure and sizes) including a proportion of affordable housing to contribute towards meeting needs within the area. This range of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom and self build providers. The site is of a sufficient size to be able to support a high number of housing starts / completions from a number of different outlets around the site, which in turn will ensure a good pace of delivery.<br><br>As such, significant positive effects are expected. |
| **9. HEALTH**<br><br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site is within 800m of major open space, Cranbrook Country Park and Accessible Woodland, and is adjacent to Public Rights of Way. As such, significant positive effects are expected.<br><br>However, as the site is expected to deliver between 1,000-1,999 homes, it is assumed that development of the site would provide some open space and active transport links. As such, minor positive effects are expected.<br><br>Overall, significant positive effects are expected. |
| **10. WELLBEING**<br><br>To support positive, safe and healthy communities. | - | While providing new homes will have a positive impact on the health and wellbeing of occupants, the site is within the 'E02004134' Middle Super Output Area. This area, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees average levels of deprivation than Nationally as a whole. It is likely that a reasonably large residential-led development of this nature will provide potential improvements to the availability of homes in the area, which will provide broad wellbeing benefits. As such, negligible effects are expected.<br><br>The site lies adjacent to a railway line and an industrial area, Lodge Trading Estate. These features may result in noise pollution affecting residents of the site in the longer term. As such, minor negative effects are expected.<br><br>The site is not within 1km of an AQMA. However, car movements emanating from the site could potentially contribute to worsening air quality as a result of congestion at the Exeter AQMA, along the Pinhoe Road corridor. As such, minor negative effects are expected.<br><br>Overall, minor negative effects are expected. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | + | The site is located adjacent to Broadclyst (a Defined Village), which provides shops, meeting venues, public houses and places of worship. Further such facilities are available in Cranbrook to the east and Pinhoe to the south west, which are both located around 1km from the site. Larger shops, hospitals and larger cultural facilities are located in Exeter which is easily accessible from this location by multiple modes of transport. As such, minor positive effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | The site is within 1km of St Martin's Primary School and Broadclyst Primary Academy is just over 1km away. The site is within 500m of Clyst Vale Community College (a secondary school). Additional primary capacity will be required either on-site or by increasing capacity at an existing school. Clyst Vale Community College has limited capacity to expand. Additional capacity would need to be created either here or in other nearby secondary schools to accommodate pupils from the site. As such, uncertain minor positive effects are expected.<br><br>The site is adjacent to an area that has access to superfast broadband (80-300Mbps), which it is assumed could be extended to the site if development came forward. As such, minor positive effects are expected.<br><br>The site is medium sized, providing over 500 homes, and therefore it is assumed that development would be more likely to include a primary school on site. As such, minor positive effects are expected.<br><br>Overall, minor positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | + | The site is not adjacent to a Main Town but it is within 1km of existing or proposed employment sites that could provide employment opportunities. As such, minor positive effects are expected.<br><br>Jobs would be created during the construction phase of the site and any new homes would create expenditure in the area. It is assumed that, as the site has the capacity to deliver over 1,000 homes, the site will provide medium scale mixed use employment opportunities and a business park or employment estate as well as a neighbourhood hub with shops and services. As such, minor positive effects are expected.<br><br>Impact on tourism not considered likely.<br><br>Overall, minor positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br><br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, | + | The site is not located within 1km of railway stations or cycle routes. However, the site is located adjacent to bus stops served by frequent bus services. As such, due to the proximity of bus stops, minor positive effects are expected.<br><br>In addition, the site has capacity for more than 1,000 homes and therefore is assumed to provide |

| SA Objective | SA Score | Justification |
|---|---|---|
| cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | | sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br>Overall, minor positive effects are expected. |

## SA-ED-25: Westclyst & Mosshayne Farms

| SA-ED-25 | Westclyst & Mosshayne Farms |
|---|---|
| **Authority Area:** East Devon | |
| **Site Area:** 117ha (Net 53.4ha) | |
| **Approximate total capacity:** 1,656 – 2,136 dwellings | |
| **Site status:** Potential site option | |
| **Outline description and context:**<br><br>Residential-led development to the east of the M5 and predominantly north of the Waterloo Railway line. | |



| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/--? | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, but is within 1km of Poltimore County Wildlife Site. The site contains two priority habitats, coastal and floodplain grazing marsh, traditional orchard and deciduous woodland. The site is flagged as Amber in the HRA sensitivity work with regard to Exe Estuary SPA and East Devon Pebblebed SAC/SPA and is within the 10km recreation zones of the Exe Estuary and Pebblebed Heaths; mitigation is likely to include a requirement for SANGS. The site is also within the 5 km great crested newt consultation zone. A significant proportion of the site is part of an unconfirmed wildlife site covering all of the Broadclyst Moor-Dymonds Bridge Marsh which consists of the low-lying land either side of the River Clyst and lower end of the Cranny Brook. Retention and enhancement of this asset will be required to mitigate impacts. As such, uncertain significant negative effects are expected.<br><br>Existing green infrastructure on the site, including marshes and woodland bands, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space and playing pitches that could mitigate the biodiversity impact of development. As such, significant positive effects are also expected.<br><br>Overall, mixed significant positive and uncertain significant negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | -? | The site is comprised of predominantly lower rolling farmed and settled valley slopes. Development would result in urbanisation of the environment within the site. The site is considered to be of medium landscape sensitivity as there intervisibility between potential development and the East Devon AONB is very distant. The site would also be seen within the context of surrounding developments.<br><br>As such, uncertain minor negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/-? | The site contains one Grade II listed building within its boundaries (West Clyst Farmhouse). There are multiple designated assets within 3km including three Grade II listed buildings within 300m of the western boundary of the site across the M5, which does offer a degree of separation to any development that may come forward in the site. There are further designated heritage assets within 3km including Sowton Conservation Area around 1.2km to the south and Broadclyst Conservation area around 1.4km to the north, which both contain a high concentration of listed buildings. Additionally, there is a Scheduled Monument (Manorial settlement incorporating a medieval undercroft) around 1.7km to the north of the site.There is potential for development to compromise the setting of these historic environment assets. As such, uncertain minor negative effects are expected.<br><br>It is likely that the site is of sufficient size (>10ha) to accommodate a well-designed development and create a new high quality built environment. It should be possible for development to respond |

| SA Objective | SA Score | Justification |
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| | | appropriately to existing heritage assets in the area and minimise any disturbance to the historic environment. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | ++? | The site is adjacent to Exeter City. As such, uncertain significant positive effects are expected.<br><br>Although the site is not located within 1km of cycle routes, the site is located within 500m of bus stops serves by frequent bus services. The site is also located within 1km of Pinhoe railway station, however the intervening M5 motorway could prevent access to this. As such, due to the proximity of some accessible public transport links, minor positive effects are expected.<br><br>As the site is expected to deliver over 1,000 homes, it is assumed that development of the site would provide some sustainable transport, walking and cycle links and services. As such, uncertain negligible effects are expected.<br><br>Overall, uncertain significant positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and in an area with no significant flood risk. There is a river in the east and south of the site and as such, areas of the site are on flood zone 2 and flood zone 3. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | -- | The site is comprised of over 5ha of Grade 1 agricultural land as well as over 5ha of Grade 2 agricultural land also. As such, significant negative effects are expected due to the potential loss of high quality agricultural land during development. Remaining land within the site is Grade 3 and a small area of non-agricultural land.<br><br>Although the site does not contain any land considered to be brownfield that could be used during development, it is noted that it does contain some existing dwellings as well as a trailer storage yard just north of the railway.<br><br>The site is not located within any Minerals Safeguarding Areas.<br><br>Overall, significant negative effects are expected due to development on high quality agricultural land. |
| **7. WATER RESOURCES** | --? | Development should ensure no deterioration in the water quality of the River Clyst, which runs through |

| SA Objective | SA Score | Justification |
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| To utilise our water resources efficiently and minimise their loss or degradation. | | the eastern side of the site and flows into the Exe Estuary SPA.<br><br>As such, uncertain significant negative effects are expected. |
| **8. HOMES**<br><br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | ++ | The site is likely to be able to accommodate about 1,656-2,136 homes. However this capacity is likely to reduce once account has been taken of the likely mitigation requirements, including those highlighted elsewhere in this assessment. The site would also need to ensure a viable mix of homes (tenure and sizes) including a proportion of affordable housing to contribute towards meeting needs within the area. This range of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom and self-build providers. The site is of a sufficient size to be able to support a high number of housing starts / completions from a number of different outlets around the site, which in turn will ensure a good pace of delivery.<br><br>As such, significant positive effects are expected. |
| **9. HEALTH**<br><br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site contains and is adjacent to Public Rights of Way, but is not within 800m of major open space. As such, minor positive effects are expected.<br><br>However, as the site has capacity for more than 2,000 homes, it is assumed that development of the site would provide significant open space and active transport links. As such, significant positive effects are expected.<br><br>Overall, significant positive effects are expected. |
| **10. WELLBEING**<br><br>To support positive, safe and healthy communities. | - | While providing new homes will have a positive impact on the health and wellbeing of occupants, the site is within the 'E02004134' Middle Super Output Area. This area, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees average levels of deprivation than Nationally as a whole. It is likely that a reasonably large residential-led development of this nature will provide potential improvements to the availability of homes in the area, which will provide broad wellbeing benefits. As such, negligible effects are expected.<br><br>The site lies adjacent to the M5 motorway to the west and a railway line to the south. These features may result in noise pollution affecting residents of the site in the longer term. As such, minor negative effects are expected.<br><br>The site is not within 1km of an AQMA. However, car movements emanating from the site could potentially contribute to worsening air quality as a result of congestion at the Exeter AQMA, along the Pinhoe Road corridor. As such, minor negative effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | Overall, minor negative effects are expected. |
| **11. ACCESS TO SERVICES**<br>To provide accessible and attractive services and community facilities for all ages and interests. | ++ | The site is located adjacent to Exeter City, which provides a range of shops and leisure facilities in the city centre. Pinhoe, located on the outskirts of Exeter directly adjacent to the site provides shops, meeting venues, public houses and places of worship also. As such, significant positive effects are expected.<br>The site is within 1km of Pinhoe Primary School but it is not within 1km of any secondary schools. Additional primary capacity will likely be required either on-site or by increasing capacity at an existing/proposed school. Clyst Vale Community College is approximately a 2km walk from the centre of the site but has limited capacity to expand. Additional capacity would need to be created either here or in other nearby secondary schools to accommodate pupils from the site. Exeter College is within 3km of the site, providing further education opportunities. As such, uncertain minor positive effects are expected.<br>The site is adjacent to areas that have access to superfast broadband (80-300Mbps), which it is assumed could be extended to the site if development came forward. As such, minor positive effects are expected.<br>The site is medium sized, providing over 500 homes, and therefore it is assumed that development would be more likely to accommodate a primary school on site. As such, minor positive effects are expected.<br>Overall, significant positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | ++ | The site is adjacent to Exeter City and it is within 1km of existing or proposed employment sites that could provide employment opportunities. As such, significant positive effects are expected.<br>Jobs would be created during the construction phase of the site and any new homes would provide expenditure in the area. It is assumed that, as the site has the capacity to deliver over 2,000 homes, the site will provide large scale mixed use employment opportunities and a business park or employment estate as well as a neighbourhood hub with shops, services and community buildings. As such, significant positive effects are expected.<br>Impact on tourism not considered likely.<br>Overall, significant positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the | ++ | The site is located adjacent to Exeter City and will deliver less than 4,000 homes, which is a scale not expected to detract visitors from the current town centre. A new residential site could support the |

| SA Objective | SA Score | Justification |
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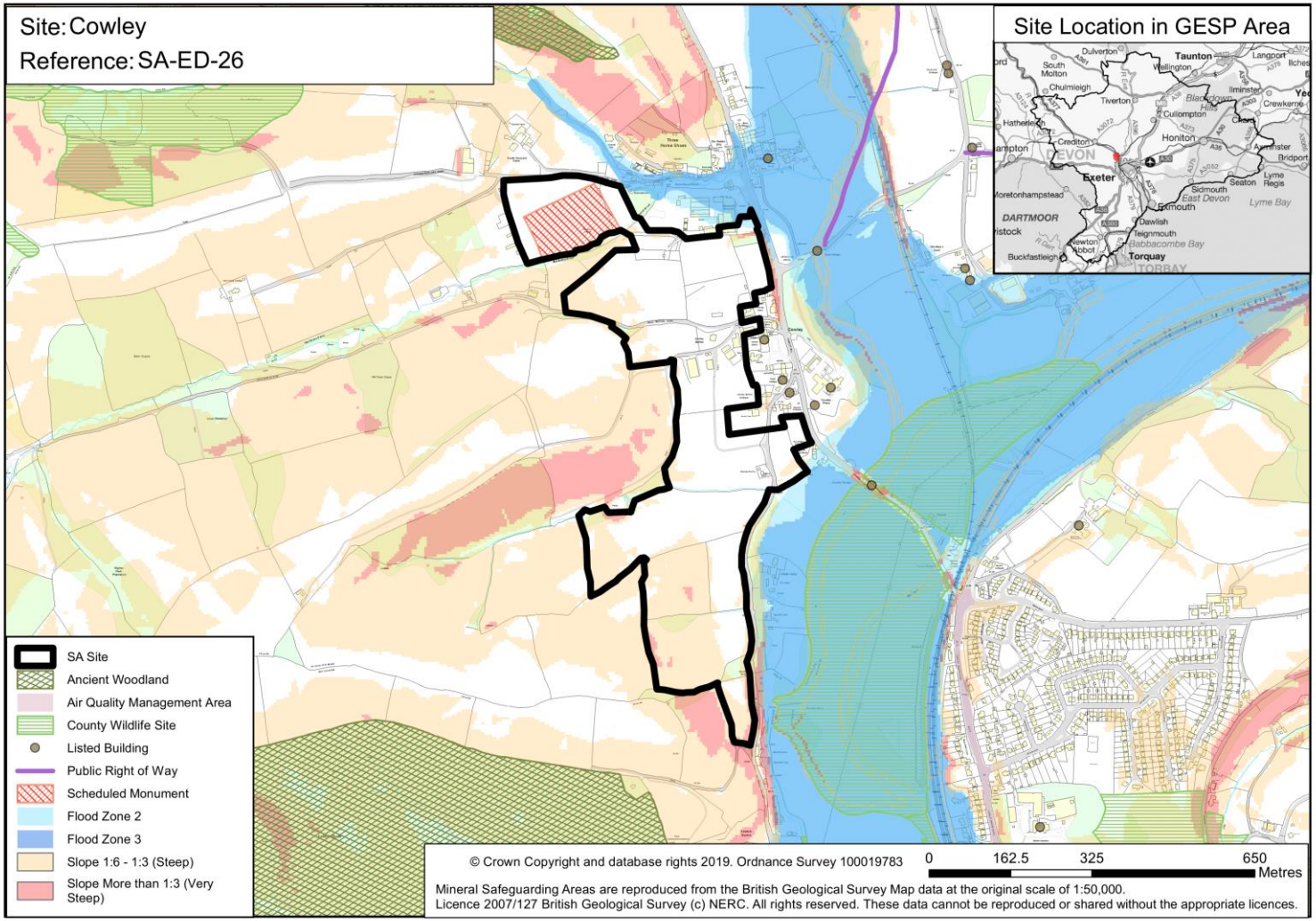
| vitality and viability of our city and town centres. | | vitality and viability of the existing town centre by increasing the number of day-to-day visitors and supporting businesses and services there.<br><br>As such, significant positive effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | + | Although the site is not located within 1km of cycle routes, the site is located within 500m of bus stops serves by frequent bus services. The site is also located within 1km of Pinhoe railway station, however the intervening M5 motorway could prevent access to this. As such, due to the proximity of some accessible public transport links, minor positive effects are expected.<br><br>In addition, the site has capacity for more than 1,000 homes and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br><br>Overall, minor positive effects are expected. |

## SA-ED-26: Cowley

| SA-ED-26 | Cowley |
|---|---|
| **Authority Area:** East Devon |  |
| **Site Area:** 26.9ha (Net 11.6ha) | |
| **Approximate total capacity:** 359 – 463 dwellings | |
| **Site status:** Potential site option | |
| **Outline description and context:** Residential development around the existing hamlet of Cowley. | |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | --?/+ | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, but the site is within 250m of Duryardwood Copse County Wildlife Site to the north and two County Wildlife Sites to the south east, Cowley Barton Fields and Exwick Weir. The site is also within 1km of Oakwood Copse County Wildlife Site. The site contains priority habitat deciduous woodland. The site is within the 5 km great crested newt consultation zone. The site is flagged as Amber in the HRA sensitivity work with regard to Exe Estuary SPA and is within the 10km recreation zones of the Exe Estuary and Pebblebed Heaths; mitigation is likely to include a requirement for SANGS. The site is more than 1km from Stoke Woods SSSI; however development may result in increased recreational pressures upon the site requiring mitigation. Recreational pressures will also need to be mitigated for the County Wildlife Sites that are within close proximity to the site. As such, uncertain significant negative effects are expected.<br><br>Existing green infrastructure on the site, including woodland bands, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for less than 1,000 homes, and therefore is expected to provide local public open space that could mitigate the biodiversity impact of development. As such, minor positive effects are also expected.<br><br>Overall, mixed minor positive and uncertain significant negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The landscape within the site is characterised by river valley slopes and combes. Development would result in urbanisation of the environment within the site. The site is considered to be of medium-high landscape sensitivity as development would see Exeter's growth expanding into a relatively undeveloped valley.<br><br>As such, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | --?/+? | The northern half of the site contains a Scheduled Monument (earthwork enclosure 330 metres south-west of Three Horse Shoes Inn) within its boundaries. There are multiple designated assets within 3km including seven Grade II listed buildings within 250m of the north-eastern boundary of the site and there is a further Scheduled Monument around 100m to the west (Cowley Bridge). There is potential for development to compromise the setting of these historic environment assets. Uncertain significant negative effects are expected due to the presence of a Scheduled Monument onsite.<br><br>It is likely that the site is of sufficient size (>10ha) to accommodate a well-designed development and create a new high quality built environment. It should be possible for development to respond appropriately to existing heritage assets in the area and minimise any disturbance to the historic environment. The will likely involve accommodating a buffering region around the Scheduled |

| SA Objective | SA Score | Justification |
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| | | Monument contained onsite. Uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain significant negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | --?/+ | The site is located within 1km of Exeter City. As such, uncertain minor positive effects are expected.<br><br>The site is not located within 1km of cycle routes or railway stations. The site is however located adjacent to bus stops served by frequent bus services. As such, due to the proximity of bus stops, minor positive effects are expected.<br><br>As the site is expected to deliver under 1,000 homes, it is assumed that development of the site would provide fewer sustainable transport, walking and cycle links, and services. As such, uncertain significant negative effects are also expected.<br><br>Overall, mixed minor positive and uncertain significant negative effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and in an area with no significant flood risk. There is a river to the right of the site and as such, areas of the site are on flood zone 2 and flood zone 3. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain minor negative effects can be expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | -- | The vast majority of the site (>5ha) is comprised of Grade 3 agricultural land. However, it is unclear if it is Grade 3a or Grade 3b. As such, uncertain significant negative effects are expected due to the potential for loss of high quality agricultural land during development.<br><br>The site does not contain any previously developed land apart from some agricultural developments.<br><br>The site is not located within any Mineral Safeguarding Areas.<br><br>Overall, significant negative effects are expected due to development on high quality agricultural land. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or degradation. | --? | Development should ensure no deterioration in the water quality of the Duryardwood Brook which is adjacent to the northern boundary of the site and flows into the Exe Estuary SPA.<br><br>As such, uncertain significant negative effects are expected. |
| **8. HOMES** | + | The site is likely to be able to accommodate about 359-463 homes. However this capacity is likely to reduce once account has been taken of the likely mitigation requirements, including those highlighted |

| SA Objective | SA Score | Justification |
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| To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | | elsewhere in this assessment. The site would also need to ensure a viable mix of homes (tenure and sizes) including a proportion of affordable housing to contribute towards meeting needs within the area. This range of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom and self-build providers. The site is likely to be borderline in terms of a sufficient size to be able to support a high number of housing starts / completions from a number of different outlets around the site. As such, delivery may be at a reduced annual rate compared to some larger sites.<br><br>As such, minor positive effects are expected. |
| **9. HEALTH**<br><br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site is adjacent to major open space, Riverside Valley Park, and is within 400m of Public Rights of Way.<br><br>As such, significant positive effects are expected. |
| **10. WELLBEING**<br><br>To support positive, safe and healthy communities. | -- | While providing new homes will have a positive impact on the health and wellbeing of occupants, the site is within the 'E02004134' Middle Super Output Area. This area, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees average levels of deprivation than Nationally as a whole. It is likely that a reasonably large residential-led development of this nature will provide potential improvements to the availability of homes in the area, which will provide broad wellbeing benefits. As such, negligible effects are expected.<br><br>The site is in close proximity to existing residential development, Exwick to the south of the site, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. As such, minor negative effects are expected.<br><br>The site is within 1km of Exeter AQMA, car movements emanating from the site could potentially contribute to worsening air quality as a result of congestion at the Exeter AQMA, along the Cowley Bridge Road corridor. As such, significant negative effects are expected.<br><br>Overall, significant negative effects are expected. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for | +?/- | The site is located adjacent to Cowley, (an Undefined Village) which has limited access to services. Improvement to walking and cycling links in all would be necessary, especially in relation to crossing the River Exe and to Newton St Cyres which have the potential to be significant blocks to access. Larger shops, hospitals and larger cultural facilities are located in Exeter which is easily accessible from |

| SA Objective | SA Score | Justification |
|---|---|---|
| all ages and interests. | | this location by car and bus. As such, minor negative effects are expected.<br><br>The site is within 1km of a primary school (a Steiner Academy) but it is not within 1km of any secondary schools. Exwick Heights Primary School and Newton St Cyres Primary School are located a little within the area also. Capacity may be an issue in all cases. As such, additional primary capacity will likely be required either on-site or by increasing capacity at an existing/proposed school. Secondary provision exists within Exeter, however in all cases capacity is an issue. Additional capacity may need to be created to accommodate pupils from the site and others along the A377 corridor and around Exeter. Multiple further education opportunities are available within 3km in Exeter. As such, uncertain minor positive effects are expected.<br><br>Currently, the site only has access to standard broadband speeds (10-30Mbps). As such, negligible effects are expected.<br><br>The site is small, providing less than 500 homes, and therefore it is assumed that development would be less likely to accommodate new schools on site. As such, minor negative effects are expected.<br><br>Overall, mixed minor negative and uncertain minor positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | -- | The site is not adjacent to a Main Town and it is not within 1km of any existing or proposed employment sites that could provide employment opportunities. As such, significant negative effects are expected.<br><br>Jobs would be created during the construction phase of the site and any new homes would provide expenditure in the area. It is assumed that, as the site has the capacity to deliver less than 500 homes, the site will provide limited employment opportunities and no shops or services. As such, negligible effects are expected.<br><br>Impact on tourism not considered likely.<br><br>Overall, significant negative effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br><br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT** | + | The site is not located within 1km of cycle routes or railway stations. The site is however located adjacent to bus stops served by frequent bus services. |

| SA Objective | SA Score | Justification |
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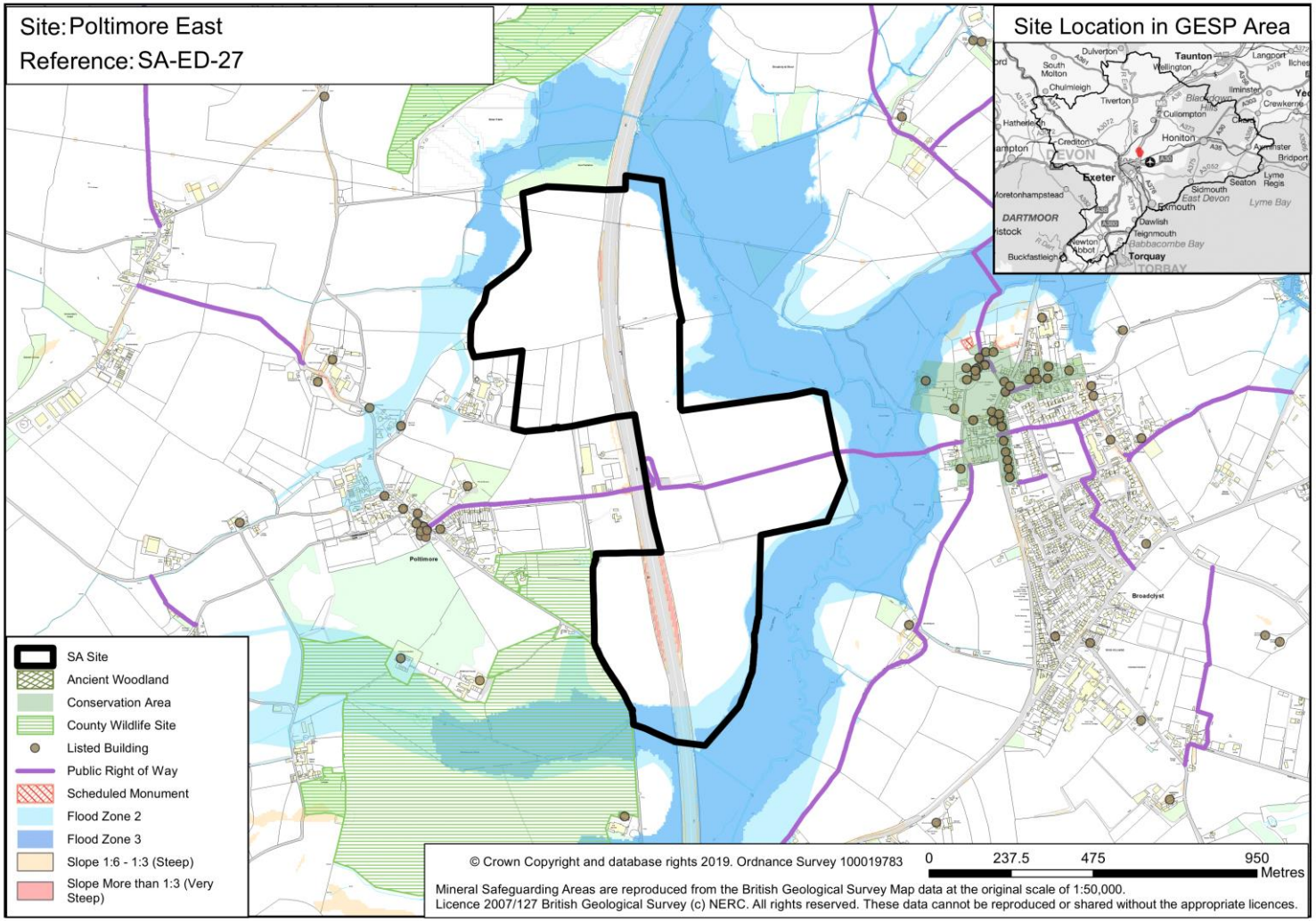
| To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | | As such, due to the proximity of bus stops, minor positive effects are expected. |

## SA-ED-27: Poltimore East

| SA-ED-27 | Poltimore East |
|---|---|
| **Authority Area:** East Devon | |
| **Site Area:** Estimated 5-10 ha service station incorporating A3 and A1 uses, plus car parking | |
| **Approximate total capacity:** New Motorway Service Area | |
| **Site status:** Potential site option | |
| **Outline description and context:** Agricultural land either side of the M5 west of Broadclyst and north east of Poltimore (north of Junction 29 of the M5). The site is largely flat or gently sloping, with land to the west of the M5 adjoining the River Clyst. The site is partially within the Clyst Valley Regional Park designated in the East Devon Local Plan. New Services would replace existing site at M5 J30. New Motorway services with dedicated slip roads would remove traffic from J30 and allow easier on/off motorway access. This site would contribute to reducing the impact of the |  |

| SA-ED-27 | Poltimore East |
| --- | --- |
| motorway services on congestion and emissions in the city. | |

| SA Objective | SA Score | Justification |
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| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | --? | The site is not located within 1km of any internationally or nationally designated biodiversity or geodiversity sites. However, the south-western boundary of the site is adjacent to a County Wildlife Site (Poltimore). The southern part of the site also contains areas of priority for habitat for coastal and floodplain grazing marsh and there are strategic nature areas to the north (coastal and floodplain grazing marsh and east (good-quality semi-improved grassland) of the site. The land is also within a consultation zone for great crested newts and there are records of otter, purple hairstreak butterfly and lesser horseshoe bats in the area. There are some mature trees and hedgerows present within the site. In addition, much of the land is within the Clyst Valley Regional Park, in which Strategy 10 of the Local Plan applies offering special protection. The development proposal is contrary to Strategy 10.<br><br>The site has been flagged Amber in HRA sensitivity work. The site is within the recreational buffer for East Devon Pebblebed SAC/SPA and the Exe Estuary SPA, which could lead to increased visitor pressure at these locations as a result of development. Development could also result in elevated nutrient levels at waste water treatment discharges, which may negatively impact on water quality in the Exe estuary SPA. Whilst the site is proposed for employment uses, it still needs to be considered in relation to HRA work as there could potentially be tourist accommodation included as part of the development proposal. As such, uncertain significant negative effects are expected.<br><br>The site is entirely greenfield and contains a number of trees and hedgerows that could be lost if employment development comes forward. The site is less than 20ha and therefore there is less potential for the provision of local green infrastructure. As such, uncertain minor negative effects are expected due to the potential loss of green infrastructure assets.<br><br>Overall, uncertain significant negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The majority of the site is comprised of land that is considered to be estate wooded farmland in character. Development at the site would result in urbanisation of the environment. The site is considered to be of medium-high landscape sensitivity due to its proximity to Clyst Valley Regional Park, intervisibility with the local Public Right of Way network and Ashclyst Forest. As such, uncertain significant negative effects are expected.<br><br>The landscape sensitivity is considered to be low-medium in the north-western area of the site due to existing screen planting to the north and distance from other visual receptors. As such, uncertain minor negative effects are expected.<br><br>Overall, uncertain significant negative effects are expected due to the potential for development to disturb the setting of Clyst Valley Regional Park and other key local assets. |

| SA Objective | SA Score | Justification |
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| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | -? | The site does not contain any designated heritage assets within its boundaries. However, there are multiple designated assets within 3km including a high concentration of listed buildings around 500m to the west in Poltimore and a high concentration of listed buildings around 300m to the west of the site contained within Broadclyst Conservation Area. Of particular importance is Poltimore House, a Grade II* listed building. The historic parkland that is associated with the house adjoins the site boundary on the south-western edge. There is also a Scheduled Monument around 500m to the east (Manorial settlement incorporating a medieval undercroft) and Killerton House, which is a Registered Park and Garden, is located around 1.7km north of the site. There is potential for development to compromise the setting of these historic environment assets.<br>As such, uncertain minor negative effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br>To minimise greenhouse gas emissions. | --? | The site is located within 5km of Exeter City. As such, uncertain negligible effects are expected.<br>The site is not within 1km of any railway stations but it is within 500m of bus stops to the east and west of the site. As such, minor negative effects are expected due to there being limited public transport options in close proximity to the site.<br>The site is proposing under 10ha of employment land and therefore it is less likely that the development would be accompanied by sustainable transport links. As such, uncertain significant negative effects are expected.<br>Overall, uncertain significant negative effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br>To adapt to the possible effects of climate change. | --? | The site is entirely greenfield and there are parts of the site located in flood zone 3. There is potential for development to raise flood risk in the area as a result of an increase in the level of impermeable surfaces. It is unclear at this stage whether the land in flood zones is 3a or 3b, the latter being unsuitable for employment uses. There is also uncertainty over the design and provision of SuDS, which have the potential to mitigate flood risk associated with new development.<br>As such, uncertain significant negative effects are expected. |
| **6. LAND RESOURCES**<br>To utilise our land resources efficiently and minimise their loss or degradation. | -- | The site is comprised of over 5ha of Grade 1 agricultural land. As such, significant negative effects are expected due to the potential for the loss of high quality agricultural land during development. The remaining pockets of land within the site are comprised of Grade 3 agricultural land on the eastern boundary and Grade 4 agricultural land in the north of the site.<br>The site does not contain any previously developed land that could be reused. |

| SA Objective | SA Score | Justification |
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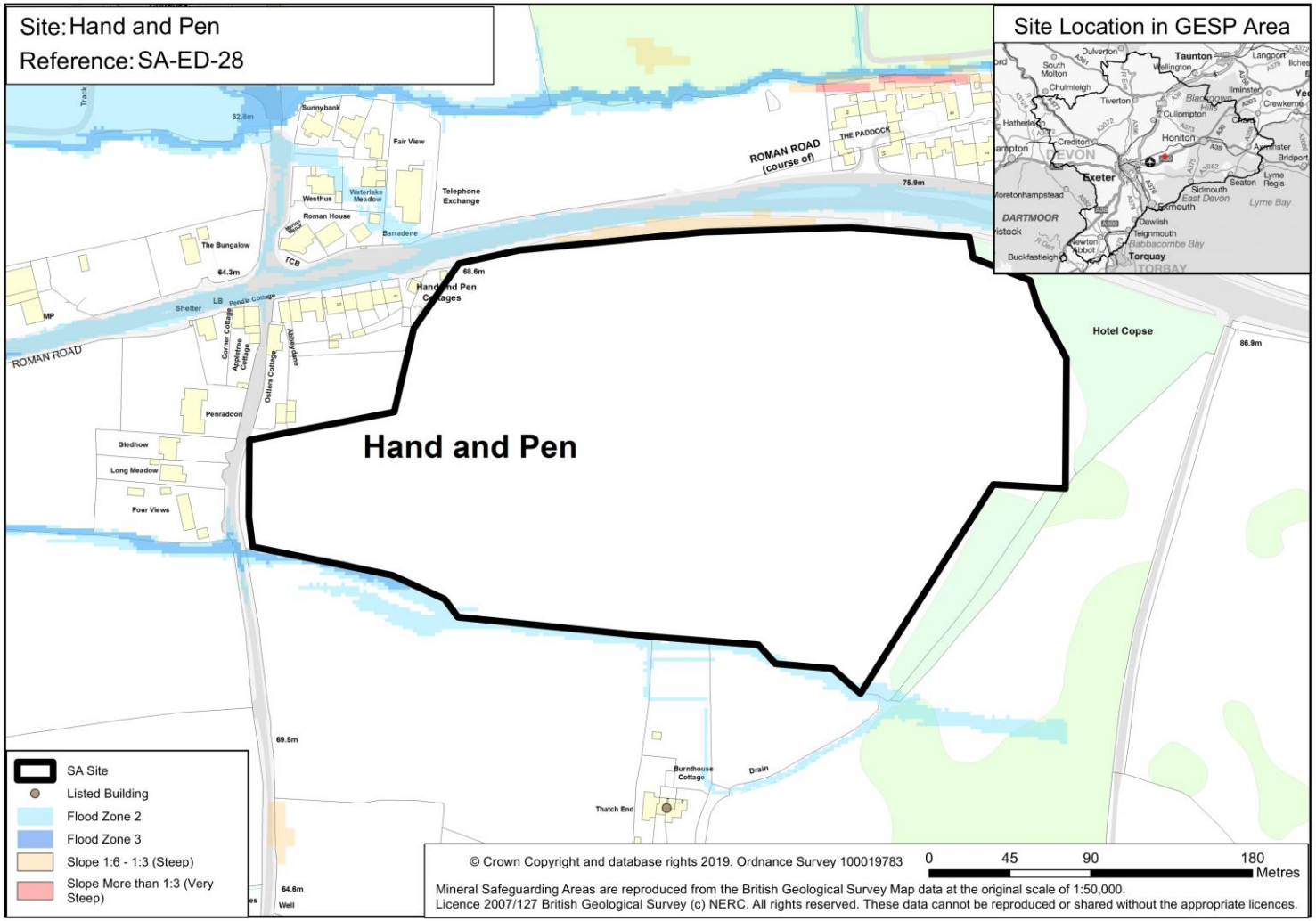
| | | The site is not located within any Minerals Safeguarding Areas.<br><br>Overall, significant negative effects are expected due to the potential for loss of high quality agricultural land. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or degradation. | --? | Development should ensure no deterioration in the water quality of the River Clyst, which runs adjacent to the eastern boundary of the site and flows into the Exe Estuary SPA. A stream diverging from the River Clyst also runs adjacent to the southern boundary of the site.<br><br>As such, uncertain significant negative effects are expected. |
| **8. HOMES**<br><br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | 0 | This site is proposed for a service station with employment uses and therefore will not contribute to housing.<br><br>As such, negligible effects are expected. |
| **9. HEALTH**<br><br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | + | The site not located within 800m of any major open space but it does contain and is adjacent to Public Rights of Way that could encourage recreation for employees at the site if development came forward. As such, minor positive effects are expected.<br><br>The site will deliver less than 20ha of employment land and therefore is not expected to deliver green infrastructure and active transport links as a part of development. As such, negligible effects are expected.<br><br>Overall, minor positive effects are expected. |
| **10. WELLBEING**<br><br>To support positive, safe and healthy communities. | 0 | The site is located within Middle Super Output Area covering Cranbrook, Broadclyst and surrounding areas to the north-east of Exeter which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, experiences below average levels of deprivation compared to Devon as a whole.<br><br>The site is not within 100m of any existing residential development and therefore development is not expected to have any negative impacts through noise pollution during construction or post-construction.<br><br>The site is not within 1km of any AQMAs and is not expected to have direct impacts on the level of |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | traffic entering AQMAs. As such, negligible effects are expected.<br><br>Overall, negligible effects are expected. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | --/+ | The site is not located adjacent to any settlements that could provide services and facilities further to those supplied at the service station proposed. As such, significant negative effects are expected.<br><br>The site is adjacent to areas that have access to superfast broadband (30-300Mbps), which it is assumed could be extended to support the site if development came forward. As such, minor positive effects are expected.<br><br>Overall, mixed significant negative and minor positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | ++ | The site has the capacity for over 5ha of employment. As such, minor positive effects are expected.<br><br>The site is within 3km of Exeter Science Park / Sky Park and Airport Business Park, which is a high value employment cluster and labour supply. As such, significant positive effects are expected.<br><br>Overall, significant positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or a Main Town and therefore development at the site is unlikely to impact on the vitality of existing town centres.<br><br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the | + | The site is not located within 1km of a railway station but it is within 500m of a bus stop.<br><br>As such, minor positive effects due to the proximity of public transport making employment opportunities at the proposed site more accessible. |

| SA Objective | SA Score | Justification |
|---|---|---|
| Greater Exeter area and beyond. | | |

## SA-ED-28: Hand-and-Pen

| SA-ED-28 | Hand-and-Pen |
|---|---|
| **Authority Area:** East Devon |  |
| **Site Area:** 8ha (Net 3.3ha) | |
| **Approximate total capacity:** 3.3ha employment | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:** Standalone employment site adjacent to the hamlet of Hand-and-Pen. | |

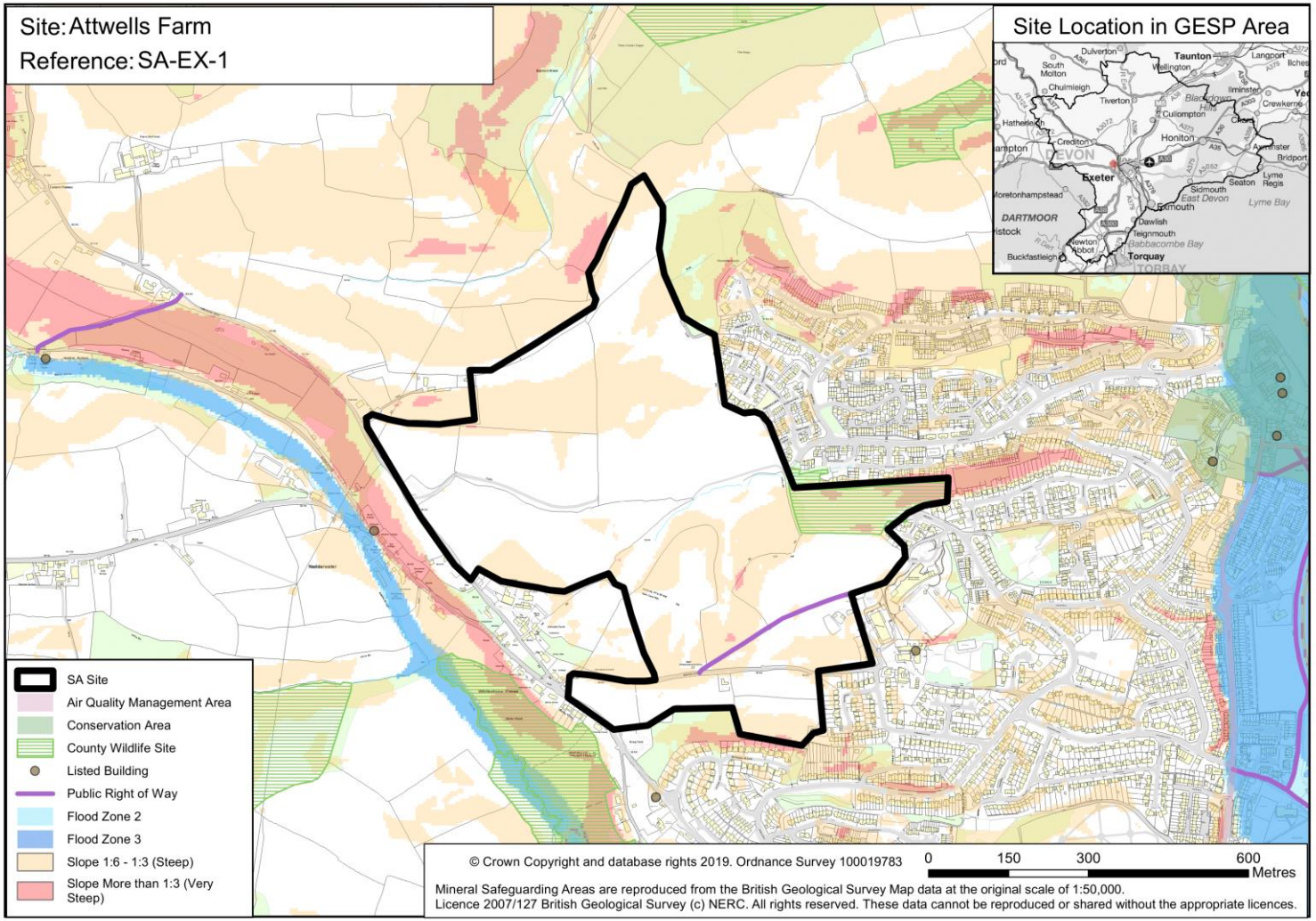
| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | 0? | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, or within 250m of a locally designated site. The site lies within a SSSI IRZ. The site is within the 10km recreation zone of the Pebblebed Heaths although as the site is being considered for employment this will likely reduce the overall recreational impact from development. It is also within the 5km Great Crested Newt consultation zone. The site supports unconfirmed wildlife areas in the form of secondary woodland. As such, uncertain negligible effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | -? | The entirety of the site is comprised of open rural countryside and so development would cause an urbanisation effect on the environment. The site is of medium landscape sensitivity due to there being low potential for intervisibility between the site and the East Devon AONB.<br>As such, uncertain minor negative effects are likely. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | -? | The site does not contain any heritage assets within its boundaries. The site is within 3km of multiple designated assets including three Grade II listed buildings in close proximity to the site, the closest of which is 95m south (Burnthouse Cottage), and the remaining two are around 250m south (Strete Ralegh House and Farmhouse). Further designated heritage assets within 3km include Whimple Conservation Area around 1.1km to the north and Rockbeare Manor (a Registered Park and Garden) around 2km to the south-west. There is potential for development to compromise the setting of these historic environment assets.<br>As such, uncertain minor negative effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br>To minimise greenhouse gas emissions. | --?/+ | The site is within 5km of the Main Towns of Cranbrook and Ottery St Mary and as such, uncertain negligible effects are expected.<br>The site is not located within 1km of existing cycle paths or railway stations. However, the site is adjacent to an existing bus stop served by frequent bus services. As such, due to the proximity of bus stops, minor positive effects are expected.<br>As the site is expected to deliver under 10ha of employment land, it is assumed that development of the site would provide fewer sustainable transport, walking and cycle links, and services. As such, uncertain significant negative effects are also expected.<br>As such, mixed minor positive and uncertain significant negative effects are expected. |
| **5. CLIMATE CHANGE** | -? | This site is predominantly greenfield and there is no significant flood risk within the area. Development |

| SA Objective | SA Score | Justification |
|---|---|---|
| **ADAPTATION**<br>To adapt to the possible effects of climate change. | | of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br>To utilise our land resources efficiently and minimise their loss or degradation. | --? | The entirety of the site (>5ha) comprises of Grade 3 agricultural land, However it is unclear whether this is Grade 3a or Grade 3b agricultural land. As such, uncertain significant negative effects are expected.<br>The site does not contain any previously developed land and is not located within any Minerals Safeguarding Areas.<br>Overall, uncertain significant negative effects are expected due to development on high quality agricultural land. |
| **7. WATER RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or degradation. | 0 | The site is not adjacent to and does not contain any watercourses.<br>As such, negligible effects are expected. |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | 0 | The site is not considered to be suitable for accommodating a strategic level of housing due to its size, lack of additional suitable land to consider in combination with the site and otherwise isolated location away from existing settlements.<br>As such, negligible effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | - | The site is not within 800m of major open space or within 400m of walking and cycle paths.<br>As such, minor negative effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy | - | While providing new jobs will have a positive impact on the health and wellbeing of workers, the site is within the 'E02004132' Middle Super Output Area which, according to the Devon Joint Strategic Needs |

| SA Objective | SA Score | Justification |
|---|---|---|
| communities. | | Assessment index of multiple deprivation, sees below average levels of deprivation than Nationally as a whole. As such, it is likely that a medium employment development of this nature will provide potential improvements to the availability of jobs in the area, which will provide broad wellbeing benefits. As such, negligible effects are expected.<br><br>The site is adjacent to an existing residential development including The Paddocks to the north of the site, which could be adversely affected as a result of noise and light pollution from development of the site during the construction and operational phases. As such, minor negative effects are expected.<br><br>The site is not within 1km of an AQMA. However, car movements to and from this site could potentially contribute to worsening air quality to the Exeter AQMA. As such, minor negative effects are expected.<br><br>Overall, minor negative effects are expected. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | --/+ | The site is not located adjacent to any settlements that could provide services. Users of the site are unlikely to access services and facilities at Cranbrook, Whimple or Ottery St Mary due to the distance of the town centres. As such, significant negative effects are expected.<br><br>The site is adjacent to areas that have access to superfast broadband (80-300Mbps), which it is assumed could be extended to the site if development came forward. As such, minor positive effects are expected.<br><br>Overall, mixed significant negative and minor positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | +? | The site has the capacity to deliver less than 5ha of employment land. The site is located some distance from high value employment clusters but in time should be reasonably close to labour supply from the eastern end of Cranbrook. The site has excellent connections to Exeter and other local populations as well as the wider region via the Strategic Road Network. Assuming super/ultrafast broadband can be achieved then this could be a productive site for the local economy, bringing jobs closer to rural populations in East Devon.<br><br>Jobs would be created during the construction phase of the site.<br><br>As such, uncertain minor positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br><br>As such, minor negative effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | + | The site is not located within 1km of existing cycle paths or railway stations. However, the site is adjacent to an existing bus stop served by frequent bus services.<br><br>As such, due to the proximity of bus stops, minor positive effects are expected. |

## SA-EX-1: Attwells Farm

| SA-EX-1 | Attwells Farm |
|---|---|
| **Authority Area:** Exeter City Council/Teignbridge District Council |  |
| **Site Area:** 47.5ha (Net 15.6ha) | |
| **Approximate total capacity:** 483 - 624 dwellings | |
| **Site status:** Potential site option | |
| **Outline description and context:** The area consists of agricultural land to the north west fringe of Exeter, beyond the built-up area of Exwick. The area is centred on the working Atwell Farm. The area is bounded by Rowthorn Road and Redhills to the west. Exwick Lane crosses the site east to west. The land form is complex and the topography is, in some places, very steep. The southern part of the site is within Exeter City Council, but the majority of the site is within Teignbridge District Council. | |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | --?/+ | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, but Kinnerton Way Country Wildlife Site covers approximately 2.3 hectares of the site. There are a significant number of mature trees across the site but the site does not contain priority habitat. The site is within the 5 km great crested newt consultation zone. Bats and dormice are highly likely to be present given the network of hedgerows and streams on site, and the site is in close proximity to excellent habitat within Nadderwater valley. The area is within the Recreational Zone for Exe Estuary SPA; a Habitat Regulations Assessment will be required and this is likely to conclude that mitigation is required (likely to include a requirement for SANGS). The site is flagged as Amber in the HRA sensitivity work with regard to Exe Estuary SPA. As such, uncertain significant negative effects are expected.<br><br>Existing green infrastructure on the site, including the streams and woodland bands, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for less than 1,000 homes, and therefore is expected to provide local public open space that could mitigate the biodiversity impact of development. As such, minor positive effects are also expected.<br><br>Overall, a mixed uncertain significant negative and minor positive effect is expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is some significant distance from the coast (and accordingly will have no impact on coastal areas). The southern part of the site is within Exeter's boundary and is currently designated as a 'Landscape Setting Area'. The majority of the site is within Teignbridge and is currently designated as an 'Area of Great Local Value' (AGLV). The site has a complex form with incised valleys and in places there is very steep topography. The area consists of 'River valley slopes and combes' (landscape character type 3G). The Revised Interim Landscape Sensitivity Assessment (LSA) has concluded that the site has high sensitivity (the site being an integral part of the wider Landscape Setting for Exeter).<br><br>As such, an uncertain significant negative effect is expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/-? | There are no listed buildings or significant historic assets within the site (although the potential for un-designated heritage assets would need to be investigated and therefore the site is considered to have medium heritage sensitivity). In addition, the site is located within 3km of statutory heritage assets, including Exwick Conservation Area located approximately 400m to the east of the site, Cleve House Grade II* listed building located approximately 80m east of the site, St Bartholomew's Cemetery Grade II* Registered Park and Garden located approximately 1.6km southeast of the site and Exeter City Walls Scheduled Monument located 1.6km southeast of the site. The setting of these could be adversely impacted by development on this site. The site presents no opportunities for regeneration. |

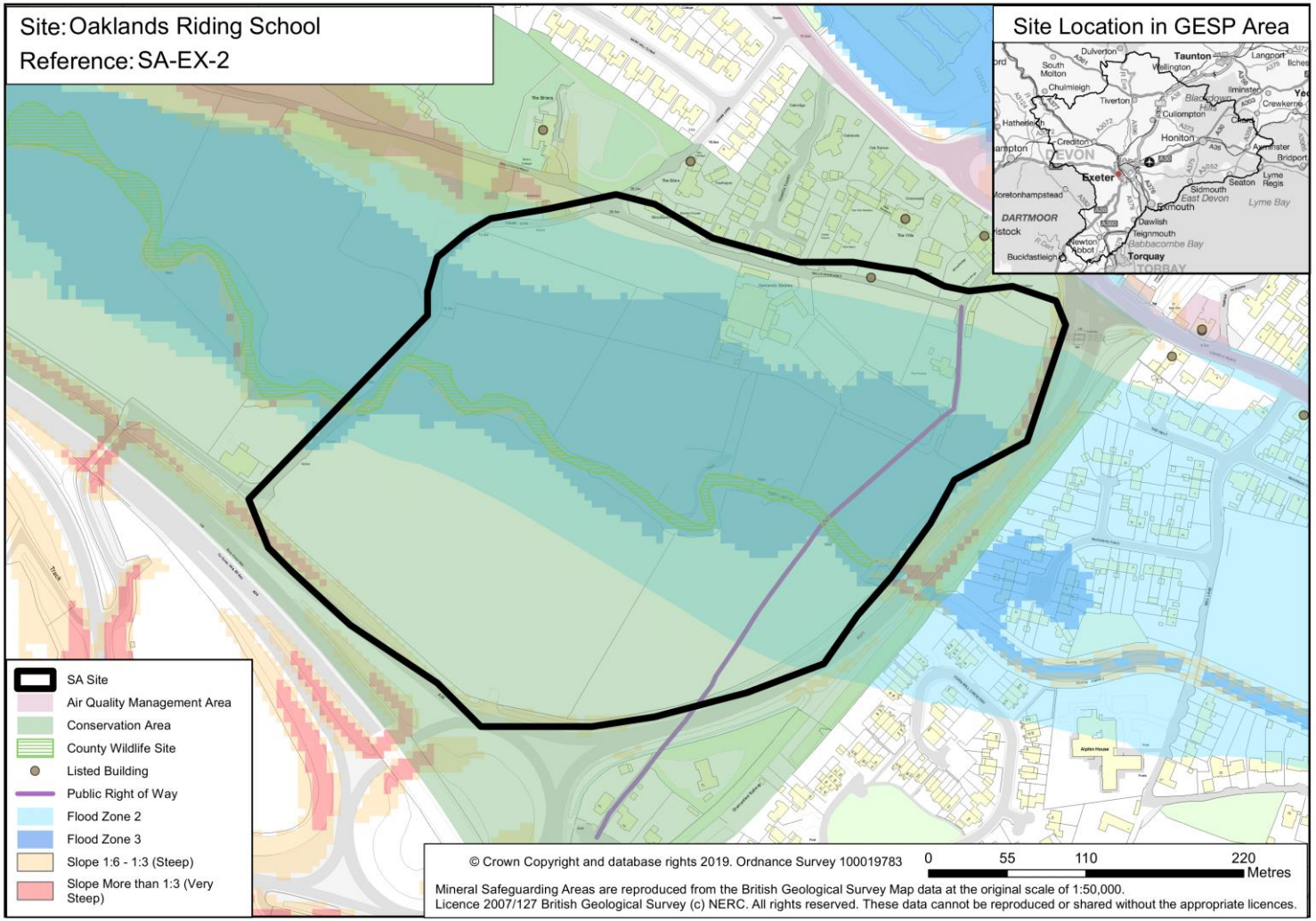
| SA Objective | SA Score | Justification |
|---|---|---|
| | | As such, uncertain minor negative effects are expected.<br><br>With the scale of the proposal (>10ha), it seems likely that this impact can be mitigated through design and layout. As such, uncertain minor positive effects are also expected.<br><br>Overall, mixed uncertain minor positive and uncertain minor negative effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | ++/--? | The site is adjacent to Exeter and as such uncertain significant positive effects are expected.<br><br>The site is located adjacent to an existing high frequency bus service, is in close proximity (within 1km) to St David's railway station and is adjacent to a cycle route. As such, significant positive effects are expected.<br><br>However, as the site is expected to deliver less than 1,000 homes, it is assumed that development of the site would provide fewer sustainable transport, walking and cycle links, and services. As such, uncertain significant negative effects are also expected.<br><br>Overall, mixed uncertain significant positive effects and uncertain significant negative effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and there is no significant flood risk within the area. However, the topography of the area suggests that without careful treatment there would be discharge onto downstream development. Conversely, development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS), and the design of the development brought forward could avoid areas of flood risk.<br><br>As such, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | --? | The site comprises over 5ha of Grade 3 agricultural land, which could be lost to development of the site. The site does not include any existing brownfield land or redundant buildings and therefore there is no potential for reuse of previously developed land.<br><br>In addition, the site does not contain any safeguarded mineral resources.<br><br>As such, uncertain significant negative effects are expected on high quality agricultural land. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or degradation. | 0 | The site does not contain and is not adjacent to a watercourse.<br><br>As such, negligible effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | + | The landscape form and topography mean that large parts of this 47ha site will not be developable; it is estimated that at least 29 hectares should be discounted due to topographical constraints. However, the actual capacity is likely to be less than this once all constraints and mitigation requirements have been taken account of. Although it is noted that there is little to suggest that these sites could be brought forward as a comprehensive development. The site would also need to ensure a viable mix of homes (tenure and sizes) including a proportion of affordable housing to contribute towards meeting needs within the area. The viability is likely to be marginal (due to high costs of access and construction) and therefore a full range of housing types and affordable housing may not be forthcoming. The site is not of a sufficient size to support a high number of housing starts/completions from a number of different outlets (and is unlikely to support a diverse range of providers including SME house building companies, housing associations and custom and self-build providers).<br>As such, minor positive effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site contains a Public Right of Way, is adjacent to a cycle route and adjoins Alphington Whitestone Valley Park major open space.<br>As such, significant positive effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | --/+ | The north of the site is within the 'Tedburn St Mary, Shillingford St George and other areas West of Exeter' Middle Super Output Area, which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees significantly lower levels of deprivation than compared to Devon as a whole. However, the south of the site is within and adjacent to the 'North West areas of Exeter (Exwick)' Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees higher levels of deprivation than compared to Devon as a whole. It is likely that a small residential development of this nature would provide potential improvements to the availability of homes in the area, which could provide broad wellbeing benefits (although the impacts on levels of deprivation are likely to be minimal). As such, a minor positive effect is expected.<br>The site is adjacent to existing residential development, including that in Exwick, and Exwick Heights Primary School, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. It is also noted that the site adjoins a scrapyard, however this is not considered to represent an industrial area that may result in long term noise pollution. As such, minor negative effects are also expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | Air quality sensitivity is high and the site is located partially within 1km of Exeter AQMA. Therefore, residents in the site could be significantly adversely affected by poor air quality within the AQMA. In addition, bus routes could be extended into these areas, but the topography would make walking and cycling unattractive, and there are no train stations nearby. Car traffic would have to travel through already congested routes (designated as an AQMA) to reach either the city centre, M5 or shopping and employment. As such, significant negative effects are expected.<br><br>Overall, mixed significant negative effects in relation to air quality, noise and light pollution and minor positive effects in relation to deprivation are likely. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | ++/- | The site is adjacent to the city of Exeter. As such, significant positive effects are expected. However, the Attwell Farm area currently includes no services or facilities. The closest Local Centre is Exwick Road/Wincester Avenue which is over 2km away down a steep hill.<br><br>Whilst Exwick Heights Primary School is relatively well related to the site (within 500m), there is no additional primary capacity, and a strategy for additional primary and secondary provision would be needed. The site is also not within 1km of a secondary school, a further education college or a university. As such, minor positive effects are expected.<br><br>Access to other higher level facilities is poor. Any development is likely to be similar in form to existing parts of Exwick, which are not well served by facilities and services and suffer a degree of isolation from the rest of Exeter. If developed, significant mitigation, in terms of a new community hub, would be required. Potential development is unlikely to be at such scale as to address these concerns. However, when compared to other potential areas for development within the GESP this site does benefit from its proximity to Exeter and mitigation could improve accessibility to the City Centre. Standard Broadband speeds of up to 6 Mbps and Superfast speeds of up to 80 Mbps are currently available in this area. As such, minor positive effects are expected.<br><br>The site is small, providing less than 500 homes, and therefore it is assumed that development of the site would be less likely to accommodate a new primary school. As such, minor negative effects are also expected.<br><br>Overall, mixed significant negative and minor positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and | + | The site is located adjacent to Exeter but there are no existing or proposed employment areas to the north-west of the city and therefore the site is not located within 1km of an existing or proposed employment site. As such, minor positive effects are expected.<br><br>It is assumed that as the site is relatively small (providing less than 500 homes) the site would provide limited employment opportunities. Jobs would be created during the construction phase of the site, |

| SA Objective | SA Score | Justification |
|---|---|---|
| greater productivity in Greater Exeter. | | and additional homes would create expenditure in the area.<br>There would be no impact on Exeter's existing tourism offer.<br>Overall, minor positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and town centres. | ++ | The site is located adjacent to Exeter and is of a scale (<4,000 homes) that would not be expected to deliver town centre facilities that may detract some visitors from the existing centre of Exeter.<br>As such, significant positive effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | ++ | The site is located adjacent to an existing high frequency bus service, is in close proximity (within 1km) to St David's railway station and is adjacent to a cycle route.<br>As such, significant positive effects are expected. |

## SA-EX-2: Oaklands Riding School

| SA-EX-2 | Oaklands Riding School |
|---|---|
| **Authority Area:** Exeter City Council |  |
| **Site Area:** 13.7ha (Net 3.8ha) | |
| **Approximate total capacity:** 117 - 151 dwellings | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:** This relatively flat site lies on the western fringe of the City, close to the A30/A377 junction and within Alphington/Whitestone Valley Park. It forms part of a riding school and is subdivided by fencing into a number of paddocks. It also contains stables and a dwelling (The Rosary). The Alphin Brook runs across the site. | |

| SA Objective | SA Score | Justification |
|---|---|---|
| **15. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | --?/+ | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, but lies entirely within Alphington Whitestone Valley Park and within Alphinbrook County Wildlife Site. The site does not contain priority habitat. The site is within the 5 km great crested newt consultation zone and bats are likely to be present along the river corridor and within farm buildings on site. The area is within the Recreational Zone for Exe Estuary SPA; a Habitat Regulations Assessment will be required and this is likely to conclude that mitigation is required (likely to include a requirement for SANGS). The site is flagged as Amber in the HRA sensitivity work with regard to Exe Estuary SPA. As such, uncertain significant negative effects are expected.<br><br>Existing green infrastructure on the site, including the Alphington Whitestone Valley Park and river corridor, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for less than 1,000 homes, and therefore is expected to provide local public open space that could mitigate the biodiversity impact of development. As such, minor positive effects are also expected.<br><br>Overall, mixed uncertain significant negative and minor positive effects are expected. |
| **16. LANDSCAPE**<br><br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | This site consists of a number of paddocks on the south-western edge of Exeter's built up area and is designated as 'Landscape Setting Area' in the Local Plan First Review. The site is considered to have high Landscape Sensitivity as it forms an integral part of the hills to the west of Exeter. Residential development could have adverse effects on the character and quality of the landscape.<br><br>As such, uncertain significant negative effects are expected. |
| **17. HISTORIC AND BUILT ENVIRONMENT**<br><br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | --? | The entirety of the site is located within Alphinbrook Conservation Area. The site also contains a Grade II listed building (Villa Garden Walls) and is adjacent to multiple listed buildings including The Crosse House, which is Grade II listed. There are also multiple listed buildings within 3km in all directions surrounding the site, including a majority of which are contained within Conservation Areas (Midway Terrace and Ide Lane, Alphington and Princes Square). The nearest Scheduled Monument (Linear round barrow cemetery at Castle Park) is around 1.3km to the south-east of the site. There is potential for residential development to significantly compromise these historic environment assets.<br><br>Additionally, there are multiple Registered Parks and Gardens around 2km north of the site in Exeter. However, the potential for development to disturb these assets is reduced, given that they are already surrounded by development.<br><br>As such, uncertain significant negative effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **18. CLIMATE CHANGE MITIGATION**<br>To minimise greenhouse gas emissions. | ++?/--? | The site is adjacent to Exeter and as such uncertain significant positive effects are expected.<br>The site is not located within 1km of railway stations or cycle routes. The site is however within 500m of bus stops served by high frequency bus services. As such, minor positive effects are expected.<br>However, as the site is expected to deliver less than 1,000 homes, it is assumed that development of the site would provide fewer sustainable transport, walking and cycle links, and services. As such, uncertain significant negative effects are also expected.<br>Overall, mixed uncertain significant positive effects and uncertain significant negative effects are expected. |
| **19. CLIMATE CHANGE ADAPTATION**<br>To adapt to the possible effects of climate change. | --? | The site is predominantly greenfield and the majority of the site is within flood zones 2 and 3. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br>Therefore, uncertain significant negative effects are expected. |
| **20. LAND RESOURCES**<br>To utilise our land resources efficiently and minimise their loss or degradation. | --? | The site is comprised of over 5ha of Grade 3 agricultural land. However, it is unclear it is Grade 3a or Grade 3b. As such, uncertain significant negative effects are expected due to the potential loss of high quality agricultural land during development.<br>Apart from riding school buildings in existing use, there is no existing brownfield land or redundant buildings and therefore there is no potential for reuse of previously developed land.<br>The site is not located within any Mineral Safeguarding Areas.<br>Overall, uncertain significant negative effects are expected due to development on high quality agricultural land. |
| **21. WATER RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or degradation. | --? | Development should ensure no deterioration in the water quality of Alphin Brook, which passes through the boundaries of the site and runs into the Exe Estuary SPA.<br>As such, uncertain significant negative effects are expected. |
| **22. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially | + | The flood risk issue means that almost half of the site (that element within flood zone 3) is not developable; on this basis 6 hectares are discounted giving a capacity of approximately 117-151 dwellings. However, this capacity is likely to reduce once account has been taken of the constraints |

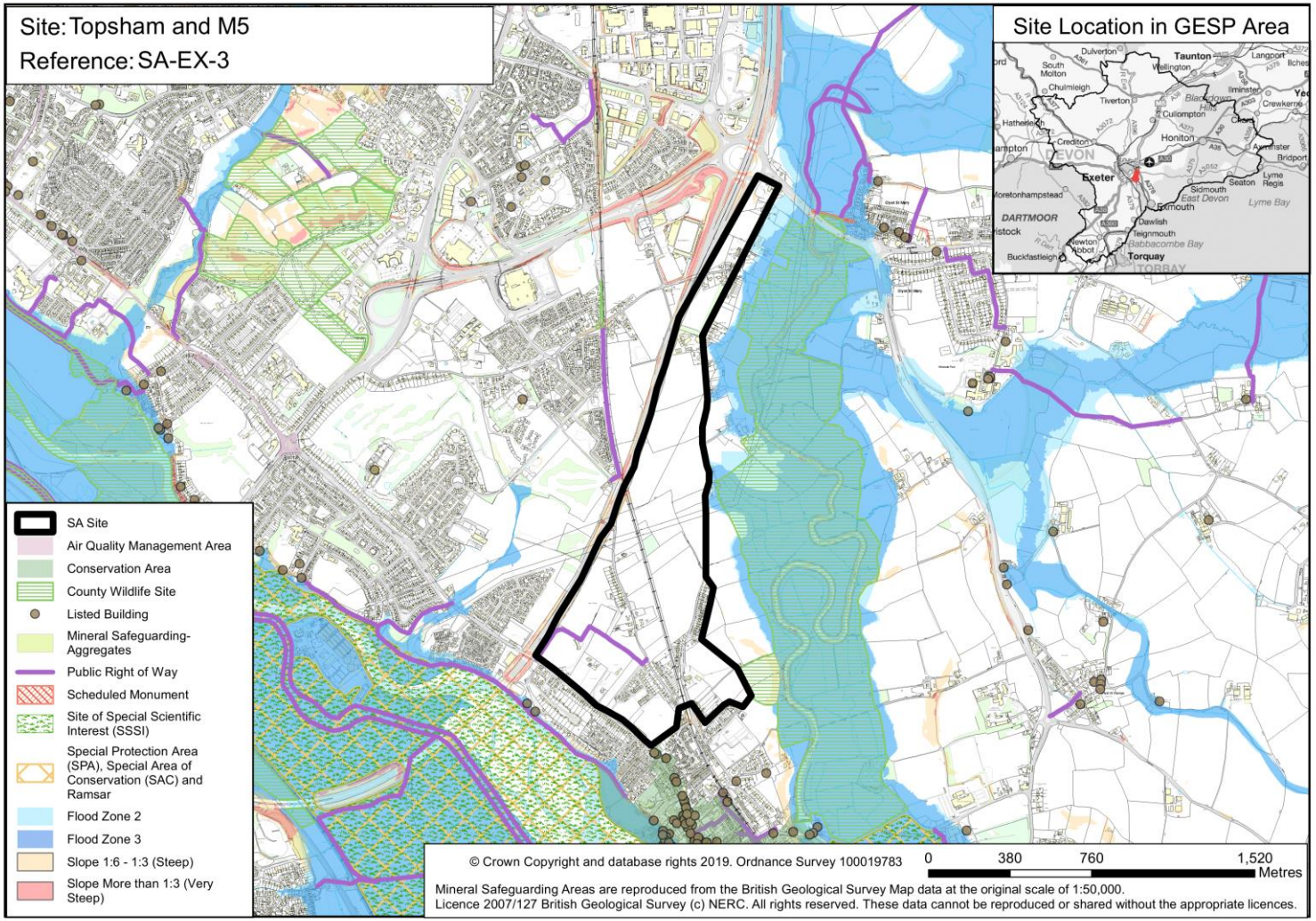
| SA Objective | SA Score | Justification |
|---|---|---|
| accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | | and likely mitigation requirements, including those highlighted elsewhere in this assessment.<br><br>The site should be capable of delivering a suitable mix of dwellings in terms of size and tenure and diversity of supply and there is no reason to think that affordable housing would not be forthcoming.<br><br>However, the site is not of a sufficient size to support a high number of housing starts/completions from a number of different outlets (and is unlikely to support a diverse range of providers including SME house building companies, housing associations and custom and self-build providers).<br><br>As such, minor positive effects are expected. |
| **23. HEALTH**<br><br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site lies entirely within Alphington Whitestone Valley Park, major open space, and contains Public Rights of Way.<br><br>As such, significant positive effects are expected. |
| **24. WELLBEING**<br><br>To support positive, safe and healthy communities. | -- | The site is within the 'Alphington area of Exeter' Middle Super Output Area, which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees significantly lower levels of deprivation than compared to Devon as a whole. It is likely that a small residential development of this nature would provide potential improvements to the availability of homes in the area, which could provide broad wellbeing benefits (although the impacts on levels of deprivation are likely to be minimal). As such, negligible effects are expected.<br><br>The site is within Exeter City and is adjacent to residential receptors, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. In addition, the site is lies adjacent to an 'A' road. This feature may result in noise pollution affecting residents of the site in the longer term. As such, minor negative effects are also expected.<br><br>The site lies adjacent to Exeter AQMA. Therefore, residents in the site could be significantly adversely affected by poor air quality within the AQMA. Car traffic would have to travel through already congested routes (designated as an AQMA) to reach the city centre, M5 or shopping and employment. However, the topography of the site and proximity of cycle routes and facilities and services within walking distance suggest that the area could support active transport. As such, significant negative effects are expected.<br><br>Overall, significant negative effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **25. ACCESS TO SERVICES**<br>To provide accessible and attractive services and community facilities for all ages and interests. | ++/- | The site is within Exeter City. As such, significant positive effects are expected. The site currently includes no services or facilities. However, there is good easy access to Sainsbury's supermarket (within about 0.5km of the site).<br>The site is within 500m of Alphington Primary School to the south east and West Exe Secondary School to the north east. However, there is currently no primary and secondary school capacity to accommodate development and a strategy for provision would be required. The site is also within 3km of a further education college. As such, uncertain significant positive effects are expected.<br>St Thomas District Centre (including St Thomas Medical Centre) is just over 1.5km away and all other services and facilities are available in the city centre (just over 2km distant) served by a frequent bus service. Standard Broadband speeds of up to 7Mbps and Superfast speeds of up to 80 Mbps are currently available in this area. As such, minor positive effects are expected.<br>The site is small, providing less than 500 homes, and therefore it is assumed that development of the site would be less likely to accommodate new schools. As such, minor negative effects are expected.<br>Overall, mixed significant positive and minor negative effects are expected. |
| **26. JOBS AND LOCAL ECONOMY**<br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | ++ | The site is within Exeter City and is also within 1km of existing or proposed employment sites that could provide employment opportunities. As such, significant positive effects are expected.<br>Jobs would be created during the construction phase of the site and any new homes would create expenditure in the area. It is assumed that, as the site has the capacity to deliver less than 500 homes, the site will provide limited employment opportunities. As such, uncertain minor positive effects are expected.<br>With the provision of cycle and pedestrian links, the site is well located in relation of Marsh Barton and Matford and would have good access to education, and skills training.<br>There would be no impact on Exeter's existing tourism offer.<br>Overall, significant positive effects are expected. |
| **27. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and town centres. | ++ | The site is within Exeter City and is of a scale (<4,000 homes) that would not be expected to deliver town centre facilities that may detract some visitors from the existing centre of Exeter.<br>As such, significant positive effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **28. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | + | The site is not located within 1km of railway stations or cycle routes. The site is however within 500m of bus stops served by high frequency bus services.<br><br>As such, minor positive effects are expected. |

## SA-EX-3: Topsham and M5

| SA-EX-3 | Topsham and M5 |
|---|---|
| **Authority Area:** Exeter City Council | |
| **Site Area:** 96.6ha (Net 42.5ha) | |
| **Approximate total capacity:** 1,316 - 1,700 dwellings | |
| **Site status:** Potential site option | |
| **Outline description and context:** Roughly triangular area of land to the east of the M5, between Topsham Road and Clyst Road. Consists of relatively flat fields to the south, with a definite cut hedgerow pattern compartmentalising the various uses. Land slopes down to the north of the railway with larger agricultural fields. | |



| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/--? | The site is within 250m of Exe Estuary SSSI, SPA and Ramsar site and of Ferry Road County Geological site. The site is also within the Recreational Zone for Dawlish Warren SAC, East Devon Peddlebed Heaths (EDPH) SPA and Exe Estuary SPA. A Habitat Regulations Assessment will be required and this is likely to conclude that mitigation is required (likely to include a requirement for SANGS). In addition, the site is flagged as Amber in the HRA sensitivity work with regard to East Devon Pebblebed SAC/SPA and is flagged as Red with regard to Exe Estuary SPA.<br><br>The site also lies within two Strategic Nature Areas, Mudflats in the south and Coastal and floodplain grazing marsh. The site lies adjacent to Clyst Marshes County Wildlife site. In addition, the site is within 1km of Riverside Valley Park, which is an Exeter Valley Park. The site also contains a priority habitat, traditional orchard and is adjacent to good quality semi-improved grassland. The site is within the 5 km great crested newt consultation zone and surveys of ponds and adjacent hibernation habitat will be required. The area also includes hedgerows, mature trees and areas of significant tree cover. No detailed information on protected species has been analysed, but bats will be present, possible dormice, and populations of farmland birds such as song thrush and bullfinch which will depend on hedges and trees as breeding habitat. As such, uncertain significant negative effects are expected.<br><br>Existing green infrastructure on the site, including hedgerows and trees, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space that could mitigate the biodiversity impact of development. As such, significant positive effects are also expected.<br><br>Overall, mixed significant positive and significant negative effects with uncertainty are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | -? | The site is comprised of open rural countryside on flat terrain with development associated with Exeter to the north west and Topsham and the Exe Estuary SPA located to the south. Development within the site would cause an urbanisation effect on the environment. Land in the south of the site has been designated as low landscape sensitivity whilst land in the north of the site has been designated as medium landscape sensitivity as it is located within a Green Wedge area.<br><br>As such, uncertain minor negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built | +?/-? | The site does not contain any heritage assets within its boundaries. There are multiple designated assets within 3km including Topsham Conservation Area, which is located to the immediate south of the site and contains in excess of 30 listed buildings. Topsham has particular historic and architectural |

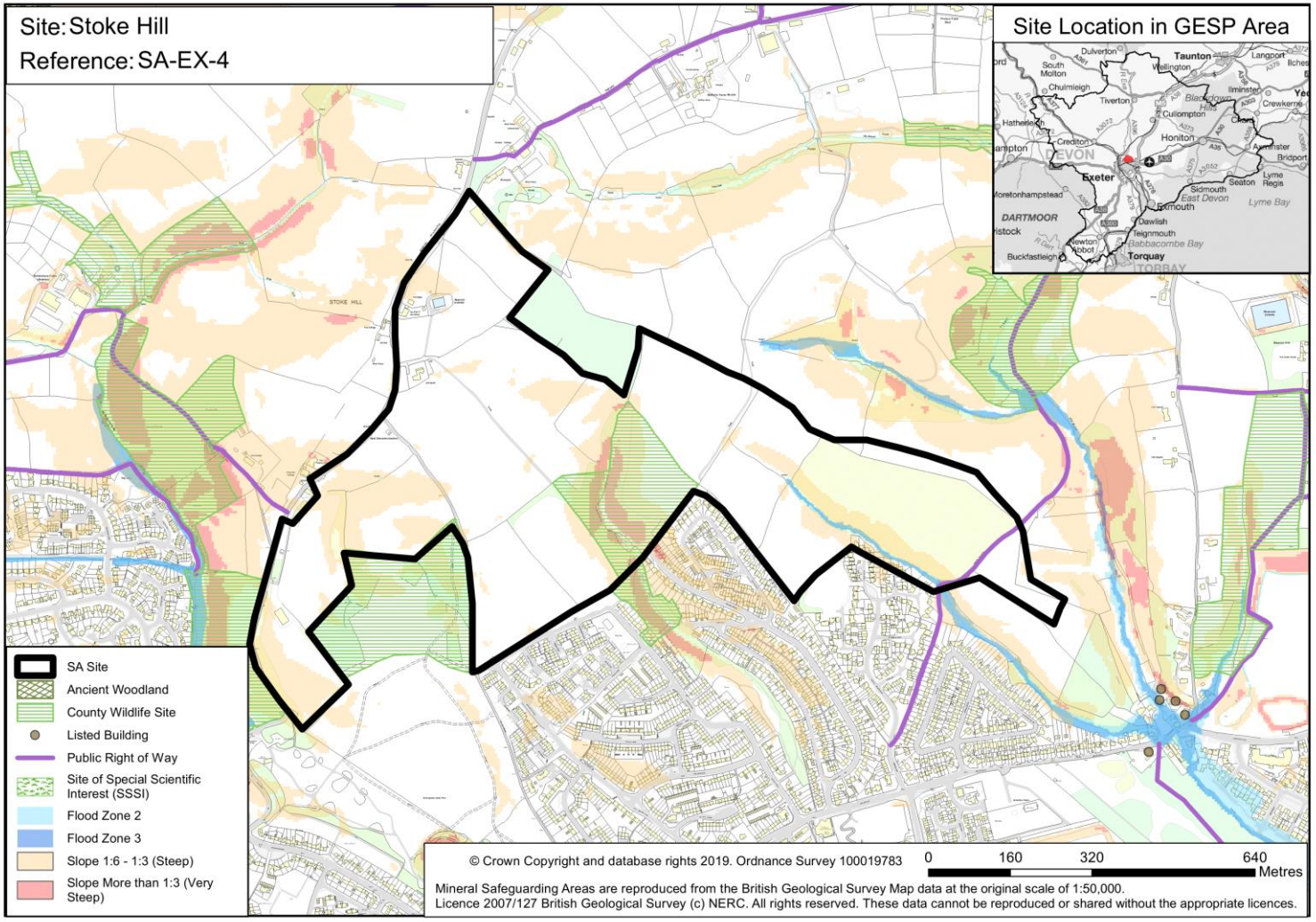
| SA Objective | SA Score | Justification |
|---|---|---|
| and historic assets and promote high quality architecture, design and accessibility in new build development. | | value and this land forms part of a wider area of land that is important to its setting. Topsham's separate identity derives, in the main, from its history and architecture, however, the Topsham Gap also contributes to its sense of separation. Further to this, Clyst St Mary is around 500m east of the northern boundary of the site and contains multiple Grade II listed buildings. There also is a Scheduled Monument around 2.5km south-west of the site (earthwork enclosure 200m NE of Church Path Hill Plantation. There is potential for residential development to compromise these historic environment assets. As such, uncertain minor negative effects are expected.<br><br>It is likely that the site is of sufficient size (>10ha) to accommodate a well-designed development and create a new high quality built environment. It should be possible for development to respond appropriately to existing heritage assets in the area and minimise any disturbance to the historic environment. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | ++? | The site is adjacent to Exeter and as such uncertain significant positive effects are expected.<br><br>The site is split by a railway, with the southern half in vicinity to Exeter Road with access to existing sustainable transport options. The land to the north of the railway is not so well located in regard to these routes, although the provision of a pedestrian/cycle crossing over the railway would significantly improve transport options. Nonetheless, the site is adjacent to a cycle route, within 1km of train stations and within 500m of high frequency bus services. As such, due to the proximity of some accessible public transport links, minor positive effects are expected.<br><br>As the site is expected to deliver over 1,000 homes, it is assumed that development of the site would provide some sustainable transport, walking and cycle links and services. As such, uncertain negligible effects are expected.<br><br>Overall, uncertain significant positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and there is no significant flood risk in the area.<br><br>However, the topography of the area suggests that without careful treatment there would be discharge onto downstream development. National Planning Practice Guidance identifies that development of residential properties would require an exemption test in flood zone 3a and is unsuitable in flood zone 3b.<br><br>As such, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES** | -- | The site is comprised of over 5ha of Grade 1 agricultural land as well as over 5ha of Grade 2 and Grade |

| SA Objective | SA Score | Justification |
|---|---|---|
| To utilise our land resources efficiently and minimise their loss or degradation. | | 3a agricultural land. As such, significant negative effects are expected due to the potential loss of high quality agricultural land during development. The remaining areas within the site are comprised of Grade 3b agricultural and urban land.<br><br>The site contains some areas of previously developed land associated with residential, agricultural and recreational purposes which are in existing use.<br><br>The site is not located within any Minerals Safeguarding Areas.<br><br>Overall, significant negative effects are expected due to development on high quality agricultural land. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or degradation. | --? | Development should ensure no deterioration of the River Clyst which is adjacent to the eastern boundary of the site and flows into the Exe Estuary SPA.<br><br>As such, uncertain significant negative effects are expected. |
| **8. HOMES**<br><br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | ++ | Much of the land between Exeter and Topsham has not come forward as part of the HELAA process (the HELAA sites consist of 7.86ha). However, it is likely that, with approaches to landowners, additional land could become available. The site is likely to be able to deliver around 1316–1700 homes. However, this capacity is likely to reduce once account has been taken of all constraints and likely mitigation requirements, including those highlighted elsewhere in this assessment. The area should capable of bringing forward a suitable mix of dwellings in terms of size and tenure and diversity of supply. Homes may be provided by a diverse range of providers including SME house buildings companies, housing associations and custom and self-build providers. This site is of a sufficient size to be able to support a high number of housing starts/completions from a number of different outlets around the sites, which in turn will ensure a good pace of delivery. There is nothing to suggest delivery will not be viable (and indeed profitable) and therefore provision of affordable housing should not be compromised.<br><br>As such, significant positive effects are expected. |
| **9. HEALTH**<br><br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site is within 800m of Riverside Valley Park, major open space, and contains Public Rights of Way as well as lies directly adjacent to the National Cycle route. As such, significant positive effects are expected.<br><br>However, as the site is expected to deliver between 1,000 - 1,999 homes, it is assumed that development of the site would provide some open space and active transport links. As such, minor positive effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | Overall, significant positive effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | +/- | The site is within the 'Topsham and Countess Wear areas of Exeter' Middle Super Output Area, which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees significantly higher levels of deprivation than compared to Devon as a whole. It is likely that a medium residential development of this nature would provide potential improvements to the availability of homes in the area, which could provide broad wellbeing benefits (although the impacts on levels of deprivation are likely to be minimal). As such, minor positive effects are expected.<br><br>The site is adjacent to Exeter City and is adjacent to existing residential developments, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. In addition, the site is lies adjacent to the motorway, M5, and is crossed by a railway line. These features may result in noise pollution affecting residents of the site in the longer term. As such, minor negative effects are also expected.<br><br>The site does not lie within 1km of an AQMA. The proximity to cycle routes and facilities and services within walking distance suggest that the area could support active transport. However, car movements emanating from the site could worsen air quality in the Exeter AQMA. As such, minor negative effects are expected.<br><br>Overall, mixed minor positive and minor negative effects are expected. |
| **11. ACCESS TO SERVICES**<br>To provide accessible and attractive services and community facilities for all ages and interests. | ++ | The site is adjacent to Exeter City. As such, significant positive effects are expected. The elongated nature of the site would mean providing good access to communal facilities would be more challenging to the north of the site.<br><br>The site is within 500m of a primary school but it is not within 1km of a secondary school. The potential for expansion of existing education provision has been almost exhausted. A wider strategy regarding secondary provision for Exeter and its borders would be required. There is currently no secondary capacity to accommodate development. As such, uncertain minor positive effects are expected.<br><br>Topsham district centre (within 2km walk of the whole area) provides a full range of facilities including shops, post office, doctor's surgery, dentists, pharmacy, library, swimming pool, community hall, three churches and ten Public Houses. Topsham also has many community and leisure facilities. Facilities are also available as part of the Newcourt development to the east (including Aldi within 1km of most of the area). The site is also within 3km of a further education college. Standard Broadband speeds of up to 16 Mbps and Superfast speeds of up to 80 Mbps are currently available in the area. As such, minor positive effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | The site is of medium size, providing over 500 homes, and therefore it is assumed that development of the site would be more likely to accommodate a new primary school. As such, minor positive effects are expected.<br><br>Overall, significant positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | ++ | The site is adjacent to Exeter and it is within 1km of existing or proposed employment sites that could provide employment opportunities. As such, significant positive effects are expected.<br><br>Jobs would be created during the construction phase of the site and any new homes would provide expenditure in the area. It is assumed that, as the site has the capacity to deliver over 500 homes, the site will provide medium scale employment opportunities and a business park or employment estate as well as a neighbourhood hub with shops and services. As such, minor positive effects are expected.<br><br>There would be no impact on Exeter's existing tourism offer.<br><br>Overall significant positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | ++ | The site is adjacent to Exeter and is of a scale (<4,000 homes) that would not be expected to deliver town centre facilities that may detract some visitors from the existing centre of Exeter.<br><br>As such, significant positive effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | + | The site is split by a railway, with the southern half in vicinity to Exeter Road with access to existing sustainable transport options. The land to the north of the railway is not so well located in regard to these routes, although the provision of a pedestrian/cycle crossing over the railway would significantly improve transport options. Nonetheless, the site is adjacent to a cycle route, within 1km of train stations and within 500m of high frequency bus services. As such, due to the proximity of some accessible public transport links, minor positive effects are expected.<br><br>In addition, the site has capacity for more than 1,000 homes and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br><br>Overall, minor positive effects are expected. |

## SA-EX-4: Stoke Hill

| SA-EX-4 | Stoke Hill |
|---|---|
| **Authority Area:** Exeter City Council |  |
| **Site Area:** 58ha (Net 23.7ha) | |
| **Approximate total capacity:** 736 - 948 dwellings | |
| **Site status:** Potential site option | |
| **Outline description and context:** Land to the northern fringe of Exeter beyond the build-up area of Beacon Heath. The area comprises agricultural fields bounded by hedgerows and belts of mature trees (interspersed with areas of rough vegetation and woodland). The area is generally south facing with a complex form and steep topography. The site is crossed by Mile Lane (a bridleway linking Stoke Hill to Beacon Heath). | |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | --?/+ | The site is located within 1km of Stoke Woods, SSSI and Pinhoe Brickpit County Geological site and lies within Savoy Hill County Wildlife Site (which consists of species-rich unimproved grassland). In addition, the site lies adjacent to Lower Covert and Mincinglake Plantation, both County Wildlife Sites. The site is located within and adjacent to Mincinglake Valley Park. The site lies completely within the Strategic Nature Area of Woodland and has significant biodiversity value and opportunities for biodiversity enhancement, and may also function as SANGs to mitigate for development elsewhere. The site also lies within Priority habitats, Deciduous Woodland and Lowland Meadows. The site is within 5km of great crested newt consultation zone. It is highly likely that impacts on dormice and bats, given the presence of mature hedgerows, scrub and woodland would be difficult to mitigate. The site is also likely to support several species of breeding bird e.g. whitethroat. The area is within the Recreational Zone for Exe Estuary SPA; a Habitat Regulations Assessment will be required and this is likely to conclude that mitigation is required (likely to include a requirement for SANGS). The site is flagged as Amber in the HRA sensitivity work with regard to Exe Estuary SPA. As such, uncertain significant negative effects are expected.<br><br>Existing green infrastructure on the site, including woodland and meadows, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for less than 1,000 homes, and therefore is expected to provide local public open space that could mitigate the biodiversity impact of development. As such, minor positive effects are also expected.<br><br>Overall, mixed uncertain significant negative and minor positive effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is located in open rural countryside with large areas of residential development to the south. The site is on a slope with land in the north of the site being higher than that in the south. Development within the site would cause an urbanisation effect on the environment. The site is of high landscape sensitivity as it is an integral part of the wider landscape setting of hills to the north of Exeter. There is also land off Pendragon Road and land at Pinwood and East of Stoke Hill that is within Killerton setting zone of influence.<br><br>As such, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and | +?/-? | The site does not contain any heritage assets within its boundaries. There are multiple designated assets within 3km including four listed buildings around 250m south-east of the site, three of which are Grade II listed and one of which is Grade II* listed (Pinbrook House and surrounding buildings). There are scheduled monuments around 900m south of the site (St Katherine's Priory, Polsloe) and around 1km west (Signal Station) and north-west (Stoke Hill Camp). There is potential for residential |

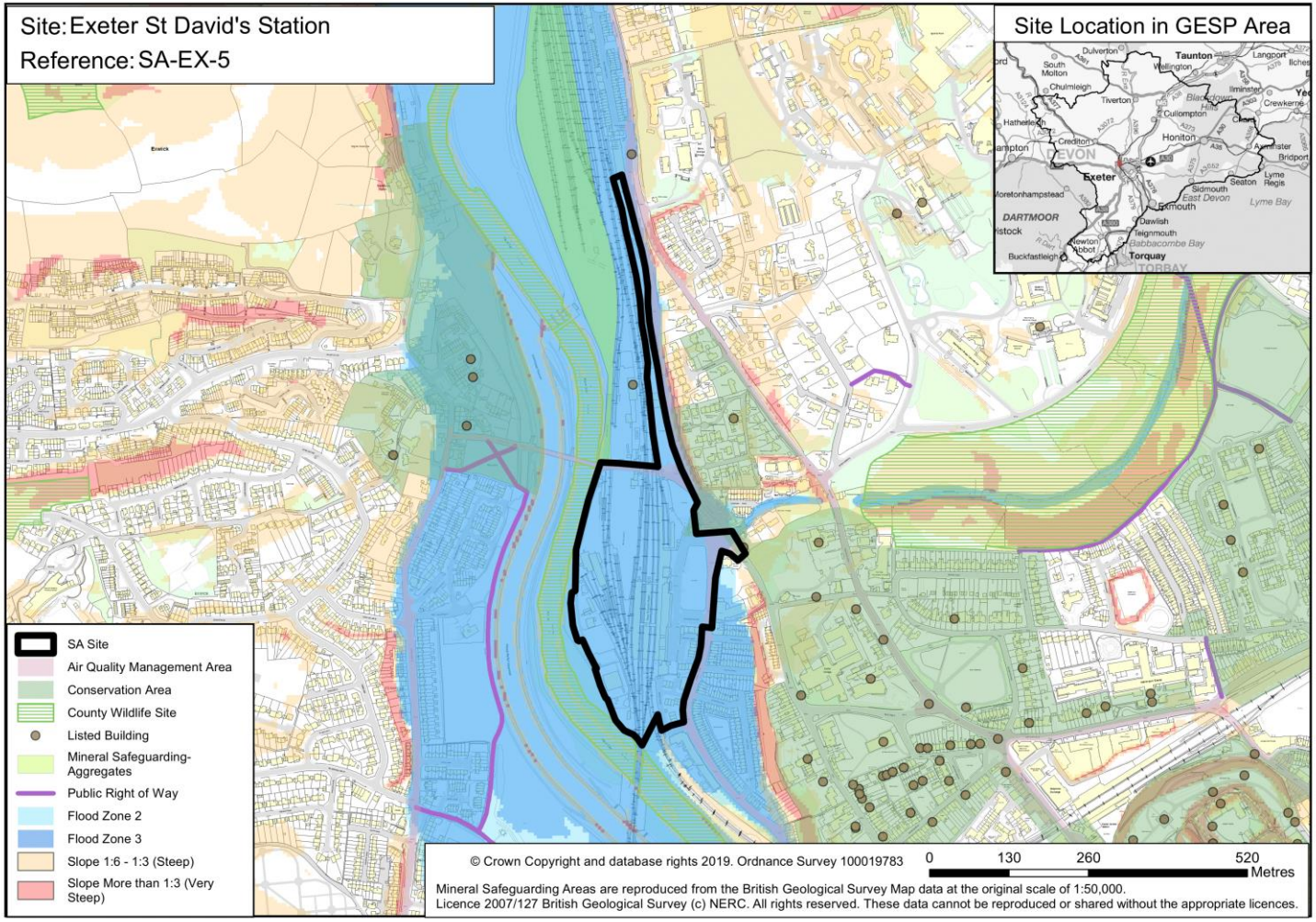
| SA Objective | SA Score | Justification |
|---|---|---|
| accessibility in new build development. | | development to compromise the setting of these historic environment assets. There are also multiple Registered Parks and Gardens and Conservation Areas within 3km to the south in Exeter. However, these assets are separated by existing residential development, reducing their sensitivity to development within the site. As such, uncertain minor negative effects are expected.<br><br>It is likely that the site is of sufficient size (>10ha) to accommodate a well-designed development and create a new high quality built environment. It should be possible for development to respond appropriately to existing heritage assets in the area and minimise any disturbance to the historic environment. This may be problematic at the site due to the form and topography. As such, uncertain minor positive effects are expected.<br><br>Overall, uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | ++?/--? | The site is adjacent to Exeter and as such uncertain significant positive effects are expected.<br><br>The site is not located within 1km of cycle routes or railway stations, however the site is within 500m of high frequency bus services. The topography of the site is not conducive to walking or cycling which is likely to discourage use of the nearest bus service on Chancellors Way for all but the southernmost parts of the site. As such, due to the proximity of parts of the site to bus services, uncertain minor positive effects are expected.<br><br>However, as the site is expected to deliver less than 1,000 homes, it is assumed that development of the site would provide fewer sustainable transport, walking and cycle links, and services. As such, uncertain significant negative effects are also expected.<br><br>Overall, mixed uncertain significant positive and uncertain significant negative effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield land. The site is mostly in an area with no significant flood risk however, it contains a river and as such areas fall under flood zone 2 and flood zone 3. The topography of the area suggests that without careful treatment there would be discharge onto downsteam development.<br><br>As such, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | --? | The site is comprised of over 5ha of Grade 3 agricultural land. However, it is unclear if it is Grade 3a or 3b. As such, uncertain significant negative effects are expected due to the potential loss of high quality agricultural land during development. The remaining area within the site is comprised of urban land.<br><br>The site does not contain any existing brownfield land or redundant buildings. Therefore, there is no potential for use of previously developed land. |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | The site is not located within any Minerals Safeguarding Areas.<br><br>Overall, uncertain significant negative effects are expected due to the development on high quality agricultural land. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or degradation. | --? | Development should ensure no deterioration in the water quality of Mincinglake Stream, which is adjacent to the south western boundary of the site and flows into the Exe Estuary SPA.<br><br>As such, uncertain significant negative effects are expected. |
| **8. HOMES**<br><br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | + | The site has a total area of approximately 58ha; however, landscape form and capacity (parts of the site have gradients that are not conducive to development), together with the presence of Savoy Hill Valley Park and County Wildlife Site, mean that the large parts of the sites will not be developable. It is estimated that around 23.7ha would be developable, with the potential to deliver around 736-948 homes. However the true capacity is likely to reduce once account has been taken of the likely mitigation requirements, including those highlighted elsewhere in this assessment. The viability is likely to be marginal (due to the high costs of access and construction) and therefore a full range of housing types and affordable housing may not be forthcoming. The site is not of a sufficient size to support a high number of housing starts/completions from a number of different outlets (and is unlikely to support a diverse range of providers including SME house building companies, housing associations and custom and self-build providers).<br><br>As such, minor positive effects are expected. |
| **9. HEALTH**<br><br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site lies within two major open spaces, Savoy Hill Velley Park and Mincinglake Valley Park. In addition the site lies adjacent to multiple Public Rights of Way.<br><br>As such, significant positive effects are expected. |
| **10. WELLBEING**<br><br>To support positive, safe and healthy communities. | --/+ | The site is within the 'Stoke Hill and Mincinglake areas of Exeter' Middle Super Output Area, which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees significantly higher levels of deprivation than compared to Devon as a whole. It is likely that a medium residential development of this nature would provide potential improvements to the availability of homes in the area, which could provide broad wellbeing benefits (although the impacts on levels of |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | deprivation are likely to be minimal). As such, a minor positive effect is expected.<br><br>The site is within Exeter City and is adjacent to residential receptors which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. It is also noted that the site is adjacent to a Landfill site and accordingly contaminated land sensitivity is considered medium. As such, minor negative effects are also expected.<br><br>Air quality sensitivity is considered high and the site is located within 1km of Exeter AQMA. Therefore, residents in the site could be significantly adversely affected by poor air quality within the AQMA. In addition, bus routes could be extended into these areas, but the topography would make walking and cycling unattractive. Car traffic would have to travel through already congested routes (designated as an AQMA) to reach the city centre, M5 or shopping and employment. As such, significant negative effects are expected.<br><br>Overall, mixed significant negative effects in relation to air quality, noise and light pollution and minor positive effects in relation to deprivation are likely. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | ++/- | The site is adjacent to Exeter City. As such, significant positive effects are expected. However, the area currently includes no services or facilities. Whipton Local Centre is over 1.5km away down a steep hill.<br><br>The site is within 500m of a primary school and it is within 1km of a secondary school. However, the potential for expansion of existing education provision has been exhausted. The Monkerton school site is capable of expansion and could be combined with a review of other school catchment areas. As such, uncertain minor positive effects are expected.<br><br>Access to other higher level facilities is poor due to lack of public transport and poor highway infrastructure. Potential development should be required to invest in local services, but is unlikely to be at such a scale as to address these concerns. However, when compared to other potential areas for development within the GESP, this site does benefit from its proximity to Exeter and mitigation could improve accessibility to the city centre. Standard Broadband speeds of up to 6Mbps are currently available in the area. Superfast packages are not currently available. As such, minor negative effects are expected.<br><br>The site is of medium size, providing over 500 homes, and therefore it is assumed that development of the site would be more likely to accommodate a new primary school. As such, minor positive effects are expected.<br><br>Overall, mixed significant positive and minor negative effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **12. JOBS AND LOCAL ECONOMY**<br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | ++ | The site is adjacent to Exeter and it is within 1km of existing or proposed employment sites that could provide employment opportunities. As such, significant positive effects are expected.<br>Jobs would be created during the construction phase of the site and any new homes would provide expenditure in the area. It is assume that, as the site has the capacity to deliver over 500 homes, the site will provide small scale mixed use employment opportunities and small cluster of shops and services. As such, minor positive effects are expected.<br>There would be no impact on Exeter's existing tourism offer.<br>Overall, significant positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and town centres. | ++ | The site is adjacent to Exeter and is of a scale (<4,000 homes) that would not be expected to deliver town centre facilities that may detract some visitors from the existing centre of Exeter.<br>As such, significant positive effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | + | The site is not located within 1km of cycle routes or railway stations, however the site is within 500m of high frequency bus services. The topography of the site is not conducive to walking or cycling which is likely to discourage use of the nearest bus service on Chancellors Way for all but the southernmost parts of the site. As such, due to the proximity of parts of the site to bus services, uncertain minor positive effects are expected.<br>In addition, the site has capacity for more than 1,000 homes and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br>Overall, minor positive effects are expected. |

### SA-EX-5: Exeter St David's Station

| SA-EX-5 | Exeter St David's Station |
|---|---|
| **Authority Area:** Exeter City Council |  |
| **Site Area:** 5.3ha | |
| **Approximate total capacity:** 151 – 180 dwellings | |
| **Site status:** Potential site option | |
| **Outline description and context:** Mixed-use site within the urban area of Exeter, bisected by Station Road. Includes St David's Station and associated surface car parks. The remaining land parcels in the northern and western parts of the site are in storage and industrial use. The southern part of the site comprises Exeter University-owned student accommodation (21 houses and 17 flats) and ground floor retail uses. Cowley Bridge Road and Bonhay Road run along the site's eastern boundary, beyond which are a hotel, student accommodation and residential areas. Much of the site is allocated for office/employment redevelopment in the Exeter Local Plan First Review. | |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | --?/+ | The site is located within 1km of Bonhay Road Cutting SSSI, is adjacent to Exwick Weir County Wildlife Site and is within 250m of Taddiford Brook County Wildlife Site also. The north of the site is also within a Strategic Nature Area associated with Coastal and Floodplain Grazing Marsh. Warehouses in the northern part of the site may be used as bat roosts and there is the potential for the site to provide habitats for other protected species. For example, the site is within 5km of a Greater Crested Newt record. Also, the site is flagged as Amber in the HRA sensitivity work with regard to Exe Estuary SPA. As such, uncertain significant negative effects are expected.<br><br>Existing green infrastructure on the site, including marshes, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for less than 1,000 homes, and therefore is expected to provide local public open space that could mitigate the biodiversity impact of development. As such, minor positive effects are also expected.<br><br>Overall, mixed minor positive and uncertain significant negative effects with uncertainty are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | 0? | The site includes Exeter St David's Station and is comprised of previously developed land with warehouses in the north and car parks in the south as well as the existing station in the western half of the site. As a result of this, the site is of low landscape sensitivity and it is considered development would enhance the quality of this urban landscape and thereby greatly enhance a key gateway into Exeter.<br><br>As such, negligible effects are expected. The sensitivity assessment for this site was based on a slightly different site boundary to that which has now been included in the SA, which contributes additional uncertainty to the potential effect identified. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/-? | There centre of the site contains part of St David's Conservation Area. There are multiple listed buildings within 3km including a Grade II listed building in close proximity to the north-western (former Transit Shed) and north-eastern (Taddiforde) boundaries of the site and a Grade II* listed building 120m to the east (Imperial Hotel). The western boundary of the site is within 100m of Exwick Conservation Area. There is potential for development to compromise the setting of these historic environment assets. There are also multiple Registered Parks and Gardens and Scheduled Monuments within 3km of the site, the closest of which are located around 800m to the south-east (Danes Castle, Northernhay and Rougemont Gardens and Rougemont Castle). As such, uncertain minor negative effects are expected. |

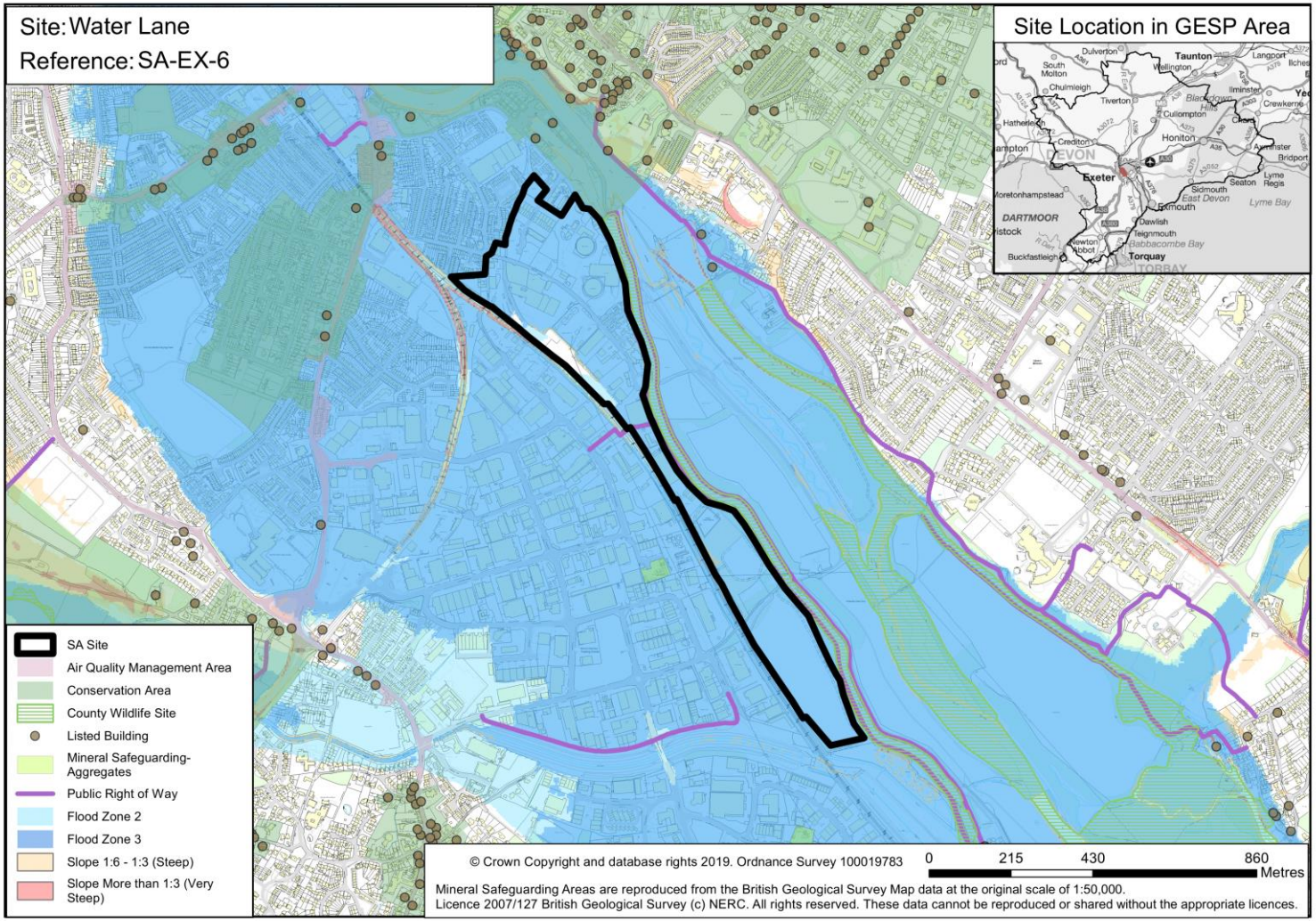
| SA Objective | SA Score | Justification |
|---|---|---|
| | | The site contains over 1ha of previously used land, which may present opportunities to enhance the overall quality of the built environment as new development would replace and potentially improve the existing development. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | ++/--? | The site is within Exeter and as such uncertain significant positive effects are expected.<br><br>The site is already a key public transport interchange for the City containing Exeter St David's Station (with access to both main and local train services) and containing bus stops that provide high frequency access to various locations in and around Exeter. The site is also crossed by a cycle route. The ability for future residents to access services, facilities and employment by sustainable transport links is therefore good and as such significant positive effects are expected.<br><br>However, as the site is expected to deliver under 1,000 homes, it is assumed that development of the site would provide fewer sustainable transport, walking and cycle links, and services. As such, uncertain significant negative effects are also expected.<br><br>Overall, mixed significant positive effects and uncertain significant negative effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly brownfield and on flood zone 3. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | + | The entirety of the site is comprised of urban use land. As such, negligible effects are expected due to their being no loss of high quality agricultural land.<br><br>Development would result in the redevelopment of previously developed land (>5ha). As such, minor positive effects are expected.<br><br>The site is not located within any Minerals Safeguarding Areas.<br><br>Overall, minor positive effects are expected due to development on previously developed land. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or degradation. | --? | Development should ensure no deterioration in the water quality of the of the River Exe, which is adjacent to the western boundary of the site and flows into the Exe Estuary SPA.<br><br>As such, uncertain significant negative effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | + | The site is likely to be able to accommodate around 151-180 dwellings However this capacity is likely to reduce once account has been taken of the likely mitigation requirements, including those highlighted elsewhere in this assessment.<br>In the context of other SEA sites, the site would make only a minor contribution to housing mix and the availability of affordable housing in the GESP area. The ability of the site to deliver the full policy quota of affordable housing is likely to be hampered by viability considerations, due to the site's constraints.<br>The site may be attractive to a diverse range of housing providers (e.g. small and medium scale developers, self/custom builders and older persons housing providers). However, due to the size of the site and it's constraints, development would make only a minor contribution to the diversity of housing supply in the GESP area.<br>Again, due to the comparatively small size of the site and its constraints, residential redevelopment would make only a minor contribution to housing affordability in the GESP area.<br>As such, minor positive effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site is within 800m of Riverside Valley Park, major open space, and lies within the National Cycle Route as well as within 400m of Public Rights of Way.<br>As such, significant positive effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | --/+ | The north of the site is within the 'least deprived' Middle Super Output Area, and the southern section of the site is within the 'above average' Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees higher levels of deprivation than compared to Devon as a whole. It is likely that a small residential development of this nature would provide potential improvements to the availability of homes in the area, which could provide broad wellbeing benefits (although the impacts on levels of deprivation are likely to be minimal). As such, a minor positive effect is expected.<br>The site is within Exeter City and adjacent to residential receptors, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. In addition, the site lies adjacent to a railway line. This feature may result in noise pollution affecting residents of the site in the longer term. As this is a brownfield site within an urban |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | area, it is not expected that redevelopment would result in any significant net increase in light pollution. As such, minor negative effects are also expected.<br><br>The site lies adjacent to Exeter AQMA along its eastern border. Therefore, residents in the site could be significantly adversely affected by poor air quality within the AQMA. As such, significant negative effects are expected.<br><br>Overall, mixed significant negative effects in relation to air quality, noise and light pollution and minor positive effects in relation to deprivation are likely. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | ++/- | The site is located within Exeter City. As such, significant positive effects are expected. The site is within walking and cycling distance, and benefits from public transport access to, of a wide variety of area-wide, community and cultural services and facilities in Exeter.<br><br>The site is within 1km of St David's Primary School to the south east but it is not within 1km of a secondary school. Devon County Council advises that the potential for expansion of existing primary and secondary schools on the eastern side of Exeter has been exhausted. Any requirements for primary education arising from redevelopment of the site would need to be accommodated through the expansion of the new Monkerton School and a review of primary school catchment areas. Any requirement for secondary education arising from redevelopment of the site would need to be explored via a strategy review of secondary provision in the City and its border areas. The site is also within 1km of further education colleges and the University of Exeter. As such, uncertain minor positive effects are expected.<br><br>The majority of the site is adjacent to an area where superfast download speeds of 78 Mbps are available. As such, minor positive effects are expected. However, Ofcom mapping indicates that parts northern area of the site does not currently have access to superfast broadband. It is expected that superfast broadband could be rolled out to this area.<br><br>The site is small in size, providing less than 500 homes, and therefore it is assumed that development of the site would be less likely to accommodate new schools. As such, minor negative effects are expected.<br><br>Overall, mixed significant positive and minor negative effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support | ++/-- | The site is located within Exeter City and it is within 1km of existing or proposed employment sites that could provide employment opportunities. As such, significant positive effects are expected.<br><br>Jobs would be created during the construction phase of the site and any new homes would provide expenditure in the area. It is assumed that, as the site has the capacity to deliver less than 500 |

| SA Objective | SA Score | Justification |
|---|---|---|
| improved job opportunities and greater productivity in Greater Exeter. | | homes, the site will provide limited employment opportunities. As such, negligible effects are expected.<br><br>Full residential build out would result in the loss of existing employment on the site. As such, significant negative effects are expected.<br><br>Subject to design, residential-led redevelopment of the site could help to significantly enhance a key public transport gateway to Exeter and thereby to improve the City's tourism offer.<br><br>Overall, mixed significant positive and significant negative effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | ++ | The site is located within Exeter City and is of a scale (<4,000 homes) that would not be expected to deliver town centre facilities that may detract some visitors from the existing centre of Exeter.<br><br>As such, significant positive effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | ++ | The site is already a key public transport interchange for the City, containing Exeter St David's Station (with access to both main and local train services) and containing bus stops that provide high frequency access to various locations in and around Exeter. The site is also crossed by a cycle route. The ability for future residents to access services, facilities and employment by sustainable transport links is therefore good.<br><br>As such significant positive effects are expected. |

## SA-EX-6: Water Lane

| SA-EX-6 | Water Lane |
|---|---|
| **Authority Area:** Exeter |  |
| **Site Area:** 26.2ha (Net 13.5ha) | |
| **Approximate total capacity:** 1,363 – 1,620 dwellings | |
| **Site status:** Potential site option | |
| **Outline description and context:** Large, predominantly industrial area sandwiched between the River Exe and Canal (to the east) and main railway line to Plymouth (to the west). Pockets of industry remain at:<br>• The Vulcan Works, south of Water Lane/east of Tan Lane - 10 industrial and workshop units, some vacant, most in poor repair;<br>• City Industrial Estate, north of Water Lane – 24 industrial and warehouse units and The Boatshed, in relatively good condition and attractive to small businesses;<br>• Witchita Works, south of Water Lane – untidy site | |

| SA-EX-6 | Water Lane |
| --- | --- |
| occupied by low intensity uses including scaffold hire, roofing contractors, vehicle hire and outdoor storage;<br>• Units 1, 2 and 3 Gabriels Wharf – modern warehouse units;<br>• SecAnim – large animal rendering plant situated at the southern end of Water Lane;<br>• Colas, Tan Lane – occupied by a business providing bitumen products;<br>• Smith Court/Crocker Court – 4 small industrial units, plus areas used for car storage.<br>The area also contains Willeys Social Club, an electricity sub-station, the Grace Road Playing Fields and additional greenfield land and two large vacant sites previously occupied by a power station and a gas works. Marsh Barton employment area, including a new gas power station and energy recovery facility, lies to the west. Residential uses abut to the north and the River Exe Valley Park lies to the east. | |

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| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/--? | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, but lies adjacent to Exeter Canal County Wildlife Site. The site is also located within Riverside Valley Park and Strategic Nature Area, coastal and floodplain grazing marsh. The site is also within 1km of two additional County Wildlife Sites, Cricklepit Lane & Quay Lane and Countess Wear. The site is flagged as Amber in the HRA sensitivity work with regard to Exe Estuary SPA and lies within the 10 km recreation zone for the SPA. Grace Road Playing Field and the adjoining greenfield area in the southern part of the site are part of a Priority Habitat (UK BAP Coastal and Floodplain Grazing Marsh). The site's brownfield areas include vacant/underused land and premises, which are likely to provide a habitat for a variety of protected species, particularly given their proximity to the Canal County Wildlife Site and Riverside Valley Park. Great Crested Newts have been recorded within 5km of the site. As such, uncertain significant negative effects are expected.<br><br>Existing green infrastructure on the site, the Riverside Valley Park, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space that could mitigate the biodiversity impact of development. As such, significant positive effects are also expected.<br><br>Overall, mixed significant positive and significant negative effects with uncertainty are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is comprised of brownfield land in the north associated with previous or current industrial use and greenfield land in the south. Land in the north of the site is of low landscape sensitivity and offers opportunity for regeneration in the form of tourist, leisure, employment and housing facilities. As such, negligible effects are expected.<br><br>Land in the south is of high landscape sensitivity and should be kept as enhanced green open space with existing trees retained.<br><br>As such, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build | +?/-? | The site does not contain any heritage assets within its boundaries. The northern boundary of the site is adjacent to Exeter Riverside Conservation Area, which contains multiple Grade II listed buildings. There are multiple Conservation Areas, Registered Parks and Gardens and Scheduled Monuments within 3km to the north in Exeter City. However, their sensitivity to development at this site is lower given the level of existing development between the site and these designated assets. There are further designated assets within 3km including three Scheduled Monuments 1.2-1.8km to the south |

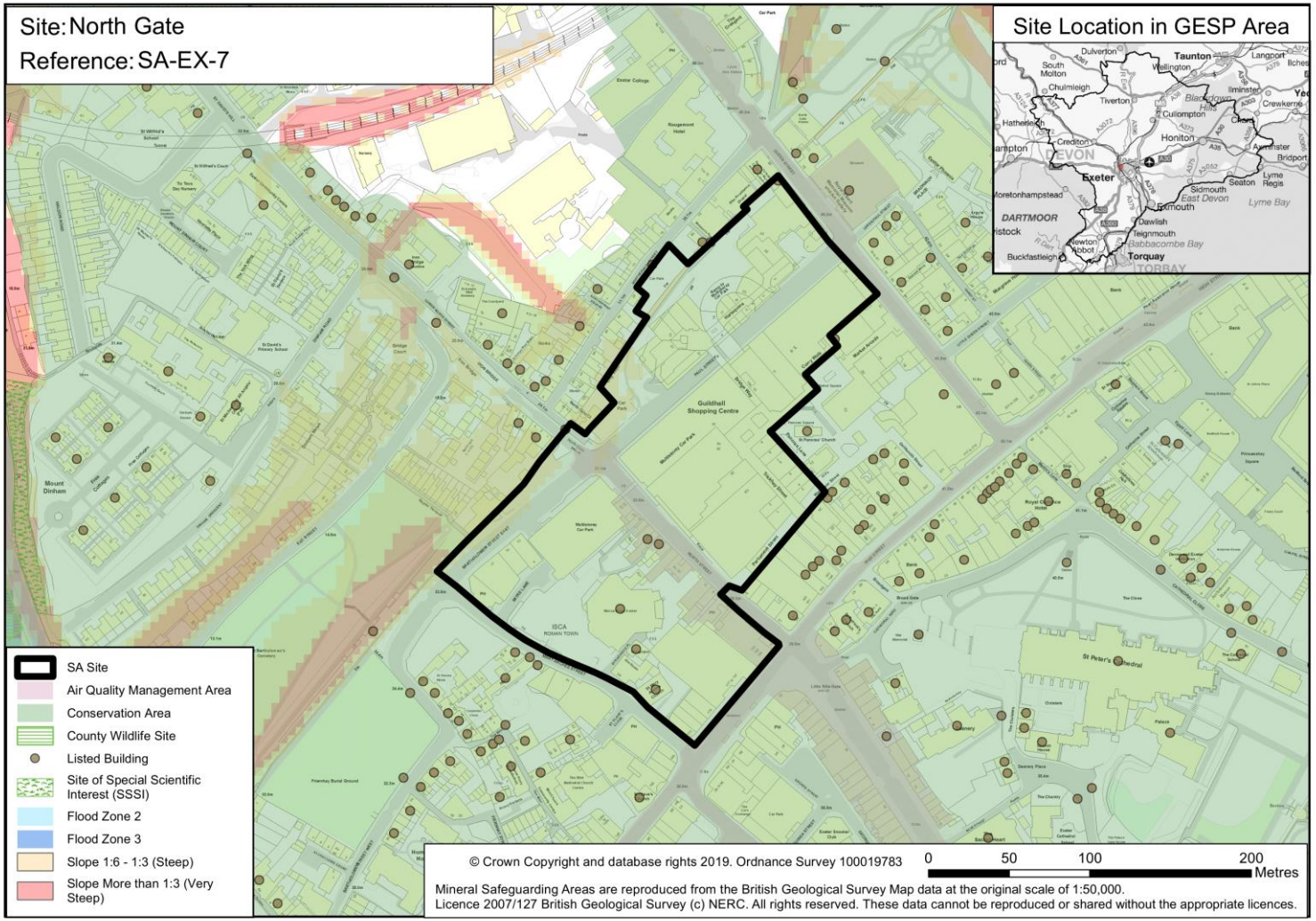
| SA Objective | SA Score | Justification |
|---|---|---|
| development. | | (linear round barrow cemetery at Castle Park, earthwork enclosure 200m NE of Church Path Hill Plantation and enclosures NE of Peamore Cottage. There is potential for development to compromise the setting of these historic environment assets. As such, uncertain minor negative effects are expected.<br><br>The site contains over 1ha of previously used land, which may present opportunities to enhance the overall quality of the built environment as new development would replace and potentially improve the existing development. As such, uncertain minor positive effects are expected.<br><br>Overall, uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | ++ | The site is within Exeter and as such uncertain significant positive effects are expected.<br><br>The ability to travel by public transport is currently adequate; the site is within 1km of St Thomas railway station, is crossed by a cycle route and is within 500m of frequent bus services, including those providing access to Marsh Barton Park and Ride/the City Centre. As such, significant positive effects are expected.<br><br>As the site is expected to deliver over 1,000 homes, it is assumed that development of the site would provide some sustainable transport, walking and cycle links and services. As such, uncertain negligible effects are expected.<br><br>Overall, significant positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly brownfield and on flood zone 3. Areas of the site are also on flood zone 2. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | ++/-? | The majority of the site is comprised of urban use land apart from a small area (>5ha) of Grade 3 agricultural land in the southern tip of the site. However, it is unclear if it is Grade 3a or Grade 3b. As such, uncertain minor negative effects are expected due to the potential for loss of high quality agricultural land during development. There is also a very small region of Grade 4 agricultural land located in the south east of the site.<br><br>Development within the site would result in the use of over 5ha of previously developed land. As such, significant positive effects are expected.<br><br>The site is not located within any Minerals Safeguarding Areas. |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | Overall, uncertain minor negative effects are expected due to the loss of high quality agricultural land and significant positive effects are expected due to development on previously developed land. |
| **7. WATER RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or degradation. | --? | Development should ensure no deterioration in the water quality of the River Exe and Exeter Canal which are adjacent to the site and flow into the Exe Estuary SPA.<br>As such, uncertain significant negative effects are expected. |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | + | The site is likely to be able to accommodate up to around 1,363 – 1,620 dwellings. However this capacity is likely to reduce once account has been taken of the likely mitigation requirements. The Exeter Core Strategy has allocated this site for the provision of 800 dwellings.<br>In the context of other SEA sites, the site would make only a minor contribution to housing mix and the availability of affordable housing in the GESP area. The ability of the site to deliver the full policy quota of affordable housing is likely to be hampered by viability considerations, due to the site's constraints.<br>The site may be attractive to a diverse range of housing providers (e.g. small and medium scale developers, self/custom builders and older persons housing providers). However, due to the size of the site and its constraints, development would make only a minor contribution to the diversity of housing supply in the GESP area.<br>Again, due to the comparatively small size of the site and its constraints, residential redevelopment would make only a minor contribution to housing affordability in the GESP area.<br>As such, minor positive effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The southern section of the site lies within Riverside Valley Park, major open space, and contains Public Rights of Way and part of the National Cycle Route. As such, significant positive effects are expected.<br>However, as the site is expected to deliver between 1,000 - 1,999 homes, it is assumed that development of the site would provide some open space and active transport links. As such, minor positive effects are expected.<br>Overall, significant positive effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy | -- | The site is within the 'below average' Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees lower levels of deprivation than compared to Devon as a whole. It is likely that a small residential development of this nature would |

| SA Objective | SA Score | Justification |
|---|---|---|
| communities. | | provide potential improvements to the availability of homes in the area, which could provide broad wellbeing benefits (although the impacts on levels of deprivation are likely to be minimal). As such, negligible effects are expected.<br><br>The site is within Exeter City and adjacent to residential receptors, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. In addition, the site lies adjacent to a railway line and in close proximity to Energy from Waste Incinerator. These features may result in noise pollution affecting residents of the site in the longer term. As this is a brownfield site within an urban area, it is not expected that redevelopment would result in any significant net increase in light pollution. As such, minor negative effects are also expected.<br><br>The site is within 1km of the Exeter AQMA. Therefore, residents in the site could be adversely affected by poor air quality within the AQMA. The site's main highways access is via Alphington Street/Road, which is part of Exeter's AQMA. However, it is noted that car access to the site could be limited due to its proximity to public transport and pedestrian/cycle links. As such, due to the location of the site in relation to an AQMA, significant negative effects are expected.<br><br>Overall, significant negative effects are likely. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | ++ | The site is located within Exeter City. As such, significant positive effects are expected. The site is within walking and cycling distance, and benefits from public transport access to, of a wide variety of area-wide, community and cultural services and facilities in Exeter.<br><br>The site is within 500m of a primary school and within 1km of a secondary school. Devon County Council has advised that the need for new primary school places arising from residential redevelopment of the site could be met at South West Exeter, through the provision of a new school within the Water Lane site itself and/or by expanding Alphington Primary School. Any requirement for secondary education arising from redevelopment of the site would need to be explored via a strategy review of secondary provision in the City and its border areas. As such, uncertain minor positive effects are expected.<br><br>Ofcom mapping indicates that the majority of the site currently has access to superfast broadband (30-300Mbps). As such, minor positive effects are expected. It is expected that superfast broadband could be rolled out to the remaining area.<br><br>The site is of medium size, providing over 500 homes, and therefore it is assumed that development would be more likely to accommodate a primary school. As such, minor positive effects are expected.<br><br>Overall, significant positive effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **12. JOBS AND LOCAL ECONOMY**<br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | ++/-- | The site is located within Exeter City and it is within 1km of existing or proposed employment sites that could provide employment opportunities. As such, significant positive effects are expected.<br>Jobs would be created during the construction phase of the site and any new homes would provide expenditure in the area. It is assumed that as the site has the capacity for over 500 homes, the site will provide medium scale mixed use employment opportunities and a neighbourhood hub with shops and services. As such, minor positive effects are expected.<br>Full residential build out would result in the loss of existing employment uses on the site, which employ a significant amount of people. As such, significant negative effects are expected.<br>Subject to design, residential-led redevelopment of the site could help to significantly enhance the urban landscape of the quayside, which is a key tourist location for Exeter.<br>Overall, mixed significant positive and significant negative effects are expected. |
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and town centres. | ++ | The site is located within Exeter City and is of a scale (<4,000 homes) that would not be expected to deliver town centre facilities that may detract some visitors from the existing centre of Exeter.<br>As such, significant positive effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | ++ | The ability to travel by public transport is currently adequate; the site is within 1km of St Thomas railway station, is crossed by a cycle route and is within 500m of frequent bus services, including those providing access to Marsh Barton Park and Ride/the City Centre. As such, significant positive effects are expected.<br>In addition, the site has capacity for more than 1,000 homes and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br>Overall, significant positive effects are expected. |

## SA-EX-7: North Gate

| SA-EX-7 | North Gate |
|---|---|
| **Authority Area:** Exeter City Council |  |
| **Site Area:** 3.9ha | |
| **Approximate total capacity:** 181 – 216 dwellings | |
| **Site status:** Potential site option | |
| **Outline description and context:** Mixed-use site within Exeter's urban area, including part of the Guildhall and all of the Harlequins Shopping Centres, alongside the Guildhall and Mary Arches public car parks, a large listed Bingo Hall, smaller scale commercial uses and homes. A section of the Roman City Wall lies immediately adjacent to the western corner of the site. | |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | --?/+ | The site is located within 250m of Bonhay Road Cutting SSSI and is flagged as amber in the HRA sensitivity work with regard to Exe Estuary SPA. In addition, the site lies within the 10 km recreation zone for the Exe Estuary SPA. The site currently contains no known biodiversity features of note or green infrastructure. As such, uncertain significant negative effects are expected.<br>However, the site has capacity for less than 1,000 homes, and therefore is expected to provide local public open space that could mitigate the biodiversity impact of development. As such, minor positive effects are also expected.<br>Overall, mixed minor positive and significant negative effects with uncertainty are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | 0? | The site is comprised of urban development associated with retail activity. Redevelopment of the site offers an opportunity to deliver moderate improvements to the townscape. Therefore, the site is of low landscape sensitivity.<br>As such, negligible effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | --?/+? | The entirety of the site is located Exeter City Centre Conservation Area and part of a Scheduled monument passes through the northern half of the site (Exeter City Walls). There are six listed buildings within the site boundaries, three of which are Grade II listed (29 Queen Street, 18 North Street, 17 North Street and Gaumont Palace/Mecca, one of which is Grade II* listed (Synagogue) and one of which is Grade I listed (St Mary Arches Church). The south-western boundary of the site is adjacent to St Bartholomew's Cemetery (a Registered Park and Garden) and the norther boundary of the site is around 50m away from Northernhay and Rougemont Gardens (a Registered Park and Garden. Additionally, there are multiple Scheduled Monuments in close proximity to the site, including around 50m east (part of the Roman town), 50m southwest (St Nicholas' Priory), 200m east (bomb damaged remains of St Catherine's Almshouses) and 110m north (Rougemont Castle). There is potential for residential development to compromise the setting of these historic environment assets. As such, uncertain significant negative effects are expected.<br>The site contains over 1ha of previously used land, which may present opportunities to enhance the overall quality of the built environment as new development would replace and potentially improve the existing development. As such, uncertain minor positive effects are expected.<br>Overall, mixed uncertain significant negative and uncertain minor positive effects are expected. |

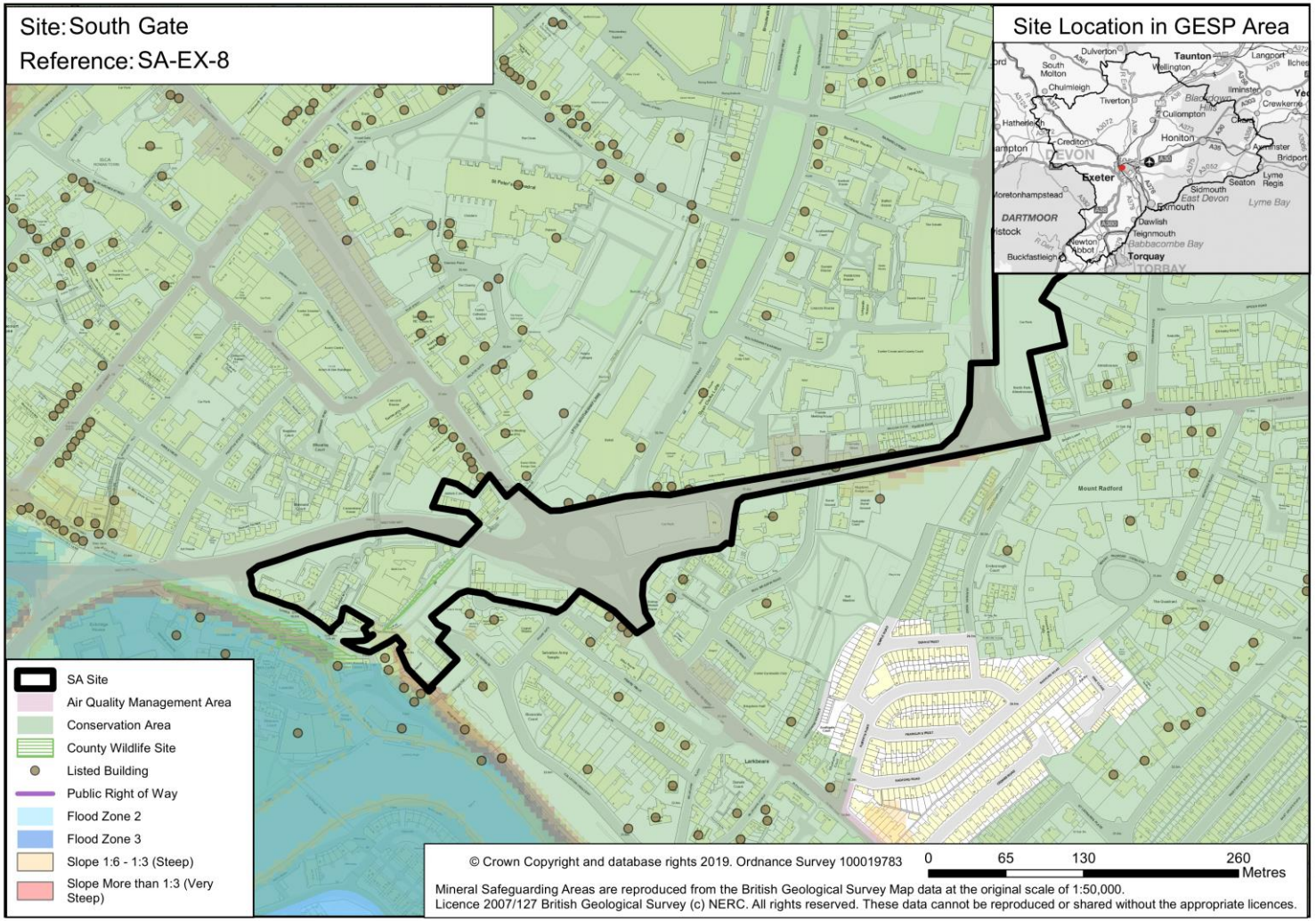
| SA Objective | SA Score | Justification |
|---|---|---|
| **4. CLIMATE CHANGE MITIGATION**<br>To minimise greenhouse gas emissions. | ++/-- | The site is within Exeter and as such uncertain significant positive effects are expected.<br>The site is within 1km of train stations and cycle routes, and is adjacent to bus stops served by high frequency bus services. As such, significant positive effects are expected.<br>However, as the site is expected to deliver less than 1,000 homes, it is assumed that development of the site would provide fewer sustainable transport, walking and cycle links, and services. As such, uncertain significant negative effects are also expected.<br>Overall, mixed significant positive effects and uncertain significant negative effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br>To adapt to the possible effects of climate change. | 0 | The site is predominantly brownfield and there is no significant flood risk within the area. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br>Therefore, uncertain negligible effects are expected. |
| **6. LAND RESOURCES**<br>To utilise our land resources efficiently and minimise their loss or degradation. | + | The entirety of the site is comprised of urban use land. As such, negligible effects are expected due to there being no loss high quality agricultural land.<br>Development would result in the use of previously developed land (>5ha). As such, minor positive effects are expected.<br>The site is not located within any Minerals Safeguarding Areas.<br>Overall, minor positive effects are expected due to development of previously used land. |
| **7. WATER RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or degradation. | 0 | The site is not adjacent to and does not contain any watercourses.<br>As such, negligible effects are expected. |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | + | The site is likely to be able to accommodate around 181-216 dwellings However this capacity is likely to reduce once account has been taken of the likely mitigation requirements, including those highlighted elsewhere in this assessment.<br>In the context of other SEA sites, the site would make only a minor contribution to housing mix and the availability of affordable housing in the GESP area. The ability of the site to deliver the full policy quota of affordable housing is likely to be hampered by viability considerations, due to the site's |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | constraints.<br><br>The site may be attractive to a diverse range of housing providers (e.g. small and medium scale developers and older persons housing providers). However, due to the size of the site and it's constraints, development would make only a minor contribution to the diversity of housing supply in the GESP area.<br><br>Again, due to the comparatively small size of the site and its constraints, residential redevelopment would make only a minor contribution to housing affordability in the GESP area.<br><br>As such, minor positive effects are expected. |
| **9. HEALTH**<br><br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site is within 800m of Riverside Valley Park major open space, as well as within 400m of the National Cycle Route.<br><br>As such, significant positive effects are expected. |
| **10. WELLBEING**<br><br>To support positive, safe and healthy communities. | --/+ | The site is within the 'above average' Middle Super Output Area, which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees higher levels of deprivation than compared to Devon as a whole. It is likely that a small residential development of this nature would provide potential improvements to the availability of homes in the area, which could provide broad wellbeing benefits (although the impacts on levels of deprivation are likely to be minimal). As such, a minor positive effect is expected.<br><br>The site is within Exeter City and is adjacent to residential receptors, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. Also, the site's proximity to a busy road could lead to residents being affected by traffic noise pollution in the long term. As this is a brownfield site within an urban area, it is not expected that redevelopment would result in any significant net increase in light pollution. As such, minor negative effects are also expected.<br><br>The site lies within part of the Exeter AQMA. Therefore, residents in the site could be significantly adversely affected by poor air quality within the AQMA. However, it is noted that the site benefits from good walking and cycling accessibility and is within walking distance of train and bus links. As such, due to the location of the site within an AQMA, significant negative effects are expected.<br><br>Overall, mixed significant negative effects in relation to air quality, noise and light pollution and minor |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | positive effects in relation to deprivation are likely. |
| **11. ACCESS TO SERVICES**<br>To provide accessible and attractive services and community facilities for all ages and interests. | ++/- | The site is located within Exeter City. As such, significant positive effects are expected. The site is within walking and cycling distance, and benefits from public transport access to, of a wide variety of area-wide, community and cultural services and facilities in Exeter.<br>The site is within 500m of a primary school but it is 1km of secondary school. Devon County Council advises that the potential for expansion of existing primary and secondary schools on the eastern side of Exeter has been exhausted. Any requirements for primary education arising from redevelopment of the site would need to be accommodated through the expansion of the new Monkerton School and a review of primary school catchment areas. Any requirement for secondary education arising from redevelopment of the site would need to be explored via a strategy review of secondary provision in the City and its border areas. The site is also within 3km of further education colleges and the University of Exeter. As such, uncertain minor positive effects are expected.<br>Ofcom mapping indicates that the site currently has access to superfast broadband (30-300Mbps). As such, minor positive effects are expected.<br>The site is small, providing less than 500 homes, and therefore it is assumed that development would be less likely to accommodate new schools. As such, minor negative effects are expected.<br>Overall, mixed significant positive and minor negative effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | + | The site is located within Exeter City but it is not within 1km of any existing or proposed employment sites that could provide employment opportunities. As such, minor positive effects are expected.<br>Jobs would be created during the construction phase of the site and any new homes would provide expenditure in the area. It is assume that as the site has the capacity to deliver less than 500 homes, the site will provide limited employment opportunities. As such, negligible effects are expected.<br>Full residential build out would result in the loss of existing retail jobs opportunities on the site. This loss could be partly mitigated if the scheme were to include an element of retail and office uses.<br>Subject to design, residential-led redevelopment of the site could help to significantly enhance the urban landscape of the City Centre, which is a key tourist location for Exeter.<br>Overall, minor positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the | ++ | The site is located within Exeter City and is of a scale (<4,000 homes) that would not be expected to deliver town centre facilities that may detract some visitors from the existing centre of Exeter. |

| SA Objective | SA Score | Justification |
|---|---|---|
| vitality and viability of our city and town centres. | | As such, significant positive effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | ++ | The site is within 1km of train stations and cycle routes, and is adjacent to bus stops served by high frequency bus services.<br><br>As such, significant positive effects are expected. |

### SA-EX-8: South Gate

| SA-EX-8 | South Gate |
|---|---|
| **Authority Area:** Exeter City Council |  |
| **Site Area:** 4.2ha (Net 2ha) | |
| **Approximate total capacity:** 202 – 240 dwellings | |
| **Site status:** Potential site option | |
| **Outline description and context:** | |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | --?/+ | The site is within 1km of Bonhay Road Cutting, SSSI and lies within County Wildlife Site, Cricklepit Land & Quay Lane. In addition, the site is within 1km of Exeter Canal County Wildlife Site. The site is flagged as Amber in the HRA sensitivity work with regard to Exe Estuary SPA. As such, significant negative effects with uncertainty are expected.<br>However, the site has capacity for less than 1,000 homes, and therefore is expected to provide local public open space that could mitigate the biodiversity impact of development. As such, minor positive effects are also expected.<br>Overall, mixed significant negative and minor positive effects with uncertainty are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | -? | The site contributes to important green corridor enhancing a major approach to city centre, the quality of the local townscape, the setting of two adjoining conservation areas and views to the south towards and beyond Bull Meadow Park. Of particular importance are the trees on the western side of the car park which are an integral part of the tree lined character of Western Way between Magdalen Road and Paris Street roundabout.<br>The Open Space on the southern side of Western Way makes a similarly important contribution as well as visually linking to the green spaces on opposite sides of Western Way.<br>The open linear green space between Western Way and Quay Hill (effectively covered by policies TM5& C5) is important in enhancing the setting and line of the City Wall whilst allowing it to be viewed from the footpath linking to the Quay.<br>The site is considered to be of medium landscape sensitivity. Development could have adverse effects on the character and quality of the environment as it is located on a hillside and close to heritage assets. However, the site is within the urban area of Exeter so it is considered that development will have a 'townscape' impact rather than 'landscape' impact. As such, uncertain minor negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | --?/+? | The majority of the site is located within Southernhay and The Friars Conservation Area, whilst the western side of the site is located within Exeter City Centre Conservation Area and the eastern side is within St. Leonard Conservation Area. Exeter City walls pass through the western side of the site and designated as a Scheduled Monument. There are multiple designated assets within 3km including at the northern and southern boundaries of the site, which are adjacent to multiple Grade II listed buildings as well as four further Scheduled Monuments in close proximity to the site, around 300m north (part of the Roman town), 350m north-west (St. Nicholas Priory), 200m west (the medieval Exe Bridge) and 400m north (bomb damaged remains of St. Catherine's Almshouses). Additionally, there are Registered Parks and Gardens located around 450m north-west of the site (St. Bartholomew's |

| SA Objective | SA Score | Justification |
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| | | Cemetery) and 600m to the north (Northernhay and Rougemont Gardens). There is potential for development to compromise the setting and fabric of these historic environment assets. As such, uncertain significant negative effects are expected.<br><br>The site contains over 1ha of previously used land, which may present opportunities to enhance the overall quality of the built environment as new development would replace and potentially improve the existing development. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain significant negative and uncertain significant positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | ++/--? | The site is located within Exeter. As such, uncertain significant positive effects are expected.<br><br>The site is located within 1km of cycle routes and railways stations, and adjacent to bus stops served by frequent bus services. As such, significant positive effects are expected.<br><br>However, as the site is expected to deliver under 10 ha of employment land, it is assumed that development of the site would provide fewer sustainable transport, walking and cycle links, and services. As such, uncertain significant negative effects are also expected.<br><br>Overall, mixed significant positive and uncertain significant negative effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | 0 | The site is predominantly brownfield and there is no significant flood risk within the area. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain negligible effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | + | The entirety of the site is comprised of urban use land. As such, negligible effects are expected due to there being no loss of high quality agricultural land.<br><br>Development would result in the use of previously developed land (<5ha). As such, minor positive effects are expected.<br><br>The site is not located within any Minerals Safeguarding Areas.<br><br>Overall, minor positive effects are expected due to development of previously used land. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or | 0 | The site is not adjacent to and does not contain any watercourses.<br><br>As such, negligible effects are expected. |

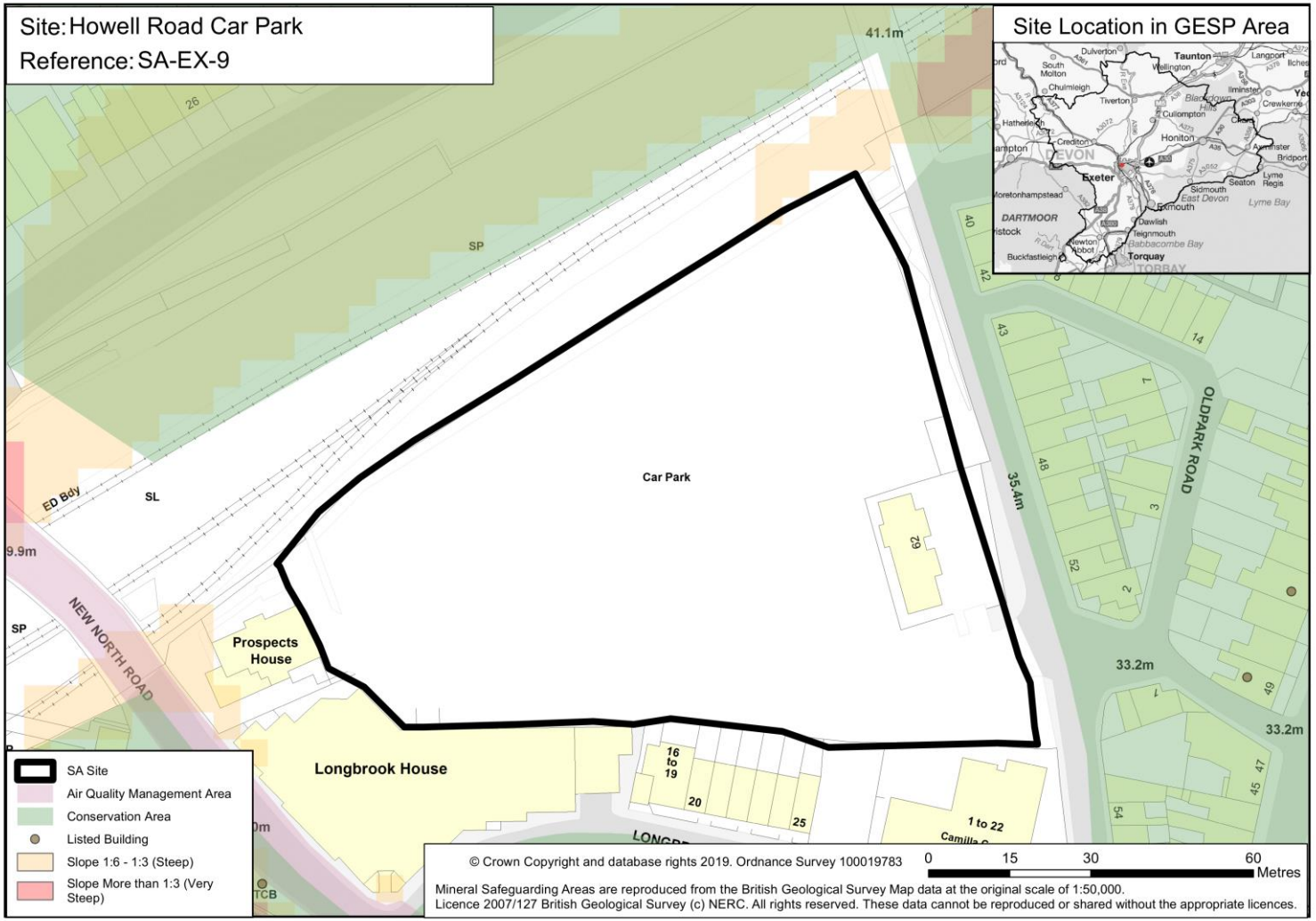
| SA Objective | SA Score | Justification |
|---|---|---|
| degradation. | | |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | + | The site is likely to be able to accommodate around 202-240 dwellings However this capacity is likely to reduce once account has been taken of the likely mitigation requirements, including those highlighted elsewhere in this assessment.<br>In the context of other SEA sites, the site would make only a minor contribution to housing mix and the availability of affordable housing in the GESP area. The ability of the site to deliver the full policy quota of affordable housing is likely to be hampered by viability considerations, due to the site's constraints.<br>The site may be attractive to a diverse range of housing providers (e.g. small and medium scale developers and older persons housing providers). However, due to the size of the site and it's constraints, development would make only a minor contribution to the diversity of housing supply in the GESP area.<br>Again, due to the comparatively small size of the site and its constraints, residential redevelopment would make only a minor contribution to housing affordability in the GESP area.<br>As such, minor positive effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site is within 800m of Riverside Valley Park, major open space, and is within 400m of the National Cycle Route and Public Rights of Way.<br>As such, significant positive effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | --/+ | The site is within the 'above average' Middle Super Output Area, which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees higher levels of deprivation than compared to Devon as a whole. It is likely that a small residential development of this nature would provide potential improvements to the availability of homes in the area, which could provide broad wellbeing benefits (although the impacts on levels of deprivation are likely to be minimal). As such, a minor positive effect is expected.<br>The site is within Exeter City and is adjacent to residential receptors, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. The site is crossed by an 'A' road, therefore proximity to a busy road could lead to residents being affected by traffic noise pollution in the long term. As such, minor negative effects are |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | also expected.<br><br>The site lies within part of the Exeter AQMA. Therefore, residents in the site could be significantly adversely affected by poor air quality within the AQMA. However, it is noted that the site benefits from good walking and cycling accessibility and is within walking distance of train and bus links. As such, due to the location of the site within an AQMA, significant negative effects are expected.<br><br>Overall, mixed significant negative effects in relation to air quality, noise and light pollution and minor positive effects in relation to deprivation are likely. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | ++/- | The site is within Exeter City. As such, significant positive effects are expected. The site is in good proximity to GP surgeries, amenities and leisure facilities.<br><br>The site is within 1km of multiple primary schools but it is not within 1km of any secondary school. The site is within 1km of Exeter College to the north. As such, minor positive effects are expected.<br><br>The site is located adjacent to an area where only standard broadband download speeds are available (10-30Mbps). As such, negligible effects are expected.<br><br>The site is small, providing less than 500 homes, and therefore it is assumed that development would be less likely to accommodate new schools. As such, minor negative effects are expected.<br><br>Overall, mixed significant positive and minor negative effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | +/- | The site is located within Exeter City but is not within 1km of any existing or proposed employment sites that could provide employment opportunities. As such, minor positive effects are expected.<br><br>Jobs would be created during the construction phase of the site and any new homes would create expenditure in the area. It is assumed that, as the site has capacity for less than 500 homes, the site will provide limited employment opportunities. As such, negligible effects are expected.<br><br>There is potential for development to increase tourism in the area as a result of townscape improvements at a key gateway to the town. However, if there is a loss of city centre parking as a result of development and it is not replaced this could have negative impacts on tourism in the area. As such, minor negative effects are expected.<br><br>Overall, mixed minor positive and minor negative effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and | ++ | The site is located within Exeter City and is of a scale (<4,000 homes) that would not be expected to deliver town centre facilities that may detract some visitors from the existing centre of Exeter. |

| SA Objective | SA Score | Justification |
|---|---|---|
| town centres. | | As such, significant positive effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | ++ | The site is located within 1km of cycle routes and railways stations, and adjacent to bus stops served by frequent bus services.<br><br>As such, significant positive effects are expected. |

### SA-EX-9: Howell Road Car Park

| SA-EX-9 | Howell Road Car Park |
|---|---|
| **Authority Area:** Exeter City Council | |
| **Site Area:** 0.9ha (Net 0.7ha) | |
| **Approximate total capacity:** 72 – 86 dwellings | |
| **Site status:** Potential site option | |
| **Outline description and context:** Edge of city centre car park of circa 0.9 ha incorporating 337 parking spaces, local recycling facilities and one residential block containing 2-3 dwellings. | |



| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | --?/+ | The site is located within 1km of Bonhay Road Cutting, SSSI and of two County Wildlife Sites, Taddiford Brook and Exwick Weir. The site is flagged as Amber in the HRA sensitivity work with regard to Exe Estuary SPA and lies within the 10 km recreation zone for the Exe Estuary SPA. The site is largely tarmacked and bordered by relatively low value trees. However, the adjoining railway embankment may provide a habitat for protected species and Great Crested Newts have been recorded within 5km of the site. The site contains no green infrastructure currently. As such, uncertain significant negative effects are expected.<br><br>However, the site has capacity for less than 1,000 homes, and therefore is expected to provide local public open space that could mitigate the biodiversity impact of development. As such, minor positive effects are also expected.<br><br>Overall, mixed minor positive and significant negative effects with uncertainty are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | 0? | The site is contains urban development which is comprised of car parking. Redevelopment offers the opportunity to significantly improve the quality of the local townscape. Therefore, the site is of low landscape sensitivity.<br><br>As such negligible effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | -? | The site does not contain any heritage assets within its boundaries. There are multiple designated assets within 3km including at the northern, eastern and southern boundaries of the site, which are adjacent to Longbrook Conservation Area that contains multiple Grade II listed buildings. The highest concentration of these buildings are around 50m to the east and south-east where there are five Grade II listed buildings. Northernhay and Rougemont Garden (a Registered Park and Garden) is around 50m to the south as well as Rougemont Castle (a Scheduled Monument) located around 100 south and Danes Castle (a Scheduled Monument) located around 220m to the north-east. There is potential for residential development to compromise these historic environment assets.<br><br>As such, uncertain minor negative effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br>To minimise greenhouse gas emissions. | ++/--? | The site is within Exeter and as such uncertain significant positive effects are expected.<br><br>The site is within 1km of train stations and cycle routes, and is within 500m of high frequency bus services. As such, significant positive effects are expected.<br><br>However, as the site is expected to deliver less than 1,000 homes, it is assumed that development of the site would provide fewer sustainable transport, walking and cycle links, and services. As such, |

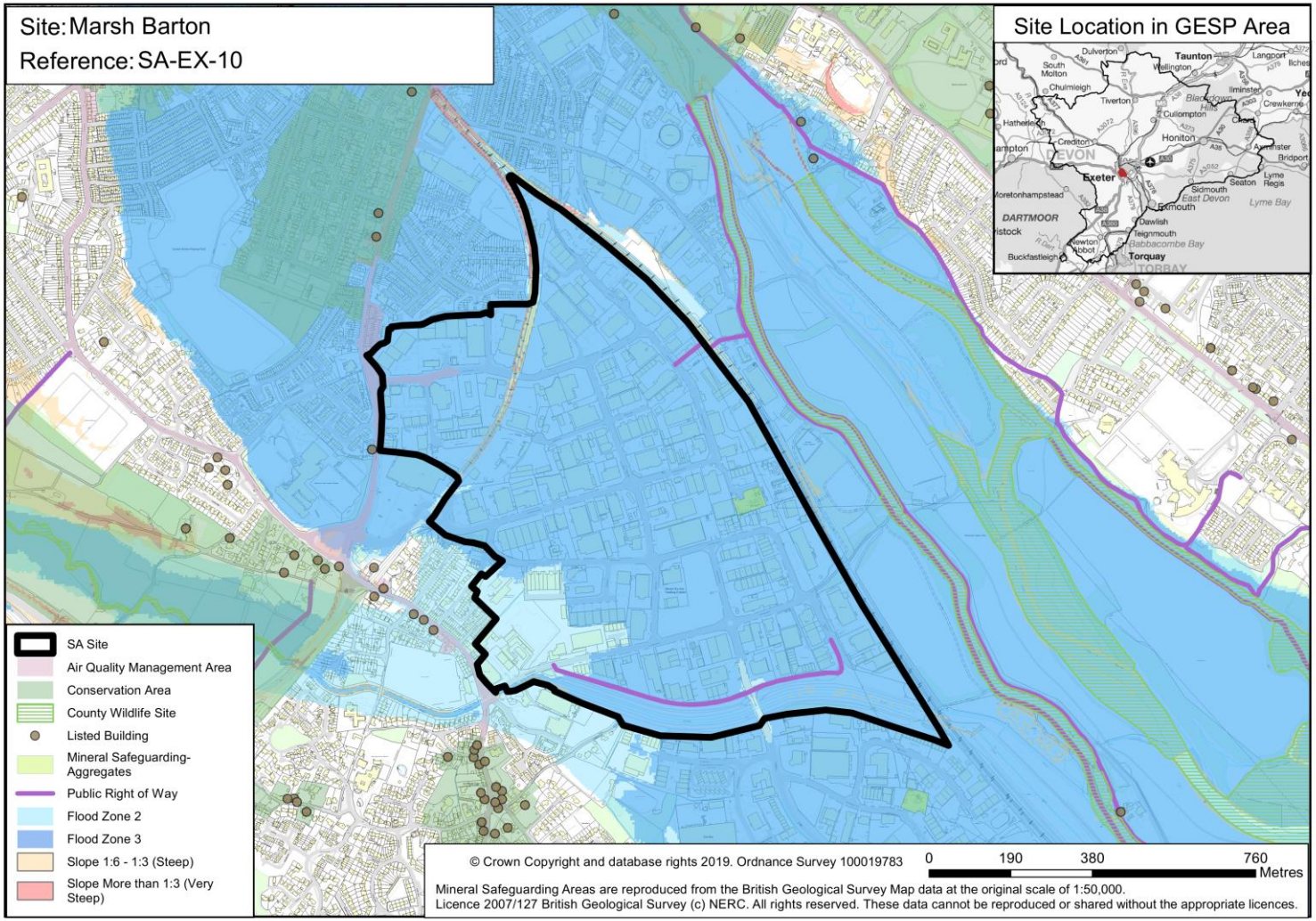
| SA Objective | SA Score | Justification |
|---|---|---|
| | | uncertain significant negative effects are also expected.<br><br>Overall, mixed significant positive effects and uncertain significant negative effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | 0 | The entirety of the site is brownfield and there is no significant flood risk within the area. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain negligible effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | + | The entirety of the site is comprised of urban use land. As such, negligible effects are expected due to there being no loss of high quality agricultural land. Contaminated soil has been recorded and so redevelopment would provide an opportunity for remediation. This would be a pre-requisite for redevelopment for residential use.<br><br>Development would contribute to the use of previously developed land (>5ha). Therefore, minor positive effects are expected.<br><br>The site is not located within any Minerals Safeguarding Areas.<br><br>Overall, minor positive effects are expected due to development on previously used land. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or degradation. | 0 | The site is not adjacent to and does not contain any watercourses.<br><br>As such, negligible effects are expected. |
| **8. HOMES**<br><br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | + | The site is likely to be able to accommodate around 72-86 dwellings. However this capacity is likely to reduce once account has been taken of the likely mitigation requirements, including those highlighted elsewhere in this assessment.<br><br>In the context of other SEA sites, the site would make only a minor contribution to housing mix and the availability of affordable housing in the GESP area. The ability of the site to deliver the full policy quota of affordable housing is likely to be hampered by viability considerations, due to the site's constraints.<br><br>The site may be attractive to a diverse range of housing providers (e.g. small and medium scale developers and older persons housing providers). However, due to the size of the site and it's constraints, development would make only a minor contribution to the diversity of housing supply in |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | the GESP area.<br><br>Again, due to the comparatively small size of the site and its constraints, residential redevelopment would make only a minor contribution to housing affordability in the GESP area.<br><br>As such, minor positive effects are expected. |
| **9. HEALTH**<br><br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | + | The site is not within 800m of major open space, but is within 400m of Public Rights of Way.<br><br>As such, minor positive effects are expected. |
| **10. WELLBEING**<br><br>To support positive, safe and healthy communities. | -- | The site is within the 'average' Middle Super Output Area, which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees average levels of deprivation than compared to Devon as a whole. It is likely that a small residential development of this nature would provide potential improvements to the availability of homes in the area, which could provide broad wellbeing benefits (although the impacts on levels of deprivation are likely to be minimal). As such, negligible effects are expected.<br><br>The site is within Exeter City and is adjacent to residential receptors, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. The site is adjacent to a railway line. This feature may result in noise pollution affecting residents of the site in the longer term. As this is a brownfield site within an urban area, it is not expected that redevelopment would result in any significant net increase in light pollution. As such, minor negative effects are also expected.<br><br>The site lies adjacent to the Exeter AQMA. Therefore, residents in the site could be significantly adversely affected by poor air quality within the AQMA. However, it is noted that the site has good access to existing pedestrian and cycle infrastructure, connected to services, facilities and employment in the City Centre and more widely in Exeter. As such, due to the location of the site in relation to an AQMA, significant negative effects are expected.<br><br>Overall, significant negative effects are likely. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive | ++/- | The site is located within Exeter City. As such, significant positive effects are expected. The site is within walking and cycling distance, and benefits from public transport access to, of a wide variety of |

| SA Objective | SA Score | Justification |
|---|---|---|
| services and community facilities for all ages and interests. | | area-wide, community and cultural services and facilities in Exeter.<br><br>The site is within 500m of a primary school but it is not within 1km of a secondary school. Devon County Council advises that the potential for expansion of existing primary and secondary schools on the eastern side of Exeter has been exhausted. Any requirements for primary education arising from redevelopment of the site would need to be accommodated through the expansion of the new Monkerton School and a review of primary school catchment areas. Any requirement for secondary education arising from redevelopment of the site would need to be explored via a strategy review of secondary provision in the City and its border areas. The site is also within 3km of further education colleges and the University of Exeter. As such, uncertain minor positive effects are expected.<br><br>The majority of the site has access to superfast (80Mbps) and ultrafast (350Mbps) broadband download speeds. As such, minor positive effects are expected. Ofcom mapping indicates that the western part of the site does not currently have access to superfast broadband. However, it is expected that superfast broadband could be rolled out to this area.<br><br>The site is small, providing less than 500 homes, and therefore it is assumed that development would be less likely to accommodate new schools. As such, minor negative effects are expected.<br><br>Overall, significant positive and minor negative effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | + | The site is located within Exeter City but it is not within 1km of any existing or proposed employment sites that could provide employment opportunities. As such, minor positive effects are expected.<br><br>Jobs would be created during the construction phase of the site and additional homes would create expenditure in the area. It is assumed that, as the site has the capacity to deliver less than 500 homes, the site will provide little employment opportunities. As such, negligible effects are expected.<br><br>Due to the site's 'tucked away' location, it is not considered that redevelopment would have any notable impact upon Exeter's tourism offer.<br><br>Overall, minor positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | ++ | The site is located within Exeter City and is of a scale (<4,000 homes) that would not be expected to deliver town centre facilities that may detract some visitors from the existing centre of Exeter.<br><br>As such, significant positive effects are expected. |
| **14. CONNECTIVITY AND** | ++ | The site is within 1km of train stations and cycle routes, and is within 500m of high frequency bus |

| SA Objective | SA Score | Justification |
|---|---|---|
| **TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | | services.<br><br>As such, significant positive effects are expected. |

## SA-EX-10: Marsh Barton

| SA-EX-10 | Marsh Barton |
|---|---|
| **Authority Area:** Exeter City Council |  |
| **Site Area:** 85.4ha (Net 45ha) | |
| **Approximate total capacity:** 4,545 – 5,400 dwellings | |
| **Site status:** Potential site option | |
| **Outline description and context:** A large area of older employment, retail, quasi retail and car showroom uses in the south of the city, largely bounded by the mainline railway, Alphington Road, residential areas and the Alphin Brook. Generally low rise, lower quality buildings on level ground with main access from south and west. Contains an energy from waste plant in the south east corner, a recycling centre and an emerging retail/leisure quarter near Exeter Retail Park. | |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/--? | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, but is within the SSSI IRZ for Exe Estuary, also an SPA and Ramsar site. The site is flagged as Amber in the HRA sensitivity work with regard to Exe Estuary SPA. The site is also within 250m of Exeter Canal County Wildlife Site and within 1km of Alphinbrook County Wildlife Site. The southern section of the site is within Strategic Nature Area, coastal and floodplain grazing marsh. As such, significant negative effects with uncertainty are expected.<br><br>Existing green infrastructure on the site, including marshes, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space that could mitigate the biodiversity impact of development. As such, significant positive effects are also expected.<br><br>Overall, mixed significant positive and significant negative effects with uncertainty are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | 0? | The Alphin Brook, apart from being a water course, is an important and distinctive landscape feature and green corridor providing footpath/cycle links to Alphington and the Riverside Valley Park.<br><br>The former railway line to the north-west is a SNCI and its visual significance and potential to create footpath/cycle links should be enhanced through development.<br><br>The site is considered to be of low landscape sensitivity as the site is within an industrial area of Exeter and so it is not considered that development will have any significant landscape impacts. As such, uncertain negligible effects are expected. The sensitivity assessment for this site was based on a slightly different site boundary to that which has now been included in the SA, which contributes additional uncertainty to the potential effect identified. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/-? | The site does not contain any heritage assets within its boundaries. There are multiple listed buildings within 3km, including the closest of which are around 150m to the south-west of the site, where there are six Grade II listed buildings. Alphington Conservation Area is around 140m to the south and contains a high concentration of Grade II listed buildings. There are three Scheduled Monuments around 1-1.5km to the south (linear round barrow cemetery at Castle Park, enclosures NE of Peamore Cottage and earthwork enclosure 200m NE of Church Path Hill Plantation). There is potential for residential development to compromise the setting of these historic environment assets. There are also multiple Registered Parks and Gardens, Scheduled Monuments and Conservations areas located within 3km to the north of the site in Exeter. However, their sensitivity to development at this site is reduced given the level of existing development between the site and these designated assets. As such, |

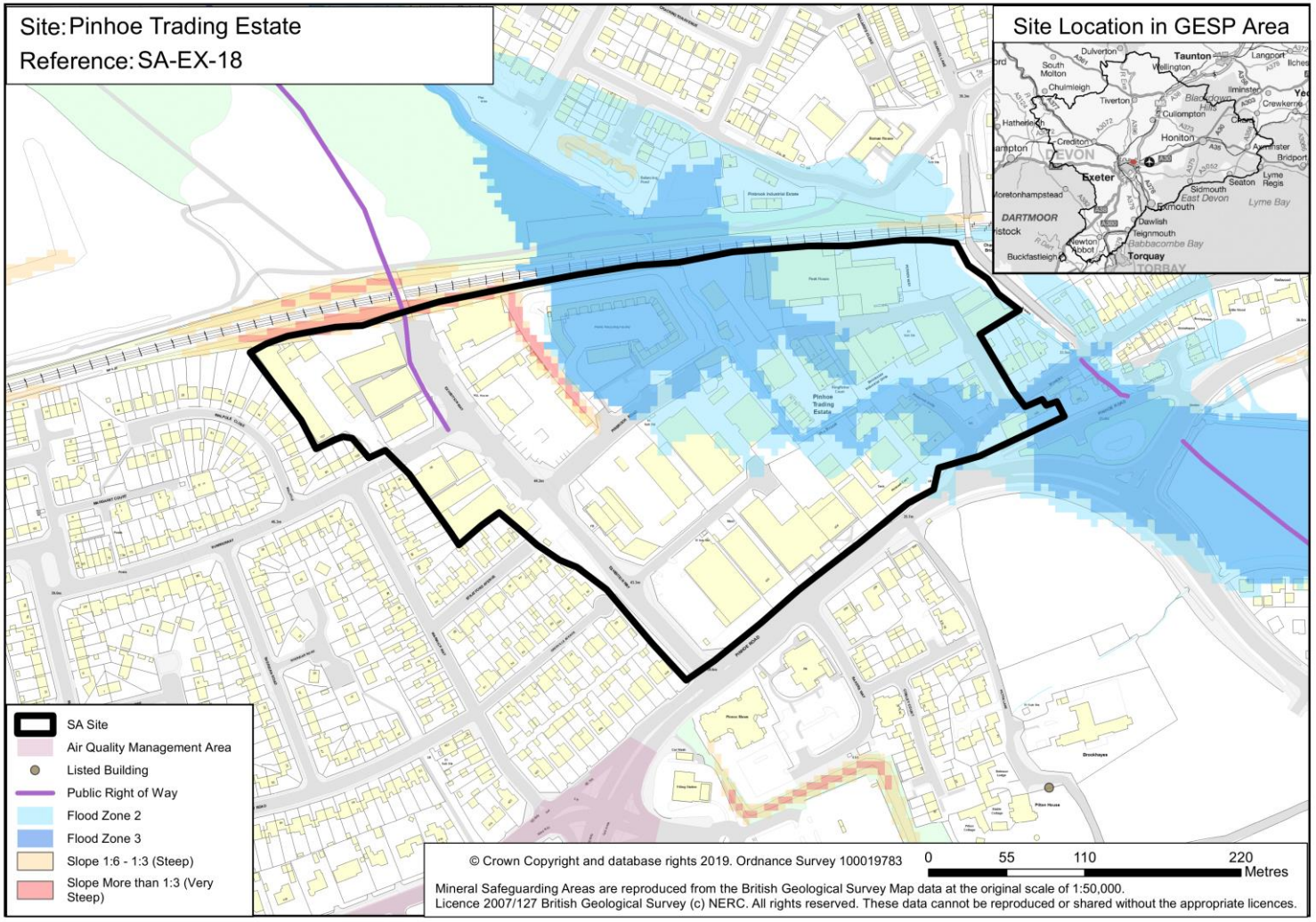
| SA Objective | SA Score | Justification |
|---|---|---|
| | | uncertain minor negative effects are expected.<br><br>The site contains over 1ha of previously used land, which may present opportunities to enhance the overall quality of the built environment as new development would replace and potentially improve the existing development. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | ++ | The site is located within Exeter City. As such, uncertain significant positive effects are expected.<br><br>The site is located within 1km of a railway station and contains part of a cycle route. In addition, the site contains multiple bus stops served by frequent bus services. As such, significant positive effects are expected.<br><br>As the site is expected to deliver over 4,000 homes, it is assumed that development of the site would provide significant sustainable transport links, walking and cycle routes and roads connecting the site to the nearest settlement. As such, uncertain minor positive effects are expected.<br><br>Overall, significant positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly brownfield and on flood zone 3. Areas of the site to the west are on flood zone 2. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore. Uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | ++/-? | The vast majority of the site is comprised of urban use land. However, there is around 2.5ha of Grade 3 agricultural land located at the southern boundary of the site. It is not clear whether this is Grade 3a or 3b agricultural land. As such, uncertain minor negative effects are expected.<br><br>Development of the site would contribute to the use of over 5ha of previously developed land. Therefore, significant positive effects are expected.<br><br>The site is not located within any Minerals Safeguarding Areas.<br><br>Overall, mixed uncertain minor negative and significant positive effects are expected. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or | --? | Development should ensure no deterioration in the water quality of Alphin Brook, which passes through the southern boundaries of the site and flows into the Exe Estuary SPA.<br><br>As such, uncertain significant negative effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| degradation. | | |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | ++ | The site is likely to be able to deliver around 4,545–5,400 homes. However, this capacity is likely to reduce once account has been taken of all constraints and likely mitigation requirements. The area should capable of bringing forward a suitable mix of dwellings in terms of size and tenure and diversity of supply. Homes may be provided by a diverse range of providers including SME house buildings companies, housing associations and custom and self-build providers. This site is of a sufficient size to be able to support a high number of housing starts/completions from a number of different outlets around the sites, which in turn will ensure a good pace of delivery. There is nothing to suggest delivery will not be viable (and indeed profitable) and therefore provision of affordable housing should not be compromised.<br>As such, significant positive effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site is within 800m of Riverside Valley Park, major open space, and contains a few Public Rights of Way and a section of the National Cycle Route. As such, significant positive effects are expected.<br>In addition, as the site is expected to deliver over 2,000 homes, it is assumed that development of the site would provide significant open space and active transport links. As such, significant positive effects are expected.<br>Overall, significant positive effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | -- | The site is within the Alphington Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, experiences below average levels of deprivation than compared to Devon as a whole. It is likely that a small residential development of this nature would provide potential improvements to the availability of homes in the area, which could provide broad wellbeing benefits (although the impacts on levels of deprivation are likely to be minimal). As such, negligible effects are expected.<br>The site is within Exeter City and is adjacent to residential receptors, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. In addition, the site lies adjacent to and is crossed by a railway line and in close proximity to Energy from Waste Incinerator. These features may result in noise pollution affecting residents of the site in the longer term. As such, minor negative effects are also expected.<br>The site lies adjacent to the Exeter AQMA. Therefore, residents in the site could be adversely affected by poor air quality within the AQMA. However, it is noted that car access to the site could be limited due to its proximity to public transport and pedestrian/cycle links. As such, due to the location of the |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | site in relation to an AQMA, significant negative effects are expected.<br><br>Overall, significant negative effects are likely. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | ++ | The site is located within Exeter City. As such, significant positive effects are expected. The site is within walking and cycling distance, and benefits from public transport access to, of a wide variety of area-wide, community and cultural services and facilities in Exeter.<br><br>The site is within 500m of West Exe Secondary School to the west and it is also within 500m of Alphington Primary School to the south west. The site is also within 3km of further education colleges and the University of Exeter. As such, uncertain significant positive effects are expected.<br><br>The majority of the site has access to superfast broadband speeds (30-300Mbps). As such, minor positive effects are expected.<br><br>The site is large, providing over 4,000 homes, and therefore it is assumed that development will be more likely to accommodate a new primary school and secondary school. As such, significant positive effects are expected.<br><br>Overall, significant positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | ++ | The site is located within Exeter City but it is not located within 1km of any existing or proposed employment sites that could provide employment opportunities. As such, minor positive effects are expected.<br><br>Jobs would be created during the construction phase of the site and any new homes would provide additional expenditure in the area. It is assumed that, as the site has the capacity to deliver over 4,000 homes, the site will provide large scale mixed use employment opportunities and a business park or employment estate as well as a town centre with shops, services and community buildings. As such, significant positive effects are expected.<br><br>The site is not likely to have any negative impacts on tourism.<br><br>Overall, significant positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | + | The site is located within Exeter City but is of a scale (>4,000 homes) that could potentially be expected to deliver town centre facilities that may detract some visitors from the existing centre of Exeter.<br><br>As such, minor positive effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | ++ | The site is located within 1km of a railway station and contains part of a cycle route. In addition, the site contains multiple bus stops served by frequent bus services. As such, significant positive effects are expected.<br><br>The site has capacity for over 1,000 homes and therefore it is assumed to provide sustainable transport links, walking and cycle routes and a road connecting the site to the nearest main settlement. As such, minor positive effects are expected.<br><br>Overall, significant positive effects are expected. |

## SA-EX-18: Pinhoe Trading Estate

| SA-EX-18 | Pinhoe Trading Estate |
|---|---|
| **Authority Area:** Exeter | |
| **Site Area:** 9.4ha (Net 3.5ha) | |
| **Approximate total capacity:** 351 – 417 dwellings | |
| **Site status:** Potential site option | |
| **Outline description and context**: Site comprising a range of different B1, B2, B8 and trade counter units, plus a recycling centre, a concrete batch plant and supermarket. Structures vary in type, size and quality, but are typically no more than 2 storeys high. The site is bound to the north by the Exeter-Exmouth railway line. Pinhoe Road (B3181) forms the southern boundary, beyond which is the Monkerton/Hill Barton Strategic Allocation identified in the Core Strategy. The site is flanked to the east and west by dwellings. |  |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | --?/+ | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, but is within 1km of Pinhoe Brickpit, County Geological Site and Beacon Hill, County Wildlife Site. The site is flagged as Amber in the HRA sensitivity work with regard to East Devon Pebblebed SAC/SPA and Exe Estuary SPA. The site also lies within the 10 km recreation zone for the Exe Estuary SPA and the East Devon Pebblebeds SPA. There is potential for existing structures on the site to provide habitats for species of value. Great Crested Newts have been recorded within 5km of the site. As such, uncertain significant negative effects are expected.<br>However, the site has capacity for less than 1,000 homes, and therefore is expected to provide local public open space that could mitigate the biodiversity impact of development. As such, minor positive effects are also expected.<br>Overall, mixed minor positive and significant negative effects with uncertainty are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | 0? | The site contains urban development which is comprised of B1. B2 and B8 buildings which are generally no more than two storeys high. There are number trees within the site that should be retained during any development. Redevelopment offers provides an opportunity to deliver significant townscape improvements through the removal of unattractive buildings and the provision of open space. The site is considered to be of low landscape sensitivity as the site is located within an industrial area of Exeter and so it is expected that development will not have any significant landscape impact<br>As such, uncertain negligible effects are expected. The sensitivity assessment for this site was based on a slightly different site boundary to that which has now been included in the SA, which contributes additional uncertainty to the potential effect identified. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/-? | The site does not contain any heritage assets within its boundaries. There are multiple designated assets within 3km including the closest heritage asset to the site, which is a Grade II listed building (7, Mount Pleasant Road) located around 220m to the south. There are further Grade II listed buildings located in Pinhoe (500m north-east) and Monkerton (600m south-east) as well as a cluster of five listed buildings around 500m north-west of the site, one of which is Grade II* listed whilst the others are Grade II listed (Pinbrook House and surrounding buildings). There is also a Scheduled Monument (St. Katherine's Priory) around 1.2km east of the site. There is potential for development to compromise the setting of these historic environment assets. There are further designated heritage assets within 3km to the south-west in Exeter City Centre. However, their sensitivity to development at this site is reduced given the level of existing development between the site and these designated heritage assets. As such, uncertain minor negative effects are expected. |

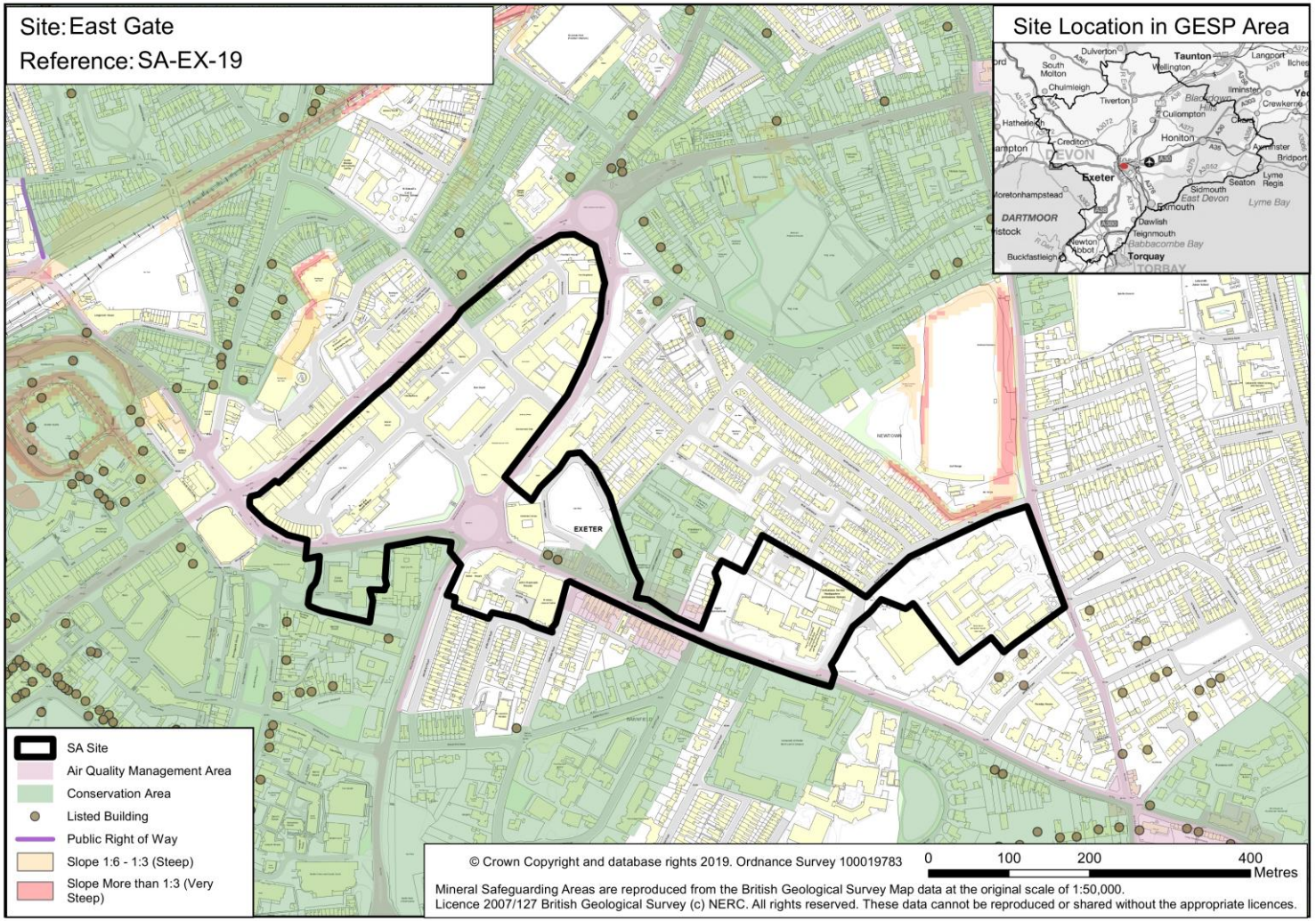
| SA Objective | SA Score | Justification |
|---|---|---|
| | | The site contains over 1ha of previously used land, which may present opportunities to enhance the overall quality of the built environment as new development would replace and potentially improve the existing development. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | ++/--? | The site is within Exeter and as such uncertain significant positive effects are expected.<br><br>Although not located within 1km of cycle paths, the site is within 1km of train stations with an at least 1 hourly frequency of service. The frequency of rail services will increase to at least half hourly in the future. The site is also within 500m of frequent bus services along Pinhoe Road, providing access into and out of the City Centre. As such, due to the proximity to rail and bus links, significant positive effects are expected.<br><br>However, as the site is expected to deliver under 1,000 homes, it is assumed that development of the site would provide fewer sustainable transport, walking and cycle links, and services. As such, uncertain significant negative effects are also expected.<br><br>Overall, mixed significant positive and uncertain significant negative effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The entirety of the site is brownfield and part of which is on flood zone 2 and 3. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain minor negative effects can be expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | + | The entirety of the site is comprised of urban use land. As such, negligible effects are expected due to there being no loss of previously developed land. Contaminated soil has been recorded and so redevelopment would provide an opportunity for remediation. This would be a pre-requisite for redevelopment for residential use.<br><br>Development within the site would contribute to the use of previously developed land (<5ha). As such, minor positive effects are expected<br><br>The site is not located within any Minerals Safeguarding Areas.<br><br>Overall, significant positive effects are expected. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources | --? | Development should ensure no deterioration in the water quality of Pin Brook which passes through the site boundaries and flows into the Exe Estuary SPA. |

| SA Objective | SA Score | Justification |
|---|---|---|
| efficiently and minimise their loss or degradation. | | As such, uncertain significant negative effects are expected. |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | + | The site is likely to be able to accommodate around 351 – 417 dwellings. However this capacity is likely to reduce once account has been taken of the likely mitigation requirements, including those highlighted elsewhere in this assessment.<br>In the context of other SEA sites, the site would make only a minor contribution to housing mix and the availability of affordable housing in the GESP area. The ability of the site to deliver the full policy quota of affordable housing is likely to be hampered by viability considerations, due to the site's constraints.<br>The site may be attractive to a diverse range of housing providers (e.g. small and medium scale developers, self/custom builders and older persons housing providers). However, due to the size of the site and it's constraints, development would make only a minor contribution to the diversity of housing supply in the GESP area.<br>Again, due to the comparatively small size of the site and its constraints, residential redevelopment would make only a minor contribution to housing affordability in the GESP area.<br>As such, minor positive effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | + | The site is not within 800m of major open space; however the site contains and is within 400m of Public Rights of Way.<br>As such, minor positive effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | -- | The site is within the 'average' Middle Super Output Areas which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees average levels of deprivation than compared to Devon as a whole. It is likely that a small residential development of this nature would provide potential improvements to the availability of homes in the area, which could provide broad wellbeing benefits (although the impacts on levels of deprivation are likely to be minimal). As such, negligible effects are expected.<br>The site is within Exeter City and is adjacent to residential receptors, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. In addition, the site lies adjacent to a railway line. This feature may result in noise |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | pollution affecting residents of the site in the longer term. As this is a brownfield site within an urban area, it is not expected that redevelopment would result in any significant net increase in light pollution. As such, minor negative effects are also expected.<br><br>The site is within 1km of the Exeter AQMA. Therefore, residents in the site could be adversely affected by poor air quality within the AQMA. However, it is noted that the site has good access to existing pedestrian and cycle facilities connecting to the City Centre and wider Exeter area, but, infrastructure could be improved to encourage further active travel. As such, due to the location of the site in relation to an AQMA, significant negative effects are expected.<br><br>Overall, significant negative effects are likely. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | ++/- | The site is located within Exeter City. As such, significant positive effects are expected. The site is within walking and cycling distance, and benefits from public transport access to, of a wide variety of area-wide, community and cultural services and facilities in Exeter.<br><br>The site is within 500m of a primary school and secondary school. Devon County Council advises that the potential for expansion of existing primary and secondary schools on the eastern side of Exeter has been exhausted. Any requirements for primary education arising from redevelopment of the site would need to be accommodated through the expansion of the new Monkerton School and a review of primary school catchment areas. Any requirement for secondary education arising from redevelopment of the site would need to be explored via a strategy review of secondary provision in the City and its border areas. The site is also within 3km of Exeter College and the University of Exeter. As such, uncertain significant positive effects are expected.<br><br>Ofcom mapping indicates that the site currently has access to superfast broadband (30-300Mbps). As such, minor positive effects are expected.<br><br>The site is small, providing less than 500 homes, and therefore it is assumed that development would be less likely to accommodate new schools. As such, minor negative effects are expected.<br><br>Overall, mixed significant positive and minor negative effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater | ++/-- | The site is located within Exeter City and it is within 1km of existing or proposed employment sites that could provide employment opportunities. As such, significant positive effects are expected.<br><br>Jobs would be created during the construction phase of the site and any new homes would provide additional expenditure in the area. It is assumed that, as the site has the capacity for less than 500 homes, the site will provide limited employment opportunities. As such, negligible effects are expected.<br><br>Full residential build out would result in the loss of existing employment uses on the site, which provide |

| SA Objective | SA Score | Justification |
|---|---|---|
| Exeter. | | a significant number of jobs. As such, significant negative effects are expected.<br>It is not considered that redevelopment would have any notable impact upon Exeter's tourism offer.<br>Overall, mixed significant positive and significant negative effects are expected. |
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and town centres. | ++ | The site is located within Exeter City and is of a scale (<4,000 homes) that would not be expected to deliver town centre facilities that may detract some visitors from the existing centre of Exeter.<br>As such, significant positive effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | ++ | Although not located within 1km of cycle paths, the site is within 1km of train stations with an at least 1 hourly frequency of service. The frequency of rail services will increase to at least half hourly in the future. The site is also within 500m of frequent bus services along Pinhoe Road, providing access into and out of the City Centre.<br>As such, due to the proximity to rail and bus links, significant positive effects are expected. |

## SA-EX-19: East Gate

| SA-EX-19 | East Gate |
|---|---|
| **Authority Area:** Exeter |  |
| **Site Area:** 16.4ha | |
| **Approximate total capacity:** 854-1015 dwellings | |
| **Site status:** Potential site option | |
| **Outline description and context:** Area comprising 3 distinct sections. (1) The Grecian Quarter, in the west, is identified as a Regeneration Area in the Exeter Core Strategy. It currently incorporates the Exeter Bus and Coach Station, retail, residential, cinema, postal sorting office, public car park and car garage uses. (2) Land on the northern side of Heavitree Road, which includes The Triangle public surface car park and Clarendon House, a 6-storey office building. (3) Land on southern side of Heavitree Road contains The Pyramids Leisure Centre and Eaton House, which is a Housing Association-owned retirement facility of 68 flats. | |

| SA-EX-19 | East Gate |
|---|---|
| The site lies on the eastern fringe of the City Centre. | |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/--? | The site is located within 1km of Bonhay Road Cutting, SSSI, Taddifor Brook County Wildlife Site and Riverside Valley Park. The site is flagged as Amber in the HRA sensitivity work with regard to Exe Estuary SPA and lies within the 10 km recreation zone for the Exe Estuary SPA. Although Great Crested Newts have been recorded within 5km of the site, it is considered unlikely that existing structures provide habitats for any protected species. The site contains minimal green infrastructure currently. As such, uncertain significant negative effects are expected.<br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space that could mitigate the biodiversity impact of development. As such, significant positive effects are also expected.<br>Overall, mixed significant positive and significant negative effects with uncertainty are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | 0? | The site contains urban development which is comprised of community use buildings, car parking and employment floorspace. There are mature trees around the perimeter of the Triangle Car Park and along Denmark Road and Western Way which should be retained during development. Redevelopment offers an opportunity to deliver townscape improvements through the removal of unattractive buildings and the provision of open space. Therefore, the site is of low landscape sensitivity.<br>As such, negligible effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | --?/+? | There are four Conservation Areas that overlap the boundaries of the site which are Southernhay and the Friars in the south-west of the site, St. Sidwells in the north-west, Lower Summerlands in the centre of the site and St. Leonard on the southern boundary. These Conservation areas contain multiple Grade II and Grade II* listed buildings in close proximity to the site (<500m), and two Grade II listed buildings (part of Eaton Place) are located within the site in Lower Summerlands Conservation Area. There are Scheduled Monuments in close proximity to the site, including around 300m to the south-west (part of the Roman town) and 200m to the west (Rougemont Castle). There is also a Registered Park and Garden around 200m to the west (Northernhay and Rougemont Gardens). There |

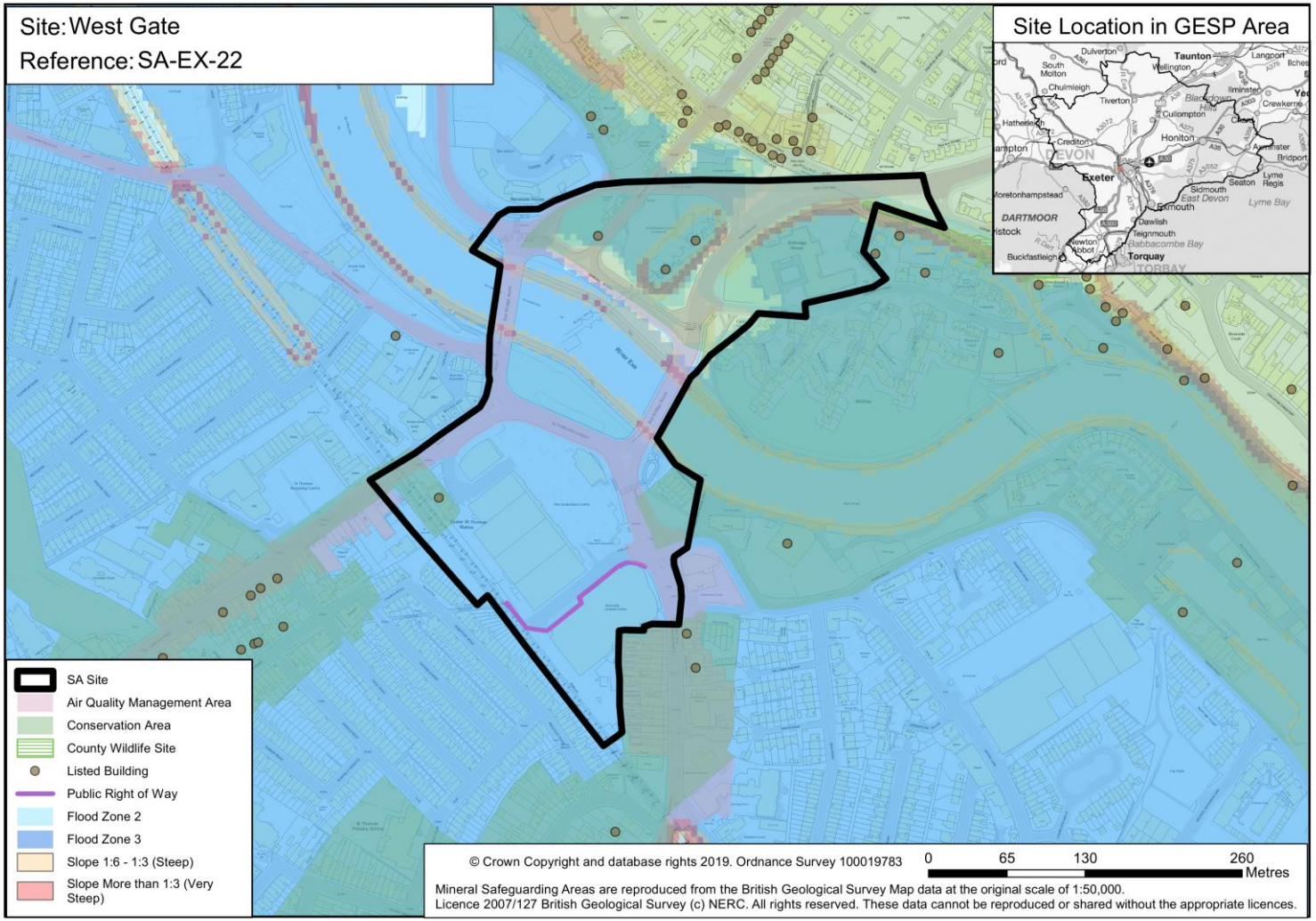
| SA Objective | SA Score | Justification |
|---|---|---|
| | | is potential for development to compromise the setting of these historic environment assets. As such, uncertain significant negative effects are expected.<br><br>The site contains over 1ha of previously used land, which may present opportunities to enhance the overall quality of the built environment as new development would replace and potentially improve the existing development. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain significant negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | ++ | The site is within Exeter and as such uncertain significant positive effects are expected.<br><br>The site is within 1km of railway stations and cycle routes. In addition, the site incorporates the Bus Station (and will continue to do so, in a redeveloped form), from which services leave at least every 5 minutes, and the site is within 500m of frequent bus services along roads including the High street and Heavitree Road. As such, significant positive effects are expected.<br><br>The site is has the capacity to deliver over 1,000 homes, and therefore it is assumed that development of the site would provide sustainable transport links, walking and cycle routes and a road connecting the site to the nearest main settlement. As such, uncertain negligible effects are expected.<br><br>Overall, significant positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly brownfield and there is no significant flood risk within the area. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | ++ | The entirety of the site is comprised of urban use land. As such, negligible effects are expected due to there being no loss of high quality agricultural land. Contaminated soil has been recorded and so redevelopment would provide an opportunity for remediation. This would be a pre-requisite for redevelopment for residential use.<br><br>Development within the site would contribute to the use of over 5ha of previously developed land. As such, significant positive effects are expected.<br><br>The site is not located within any Minerals Safeguarding Areas.<br><br>Overall, significant positive effects are expected due to development on previously used land. |
| **7. WATER RESOURCES** | 0 | The site is not adjacent to and does not contain any watercourses. |

| SA Objective | SA Score | Justification |
|---|---|---|
| To utilise our water resources efficiently and minimise their loss or degradation. | | As such, negligible effects are expected. |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | ++ | The site is likely to be able to deliver around 854-1,289 homes. However, this capacity is likely to reduce once account has been taken of all constraints and likely mitigation requirements. The area should capable of bringing forward a suitable mix of dwellings in terms of size and tenure and diversity of supply. Homes may be provided by a diverse range of providers including SME house buildings companies, housing associations and custom and self-build providers. This site is of a sufficient size to be able to support a high number of housing starts/completions from a number of different outlets around the sites, which in turn will ensure a good pace of delivery. There is nothing to suggest delivery will not be viable (and indeed profitable) and therefore provision of affordable housing should not be compromised.<br>As such, significant positive effects are expected |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site is within 800m of Riverside Valley Park major open space, and is within 400m of Public Rights of Way. The western section of the site also contains part of an ECC Open Space. As such, significant positive effects are expected.<br>However, as the site has capacity for more than 1,000 homes, it is assumed that development of the site would provide some open space and active transport links. As such, minor positive effects are expected.<br>Overall, significant positive effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | --/+ | The site is within the 'above average' Middle Super Output Areas which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees higher levels of deprivation than compared to Devon as a whole. It is likely that a small residential development of this nature would provide potential improvements to the availability of homes in the area, which could provide broad wellbeing benefits (although the impacts on levels of deprivation are likely to be minimal). As such, minor positive effects are expected.<br>The site is adjoining residential development within Exeter City, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. As this is a brownfield site within an urban area, it is not expected that redevelopment would result in any significant net increase in light pollution. As such, minor negative effects are also expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | The site lies within the Exeter AQMA. Therefore, residents in the site could be adversely affected by poor air quality within the AQMA. The site's proximity to buy roads and land uses associated with the night-time economy means that future residents would be affected by noise pollution. However, the site has good access to existing pedestrian and cycle facilities connecting to the City Centre and wider Exeter area, but, infrastructure could be improved to encourage further active travel. As such, due to the location of the site within an AQMA, significant negative effects are expected.<br><br>Overall, mixed significant negative effects in relation to air quality, noise and light pollution and minor positive effects in relation to deprivation are likely. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | ++ | The site is located within Exeter City. As such, significant positive effects are expected. The site is within walking and cycling distance, and benefits from public transport access to, of a wide variety of area-wide, community and cultural services and facilities in Exeter.<br><br>The site is within 500m of a primary school but it is not within 1km of secondary school. Devon County Council advises that the potential for expansion of existing primary and secondary schools on the eastern side of Exeter has been exhausted. Any requirements for primary education arising from redevelopment of the site would need to be accommodated through the expansion of the new Monkerton School and a review of primary school catchment areas. Any requirement for secondary education arising from redevelopment of the site would need to be explored via a strategy review of secondary provision in the City and its border areas. The site is within 3km of further education colleges and the University of Exeter. As such, uncertain minor positive effects are expected.<br><br>The majority of the site has access to superfast (30-300Mbps) broadband download speeds. As such, minor positive effects are expected.<br><br>The site is medium sized, with the capacity to deliver over 500 homes, and therefore it is assumed that development would be more likely to accommodate a primary school. As such, minor positive effects are expected.<br><br>Overall, significant positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater | --/+ | The site is located within Exeter City but it is not within 1km of any existing or proposed employment sites that could provide employment opportunities. As such, minor positive effects are expected.<br><br>Jobs would be created during the construction phase of the site and any new homes would provide additional expenditure in the area. It is assumed that, as the site has the capacity to deliver over 500 homes, the site will provide medium scale mixed use employment opportunities and a business park or employment estate as well as a neighbourhood hub with shops and services. As such, minor positive |

| SA Objective | SA Score | Justification |
|---|---|---|
| Exeter. | | effects are expected.<br><br>Full residential build out would result in the loss of existing jobs. As such, significant negative effects are expected.<br><br>Subject to design, residential redevelopment could significantly improve the townscape of the City Centre and thereby improve its tourism offer.<br><br>Overall, mixed minor positive and significant negative effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | ++ | The site is located within Exeter City and is of a scale (<4,000 homes) that would not be expected to deliver town centre facilities that may detract some visitors from the existing centre of Exeter.<br><br>As such, significant positive effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | ++ | The site is within 1km of railway stations and cycle routes. In addition, the site incorporates the Bus Station (and will continue to do so, in a redeveloped form), from which services leave at least every 5 minutes, and the site is within 500m of frequent bus services along roads including the High street and Heavitree Road.<br><br>It is assumed that as the site has the capacity to deliver over 1,000 homes, development would be more likely to include sustainable transport links, active transport routes and a road connecting the site to the nearest settlement. As such, minor positive effects are expected.<br><br>As such, significant positive effects are expected. |

## SA-EX-22: West Gate

| SA-EX-22 | West Gate |
|---|---|
| **Authority Area:** Exeter |  |
| **Site Area:** 9.1ha (Net 2.2ha) | |
| **Approximate total capacity:** 224 – 266 dwellings | |
| **Site status:** Potential site option | |
| **Outline description and context:** Predominantly brownfield. The site contains a retail park with car parking, offices and some residential properties. It also includes Riverside Leisure Centre, the remains of the Medieval Exe Bridge and a section of the City Wall. | |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | --?/+ | The site is located within 1km of Bonhay Road Cutting, SSSI. In addition, the site lies within Riverside Valley Park. The site is flagged as Amber in the HRA sensitivity work with regard to Exe Estuary SPA and lies within the 10 km recreation zone for the Exe Estuary SPA. As such, significant negative effects with uncertainty are expected.<br><br>Existing green infrastructure on the site, including the Riverside Valley Park, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for less than 1,000 homes, and therefore is expected to provide local public open space that could mitigate the biodiversity impact of development. As such, minor positive effects are also expected.<br><br>Overall, mixed minor positive and significant negative effects with uncertainty are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The part of the site around the old Exe Bridge is very significant to the setting of the West Gate area and the green open character of Western Way acts as an important link to the River Exe corridor. There are also visual links to the river and views towards St Thomas area. Green areas either side of Commercial Road/Western Way junction contribute to river corridor as do the green areas between the modern Exe bridges (north and south).<br><br>The site is considered to be of medium-high landscape sensitivity. Development has potential to compromise the character and quality of the environment due to the riverfront location of the site. As such, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | --?/+? | The site contains a number of heritage assets within its boundaries. The northern half of the site contains three Grade II listed buildings (Old Exe Bridge, Exe Bridge Balustrades and Arch and Former Church of St Edmund) and the southern half contains a further Grade II listed building (St Thomas Railway Station). The northern and eastern regions of the site contain parts of Exeter Riverside Conservation Area, which contains multiple Grade II and Grade II* listed buildings, and the south-western region of the site contains part of Cowick Street Conservation Area, which contains multiple Grade II listed buildings. The south-east of the site is also adjacent to Princes Square Conservation Area. There is a Scheduled Monument (The Medieval Exe Bridge and St Edmund's Church) contained within the north of the site. There are further designated assets within 3km including Scheduled Monuments in close proximity around 250m north (St. Nicholas' Priory) and around 400m to north-east (part of the Roman town). Additionally, there is a Registered Park and Garden around 280m to the north (St Bartholomew's Cemetery). There is potential for residential development to compromise the setting of these historic environment assets. As such, uncertain significant negative effects are expected. |

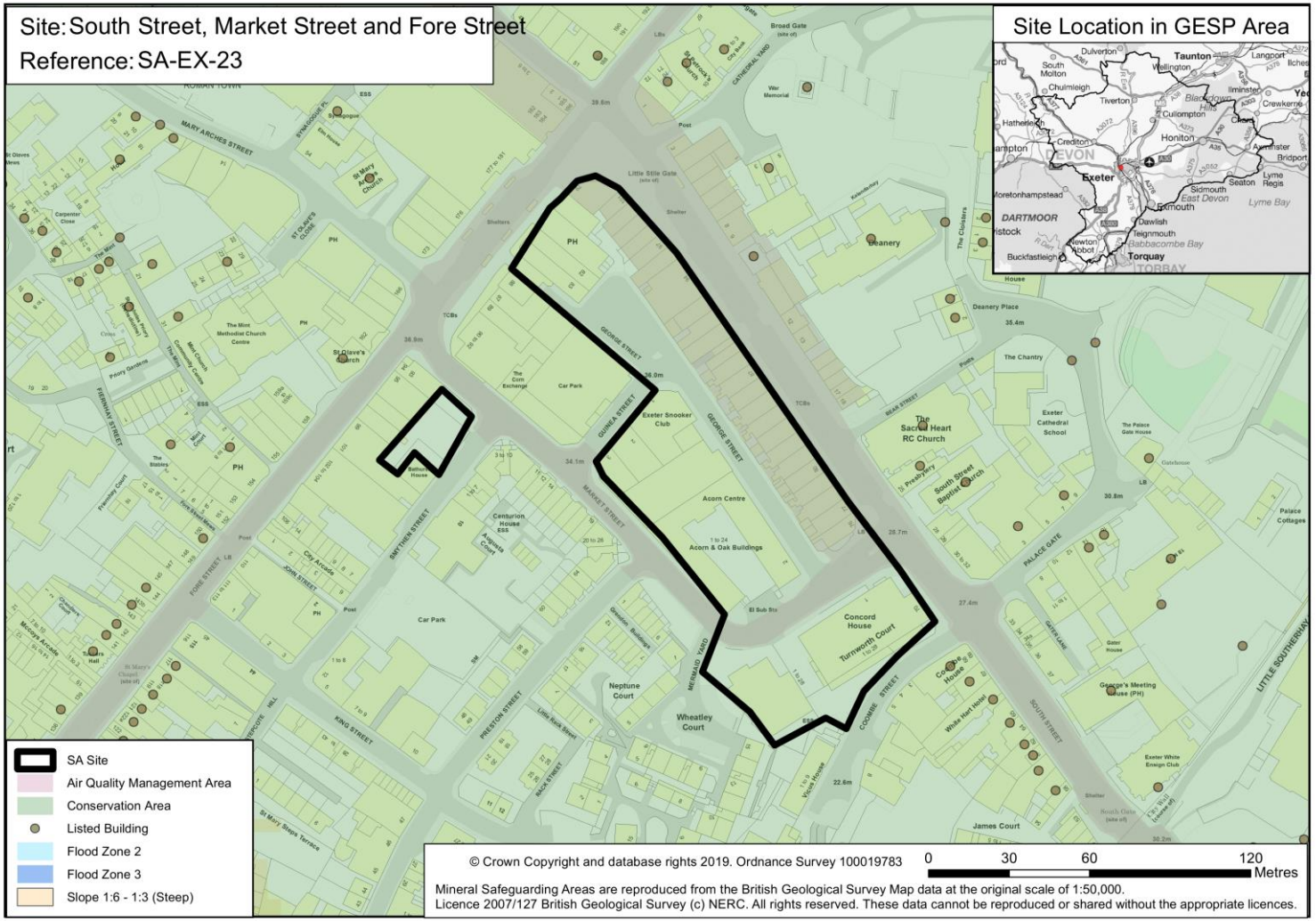
| SA Objective | SA Score | Justification |
|---|---|---|
| | | The site contains over 1ha of previously used land, which may present opportunities to enhance the overall quality of the built environment as new development would replace and potentially improve the existing development. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain significant negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | ++/--? | The site is located within Exeter City. As such, uncertain significant positive effects are expected.<br><br>The site is adjacent to Exeter St Thomas railway station and is crossed by cycle routes. The site also contains bus stops served by frequent bus services. As such, significant positive effects are expected.<br><br>The site has the capacity to deliver less than 1,000 homes, and therefore it is assumed that development of the site would provide fewer sustainable transport, walking and cycle links, and services. As such, uncertain significant negative effects are also expected.<br><br>Overall, mixed significant positive and uncertain significant negative effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly brownfield and on flood zone 2 and flood zone 3. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | + | The entirety of the site is comprised of urban use land. As such negligible effects are expected due to there being no loss of high quality agricultural land.<br><br>Development would contribute to the use of previously used land (<5ha). As such, minor positive effects are expected.<br><br>The site is not located within any Minerals Safeguarding Areas.<br><br>Overall, minor positive effects are expected due to development of previously used land. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or degradation. | --? | Development should ensure no deterioration in the water quality of the River Exe, which flows through the centre of the site and into the Exe Estuary SPA.<br><br>As such, uncertain significant negative effects are expected. |
| **8. HOMES** | + | The site is likely to be able to accommodate around 224–266 dwellings. However this capacity is likely to reduce once account has been taken of the likely mitigation requirements, including those |

| SA Objective | SA Score | Justification |
|---|---|---|
| To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | | highlighted elsewhere in this assessment.<br><br>In the context of other SEA sites, the site would make only a minor contribution to housing mix and the availability of affordable housing in the GESP area. The ability of the site to deliver the full policy quota of affordable housing is likely to be hampered by viability considerations, due to the site's constraints.<br><br>The site may be attractive to a diverse range of housing providers (e.g. small and medium scale developers, self/custom builders and older persons housing providers). However, due to the size of the site and its constraints, development would make only a minor contribution to the diversity of housing supply in the GESP area.<br><br>Again, due to the comparatively small size of the site and its constraints, residential redevelopment would make only a minor contribution to housing affordability in the GESP area.<br><br>As such, minor positive effects are expected. |
| **9. HEALTH**<br><br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site contains part of a Riverside Valley Park, major open space, and part of the National Cycle Route runs through the site.<br><br>As such, significant positive effects are expected. |
| **10. WELLBEING**<br><br>To support positive, safe and healthy communities. | --/+ | The area of the site to the north of the River Exe is within the Exeter City Middle Super Output Area and the majority of the area of the site to the south of the River is within the St Thomas Middle Super Output Area. Both areas experience above average sees higher levels of deprivation than compared to Devon as a whole. It is likely that a small residential development of this nature would provide potential improvements to the availability of homes in the area, which could provide broad wellbeing benefits (although the impacts on levels of deprivation are likely to be minimal). As such, a minor positive effect is expected.<br><br>The site is within Exeter City and is adjacent to residential receptors, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. The site is crossed by an 'A' road and railway line. These features may result in noise pollution affecting residents of the site in the longer term. As such, minor negative effects are also expected.<br><br>The site lies within part of the Exeter AQMA. Therefore, residents in the site could be significantly |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | adversely affected by poor air quality within the AQMA. However, it is noted that the site benefits from good walking and cycling accessibility and is within walking distance of train and bus links. As such, due to the location of the site in relation to an AQMA, significant negative effects are expected.<br><br>Overall, mixed significant negative effects in relation to air quality, noise and light pollution and minor positive effects in relation to deprivation are likely. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | ++/- | The site is located within Exeter City. As such, significant positive effects are expected. The site is within walking and cycling distance, and benefits from public transport access to, of a wide variety of area-wide, community and cultural services and facilities in Exeter. As such, significant positive effects are expected.<br><br>The site is within 500m of a primary school but it is not within 1km of a secondary school. The site is within 3km of Exeter College and is within 3km of the University of Exeter. As such, uncertain minor positive effects are expected.<br><br>The majority of the site has access to superfast (30-300Mbps) broadband download speeds. As such, minor positive effects are expected.<br><br>The site is small, providing less than 500 homes, and therefore it is assumed that development would be less likely to accommodate any schools on site. As such, minor negative effects are expected.<br><br>Overall, mixed significant positive and minor negative effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | ++ | The site is located within Exeter City and is also located with 1km of existing or proposed employment sites that could provide employment opportunities. As such, significant positive effects are expected.<br><br>Jobs would be created during the construction phase of the site and any new homes would provide additional expenditure in the area. It is assumed that, as the site has the capacity to deliver less than 500 homes, the site will be less likely to provide small scale mixed use employment opportunities and a small cluster of shops and services. As such, negligible effects are expected.<br><br>The site is unlikely to have any negative impacts on tourism. There is potential for an increase in tourism in the area as a result of townscape and riverfront regeneration.<br><br>Overall, significant positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and | ++ | The site is located within Exeter City and is of a scale (<4,000 homes) that would not be expected to deliver town centre facilities that may detract some visitors from the existing centre of Exeter.<br><br>As such, significant positive effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| town centres. | | |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | ++ | The site is adjacent to Exeter St Thomas railway station and is crossed by cycle routes. The site also contains bus stops served by frequent bus services.<br><br>As such, significant positive effects are expected. |

## SA-EX-23: South Street, Market Street and Fore Street

| SA-EX-23 | South Street, Market Street and Fore Street |
|---|---|
| **Authority Area:** Exeter | |
| **Site Area:** 1.3ha (Net 0.88ha) | |
| **Approximate total capacity:** 88 – 105 dwellings | |
| **Site status:** Potential site option | |
| **Outline description and context**: Site within the City Centre, predominantly consisting of retail and residential uses. The site also includes two small car parks off Guinea Street and Smythen Street. Buildings are typically post-war, or variable (often poor) quality and 2-3 storeys in height, although Concord House on the southern edge of the site is 6-storeys in height. The site slopes downwards from north-west to south-east. Surrounding uses reflect the City Centre location. Exeter Cathedral is c.150 metres to the east of the site, behind buildings fronting South Street. |  |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | --?/+ | The site is located within 1km of Bonhay Road Cutting, SSSI. The site is flagged as Amber in the HRA sensitivity work with regard to Exe Estuary SPA and lies within the 10 km recreation zone for the Exe Estuary SPA. Although the site is in an intensely used urban area, it has the potential to provide a habitat for protected species. Great Crested Newts have been recorded within 5km of the site. As such, significant negative effects with uncertainty are expected.<br>However, the site has capacity for less than 1,000 homes, and therefore is expected to provide local public open space that could mitigate the biodiversity impact of development. As such, minor positive effects are also expected.<br>Overall, mixed minor positive and significant negative effects with uncertainty are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | 0? | The site contains urban development which is comprised predominantly of retail and residential buildings as well as two small car parks. The site slopes downwards from north west to south east. There are trees aligning South Street which should be retained or replaced during development. Redevelopment presents an opportunity to deliver significant townscape improvements through the replacement of unattractive buildings. Therefore, the site is of low landscape sensitivity.<br>As such, negligible effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | --? | The entirety of the site is located within Exeter City Centre Conservation Area. There are multiple designated assets within 3km including Grade II listed buildings less than 200m from the site boundaries and a Grade II* listed building 30m south-east of the site (67, South Street). There are multiple Scheduled Monuments in close proximity to the site around 30m north (Hall of the Vicars Choral and part of the Roman town) and 100m west (St Nicholas' Priory). There is also a Registered Park and Garden located around 260m to the west of the site (St. Bartholomew's Cemetery). There is potential for residential development to compromise these historic environment assets.<br>As such, uncertain significant negative effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br>To minimise greenhouse gas emissions. | ++/--? | The site is within Exeter and as such uncertain significant positive effects are expected.<br>The site is within 1km of cycle paths and within 1km of train stations. It is also within walking distance of Exeter Central Station and within 500m of frequent bus services, including those along the High street and Fore Street, providing public transport access to a wide range of locations. As such, due to |

| SA Objective | SA Score | Justification |
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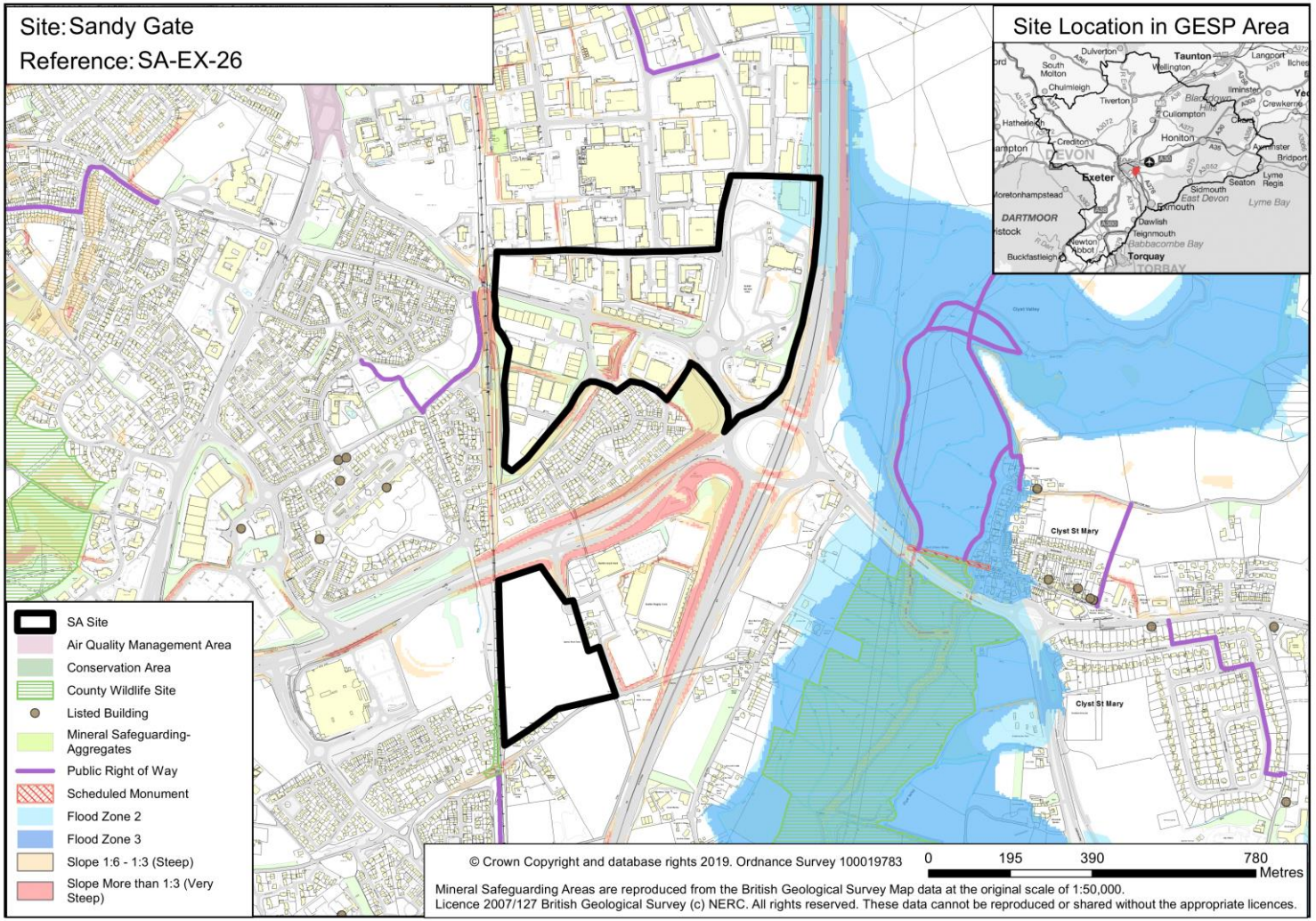
| | | proximity to bus and rail links, significant positive effects are expected.<br><br>However, as the site is expected to deliver less than 1,000 homes, it is assumed that development of the site would provide fewer sustainable transport, walking and cycle links, and services. As such, uncertain significant negative effects are also expected.<br><br>Overall, mixed significant positive and uncertain significant negative effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The entirety brownfield and there is no significant flood risk within the area. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain minor negative effects can be expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | + | The entirety of the site is comprised of urban use land. As such, negligible effects are expected due to there being no loss of high quality agricultural land. Contaminated soil has been recorded. Redevelopment would provide an opportunity for remediation. This would be a pre-requisite for redevelopment for residential use.<br><br>Development within the site would contribute to the use of previously developed land (>5ha). As such, minor positive effects are expected.<br><br>The site is not located within any Minerals Safeguarding Areas.<br><br>Overall, minor positive effects are expected due to development on previously used land. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or degradation. | 0 | The site is not adjacent to and does not contain any watercourses.<br><br>As such, negligible effects are expected. |
| **8. HOMES**<br><br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | + | The site is likely to be able to accommodate around 88-105 dwellings. However this capacity is likely to reduce once account has been taken of the likely mitigation requirements, including those highlighted elsewhere in this assessment.<br><br>In the context of other SEA sites, the site would make only a minor contribution to housing mix and the availability of affordable housing in the GESP area. The ability of the site to deliver the full policy quota of affordable housing is likely to be hampered by viability considerations, due to the site's constraints. |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | The site may be attractive to a diverse range of housing providers (e.g. small and medium scale developers and older persons housing providers). However, due to the size of the site and it's constraints, development would make only a minor contribution to the diversity of housing supply in the GESP area.<br><br>Again, due to the comparatively small size of the site and its constraints, residential redevelopment would make only a minor contribution to housing affordability in the GESP area.<br><br>As such, minor positive effects are expected. |
| **9. HEALTH**<br><br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site is within 800m of Riverside Valley Park, major open space, and is within 400m of the National Cycle Route.<br><br>As such, significant positive effects are expected. |
| **10. WELLBEING**<br><br>To support positive, safe and healthy communities. | --/+ | The site is within the 'above average' Middle Super Output Area, which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees higher levels of deprivation than compared to Devon as a whole. It is likely that a small residential development of this nature would provide potential improvements to the availability of homes in the area, which could provide broad wellbeing benefits (although the impacts on levels of deprivation are likely to be minimal). As such, a minor positive effect is expected.<br><br>The site is within Exeter City and is adjacent to residential receptors, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. As this is a brownfield site within an urban area, it is not expected that redevelopment would result in any significant net increase in light pollution. As such, minor negative effects are also expected.<br><br>The site lies within part of the Exeter AQMA. Therefore, residents in the site could be significantly adversely affected by poor air quality within the AQMA. However, it is noted that the site has good access to existing pedestrian and cycle facilities connecting to the City Centre and wider Exeter area, but, infrastructure could be improved to encourage further active travel. As such, due to the location of site within an AQMA, significant negative effects are expected.<br><br>Overall, mixed significant negative effects in relation to air quality, noise and light pollution and minor positive effects in relation to deprivation are likely. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **11. ACCESS TO SERVICES**<br>To provide accessible and attractive services and community facilities for all ages and interests. | ++/- | The site is located within Exeter City. As such, significant positive effects are expected. The site is within walking and cycling distance, and benefits from public transport access to, of a wide variety of area-wide, community and cultural services and facilities in Exeter.<br>The site is within 500m of a primary school but it is not within 1km of a secondary school. Devon County Council advises that the potential for expansion of existing primary and secondary schools on the eastern side of Exeter has been exhausted. Any requirements for primary education arising from redevelopment of the site would need to be accommodated through the expansion of the new Monkerton School and a review of primary school catchment areas. Any requirement for secondary education arising from redevelopment of the site would need to be explored via a strategy review of secondary provision in the City and its border areas. The site is within 3km of further education colleges and the University of Exeter.<br>Ofcom mapping indicates that the site currently has access to superfast broadband (30-300Mbps). As such, minor positive effects are expected.<br>The site is small, providing less than 500 homes, and therefore it is assumed that development would be unlikely to accommodate new schools. As such, minor negative effects are expected.<br>Overall, mixed significant positive and minor negative effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | --/+ | The site is located within Exeter City but it is not located within 1km of any existing or proposed employment sites that could provide employment opportunities. As such, minor positive effects are expected.<br>Jobs would be created during the construction phase of the site and any new homes would provide additional expenditure in the area. It is assumed that, as the site has the capacity to deliver less than 500 homes, the site will provide limited employment opportunities. As such, negligible effects are expected.<br>Full residential build out would result in the loss of existing jobs within the site. As such, significant negative effects are expected.<br>Subject to design, residential redevelopment could significantly improve the townscape of the City Centre and thereby improve its tourism offer.<br>Overall, mixed minor positive effects and significant negative effects are expected. |
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the | ++ | The site is located within Exeter City and is of a scale (<4,000 homes) that would not be expected to deliver town centre facilities that may detract some visitors from the existing centre of Exeter. |

| SA Objective | SA Score | Justification |
|---|---|---|
| vitality and viability of our city and town centres. | | As such, significant positive effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | ++ | The site is within 1km of cycle paths and within 1km of train stations. It is also within walking distance of Exeter Central Station and frequent bus services, including those along the High street and Fore Street, providing public transport access to a wide range of locations.<br><br>As such, due to proximity to bus and rail links, significant positive effects are expected. |

## SA-EX-26: Sandy Gate

| SA-EX-26 | Sandy Gate |
|---|---|
| **Authority Area:** Exeter | |
| **Site Area:** 36ha | |
| **Approximate total capacity:** 625 - 806 dwellings | |
| **Site Status:** Potential site option | |
| **Outline description and context:** Site in two parcels, both west of M5.<br><br>Northern parcel bisected by Sidmouth Road / Moor Lane, incorporates existing Motorway Service area and area of Sowton Industrial Estate adjacent to J30 of the M5.<br><br>Southern parcel currently undeveloped greenfield area south of the A379. Site lies close to good public transport routes including a railway station (Digby and Sowton) and high frequency bus route. |  |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | --?/+ | The site is not within 1km of any internationally or nationally designated biodiversity or geodiversity sites. However, the northern half of the site contains Bishop's Court Quarry, a County Geological Site and is adjacent to the southern area of Bishop's Court Quarry, which is designated as a County Wildlife Site. The southern parcel of the site is adjacent to Old Rydon Close to the west, which is another designated County Wildlife Site. The site is also within 250m of a Strategic Nature Area to the east and it is within 1km of Ludwell Valley Park. The site has been flagged Amber in HRA sensitivity work. The site is within the recreational buffer for the East Devon Pebblebed SAC/SPA and the Exe Estuary SPA, which could result in added pressure on these areas due to added visitors. Residential development could increase the level of nutrients at waste water treatment discharges, which could negatively impact on the Exe Estuary SPA. As such, uncertain significant negative effects are expected.<br><br>The northern half of the site contains trees and small areas of green space, which could be lost to residential development. The southern half of the site is entirely greenfield, which would become urbanised if development came forward. As such, minor negative effects are expected due to the potential for loss of existing green infrastructure.<br><br>However, the delivery large-scale residential development could be accompanied by provision of open space that has the potential to preserve and enhance biodiversity in the area. A minor positive effect is expected as the site has capacity for less than 1,000 homes.<br><br>Overall, mixed uncertain significant negative and minor positive effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | 0? | The site is comprised of land that is characterised under 'Main Cities and Towns' as it is located on the eastern fringe of Exeter City. The site is considered to be of low landscape sensitivity as it is located in an industrial and built-up area where development is unlikely to have negative impacts upon setting.<br><br>As such, uncertain negligible effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/-? | The site does not contain any heritage assets within its boundaries. There are multiple designated assets within 3km of the site including multiple Grade II listed buildings around 300m west of the site in Clyst Heath, multiple Grade II listed buildings around 600m east of the site in Clyst St Mary and a high concentration of Grade II listed buildings around 800m to the north-east contained within Sowton Concentration Area. There is also a Scheduled Monument around 600m to the east of the site (Clyst St Mary Bridge and causeway). There is potential for residential development to compromise the setting of these historic environment assets. As such, uncertain minor negative effects are expected.<br><br>The site contains over 1ha of previously developed land and therefore there is potential to enhance the quality of the environment by introducing a well-designed and high quality development. As such, |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | ++/--? | The site is located on the edge of Exeter City, which will reduce the need for car based modes of transport to access services, facilities and job opportunities. As such, uncertain significant positive effects are expected.<br><br>The site is within 500m of multiple bus stops and it is also within 1km of a railway station. As such, significant positive effects are expected due to the close proximity of public transport options reducing the need for car-based transport.<br><br>The site has the capacity to provide less than 1,000 homes. As such, uncertain significant negative effects as there is less potential for the provision of new sustainable transport links with development.<br><br>Overall, mixed significant positive and uncertain significant negative effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The northern half of the site is located on brownfield land that is not within any flood zones. However, the southern half of the site is located on greenfield land that is outside of flood zones 3a and 3b.<br><br>As such, uncertain minor negative effects are expected as an increase in impermeable surfaces in the area could also increase overall flood risk in the area. The effect is uncertain as this will depend on the implementation and design of SuDS, which is unknown and cannot be asserted at this stage. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | ++/-- | The northern half of the site is comprised of urban land and will not result in the loss of any agricultural land if development came forward. However, the entirety of the southern half of the site is comprised of over 5ha of Grade 1 agricultural land, which development would result in the loss of. As such, significant negative effects are expected.<br><br>The northern half of the site contains over 5ha of previously developed land. Residential development has the potential to reuse this land, which is more efficient than the use of greenfield. As such, significant positive effects are expected.<br><br>The site does not contain any Minerals Safeguarding Areas within its boundaries.<br><br>Overall, mixed significant negative and significant positive effects are expected due to the loss of agricultural land in the south of the site and the potential reuse of previously developed land in the north of the site. |
| **7. WATER RESOURCES** | 0 | The site does not contain and is not adjacent to any watercourses. |

| SA Objective | SA Score | Justification |
|---|---|---|
| To utilise our water resources efficiently and minimise their loss or degradation. | | As such, negligible effects are expected. |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | + | The site has a developable area of 31ha and therefore has the capacity to deliver around 625-806 dwellings. The site will have a positive effect in relation to delivery of housing in the area, but is not of a sufficient size to suggest it will provide a wide range of house tenures/ sizes and affordable housing.<br>As such, minor positive effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | + | Ludwell Valley Park is located to the west of the site but it is not quite within 800m. However, the northern half of the site is within 400m of a Public Right of Way.<br>As such, minor positive effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | -- | The site is within the Middle Super Output Area covering Digby, Sowton and Newcourt areas of Exeter which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, experiences below average deprivation levels compared to Devon as a whole. It is likely that residential development at the site would provide potential improvements to the availability of homes in the area, which could provide broad wellbeing benefits (although the impacts on levels of deprivation are likely to be minimal).<br>The site is located on the edge of Exeter City and is to the immediate west of the M5. The site is also adjacent to residential receptors to the west that could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. The northern parcel of the site is also adjacent to an industrial estate to the north, which may be a source of noise pollution for residential development at the site. As the northern parcel of the site is brownfield and the southern parcel of the site is adjacent to existing development, it is not expected that residential development at these sites will result in any significant net increase in light pollution. Minor negative effects are expected due to the proximity of the site to a motorway, existing residential development and industrial related noise receptors.<br>The site is within 1km of the Exeter AQMA, which could result is residents at the site being significantly adversely affected by poor air quality. It is also likely that residents at the site would contribute to |

| SA Objective | SA Score | Justification |
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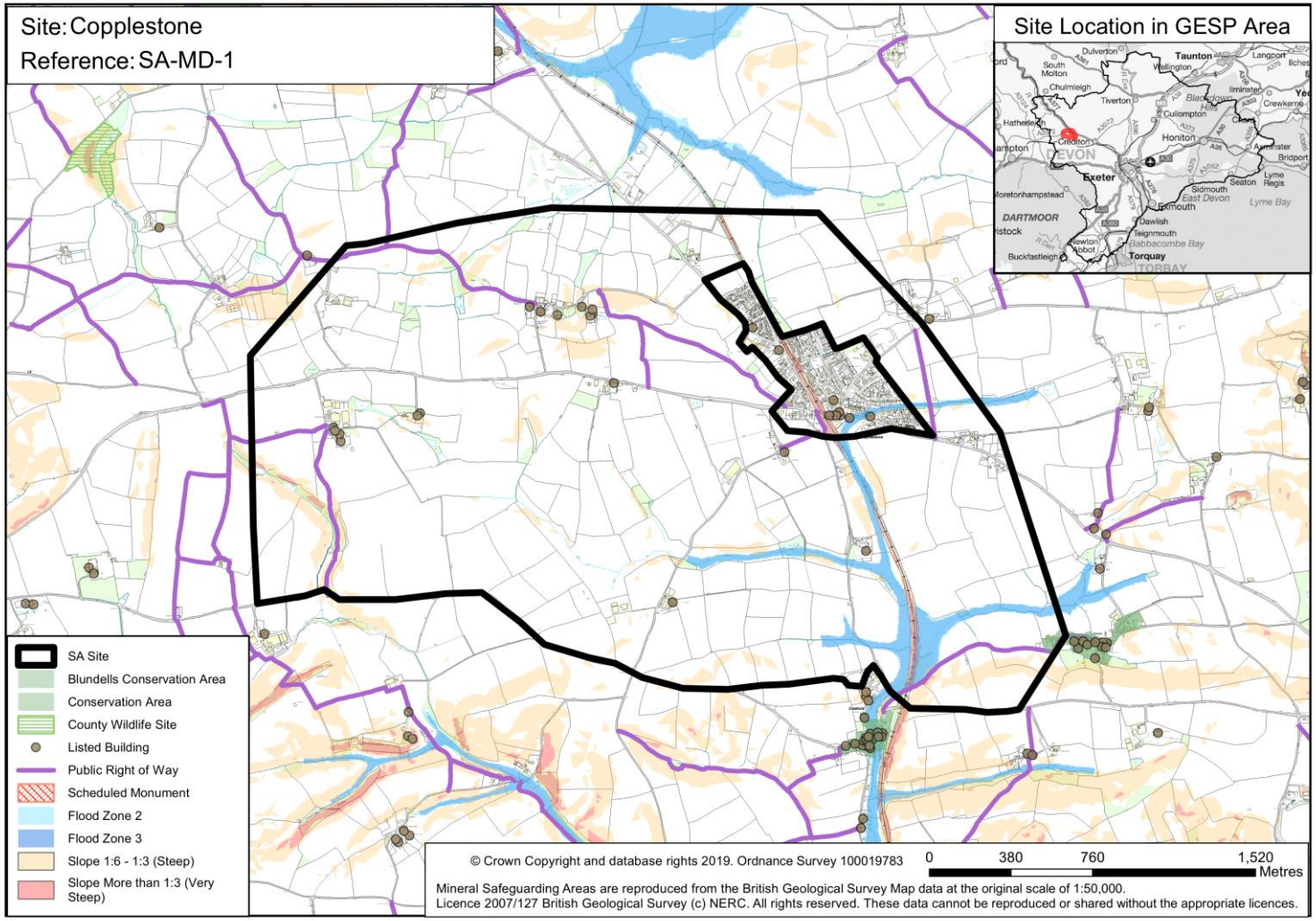
| | | increased car traffic along already congested routes within the AQMA to reach Exeter City Centre, which will further contribute to poor air quality in the area. As such, significant negative effects are expected.<br><br>Overall, significant negative effects are expected. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | ++ | The site is located on the edge of Exeter City, which could provide access to a range of services and facilities if development came forward. As such, significant positive effects are expected.<br><br>The site is adjacent to and contains areas that have access to superfast broadband (30-300Mbps), which it is assumed could be extended to support the site if residential development came forward. As such, minor positive effects are expected.<br><br>The site northern part of the site contains a secondary school and there is also a primary school within 500m of the western boundary of the northern half of the site. The southern section of the site is placed slightly further away but is still within 1km of these school sites. As such, uncertain significant positive effects are expected as the capacity required if residential sites did come forward is unknown at this point.<br><br>The site has capacity to deliver over 500 homes and therefore it is considered that development will be more likely to include a primary school onsite. As such, minor positive effects are expected.<br><br>Overall, significant positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | ++ | The site is located on the edge of Exeter City and it is within 1km of existing or proposed employment sites that could provide employment opportunities. As such, significant positive effects are expected.<br><br>The site contains existing employment that could be displaced if residential development came forward. As such, significant negative effects are expected.<br><br>As the site has capacity to deliver over 500 homes, development will likely include small scale mixed use employments opportunities. As such, minor positive effects are expected.<br><br>Overall, significant positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | ++ | The site is located on the edge of Exeter City and is not of a size (<4,000 homes) and is not of a size that could potentially draw people away from the existing city centre.<br><br>As such, significant positive effects are expected as residential development has the potential to support the existing city centre by increasing the amount of visitors. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | ++ | Although the site is not located within 1km of cycle routes, the site is located within 1km of Digby and Sowton Railway Station and Newcourt Rail Station. The site is also within 500m of bus stops with frequent services to the city centre.<br><br>As such, due to the proximity of the site to public transport links, significant positive effects are expected. |

**SA-MD-1: Copplestone**

| SA-MD-1 | Copplestone |
|---|---|
| **Authority Area:** Tarka Line / Mid Devon |  |
| **Site Area:** 640.1ha (Net 358.2ha) | |
| **Approximate total capacity:** 11,104 – 14,328 dwellings | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:** The site is predominately agricultural, encircling the village of Copplestone (with railway station) and including scattered farms/dwellings. The open countryside is picturesque with established hedgerows and mature trees. The village of Copplestone is 20km north of Exeter, 7km north east of Crediton. It is located on the A377 linking Exeter to Barnstaple with the Tarka Line railway following a similar route. The site was identified for assessment because of the railway linkage and station at Copplestone, | |

| SA-MD-1 | Copplestone |
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| providing a potential sustainable travel option. | |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/--? | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, or within 250m of a locally designated site. Mature hedgerows and trees are present on site. A 2.64 ha area north of Coleford features the probable identification of a UKBAP priority habitat - wet woodland. This corresponds to a small watercourse which flows east-west into Copplestone and then southwards, following the railway line. Tributaries enter at Coplestone House, north of Tapps Farm and north of Bolts Farm. There are six small fields scattered around the centre of the site and towards Copplestone identified as UKBAP priority habitat – traditional orchards. There are also several blocks of deciduous woodland priority habitat located within the site. As such, uncertain significant negative effects are expected.<br><br>Existing green infrastructure on the site, including the watercourses and woodland bands, could also be lost to development. In addition, the site is flagged as Yellow in the HRA sensitivity work with regard to Culm Grasslands SAC. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space and playing pitches on site that could mitigate the biodiversity impact of development. As such, significant positive effects are also expected.<br><br>Overall, mixed significant positive and uncertain significant negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The northern half of the site is Landscape Character Type 3B - lower rolling farmed and settled valley types. The Revised Interim Landscape Sensitivity Assessment (LSA) has concluded that this is considered 'high' sensitivity in local parts (associated with listed buildings) with the majority 'medium' sensitivity. The southern half of the site is Landscape Character Type 3E - lowland plains, considered 'medium' sensitivity as the countryside is unaffected by modern development. The site is not close to the coast.<br><br>Although the majority of the site is considered to be of 'medium' sensitivity, and as such minor negative effects would be expected, due to parts of the site being of 'high' sensitivity, overall uncertain significant negative effects are expected. |

| SA Objective | SA Score | Justification |
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| **3. HISTORIC AND BUILT ENVIRONMENT**<br><br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/--? | The south and south-east of the site are Coleford and Knowle Conservation Areas (the western end of the latter extends slightly into the site), which feature a concentration of listed buildings. The site itself contains a number of listed buildings, with clusters at/around Copplestone and Chaffcombe Manor. Listed buildings also feature at Clannaborough Barton (cluster with Grade II* church), The Old Rectory, Beers, Broomhill, Furzedown Cottages and Coplestone House. A number of Historic Environment Record monuments are identified across the site and Copplestone Cross Scheduled Monument is located within Copplestone. A Landscape Visual Impact assessment and heritage impact assessment is critical to progress a site with such a large potential change in site character. As such, uncertain significant negative effects are expected.<br><br>The site is of considerable size (>10ha) and should be able to respond appropriately to the existing heritage assets and buildings on the site. Any proposals would have to ensure new development is of a high quality, creates high quality public spaces and responds positively to heritage assets within the site. As such, uncertain minor positive effects are also expected.<br><br>Overall, mixed uncertain minor positive and uncertain significant negative effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | ++ | The site is within 5km of the Main Town of Crediton. As such, uncertain negligible effects are expected.<br><br>Copplestone village, surrounded by the parcel, has frequent bus services (within 500m) and is served by an hourly service on the Tarka railway line (within 1km), reaching Exeter in 30 minutes and Crediton in 12 minutes. The site is not however located within 1km of cycle routes. As such, due to the proximity to bus and rail links, significant positive effects are expected.<br><br>As the site is expected to deliver over 4,000 homes, it is assumed that development of the site would provide significant sustainable transport, walking and cycle links and services. As such, uncertain minor positive effects are expected.<br><br>Overall, significant positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield. Flood zone 3 runs along the small watercourse which flows east-west into Copplestone and then southwards, following the railway line. Tributaries enter at Coplestone House, north of Tapps Farm and north of Bolts Farm. Low level surface water flooding risk is also identified following and slightly extending the flood zone areas. However, development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS), and the design of development brought forward could avoid areas of flood risk.<br><br>As such, uncertain minor negative effects are expected. |

| SA Objective | SA Score | Justification |
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| **6. LAND RESOURCES**<br>To utilise our land resources efficiently and minimise their loss or degradation. | -- | The site contains a patchwork of agricultural land classifications, including over 5ha of Grade 1 (collection of fields west of Broomhill), over 5ha of Grade 2, and over 5ha of Grade 3 land, which could be lost to development on the site.<br>The site is not located within any Minerals Safeguarding Areas so will have no impact on mineral resources.<br>As such, significant negative effects are expected on high quality agricultural land. |
| **7. WATER RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or degradation. | --? | The site contains part of Colebrook, which flows into the Exe Estuary SPA. Development of the site could lead to deterioration in the water quality of the watercourse.<br>As such, uncertain significant negative effects are expected. |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | ++ | The site area covers approximately 640 ha. The topography of the site is reasonable for development, only small areas feature steeper slopes. Removing flood zones from the site area leaves an indicative developable area of 615ha. Development in this location would take the form of a new community which has a density of 31 to 40dph for calculation purposes, which equates to a crude potential yield of 11,104 to 14,328 dwellings. The capacity is likely to reduce once account has been taken of the likely mitigation requirements. The site would also need to ensure a viable mix of homes (tenure and sizes) including a proportion of affordable housing to contribute towards meeting needs within the area. This range of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom and self-build providers. This site is of a sufficient size to be able to support a high number of housing starts / completions from a number of different outlets around the site, which in turn will ensure a good pace of delivery.<br>As such, significant positive effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site contains and is within 400m of Public Rights of Way and is within 800m of the common at Knowle major open space. A number of local bridleways and footpaths are present in the site. These mainly cluster around Copplestone and Coleford. The long distance footpath, the Two Moors Way, enters the site near Lammacott Farm (NW of site). This route converges with the Devonshire Heartland Way west of the site near Clannaborough Barton. As such, significant positive effects are expected.<br>In addition, as the site is expected to deliver over 2,000 homes, it is assumed that development of the site would provide significant open space and active transport links. As such, significant positive |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | effects are expected.<br><br>Overall, significant positive effects are expected. |
| **10. WELLBEING**<br><br>To support positive, safe and healthy communities. | +/- | The site is within the 'Area around Crediton including Morchard Bishop, Copplestone and Newton St Cyres' Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment reporting of index of multiple deprivation, sees higher levels of deprivation than compared to Devon as a whole. It is likely that large residential development of this nature will provide potential improvements to the availability of homes in the area, which will provide broad wellbeing benefits. As such, minor positive effects are expected.<br><br>The site is adjacent to residential development, including existing and allocated residential development in Copplestone, and is adjacent to Copplestone Primary School, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. In addition, the site is crossed by an 'A' road and a railway line. These features may result in noise pollution affecting residents of the site in the longer term. As such, minor negative effects are also expected.<br><br>The site is not within 1km of an AQMA. However, car movements from the site would negatively impact Crediton's AQMA and Exeter's main arterial route AQMAs. Sustainable travel options do provide some opportunity to mitigate this however dominance of private car use is anticipated. As such, minor negative effects are expected.<br><br>Overall, mixed minor positive and minor negative effects are expected. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | ++ | The site is adjacent to Copplestone (a Defined Village), which provides a small railway station, preschool, primary school and a small convenience store. The site would most likely rely on Exeter and Crediton for larger services which due to location probably will be car dependant. The Copplestone Primary School (within 500m of the site) has limited opportunities for expansion. Additional primary capacity would be required for development. The designated secondary school is Queen Elizabeth's Community College, Crediton (located further than 1km from the site). This can support low levels of development and should be considered alongside other development in its catchment. The site is also not within 1km of a further education college or a university. As such, minor positive effects are expected.<br><br>However, the site is large, providing over 4,000 homes, and therefore it is assumed that development of the site would also provide a new primary school and a new secondary school. As such, significant positive effects are also expected.<br><br>Within Copplestone village there is superfast broadband with a download speed of 80 Mbps. Service |

| SA Objective | SA Score | Justification |
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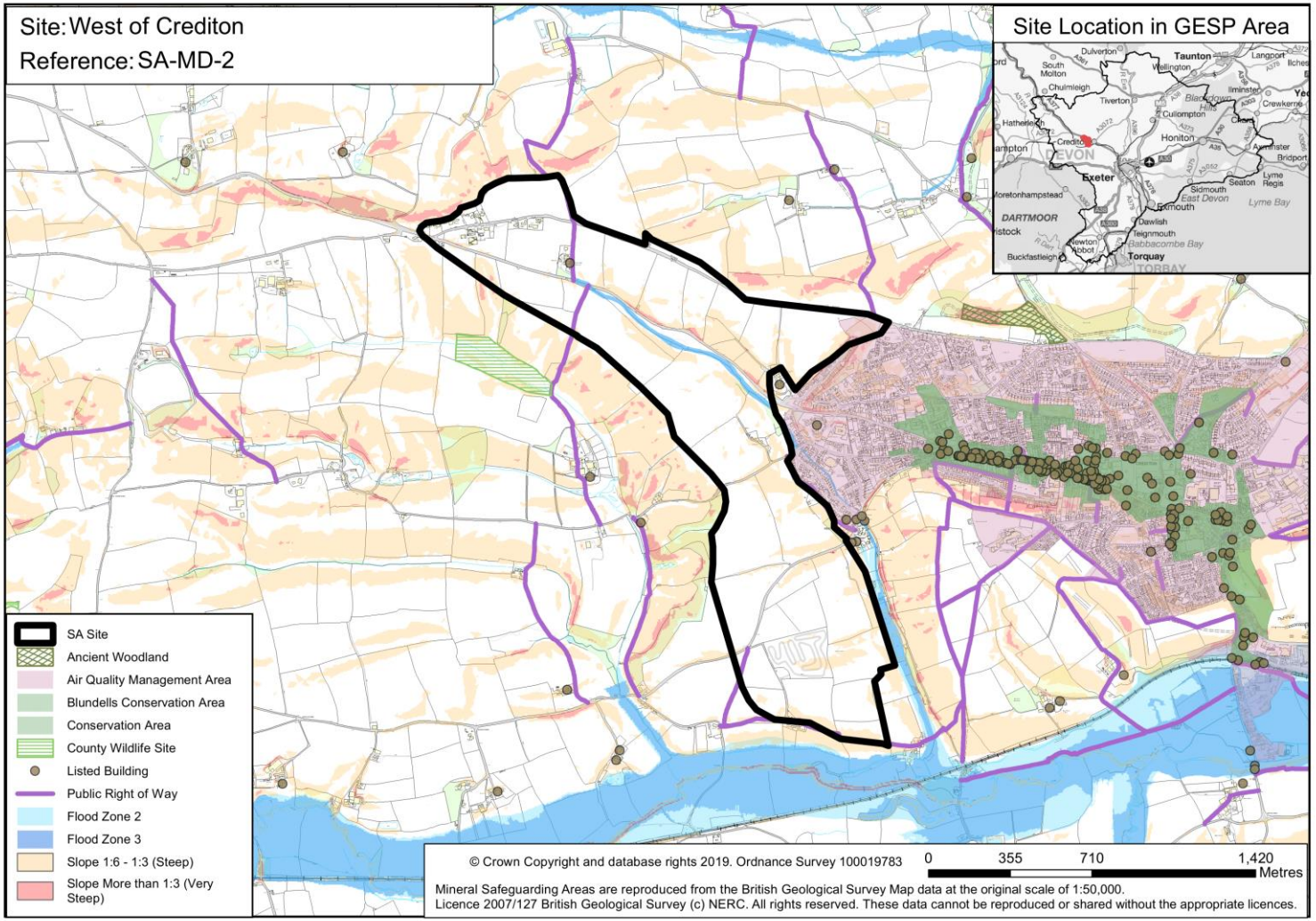
| | | expansion would be required to serve the site. As such, minor positive effects are expected.<br><br>Overall, significant positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | ++/-- | The site is not located adjacent to Main Town and is not located within 1km of existing or proposed employment sites. As such, significant negative effects are expected.<br><br>Development in this location would most likely provide predominantly residential dwellings, although live/work units could be integrated in the development mix. Development at this location would increase the available workforce who could access quality jobs in Exeter (and to an extent jobs in Crediton). However, key employment sites in Exeter dominate on the east of the city. Jobs would be created during the construction phase of the site, and additional homes would create expenditure in the area. In addition, it is assumed that, as the site has capacity to deliver over 2,000 homes, the site will deliver large scale mixed use employment opportunities and a business park or employment estate. As such, significant positive effects are also expected.<br><br>Impact on tourism not considered likely.<br><br>Overall, mixed significant positive and significant negative effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br><br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | ++ | Copplestone is a village surrounded by the site, with limited facilities on the intersection of the A377 (Exeter to Barnstaple) and A3702 (west towards Okehampton). Travel for most purposes is external and typically by car. Copplestone has frequent bus services (within 500m) and is served by an hourly service on the Tarka railway line (within 1km), reaching Exeter in 30 minutes and Crediton in 12 minutes. The site is not however located within 1km of cycle routes. As such due to the proximity to bus and rail links, significant positive effects are expected.<br><br>In addition, the site has capacity for more than 1,000 homes and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br><br>Overall, significant positive effects are expected. |

### SA-MD-2: West of Crediton

| SA-MD-2 | West of Crediton |
|---|---|
| **Authority Area:** Tarka Line / Mid Devon |  |
| **Site Area:** 164.9ha (Net 95.6ha) | |
| **Approximate total capacity:** 2,965 – 3,826 dwellings | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:** This area appears predominately agricultural. The area of the site north of the A377 generally slopes north-south, and south of the A377 generally slopes west-east. Crediton is a historic market town about 11km NW from Exeter, served by the Tarka Line railway and also linked by the A377. | |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/-? | The site lies within Pit Hill Road Cutting County Geological Site and is within 250m of Chapel Downs Road Cutting County Geological Site and within 1km of Uton Quarry County Geological Site. The site is also within 250m of Hollacombe County Wildlife Site and within 1km from Moorlake Bridge County Wildlife Site. In addition, the site is flagged as Yellow in the HRA sensitivity work with regard to Culm Grasslands SAC. Mature hedgerows and trees are present on site. There are potential dormouse/bat flight line impacts if there are to be any impacts to the hedgerows. As such, minor negative effects with uncertainty are expected.<br><br>Existing green infrastructure on the site, including hedgerows and trees, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space and playing pitches on site that could mitigate the biodiversity impact of development. As such, significant positive effects are also expected.<br><br>Overall, mixed significant positive and minor negative effects with uncertainty are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is predominantly rural open countryside and so development would have an urbanisation effect on the environment. Part of the site is of medium landscape sensitivity as development would erode the perception of the relatively nucleated character of Crediton. As such, uncertain minor negative effects are expected.<br><br>Remaining land within the site is of high landscape sensitivity as development on the upper slopes may be visible from Crediton and interrupt its green hill setting. As such, uncertain significant negative effects are expected.<br><br>Overall, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/-? | The northern part of the site contains one Grade II listed building (Dewsmoor) within its boundaries. There are multiple designated assets within 3km including seven Grade II listed buildings adjacent to the eastern boundary of the site on the edge and to the north of Westwood. Further to this, there is a high concentration of listed buildings around 1km to the east of the site contained within Credition Conservation Area. Sandford Conservation Area, which also contains multiple Grade II listed buildings, is located around 1.5km north-east of the site. There are Scheduled Monuments within 3km located around 2.2km to the south (Posbury Camp. Castle Down) and around 2.6km to the east (Romano-Bristish Villa). Additionally, Shobrooke Park (a Registered Park and Garden) is located around 2.5km to the east of the site. There is potential for residential development to compromise the setting of these |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | historic environment assets. As such, uncertain minor negative effects are expected.<br><br>The site is of considerable size (>10ha) and should be able to respond appropriately to the existing heritage assets and buildings on the site. Any proposals would have to ensure new development is of a high quality, creates high quality public spaces and responds positively to heritage assets within the site. This may include a buffering zone around the listed building contained within the site boundaries. As such, uncertain minor positive effects are also expected.<br><br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | ++? | The site is adjacent to the Main Town of Crediton and as such uncertain significant positive effects are expected.<br><br>The site is not located within 1km of cycle routes and the nearest train station is served frequently but is located more than 1km from the site on the opposite end of Crediton. The site is located within 500m of frequently served bus stops. Due to the proximity of the site to bus services, minor positive effects are expected.<br><br>As the site is expected to deliver over 1,000 homes, it is assumed that development of the site would provide some sustainable transport, walking and cycle links and services. As such, uncertain negligible effects are expected.<br><br>Overall, uncertain significant positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and there is no significant flood risk within the area. There is a river in the north of the site and as such part of the site is on flood zone 2 and flood zone 3. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>As such uncertain minor negative effects are expected, |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | -- | The majority of the site (>5ha) is comprised of Grade 2 agricultural land. As such, significant negative effects are expected due to the potential for loss of high quality agricultural land during development. The remaining land within the site is comprised of Grade 3 agricultural land but it is unclear it is Grade 3a or Grade 3b.<br><br>The site is predominantly greenfield apart from a few small areas of agricultural development.<br><br>The site is not located within any Mineral Safeguarding Areas.<br><br>Overall, significant negative effects are expected due to development on high quality agricultural land. |

| SA Objective | SA Score | Justification |
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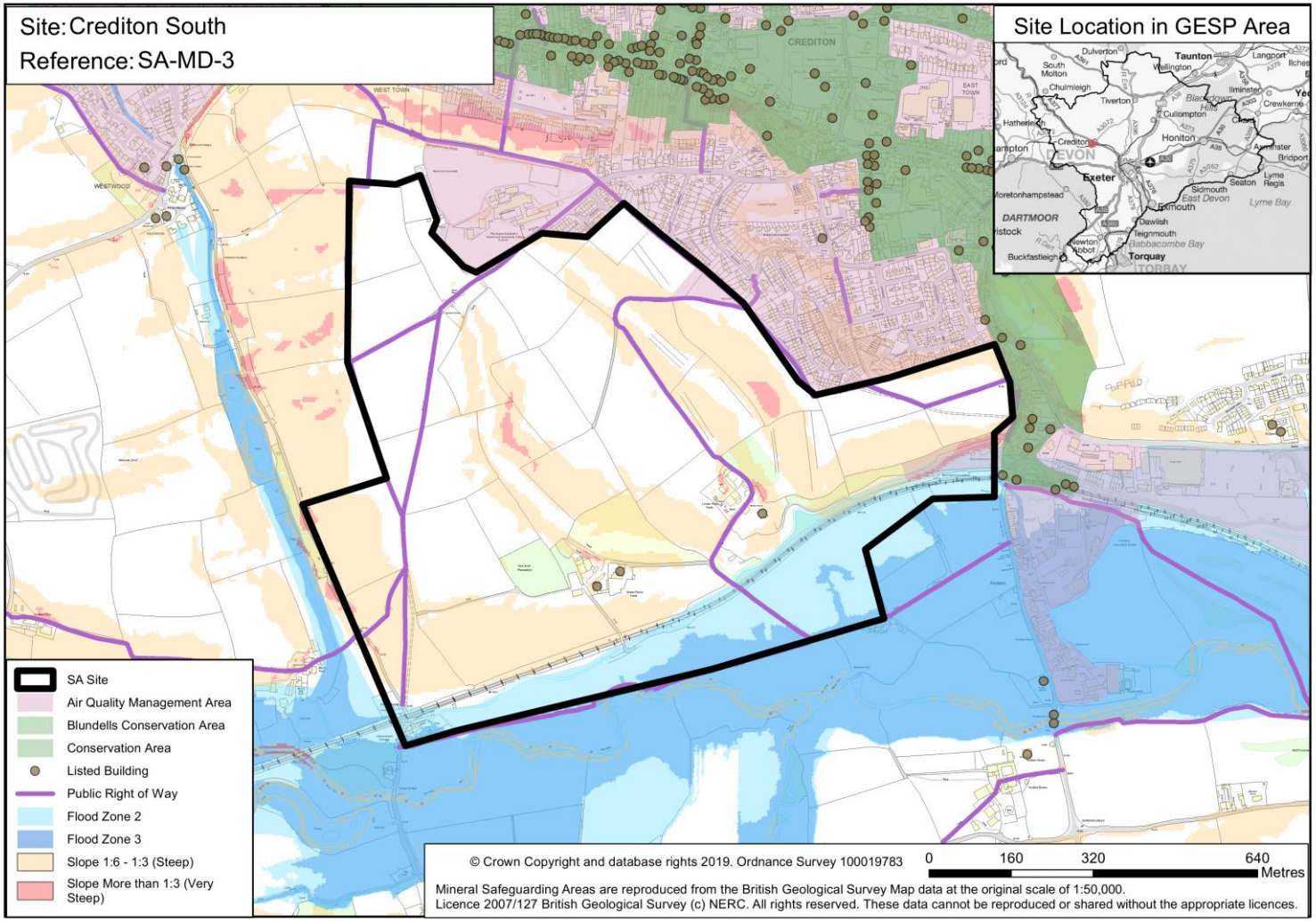
| **7. WATER RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or degradation. | 0 | The site is not adjacent to and does not to contain any watercourses.<br>As such, negligible effects are expected. |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | ++ | For an urban extension to Crediton, a density of 31 to 40dph is used for calculation purposes, which equates to a crude potential yield of 2,965 to 3,826 dwellings. The capacity is likely to reduce once account has been taken of the likely mitigation requirements.<br>The site would also need to ensure a viable mix of homes (tenure and sizes) including a proportion of affordable housing to contribute towards meeting needs within the area. The range of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom and self-build providers. The site is of a sufficient size to be able to support a high number of housing starts / completions from a number of different outlets around the site, which in turn will ensure a good pace of delivery.<br>As such, significant positive effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site is not within 800m of major open space, but does contain and is within 400m of Public Rights of Way. As such, minor positive effects are expected.<br>However, as the site is expected to deliver over 2,000 homes, it is assumed that development of the site would provide significant open space and active transport links. As such, significant positive effects are expected.<br>Overall, significant positive effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | --/+ | The site is within the 'Area around Crediton including Morchard Bishop, Copplestone and Newton St Cyres' Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment reporting of index of multiple deprivation, sees higher levels of deprivation than compared to Devon as a whole. It is likely that large residential development of this nature will provide potential improvements to the availability of homes in the area, which will provide broad wellbeing benefits. As such, minor positive effects are expected.<br>The site is adjacent to residential development, the town of Crediton to the east, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. As such, minor negative effects are also expected.<br>The site lies adjacent to and slightly within the Crediton AQMA, therefore additional car movements to |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | Exeter, Tiverton and accessing services on the east of town would pass through the site increasing air and noise pollution. In addition, there are limited sustainable transport options, so car dependency is likely. As such, significant negative effects are expected.<br><br>Overall, mixed minor positive and significant negative effects are expected. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | ++ | The site is adjacent to Crediton, (a Main Town), which provides a high street with a number of independent shops, a large out of town supermarket and community and cultural facilities. Crediton is served by the Tarka Line railway. As such, significant positive effects are expected.<br><br>The site is within 500m of Landscore Primary School and Queen Elizabeth's Secondary School to the east. Assuming Peddlarspool primary school site is secured, this could accommodate around 500 dwellings within the school catchment, in addition to those currently proposed in the town. Development greater than this is likely to require a larger site for a 420 place school, instead of the site currently identified. Secondary provision at Queen Elizabeth's can support low levels of development. As such, uncertain significant positive effects are expected.<br><br>The site is adjacent to superfast broadband download speeds (30-300Mbps) to the east which could be extended to the site if development takes place. As such, minor positive effects are expected.<br><br>The site is medium sized, with capacity for over 500 homes, and therefore it is assumed that development would be more likely to accommodate a new primary school. As such, minor positive effects are expected.<br><br>Overall, significant positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | ++ | The site is adjacent to Crediton (a Main Town) but is not within 1km of existing or proposed employment sites which could provide employment opportunities. As such, minor positive effects are expected.<br><br>Jobs would be created during the construction phase of the site, and additional homes would create expenditure in the area. It is assumed that, as the site has capacity to deliver over 2,000 homes, the site will also deliver large scale mixed use employment opportunities and a business park or employment estate. As such, significant positive effects are expected.<br><br>The site is unlikely to have any negative impacts on tourism.<br><br>Overall, significant positive effects are expected. |
| **13. CITY AND TOWN CENTRES** | ++ | The site is located adjacent to Crediton (a Main Town) and will deliver less than 4,000 homes, which is a scale not expected to detract visitors from the current town centre. A new residential site could |

| SA Objective | SA Score | Justification |
|---|---|---|
| To safeguard and strengthen the vitality and viability of our city and town centres. | | support the vitality and viability of the existing town centre by increasing the number of day-to-day visitors and supporting businesses and services there.<br><br>As such, significant positive effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | + | The site is not located within 1km of cycle routes and the nearest train station is served frequently but is located more than 1km from the site on the opposite end of Crediton. The site is located within 500m of frequently served bus stops. Due to the proximity of the site to bus services, minor positive effects are expected.<br><br>In addition, the site has capacity for more than 1,000 homes and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br><br>Overall, minor positive effects are expected. |

## SA-MD-3: Crediton South

| SA-MD-3 | Crediton South |
|---|---|
| **Authority Area:** Tarka Line / Mid Devon |  |
| **Site Area:** 90.6ha (Net 47.5ha) | |
| **Approximate total capacity:** 1,473 – 1,900 dwellings | |
| **Site status:** Potential site option | |
| **Outline description and context:** The site is predominately agricultural and generally slopes north to south, to the railway line. The site also extends beyond the railway to floodplain associated with the River Yeo. The landscape is irregular, with rounded hills and small marked valleys by Great Parks Farm, Lower Parks Farm and the western edge of the site. Crediton is a historic market town about 11km NW from Exeter, served by the Tarka Line railway and also linked by the A377. | |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/-? | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, but is within 1km of Uton Quarry County Geological Site and lies within a SSSI IRZ. The site contains three Priority habitats, deciduous woodland, coastal and floodplain grazing marsh and traditional orchard. The site also lies adjacent to Strategic Nature Area, woodland. Mature hedgerows and trees are present on site. At the east of the site, at Taw Vale Terrace is an unconfirmed county wildlife site (parkland). In addition, the site is flagged as Yellow in the HRA sensitivity work with regard to Culm Grasslands SAC. The element of the site south of the railway line could provide green space for biodiversity and potentially recreation. This would preserve the floodplain and potential priority habitat/unconfirmed wildlife site. Enhancement of the area south of the railway for biodiversity brings potentially beneficial linkage to the Strategic Nature Area. As such, minor negative effects with uncertainty are expected.<br><br>Existing green infrastructure on the site, including woodland bands, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space and playing pitches on site that could mitigate the biodiversity impact of development. As such, significant positive effects are also expected.<br><br>Overall, mixed minor negative effects and significant positive effects with uncertainty are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is comprised of rural open countryside and so development would have an urbanisation effect on the environment. The landscape is irregular with rounded hills and small marked valleys by Great Parks Farm, Lower Parks Farm and the western edge of the site. The site is of high landscape sensitivity as development could compromise the intrinsic countryside character, beauty and tranquillity of the area. Development could also compromise the local historic landscape by interrupting the setting of heritage assets.<br><br>As such, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/-? | The site contains three Grade II listed buildings within its boundaries (Henley House and surrounding farm buildings). The eastern boundary of the site is adjacent to a high concentration of Grade II listed buildings within Crediton Conservation Area. There are multiple designated assets within 3km of the site including Credition Conservation Area to the north, which contains multiple Grade II listed buildings. There are also Scheduled Monuments located around 1.2km to the east (Romano-British Villa) and around 2.5km to the south-west of the site (Posbury Camp, Castle Down). Additionally, Shobrooke Park is around 1.5km north-east of the site. There is potential for residential development to compromise the setting of these historic environment assets. As such, uncertain minor negative |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | effects are expected.<br><br>The site is of considerable size (>10ha) and should be able to respond appropriately to the existing heritage assets and buildings on the site. Any proposals would have to ensure new development is of a high quality, creates high quality public spaces and responds positively to heritage assets within the site. This may include a buffering zone around the listed buildings contained within the site boundaries. As such, uncertain minor positive effects are also expected.<br><br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | ++ | The site is adjacent to the Main Town of Crediton and as such uncertain significant positive effects are expected.<br><br>The site is located within 1km of Crediton railway station, providing links to Exeter and Barnstaple, with hourly frequency and 10 minute journey time to Exeter. The site is also located within 500m of frequent bus services. The site is not located within 1km of cycle routes. As such, due to the proximity to rail and bus links, significant positive effects are expected.<br><br>The site is expected to deliver over 1,000 homes, and therefore it is assumed that development of the site would provide sustainable transport, walking and cycle links and a road connecting to the nearest settlement. As such, uncertain negligible effects are expected.<br><br>Overall, significant positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and there is no significant flood risk within the area. However, there is a river in the south of the site and therefore, areas of the site are on flood zone 2 and 3. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>As such, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | -- | The site is comprised of over 5ha of Grade 2 agricultural land. As such, significant negative effects are expected due to the potential for loss high quality agricultural land during development. The remaining areas within the site consist of Grade 3 agricultural land and urban land.<br><br>Although the site does not contain any previously developed land that could be reused, it is noted that that it does contain some agricultural use building.<br><br>The site is not located within any Mineral Safeguarding Areas.<br><br>Overall, significant negative effects are expected due to development on high quality agricultural land. |

| SA Objective | SA Score | Justification |
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| **7. WATER RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or degradation. | --? | Development should ensure no deterioration in the water quality of the River Yeo, which is adjacent to the Southern boundary of the site and runs into the Exe Estuary SPA.<br>As such, uncertain significant negative effects are expected. |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | ++ | For an urban extension to Crediton, a density of 31 to 40dph is used for calculation purposes, which equates to a crude potential yield of 1,473 – 1,900 dwellings. The capacity is likely to reduce once account has been taken of the likely mitigation requirements.<br>The site would also need to ensure a viable mix of homes (tenure and sizes) including a proportion of affordable housing to contribute towards meeting needs within the area. The range of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom and self-build providers. The majority of the site has come forward as HELAA site, aiding deliverability. The challenging topography of the site is a factor which could lead delivery speed challenges and could influence the economics of the site.<br>As such, significant positive effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | + | The site is not within 800m of major open space, but does contain and is within 400m of Public Rights of Way. As such, minor positive effects are expected.<br>In addition, as the site is expected to deliver between 1,000 - 1,999 homes, it is assumed that development of the site would provide some open space and active transport links. As such, minor positive effects are expected.<br>Overall, minor positive effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | -- | The site is within the 'Crediton' Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment reporting of index of multiple deprivation, sees lower levels of deprivation than compared to Devon as a whole. It is likely that residential development of this nature will provide potential improvements to the availability of homes in the area, which will provide broad wellbeing benefits. As such, negligible effects are expected.<br>The site is adjacent to residential development, the town of Crediton to the north and east, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. In addition, a railway line crosses the site. This feature may result in noise pollution affecting residents of the site in the longer term. As such, minor negative effects are also expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | The site lies adjacent to a slightly within the Crediton AQMA, therefore development in this site could have an impact on the existing air quality issues within Crediton and Exeter's main arterial AQMAs. As such, significant negative effects are expected.<br><br>Overall, significant negative effects are expected. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | ++ | The site is adjacent to Crediton (a Main Town) to the north, which provides a high street with a number of independent shops, a large out of town supermarket and community and cultural facilities. Crediton is served by the Tarka Line railway. As such, significant positive effects are expected.<br><br>The site is within 500m of Landscore Primary School and Queen Elizabeth's Secondary School to the north. Assuming Pedlerspool Primary School site is secured, this could accommodate around 500 dwellings within the school catchment, in addition to those currently proposed in the town. Development greater than this is likely to require a larger site for a 420 place school, instead of the site currently identified. Secondary provision at Queen Elizabeth's can support low levels of development. As such, uncertain significant positive effects are expected.<br><br>The site is adjacent to superfast broadband download speeds (30-300Mbps) to the north which could be extended to the site if development takes place. As such, minor positive effects are expected.<br><br>The site is medium sized, providing over 500 homes, and therefore it is assumed that development would be more likely to include a primary school. As such, minor positive effects are expected.<br><br>Overall, significant positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | ++ | The site is adjacent to Crediton (a Main Town) and is within 1km of existing or proposed employment sites which could provide employment opportunities. As such, significant positive effects are expected.<br><br>Jobs would be created during the construction phase of the site, and additional homes would create expenditure in the area. It is assumed that, as the site has capacity to deliver over 500 homes, the site will also deliver smalls scale mixed use employment opportunities and a small hub of shops and services. As such, minor positive effects are expected.<br><br>The site is unlikely to have any negative impacts on tourism.<br><br>Overall, significant positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and | ++ | The site is located adjacent to Crediton (a Main Town) and will deliver less than 4,000 homes, which is a scale not expected to detract visitors from the current town centre. A new residential site could support the vitality and viability of the existing town centre by increasing the number of day-to-day |

| SA Objective | SA Score | Justification |
|---|---|---|
| town centres. | | visitors and supporting businesses and services there.<br><br>As such, significant positive effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | ++ | The site is located within 1km of Crediton railway station, providing links to Exeter and Barnstaple, with hourly frequency and 10 minute journey time to Exeter. The site is also located within 500m of frequent bus services. The site is not located within 1km of cycle routes.<br><br>As such, due to the proximity to rail and bus links, significant positive effects are expected. |

### SA-MD-4: Newton St Cyres and Sweetham

| SA-MD-4 | Newton St Cyres and Sweetham |
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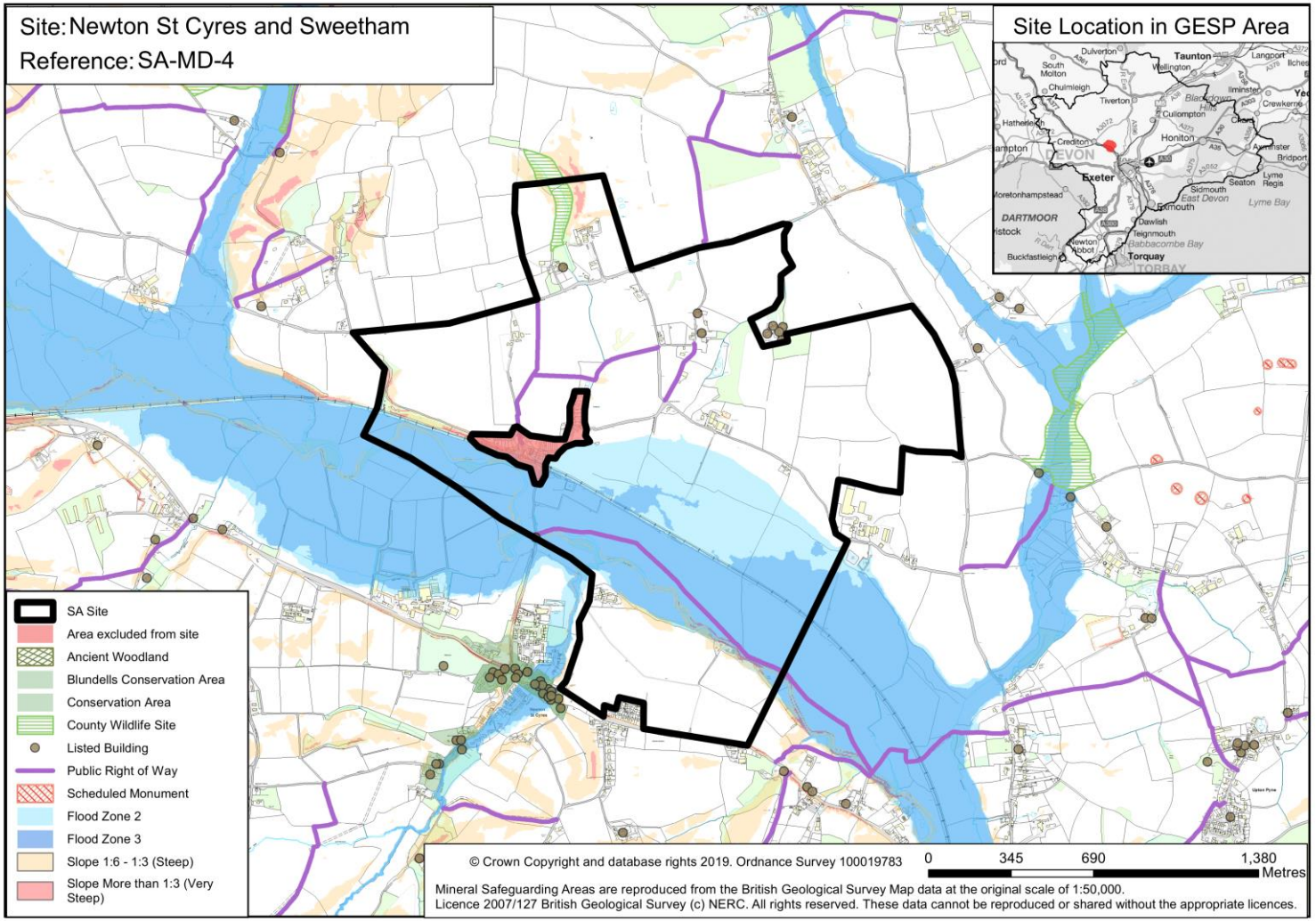
| **Authority Area:** Tarka Line / Mid Devon | |
| **Site Area:** 303.3ha (Net 122.2ha) | |
| **Approximate total capacity:** 3,787 – 4,886 dwellings | |
| **Site status:** Potential site option | |
| **Outline description and context:** The site is predominately agricultural, including scattered farms/dwellings with a Golf Club near Higher Rewe. The hamlet of Sweetham is towards the centre of the site with the larger village of Newton St Cyres to the south-west. The open countryside is picturesque with established hedgerows and mature trees. The centre of the site is approximately 8km from Exeter city centre. Running through the site is the Tarka rail line. The site was identified for assessment because of the possible cycle distance to Exeter and the railway linkage, with a station |  |

| SA-MD-4 | Newton St Cyres and Sweetham |
|---|---|
| at Sweetham, providing a potential sustainable travel options. | |

| SA Objective | SA Score | Justification |
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| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/-? | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, but lies within Lower Rewe County Wildlife Site. The site is also within 1km of two County Wildlife Sites, Jackmoor and Shobrooke Mill Farm East. The site contains four Priority habitats, good quality semi-improved grassland, traditional orchard, deciduous woodland and coastal and floodplain grazing marsh. Mature hedgerows and trees are present on site. In addition, the site is flagged as Yellow in the HRA sensitivity work with regard to Culm Grasslands SAC. Also, the southern-tip of the site is within the SPA 10km recreational buffer, therefore if development extended into this area SANGs and mitigation would be required. As such, minor negative effects with uncertainty are expected.<br><br>Existing green infrastructure on the site, including woodland bands, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space and playing pitches on site that could mitigate the biodiversity impact of development. As such, significant positive effects are also expected.<br><br>Overall, mixed significant positive and minor negative effects with uncertainty are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is comprised of rural open countryside and so development would cause an urbanisation effect on the environment. Land along the River Creedy is considered to be Sparsely Settled Farmed Valley Floors in character with medium-high landscape sensitivity due to the potential for development to interrupt to the sparse settlement pattern associated with floodplains. As such, uncertain significant negative effects are expected.<br><br>The northern half of the site is considered to be Lowland Plains in landscape character with high landscape sensitivity as the setting of listed buildings in the area require protection from hedgerow trees which could be compromised as a result of development. As such, uncertain significant negative effects are expected.<br><br>Overall, uncertain significant negative effects are expected. |

| SA Objective | SA Score | Justification |
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| **3. HISTORIC AND BUILT ENVIRONMENT**<br><br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/-? | The northern part of the site contains three Grade II listed buildings (Churchill, Little Newcombes and Lower Rewe) within its boundaries. The site is also adjacent to multiple listed buildings. There are multiple designated assets within 3km including a cluster of five Grade II listed buildings adjacent to the north-east boundary of the site, a Grade II* listed building adjacent to the south-west boundary of the site and a high concentration of Grade II listed buildings adjacent to the southern boundary of the site contained within Newton St Cyres Conservation Area. There are multiple Scheduled Monuments (Bowl Barrows) around 1km to the east of the site as well as a Registered Park and Garden (Shobrooke Park) around 2.3km north-west of the site. There is potential for residential development to compromise the setting of these historic environment assets. As such, uncertain minor negative effects are expected.<br><br>The site is of considerable size (>10ha) and should be able to respond appropriately to the existing heritage assets and buildings on the site. Any proposals would have to ensure new development is of a high quality, creates high quality public spaces and responds positively to heritage assets within the site. This may include a buffering zone around the listed buildings contained within the site boundaries. As such, uncertain minor positive effects are also expected.<br><br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | ++ | The site is located within 5km of the Main Town of Crediton and the city of Exeter. As such, uncertain significant positive effects are expected.<br><br>Although the site is not within 1km of cycle routes, it is adjacent to bus stops with frequent services. In addition, the Tarka rail line passes through the site and the site surround the Newton St Cyres railway station, providing an hourly service and 8 minute journey time to Exeter St Davids and 7 minute journey time to Crediton. As such, due to the proximity to rail and bus links, significant positive effects are expected.<br><br>As the site is expected to deliver over 4,000 homes, it is assumed that development of the site would provide significant sustainable transport, walking and cycle links and services. As such, uncertain minor positive effects are expected.<br><br>Overall, significant positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and there is no significant flood risk within the area. However, there is a river in the centre of the site and therefore, areas in the centre of the site are on flood zone 2 and flood zone 3. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS). |

| SA Objective | SA Score | Justification |
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| | | As such, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br>To utilise our land resources efficiently and minimise their loss or degradation. | -- | The site is comprised of over 5ha of Grade 1 agricultural land as well as over 5ha of Grade 2 agricultural land. As such, significant negative effects are expected due to the potential loss of high quality agricultural land during development. The remaining land within the site is Grade 3 agricultural land but it is unclear if it is Grade 3a or Grade 3b.<br>Although the does not contain any previously developed land that could be reused, it is noted that it does contain some agricultural buildings.<br>The site is not located within any Mineral Safeguarding Areas.<br>Overall, significant negative effects are expected due to development on high quality agricultural land. |
| **7. WATER RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or degradation. | --? | Development should ensure no deterioration in the water quality of the River Creedy, which passes through the site boundaries and runs into the Exe Estuary SPA.<br>As such, uncertain significant negative effects are expected. |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | ++ | Development in this location would take the form of a new community which has a density of 31 to 40dph for calculation purposes, which equates to a crude potential yield of 3,787 – 4,886 dwellings. The capacity is likely to reduce once account has been taken of the likely mitigation requirements.<br>The site would also need to ensure a viable mix of homes (tenure and sizes) including a proportion of affordable housing to contribute towards meeting needs within the area. The range of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom and self-build providers. The site is of a sufficient size to be able to support a high number of housing starts / completions from a number of different outlets around the site, which in turn will ensure a good pace of delivery.<br>A garden village style development might be more appropriate in scale for the setting.<br>As such, significant positive effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to | ++ | The site is not within 800m of major open space, but does contain and is within 400m of Public Rights of Way. As such, minor positive effects are expected.<br>However, as the site is expected to deliver over 2,000 homes, it is assumed that development of the site would provide significant open space and active transport links. As such, significant positive |

| SA Objective | SA Score | Justification |
|---|---|---|
| enjoy and experience them. | | effects are expected.<br><br>Overall, significant positive effects are expected. |
| **10. WELLBEING**<br><br>To support positive, safe and healthy communities. | +/- | The site is within the 'Area around Crediton including Morchard Bishop, Copplestone and Newton St Cyres' Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment reporting of index of multiple deprivation, sees higher levels of deprivation than compared to Devon as a whole. It is likely that large residential development of this nature will provide potential improvements to the availability of homes in the area, which will provide broad wellbeing benefits. As such, minor positive effects are expected.<br><br>The site surrounds existing residential development, Newton St Cyres, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. In addition, the site is crossed by a railway line and borders an 'A' road on the southern tip of the site. These features may result in noise pollution affecting residents of the site in the longer term. As such, minor negative effects are also expected.<br><br>The site is not within 1km of an AQMA. However, car movements from the site would negatively impact Crediton's AQMA and Exeter's AQMAs. Sustainable travel options do provide some opportunity to mitigate this however dominance of private car use is anticipated. As such, minor negative effects are expected.<br><br>Overall, mixed minor positive and minor negative effects are expected. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | ++ | The site is adjacent to Newton St Cyres (a Defined Village), which provides community and cultural facilities. Large scale development would potentially secure infrastructure and open space provision, providing pedestrian, cycle and public transport accessibility. However, the site would most likely rely on Exeter and Crediton for larger services (large supermarket 6km away). As such, minor positive effects are expected.<br><br>The site is within 500m of primary school but it is not within 1km of a secondary school. However, additional primary school capacity would be needed for development. As such, uncertain minor positive effects are expected.<br><br>The site is adjacent to an area of superfast broadband download speeds (30-300Mbps) in Newton St Cyres, which could extended to support the site if development goes ahead. As such, minor positive effects are expected.<br><br>The site is large, with the capacity to provide over 4,000 homes, and therefore it is assumed that development would be more likely to support a new primary school and secondary school on site. As |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | such, significant positive effects are expected.<br><br>Overall, significant positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | ++/-- | The site is not adjacent to a main town and is not within 1km of any existing or proposed employment sites. As such, significant negative effects are expected.<br><br>Jobs would be created during the construction phase of the site, and additional homes would create expenditure in the area. It is assumed that, as the site has capacity for over 4,000 homes, the site will also deliver large scale mixed use employment opportunities and a business park or employment estate as well as a town centre with shops, services and commercial space. As such, significant positive effects are expected.<br><br>The site is unlikely to have any negative impacts on tourism.<br><br>Overall, mixed significant negative and significant positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br><br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | ++ | Although the site is not within 1km of cycle routes, it is adjacent to bus stops with frequent services. In addition, the Tarka rail line passes through the site and the site surround the Newton St Cyres railway station, providing an hourly service and 8 minute journey time to Exeter St Davids and 7 minute journey time to Crediton. As such, due to the proximity to rail and bus links, significant positive effects are expected.<br><br>In addition, the site has capacity for more than 1,000 homes and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br><br>Overall, significant positive effects are expected. |

## SA-MD-5: Land East of Tiverton

| SA-MD-5 | Land East of Tiverton |
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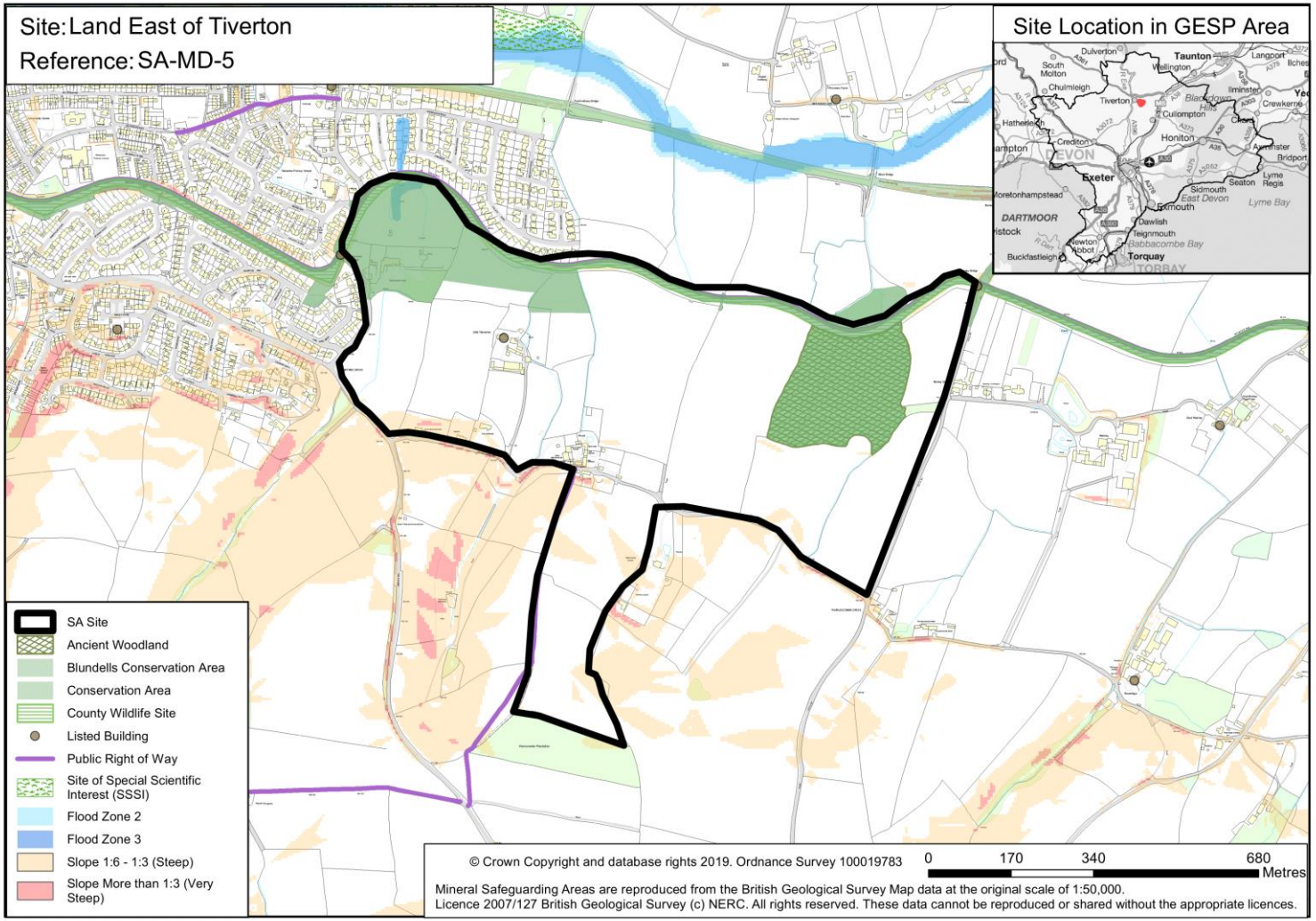
| **Authority Area:** Tarka Line / Mid Devon |  |
| **Site Area:** 66.5ha (Net 29.1ha) | |
| **Approximate total capacity:** 902 – 1,164 dwellings | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:** Land east of Tidcombe Lane in Tiverton, bounded by the Grand Western Canal to the north, Manley Lane to the west, and Tidcombe Hall to the east. steeply rising land towards Warnicombe Plantation in the south. Site is mainly agricultural pastureland bounded by hedgerows and mature trees. Immediately next to the canal, the site is relatively flat. | |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/--? | The site is within 250m of Tidcombe Lane Fen, SSSI and lies within Grand Western Canal, County Wildlife Site, Local Nature Reserve and Country Park. The site also lies within Snake's Wood County Wildlife Site, which is made of ancient woodland. The site contains one Priority habitat, deciduous woodland. In addition, the site is flagged as Yellow in the HRA sensitivity work with regard to Culm Grasslands SAC. The Tidcombe Fen SSSI catchment area lies towards the north and there are hedgerows and grassland present throughout the site. Buildings and trees offer potential roosting site for bats and there is a potential risk in terms of demolition. Potential dormouse and bat flight line will be impacted if there are to be any impacts to the hedgerows. The site would be able to include GI provision to support wildlife and provide linkages to recreational routes such as the Great Western Canal towpath. As such, significant negative effects with uncertainty are expected.<br><br>Existing green infrastructure on the site, including woodland bands, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space and playing pitches on site that could mitigate the biodiversity impact of development. As such, significant positive effects are also expected.<br><br>Overall, mixed significant positive and significant negative effects with uncertainty are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is comprised of rural open countryside and so development would have urbanisation effect on the environment. The southern area of the site falls within the Cullompton Rolling Farmland DCA and the Upper Farmed and Wooded Valley Slopes landscape character type. The land in this area of the site is of medium-high landscape sensitivity as development could compromise the sparse settlement pattern and development in the areas with steeper topography could interrupt the undeveloped rural character of the area. As such, uncertain significant negative effects are expected.<br><br>The northern part of the site forms part of the Grand Western Canal (GWC) Conservation Area and is considered to be Lowland Plains in landscape character. This area of the site is of medium landscape sensitivity as the rural character of the area is unlikely to be affected by modern development. However, the landscape sensitivity is high in places where the fabric and setting of the Grand Western Canal and listed buildings require protection and could be compromised by development. The landscape sensitivity is also high where the upper slopes contribute to the green hill setting of Tiverton and could be interrupted by development. As such, uncertain significant negative effects are expected.<br><br>Overall, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT** | --?/+? | The northern half of the site contains a section of the Grand Western Canal Conservation Area. There is a Grade II listed building (Tidcombe Farmhouse) beneath the Canal Conservation Area within the site |

| SA Objective | SA Score | Justification |
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| **ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | | boundaries as well further Grade II listed buildings being located on the north-eastern boundary of the site (Manley Bridge) and adjacent to the western boundary (Tidcombe Bridge). There are further designated assets within 3km of including Cranmore Castle, a Scheduled Monument, which is located 1.2km west of the site. There is potential for residential development to compromise the setting of these historic environment assets, particularly in the case of heritage assets on site. As such, uncertain significant negative effects are expected.<br><br>The site is of considerable size (>10ha) and should be able to respond appropriately to the existing heritage assets and buildings on the site. Any proposals would have to ensure new development is of a high quality, creates high quality public spaces and responds positively to heritage assets within the site. This may include a buffering zone around the heritage assets contained within the site boundaries. As such, uncertain minor positive effects are also expected.<br><br>Overall, mixed uncertain significant negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br>To minimise greenhouse gas emissions. | ++?/-? | The site is adjacent to the Main Town of Tiverton and as such uncertain significant positive effects are expected.<br><br>The site is not located within 1km of a railway station. An hourly (infrequent) bus service to the town centre stops on Tidcombe Lane at the western end of the site. In addition, from the edge of the site it is a 0.7km walk to Blundells Road where there is an hourly or greater (infrequent) service to Exeter via Cullompton. This service also stops at Tiverton Parkway railway station. However, the site is located within 1km of cycle routes. As such, due to the lack of accessible bus stops and railway stations, uncertain minor negative effects are expected.<br><br>As the site is expected to deliver over 1,000 homes, it is assumed that development of the site would provide some sustainable transport, walking and cycle links and services. As such, uncertain negligible effects are expected.<br><br>Overall, uncertain significant positive and uncertain minor negative effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and there is no significant flood risk within the area. There is a river in the north of the site and as such, areas in the north of the site are on flood zone 2 and flood zone 3. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES** | -- | The site is comprised of over 5ha of Grade 2 agricultural land as well as over 5ha of Grade 3a agricultural land. As such, significant negative effects are expected due to the potential loss of high |

| SA Objective | SA Score | Justification |
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| To utilise our land resources efficiently and minimise their loss or degradation. | | quality agricultural land during development. The remaining areas within the site are comprised of Grade 3b, Grade 4 and non-agricultural land.<br><br>The site does not contain any previously developed land.<br><br>The site is not located within any Minerals Safeguarding Areas.<br><br>Overall, significant negative effects are expected due to development on high quality agricultural land. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or degradation. | --? | Development should ensure no deterioration in the water quality of the Grand Western Canal, which flows adjacent to the northern boundary of the site and runs into the Exe Estuary SPA.<br><br>As such, uncertain significant negative effects are expected. |
| **8. HOMES**<br><br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | ++ | Given the overall scale of the area, there is an opportunity to accommodate 902 – 1,164 dwellings on the site. However, this figure is likely to be reduced to accommodate the mitigation measures set out in this SA. The site would also need to ensure a viable mix of homes (tenure and sizes) including a proportion of affordable housing to contribute towards meeting needs within the area. The range of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom and self-build providers. The site is of a sufficient size to be able to support a high number of housing starts / completions from a number of different outlets around the site, which in turn will ensure a good pace of delivery. The site is also of a sufficient size, scale and likely viability to accommodate a mix of housing tenures including affordable housing. The site includes a contingency housing site in the Mid Devon Local Plan Review (proposed submission) of 8.4ha for 100 dwellings to the north of Tidcombe Hall.<br><br>As such, significant positive effects are expected. |
| **9. HEALTH**<br><br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | + | The site is not within 800m of major open space, but lies adjacent and within 400m of multiple Public Rights of Way and the National Cycle Route. As such, minor positive effects are expected.<br><br>In addition, as the site has capacity for more than 1,000 homes, it is assumed that development of the site would provide some open space and active transport links. As such, minor positive effects are expected.<br><br>Overall, minor positive effects are expected. |
| **10. WELLBEING**<br><br>To support positive, safe and healthy | - | The site is within the Middle Super Output Area covering East Tiverton and villages to the North which, according to the Devon Joint Strategic Needs Assessment reporting of index of multiple deprivation, |

| SA Objective | SA Score | Justification |
|---|---|---|
| communities. | | sees below average levels of deprivation than compared to Devon as a whole. It is likely that large residential development of this nature will provide potential improvements to the availability of homes in the area, which will provide broad wellbeing benefits. As such, negligible effects are expected.<br><br>The site is adjacent to residential development, including existing and allocated residential development in Tiverton, and is adjacent to Tidcombe Primary School, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. As such, minor negative effects are also expected.<br><br>The site is not within 1km of an AQMA. However, it is noted that development of the site could have a significant impact on air quality in Tiverton, especially in connection with the Tiverton Eastern Urban Extension (EUE) proposal.<br><br>Overall, minor negative effects are expected. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | ++ | The site is adjacent to Tiverton (a Main Town), which provides a wide range of town centre services and area-wide services including GP surgeries and cultural buildings and facilities. Most facilities are within 2-5km with existing suitable routes for walking and cycling. As such, significant positive effects are expected.<br><br>The site is within 500m of a primary school but it is not within 1km of a secondary school. A new primary school would be required for a development of this scale. One option may be to relocate and expand Halberton Primary School. The closest secondary school is Tiverton High School which could be expanded to provide 1800 places which involves relocating the school across the road. This is needed to accommodate development previously identified within the Local Plan Review. Beyond this, some of the provision at the existing school site would need to be retained, in addition to the new provision across the A3126 road. The site is within 3km of a further education facility. As such, uncertain minor positive effects are expected.<br><br>Currently, superfast broadband is available in the Canal Hill area next to the site - it is reasonable to assume this can be extended to the site with improvements coming forward with development if required. Superfast broadband is available in this area with download speeds up to 61Mbps. As such, minor positive effects are expected.<br><br>The site is medium sized, providing over 500 homes, and therefore it is assumed that development would be more likely to include a new primary school on site. As such, minor positive effects are expected.<br><br>Overall, significant positive effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **12. JOBS AND LOCAL ECONOMY**<br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | ++/- | The site is adjacent to Tiverton (a Main Town) and is within 1km of existing or proposed employment sites which could provide employment opportunities. As such, significant positive effects are expected.<br>Jobs would be created during the construction phase of the site, and additional homes would create expenditure in the area. It is assumed that, as the site has capacity for over 500 homes, the site will also deliver medium scale mixed use employment opportunities and a business park or employment estate as well as a neighbourhood hub with shops and services. As such, minor positive effects are expected.<br>There is potential to impact on the tourism attraction of the Great Western Canal. As such, minor negative effects are expected.<br>Overall, mixed significant positive and minor negative effects are expected. |
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and town centres. | ++ | The site is located adjacent to Tiverton (a Main Town) and will deliver less than 4,000 homes, which is a scale not expected to detract visitors from the current town centre. A new residential site could support the vitality and viability of the existing town centre by increasing the number of day-to-day visitors and supporting businesses and services there.<br>As such, significant positive effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | +/-? | The site is not located within 1km of a railway station. An hourly (infrequent) bus service to the town centre stops on Tidcombe Lane at the western end of the site. In addition, from the edge of the site it is a 0.7km walk to Blundells Road where there is an hourly or greater (infrequent) service to Exeter via Cullompton. This service also stops at Tiverton Parkway railway station. However, the site is located within 1km of cycle routes. As such, due to the lack of accessible bus stops and railway stations, uncertain minor negative effects are expected.<br>In addition, the site has capacity for more than 1,000 homes and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br>Overall, minor positive and uncertain minor negative effects are expected. |

## SA-MD-6: West of Cullompton

| SA-MD-6 | West of Cullompton |
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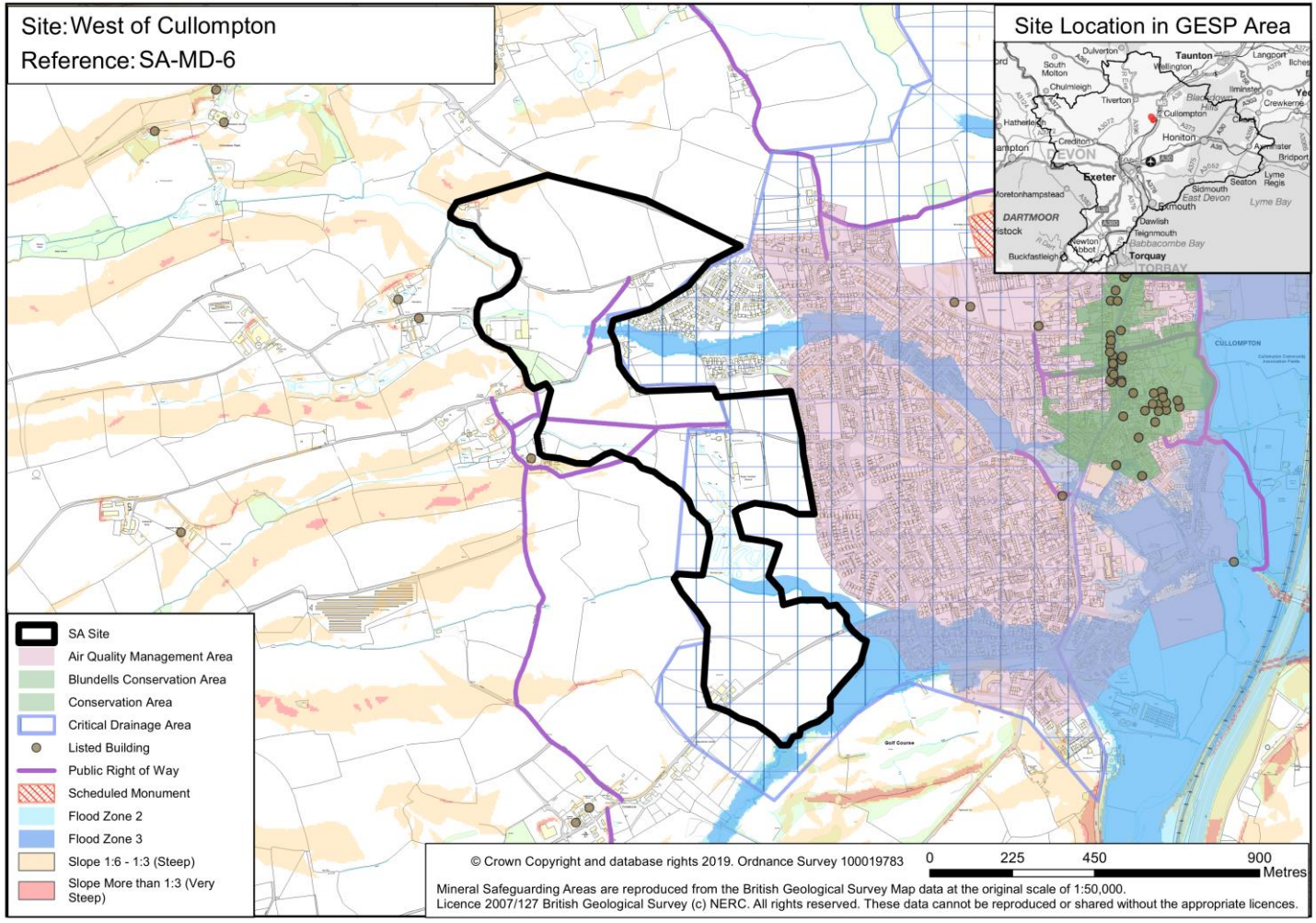
| **Authority Area:** Tarka Line / Mid Devon | |
| **Site Area:** 60.9ha (Net 34.5ha) | |
| **Approximate total capacity:** 1,070 – 1,380 dwellings | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:**<br><br>A large, irregularly shaped area on the western edge of Cullompton. The area is adjacent to the existing Mid Devon allocations of Knowle Lane, Ware Park and Footlands and the Colebrook contingency site allocation. The site extends from its northern boundary at Little Toms in the north across Ponsford Lane, Knowle Lane and Colebrook Lane in the south. The southern boundary is the Cole Brook. Owing to the size of the site and the number of highways which cross it, there are various potential access points. The main highway accesses would be Ponsford Lane, Knowle Lane and Colebrook Lane. The majority of the site is undulating and is largely in pastural use. The site |  |

| SA-MD-6 | West of Cullompton |
| --- | --- |
| includes a large number of hedgerows, mature trees and a small number of farmsteads. The site also includes Cullompton Rugby Club. | |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/-? | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, or within 250m of a locally designated site. The site lies within one Priority habitat, deciduous woodland. In addition, the site is flagged as Yellow in the HRA sensitivity work with regard to Culm Grasslands SAC and is approximately 18km from the Culm Grasslands SAC (designated for its heathland habitat and presence of the Marsh Fritillary Butterfly) which is sensitive to changes in air quality from nitrous oxide emissions. The entire site is also within a Great Crested Newt Consultation Zone. The loss of hedges and trees could be significant; however this would be mitigated if they were retained within the development. As such, minor negative effects with uncertainty are expected.<br><br>Existing green infrastructure on the site, including woodland bands, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space and playing pitches on site that could mitigate the biodiversity impact of development. As such, significant positive effects are also expected.<br><br>Overall, mixed significant positive and minor negative effects with uncertainty are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is comprised of rural open countryside and so development would have an urbanisation effect on the environment. The site is considered to be Lower Rolling Farmed and Settled Valley Slopes in landscape character. Parts of the site are level although there are areas of rolling topography which may be challenging to develop.<br><br>Land off Knowle Lane and land east of Cullompton Rugby Club is of low-medium landscape sensitivity as the area is unlikely to include landscape features valued in their own right is not located near and heritage assets. Landscape sensitivity increases to medium for areas in the site where landscape features are considered to have higher value and could be compromised by development. These areas include land north of Ponsford Lane, land south of Little Toms, land south of Ponsford Lane, land at Butts Farm and land at Kia-ora farm. As such, uncertain minor negative effects are expected.<br><br>Landscape sensitivity increase to medium-high at land around Colebrooke Lane due to increased value of landscape features such as Cole Brook and the potential for veteran trees in hedgerows. As such, uncertain significant negative effects are expected.<br><br>Overall, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built | +?/-? | The site does not contain any heritage assets within its boundaries. The western boundary of the site is adjacent to a Grade II listed building (Lower Knowle) and there are two further Grade II listed buildings (Ponsforf Farmhouse and Helmore) around 200m away from the north-western boundary. |

| SA Objective | SA Score | Justification |
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| and historic assets and promote high quality architecture, design and accessibility in new build development. | | Further to this, there are three listed buildings around 600m to the north-west of the site, two of which are Grade II listed (Stable Block and Jane's Cottage) and one which is Grade II* listed (Hillersdon House). There are further designated assets within 3km including a Scheduled Monument (two Roman forts and two Roman camps at St Andrew's Hill) around 700m east of the northern half of the site and Cullompton Conservation Area is around 700m to the east as well as Bradninch Conservation Area around 2km to the south, which both contain high concentrations of listed buildings. There is potential for residential development to compromise the setting of these historic environment assets. As such, uncertain minor negative effects are expected.<br><br>The site is of considerable size (>10ha) and should be able to respond appropriately to the existing heritage assets and buildings on the site. Any proposals would have to ensure new development is of a high quality, creates high quality public spaces and responds positively to heritage assets within the site. As such, uncertain minor positive effects are also expected.<br><br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | ++? | The site is adjacent to the Main Town of Cullompton and as such uncertain significant positive effects are expected.<br><br>The site is not located within 1km of cycle routes or railway stations. However, the site is located within 500m of bus stops, providing frequent services to Exeter, Tiverton, Willand and Cullompton. As such, due to the proximity of bus stops, minor positive effects are expected.<br><br>As the site is expected to deliver over 1,000 homes, it is assumed that development of the site would provide some sustainable transport, walking and cycle links and services. As such, uncertain negligible effects are expected.<br><br>Overall, uncertain significant positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | --? | The site is predominantly greenfield and there is no significant flood risk within the area. However, there is a river in the north and south of the site and as such, areas in the north and south of the site are on flood zone 2 and flood zone 3. The southern half of the site contains a critical drainage area. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain significant negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources | -- | The site is comprised of over 5ha of Grade 1 agricultural land as well as over 5ha of Grade 2 and Grade 3a agricultural land. As such, significant negative effects are expected due to the potential loss of high |

| SA Objective | SA Score | Justification |
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| efficiently and minimise their loss or degradation. | | quality land during development.<br>The site does not contain any previously developed land.<br>The site is not located within any Minerals Safeguarding Areas.<br>Overall, significant negative effects are expected due to development on high quality agricultural land. |
| **7. WATER RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or degradation. | --? | Development should ensure no deterioration in the water quality of streams in the north and south of the site, which pass through the site boundaries, flow into the River Culm and then run into the Exe Estuary SPA.<br>As such, uncertain significant negative effects are expected. |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | ++ | The site is fairly large with only minor constraints and therefore could provide a fairly significant amount of residential development as part of an urban extension adjoining the existing Local Plan allocations. The site is likely to be able to accommodate about 1,070 – 1,380 homes. However the capacity is likely to reduce once account has been taken of the likely mitigation requirements, including those highlighted elsewhere in this assessment which would include avoiding development in flood zone 3. The site would also need to ensure a viable mix of homes (tenure and sizes) including a proportion of affordable housing to contribute towards meeting needs within the area. The range of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom build providers. This site is of a sufficient size to be able to support a fairly high number of housing starts / completions from more than one outlet around the site, which in turn will ensure a good pace of delivery.<br>Development in this location is likely to take the form of a fairly standard urban extension and therefore offers moderate opportunities for innovative delivery models. This could result in modest affordable housing provision. If specific affordable housing policy and delivery interventions were made this could provide further affordable housing. Likewise, similar interventions could be made to provide further support for custom and self-build housing helping to diversify the housing market to some extent. These benefits would be moderate. The area includes a number of sites submitted through the HELAA process which supports deliverability and there is significant landowner interest in residential development in the area. In summary, the area could provide a fairly significant level of development which would benefit in provision of homes. There would be positive cumulative impacts associated with development at the existing north west Cullompton allocation and the site east of Cullompton due to the scale of development and numbers of homes which could be delivered in combination. Impacts are likely to be permanent. |

| SA Objective | SA Score | Justification |
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| | | As such, significant positive effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | + | The site is not within 800m of major open space, but contains and is within 400m of Public Rights of Way. As such, minor positive effects are expected.<br>In addition, as the site is expected to deliver between 1,000 - 1,999 homes, it is assumed that development of the site would provide some open space and active transport links. As such, minor positive effects are expected.<br>Overall, minor positive effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | -- | The site is within the 'area around Cullompton' Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment reporting of index of multiple deprivation, sees slightly lower levels of deprivation than compared to Devon and Mid Devon as a whole. It is likely that large residential development of this nature will provide potential improvements to the availability of homes in the area, which will provide broad wellbeing benefits. As such, negligible effects are expected.<br>The site is adjacent to residential development, including existing and allocated residential development in Cullompton, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. As such, minor negative effects are also expected.<br>The site lies adjacent to the Cullompton AQMA and there are limited sustainable transport options, so car dependency is likely. As such, significant negative effects are expected.<br>Overall, significant negative effects are expected. |
| **11. ACCESS TO SERVICES**<br>To provide accessible and attractive services and community facilities for all ages and interests. | ++ | The site is located adjacent to Cullompton (a Main Town), which provides a town centre with shops and facilities. There are some local leisure/cultural destinations close to the area including a leisure centre, sports grounds, the museum and the Hayridge which includes a library, meeting rooms and cafe. As such, significant positive effects are expected.<br>The site is within 500m of a primary school and within 1km of a secondary school. Additional school capacity would be required to mitigate against the impacts of development. As such, uncertain minor positive effects are expected.<br>Parts of the site have access to superfast broadband with download speeds of up 80Mbps. None has access to ultrafast broadband. The area is not covered by the Connecting in Devon and Somerset project, however private sector companies have plans to cover the area by the end of 2019. As such, minor positive effects are expected. |

| SA Objective | SA Score | Justification |
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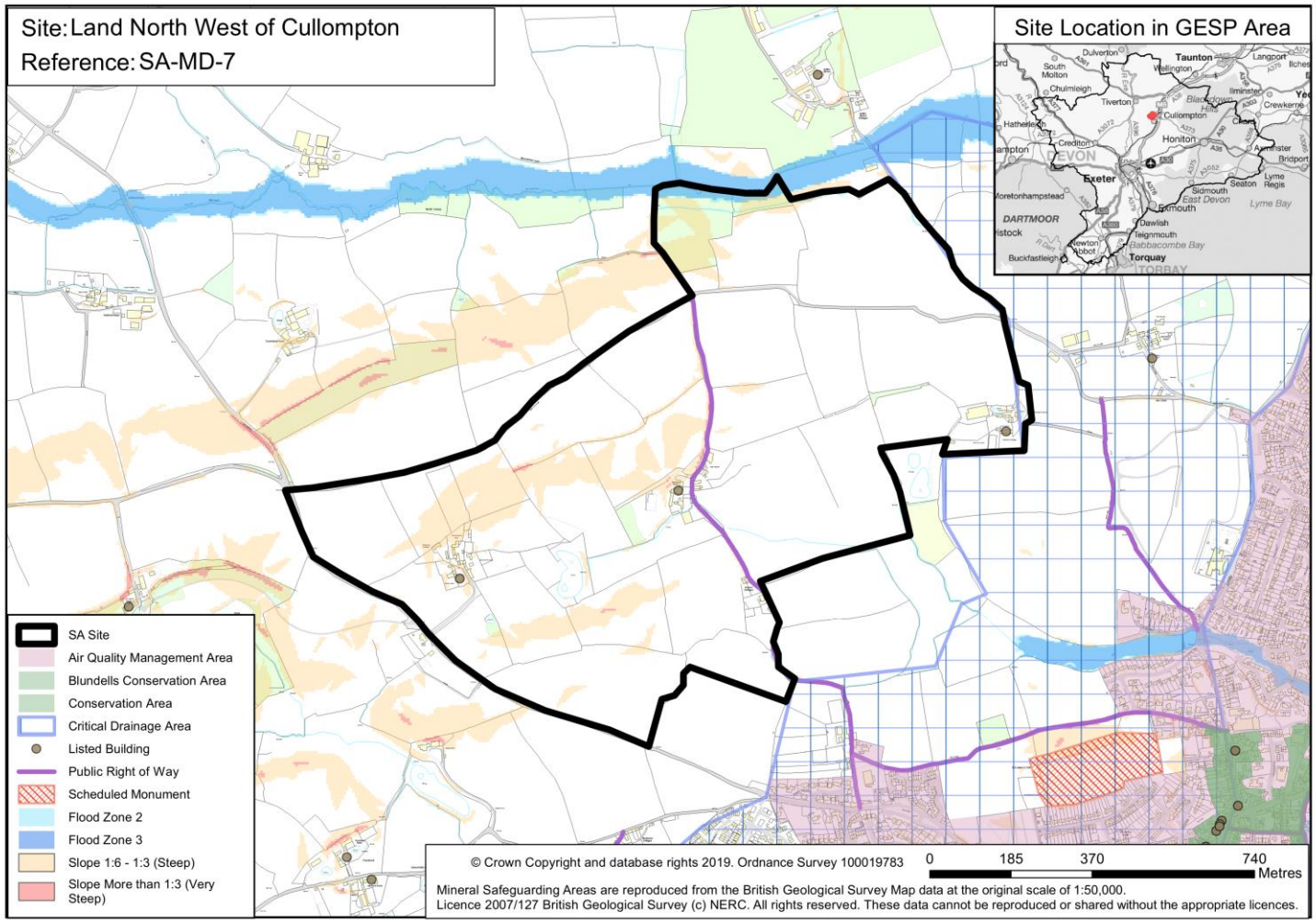
| | | The site is medium sized, providing over 500 homes, and therefore it is assumed that development would be more likely to accommodate a primary school on site. As such, minor positive effects are expected. There is minimal scope for the provision of facilities or employment within the site due to its location in relation to the M5 which would require vehicles to be routed through the town centre.<br><br>Overall, significant positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | ++ | The site is adjacent to Cullompton (a Main Town) and is within 1km of existing or proposed employment sites that could provide employment opportunities. As such, significant positive effects are expected.<br><br>Jobs would be created during the construction phase, and additional homes would create expenditure in the area. It is assumed that, as the site has capacity to deliver over 500 homes, the site will also deliver medium scale mixed use employment opportunities and a business park or employment estate as well as a neighbourhood hub with shops and services. As such, minor positive effects are expected.<br><br>The site is unlikely to have any negative impacts on tourism.<br><br>Overall, significant positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | ++ | The site is located adjacent to Cullompton (a Main Town) and will deliver less than 4,000 homes, which is a scale not expected to detract visitors from the current town centre. A new residential site could support the vitality and viability of the existing town centre by increasing the number of day-to-day visitors and supporting businesses and services there.<br><br>As such, significant positive effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | + | The site is not located within 1km of cycle routes or railway stations. However, the site is located within 500m of bus stops, providing frequent services to Exeter, Tiverton, Willand and Cullompton. As such, due to the proximity of bus stops, minor positive effects are expected.<br><br>In addition, the site has capacity for more than 1,000 homes and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br><br>Overall, minor positive effects are expected. |

## SA-MD-7: Land North West of Cullompton (Growen Farm)

| SA-MD-7 | Land North West of Cullompton (Growen Farm) |
|---|---|
| **Authority Area:** Tarka Line / Mid Devon | |
| **Site Area:** 108.8ha (Net 62.4ha) | |
| **Approximate total capacity:** 1,934 – 2,496 dwellings | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:** Land north west of Cullompton, including land at Growen Farm. The site is comprised of agricultural land and adjoins the existing Mid Devon Local Plan Review strategic allocation at North West Cullompton. Parts of the site towards the north and west occupy a steep and prominent position in the landscape. Further south, the landscape is much more level with some gentle undulation. |  |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/-? | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, or within 250m of a locally designated site, however the western part of the site lies within SSSI IRZ. The site also contains one Priority habitat, deciduous woodland. In addition, the site is flagged as Yellow in the HRA sensitivity work with regard to Culm Grasslands SAC and is located within a Great Crested Newt Consultation Zone. There is a pond located within site boundary and suitable terrestrial habitat present on site. The site encompasses numerous mature hedgerows along field boundaries which may be a suitable for wildlife. There is potential of bat flight lines and dormice to be impacted due to loss of hedgerows. There is also potential for bat roosts to be located within farm buildings and trees. Nesting birds and badgers may be present on site although impact can be mitigated. There are also records of barn owls. As such, minor negative effects with uncertainty are expected.<br><br>Existing green infrastructure on the site, including woodland bands, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space and playing pitches on site that could mitigate the biodiversity impact of development. As such, significant positive effects are also expected.<br><br>Overall, mixed significant positive and minor negative effects with uncertainty are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is comprised of rural open countryside and so development would have an urbanisation effect on the environment. The site occupies a very steep and prominent position in the landscape, particularly towards the north and west where the slope increase to between 1:6 and 1:3. Further south the landscape is much more level with some gentle undulation.<br><br>Parts of the site are of medium landscape sensitivity as they are unlikely to be negatively affected by modern development. As such, uncertain minor negative effects are expected.<br><br>The northern part of the site is considered to be Rolling Farmland and Upper Farmed and Wooded Valley Slopes in landscape character with medium-high landscape sensitivity. This is due to the potential for development to compromise the sparsely settled character of the area which is consistent with floodplain characteristics. The landscape sensitivity is also medium-high within the site where topography is steeper as development in these areas would be more visually prominent and could potentially interrupt the setting of Cullompton. The landscape sensitivity increases to high where development has the potential to interrupt the setting of listed buildings in close proximity to the site. As such, uncertain significant negative effects are expected.<br><br>Overall, uncertain significant negative effects are expected. |

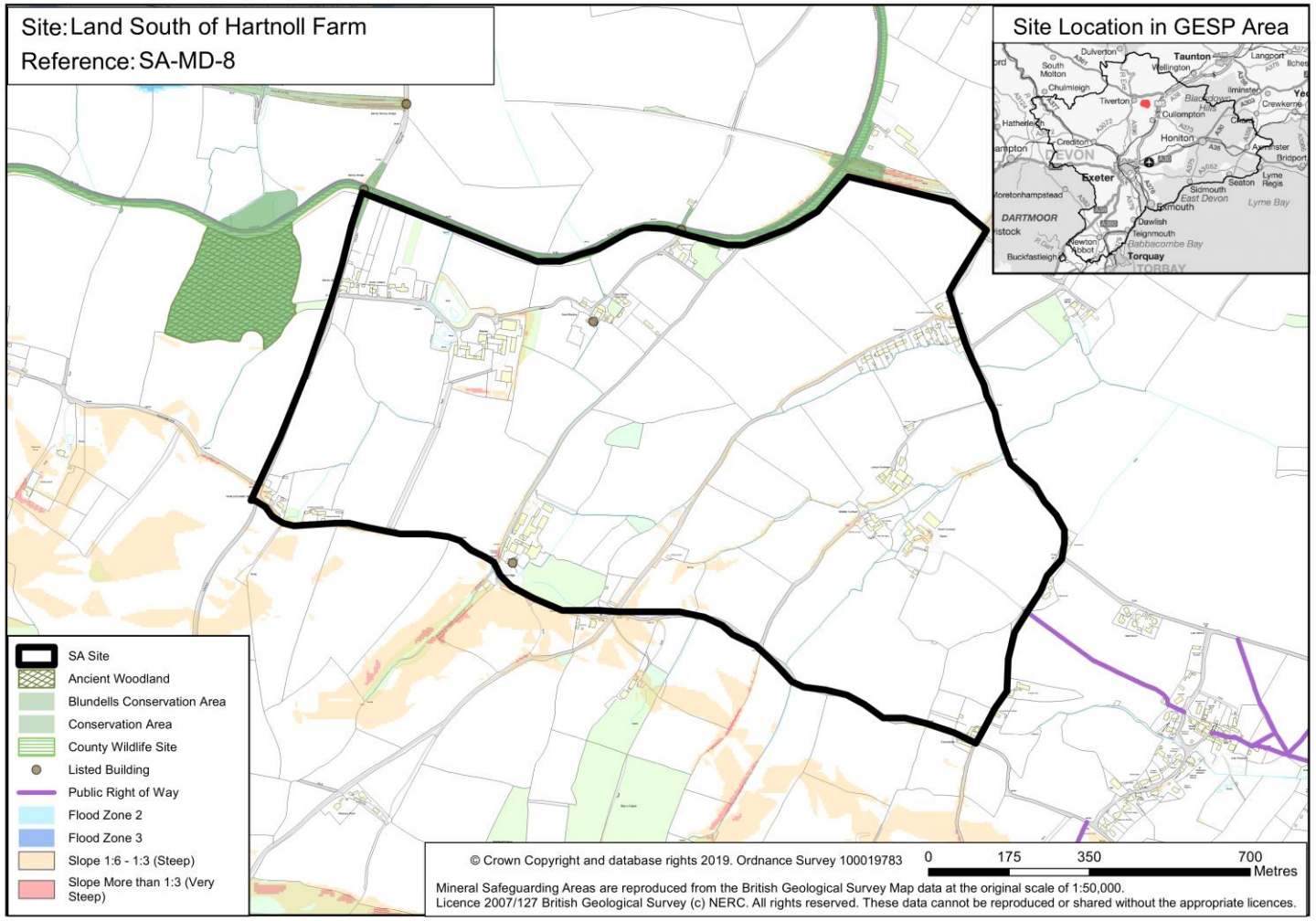
| SA Objective | SA Score | Justification |
|---|---|---|
| **3. HISTORIC AND BUILT ENVIRONMENT**<br><br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/-? | The site contains three Grade II listed buildings (Growen Farmhouse, Paulsland Farmhouse and Wells Park) within its boundaries. There are Grade II listed buildings in close proximity to the site around 300m east of the northern boundary (Little Rull), around 250m north of the site (Sutton Barton) and around 400m west of the site (Stable Block and Hillersdon House (II*)). There are further designated assets within 3km including a Scheduled Monument around 600m south-east of the site (two Roman forts and two Roman camps at St Andrew's Hill) and Cullompton Conservation Area, which contains multiple listed buildings, is around 1km south-east of the site. There is potential for development to compromise the setting of these historic environment assets. As such, uncertain minor negative effects are expected.<br><br>The site is of considerable size (>10ha) and should be able to respond appropriately to the existing heritage assets and buildings on the site. Any proposals would have to ensure new development is of a high quality, creates high quality public spaces and responds positively to heritage assets within the site. Development may need to accommodate buffering regions around heritage assets contained within the site boundaries. As such, uncertain minor positive effects are also expected.<br><br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | + | The site is within 1km of the Main Town of Cullompton and as such uncertain minor positive effects are expected.<br><br>The site is not located within 1km of cycle routes or railway stations. However, the site is located within 500m of high frequency bus services. As such, due to the proximity of bus stops, minor positive effects are expected.<br><br>As the site is expected to deliver over 1,000 homes, it is assumed that development of the site would provide some sustainable transport, walking and cycle links and services. As such, uncertain negligible effects are expected.<br><br>Overall, minor positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and there is no significant flood risk within the area. There is a river to the north of the site and as such, areas in the north of the site are on food zone 2 and flood zone 3. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore uncertain minor negative effects are expected. |
| **6. LAND RESOURCES** | -- | The site is comprised of over 5ha of Grade 2 agricultural land. As such, significant negative effects are |

| SA Objective | SA Score | Justification |
|---|---|---|
| To utilise our land resources efficiently and minimise their loss or degradation. | | expected due to the potential for loss of high quality agricultural land during development. The remaining areas within the site are comprised of Grade 3a, Grade 3b and non-agricultural land.<br><br>The site is predominantly greenfield apart from a few small areas of agricultural development.<br><br>The site is not located within any Mineral Safeguarding Areas.<br><br>Overall, significant negative effects are expected due to development on high quality agricultural land. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or degradation. | --? | Development should ensure no deterioration in the water quality of Fulford Water, which flows adjacent to the northern boundary of the site, into Spratford Stream which then flows into the River Culm and into the Exe Estuary SPA. There is also a stream which flows from the centre of the site into the River Culm also.<br><br>As such, uncertain significant negative effects are expected. |
| **8. HOMES**<br><br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | ++ | The site could potentially accommodate 1,934 – 2,496 dwellings. However the capacity is likely to reduce once account has been taken of the likely mitigation requirements. The site would also need to ensure a viable mix of homes (tenure and sizes) including a proportion of affordable housing to contribute towards meeting needs within the area. The range of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom and self-build providers. This site is of a sufficient size to be able to support a high number of housing starts / completions from a number of different outlets around the site, which in turn will ensure a good pace of delivery.<br><br>As such, significant positive effects are expected. |
| **9. HEALTH**<br><br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site is not within 800m of major open space, but contains and is within 400m of Public Rights of Way. As such, minor positive effects are expected.<br><br>However, as the site has capacity for more than 2,000 homes, it is assumed that development of the site would provide significant open space and active transport links. As such, significant positive effects are expected.<br><br>Overall, significant positive effects are expected. |
| **10. WELLBEING**<br><br>To support positive, safe and healthy communities. | -- | The site is within the Middle Super Output Area for the predominantly rural areas around Cullompton including Thorverton and Bradninch which, according to the Devon Joint Strategic Needs Assessment reporting of index of multiple deprivation, sees below average levels of deprivation than compared to Devon and Mid Devon as a whole. This Middle Super Output Area is most deprived in the living |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | environment domain that specifically identifies the sub-domain of the indoor environment as most deprived in terms of central heating availability and poor housing conditions. However, it adjoins the MSOA for Cullompton that has average levels of deprivation compared to Devon as a whole, and is above average levels of deprivation particularly for the education domain. It is likely that large residential development of this nature will provide potential improvements to the availability of homes in the area, which will provide broad wellbeing benefits. As such, negligible effects are expected.<br><br>The site is adjacent to allocated residential development and is in close proximity to existing residential development in Cullompton, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. As such, minor negative effects are also expected.<br><br>The site is within 1km of the Cullompton AQMA and there are limited sustainable transport options, so car dependency is likely. As such, significant negative effects are expected.<br><br>Overall, significant negative effects are expected. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | --/+ | The site is not located adjacent to a Main Town or Defined Village. Cullompton (a Main Town) is around 1km away and provides a town centre with shops and facilities. There are some local leisure/cultural destinations close to the area including a leisure centre, sports grounds, the museum and the Hayridge which includes a library, meeting rooms and café. As such, significant negative effects are expected.<br><br>The site is within 500m of a primary school but it is not within 1km of any secondary schools. New primary school provision to accommodate the level of development proposed would be required as existing provision has been expanded. The closest secondary school is Cullompton Community College. Cullompton CC can be expanded on its existing site with the addition of land at Meadow Lane, but not to support all the development identified to the west of Cullompton. As such, uncertain minor positive effects are expected.<br><br>Broadband download speeds within the site are currently limited to standard levels. However, due to the site being adjacent to Cullompton to the east where superfast broadband is available (80-300Mbps), it would be possible to extend this service to the site also should development come forward. As such, minor positive effects are expected.<br><br>The site is medium sized, providing over 500 homes, and therefore it is assumed that development would be more likely to accommodate a primary school on site. As such, minor positive effects are expected.<br><br>Overall, mixed significant negative and minor positive effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **12. JOBS AND LOCAL ECONOMY**<br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | ++ | The site is not adjacent to a main town but it is within 1km of existing or proposed employment sites that could provide employment opportunities. As such, minor positive effects are expected.<br>Jobs would be created during the construction phase, and additional homes would create expenditure in the area. It is assumed that, as the site has capacity for over 2000 homes, the site will also deliver large scale mixed use employment opportunities and a business park or employment estate as well as a neighbourhood hub with shops, services and community use buildings. As such, significant positive effects are expected.<br>The site is unlikely to have any negative impacts on tourism. There is potential for residential development to increase local visitor numbers to Diggerland, a local tourist attraction.<br>Overall, significant positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | + | The site is not located within 1km of cycle routes or railway stations. However, the site is located within 500m of high frequency bus services. As such, due to the proximity of bus stops, minor positive effects are expected.<br>In addition, the site has capacity for more than 1,000 homes and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br>Overall, minor positive effects are expected. |

## SA-MD-8: Land South of Hartnoll Farm

| SA-MD-8 | Land South of Hartnoll Farm |
|---|---|
| **Authority Area:** Tarka Line / Mid Devon |  |
| **Site Area:** 132.5ha (Net 74.6ha) | |
| **Approximate total capacity:** 2,313 – 2,984 dwellings | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:** The next is next to, and falls to the south of. the Grand Western Canal and includes Manley Farm. The site is relatively flat to the north and rises to the south, with mature trees and hedgerows throughout. | |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/--? | The site is within 1km of Tidcombe Lane Fen, SSSI and lies adjacent to Grand Western Canal, County Wildlife Site, Local Nature Reserve and Country Park. The canal also has the potential for otters to inhabit the water body with records within 2km of the site from 2003. The site is also within 250m of Snake's Wood, County Wildlife Site, which is ancient semi-natural woodland. The site contains Priority habitat, traditional orchard. In addition, the site is flagged as Yellow in the HRA sensitivity work with regard to Culm Grasslands SAC. There are buildings and trees that offer potential roosting site for bats. There is also the potential for dormouse/bat flight line issues if there are to be impacts to the hedgerows. As such, significant negative effects with uncertainty are expected.<br><br>There are opportunities to create multifunctional green infrastructure to link with The Grand Western Canal recreational activities (walking and cycling) and enable a buffer to conserve and enhance the County Wildlife Site and Local Nature Reserve.<br><br>Existing green infrastructure on the site, including the canal and woodland bands, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space and playing pitches on site that could mitigate the biodiversity impact of development. As such, significant positive effects are also expected.<br><br>Overall, significant positive and significant negative effects with uncertainty are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is comprised of rural open countryside and so development would have an urbanisation effect on the environment. The northern are of the site is considered to be Lowland Plains in landscape character and is of medium landscape sensitivity due to the area being unlikely to be negatively affected by modern development. As such, uncertain minor negative effects are expected.<br><br>The south west of the site is identified as Upper Farmed and Wooded Valley Slopes in landscape character and is of high landscape sensitivity. This is due to the potential for development on the upper slopes to interrupt the green hill setting of Tiverton. The landscape sensitivity is of the site is also considered high in areas where orchards and veteran trees are present as well as areas which contribute to the setting of heritage assets including a Grade II listed building at East Manley and a Grade I listed building and registered historic park, Knighthaves Court. As such, uncertain significant negative effects are expected.<br><br>Overall, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT** | --?/+? | The Grand Western Canal Conservation area runs along the northern boundary of the site. The site contains two Grade II listed buildings (Rowbridge Farmhouse and East Manley Farmhouse) within its |

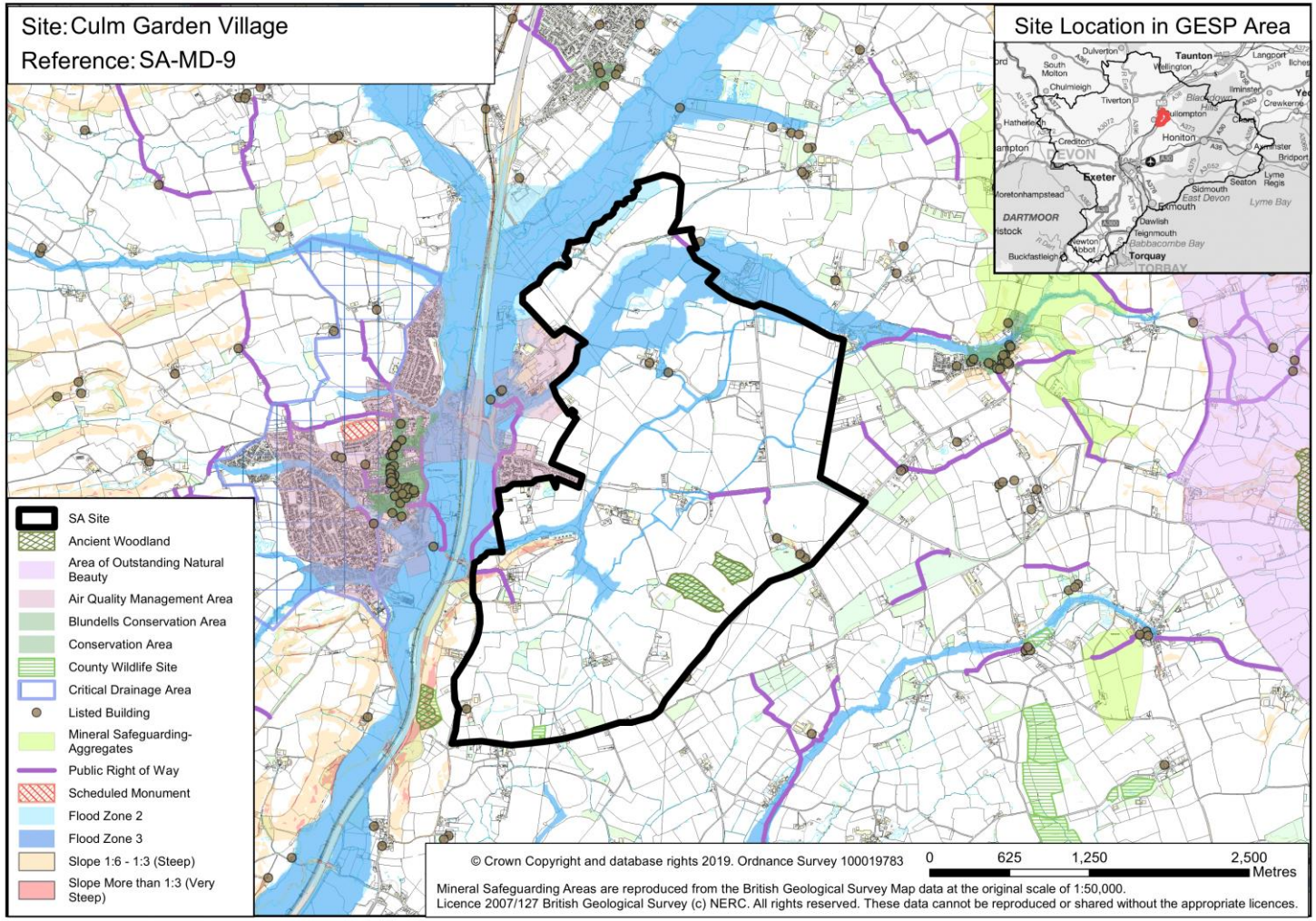
| SA Objective | SA Score | Justification |
|---|---|---|
| To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | | boundaries as well as further Grade II listed buildings being located adjacent to the northern (bridge at SS994121) and north-western boundary of the site (Manley Bridge). There are further designated assets within 3km including two Scheduled monuments, which are around 1.5km north of the site (long barrow immediately north of Blenheim House) and around 2.4km west of the site (Cranmore Castle). There is potential for development to compromise the setting of these historic environment assets, particularly those located onsite. As such, uncertain significant negative effects are expected.<br><br>The site is of considerable size (>10ha) and should be able to respond appropriately to the existing heritage assets and buildings on the site. Any proposals would have to ensure new development is of a high quality, creates high quality public spaces and responds positively to heritage assets within the site. Development may need to accommodate buffering or green infrastructure regions around heritage assets contained within the site boundaries. As such, uncertain minor positive effects are also expected.<br><br>Overall, mixed uncertain significant negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | +?/-? | The site is within 1km of the Main Town of Tiverton and as such uncertain minor positive effects are expected.<br><br>The site is not located within 1km of a railway station. There are a number of frequent buses from Tiverton to the wider area including to Taunton, South Molton and Exeter. However, the closest bus route to the nearest edge of the site is more than 500m away, along Blundells Road which services a bus route to Taunton and a frequent bus route to Exeter. The Grand Western Canal bounds the north of the site which provides existing cycling routes to Tiverton. As such, due to the lack of accessible bus stops and railway stations, uncertain minor negative effects are expected.<br><br>As the site is expected to deliver over 1,000 homes, it is assumed that development of the site would provide some sustainable transport, walking and cycle links and services. As such, uncertain negligible effects are expected.<br><br>Overall, uncertain minor positive and uncertain minor negative effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and there is no significant flood risk within the area. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES** | -- | The site is comprised of over 5ha of Grade 1 agricultural land as well as over 5ha of Grade 2 and Grade 3a agricultural land. As such, significant negative effects are expected due to the potential loss of high |

| SA Objective | SA Score | Justification |
|---|---|---|
| To utilise our land resources efficiently and minimise their loss or degradation. | | quality agricultural land during development. Remaining areas within the site are comprised of Grade 3b and non-agricultural land.<br><br>The site is predominantly greenfield aside from some areas agricultural development and a number of dwellings at Crossparks.<br><br>The site is not located within any Minerals Safeguarding Areas.<br><br>Overall, significant negative effects are expected due to development on high quality agricultural land. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or degradation. | --? | Development should ensure no deterioration in the water quality of the Grand Western Canal, which flows adjacent to the northern boundary of the site and runs into the Exe Estuary SPA.<br><br>As such, uncertain significant negative effects are expected. |
| **8. HOMES**<br><br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | ++ | The site is likely to be able to accommodate about 2,313 – 2,984 homes. However the capacity is likely to reduce once account has been taken of the likely mitigation requirements, including those highlighted elsewhere in this assessment. The site would also need to ensure a viable mix of homes (tenure and sizes) including a proportion of affordable housing to contribute towards meeting needs within the area. The range of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom and self-build providers. The site is of a sufficient size to be able to support a high number of housing starts / completions from a number of different outlets around the site, which in turn will ensure a good pace of delivery.<br><br>As such, significant positive effects are expected. |
| **9. HEALTH**<br><br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site is not within 800m of major open space, but is adjacent to the National Cycle Route and Public Rights of Way. The site is also within 400m of additional Public Rights of Way. As such, minor positive effects are expected.<br><br>However, as the site is expected to deliver over 2,000 homes, it is assumed that development of the site would provide significant open space and active transport links. As such, significant positive effects are expected.<br><br>Overall, significant positive effects are expected. |
| **10. WELLBEING**<br><br>To support positive, safe and healthy | - | The site is within the Middle Super Output Area covering villages to the East of Tiverton including Sampford Peverell which, according to the Devon Joint Strategic Needs Assessment reporting of index of multiple deprivation, sees below average levels of deprivation than compared to Devon as a whole. |

| SA Objective | SA Score | Justification |
|---|---|---|
| communities. | | It is likely that large residential development of this nature will provide potential improvements to the availability of homes in the area, which will provide broad wellbeing benefits. As such, negligible effects are expected.<br><br>The site is adjacent to allocated residential development and is in close proximity to existing residential development, the town of Tiverton, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. As such, minor negative effects are also expected.<br><br>Also, the site is not within 1km of an AQMA.<br><br>Overall, minor negative effects are expected. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | --/+ | The site is not located adjacent to any settlements. Tiverton town centre is approximately 3km from the closest point of the site and offers a wide range of services and community facilities including primary and secondary schools, GP surgery and Tiverton and District Hospital. There are also cultural facilities and buildings within the town. However, many of these facilities are considered to be in excess of a reasonable walking distance from the site. The site is approximately 1.5km from the proposed local centre of Tiverton Eastern Urban Extension which would have some local facilities and services. As such, significant negative effects are expected.<br><br>The site is within 1km of a primary school but it is not within 1km of any secondary schools. However, due to the capacity limits a new primary school would be required. One option may be to relocate and expand Halberton Primary School. Secondary provision at Tiverton High School can be expanded to 1800 places, which involves relocating the school across the road. This is also needed to accommodate capacity from previously identified development. Beyond this, some of the existing provision at the school would need to be retained in addition to the new provision across the road, which would result in a split site. As such, uncertain minor positive effects are expected.<br><br>The highest available broadband download speeds within the site are 16Mbps and the site is not located adjacent to an area of superfast broadband availability. Enhanced broadband connectivity would be required as part of the development of the site. As such, negligible effects are expected.<br><br>The site is medium sized, providing over 500 homes, and therefore it is assumed that development would be more likely to accommodate a primary school on site. As such, minor positive effects are expected.<br><br>Overall, mixed significant negative effects and minor positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY** | ++/- | The site is not adjacent to a Main Town but it is within 1km of existing or proposed employment sites |

| SA Objective | SA Score | Justification |
|---|---|---|
| To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | | that could provide employment opportunities. As such, minor positive effects are expected.<br><br>Jobs would be created during the construction phase, and additional homes would create expenditure in the area. It is assumed that, as the site has capacity to deliver over 2,000 homes, the site will also deliver large scale mixed use employment opportunities and a business park or employment estate as well as a neighbourhood hub with shops, services and community buildings. As such, significant positive effects are expected.<br><br>There is potential for development to negatively impact on the tourism attraction of the Great Western Canal. As such, minor negative effects are expected.<br><br>Overall, mixed significant positive and minor negative effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br><br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | +/-? | The site is not located within 1km of a railway station. There are a number of frequent buses from Tiverton to the wider area including to Taunton, South Molton and Exeter. However, the closest bus route to the nearest edge of the site is more than 500m away, along Blundells Road which services a bus route to Taunton and a frequent bus route to Exeter. The Grand Western Canal bounds the north of the site which provides existing cycling routes to Tiverton. As such, due to the lack of accessible bus stops and railway stations, uncertain minor negative effects are expected.<br><br>In addition, the site has capacity for more than 1,000 homes and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br><br>Overall, mixed minor positive and uncertain minor negative effects are expected. |

## SA-MD-9: Culm Garden Village

| SA-MD-9 | Culm Garden Village |
|---|---|
| **Authority Area:** Tarka Line / Mid Devon | |
| **Site Area:** 802.1ha (Net 403ha) | |
| **Approximate total capacity:** 12,493 – 16,120 dwellings | |
| **Site status:** Potential site option | |
| **Outline description and context:**<br><br>A large, lozenge-shaped area east of the M5 close to Cullompton. The area includes the emerging East Cullompton allocation in the draft Mid Devon Local Plan Review and the Culm Garden Village but extends further south. The site extends from Hayne Barton and Stag Corner in the north to Mutterton in the south. The principal access is from Honiton Road which runs broadly east to west across the centre of the area. There are also various other public highways which run through the site. The majority of the site is fairly level or slightly undulating and is largely in pastural use. The site includes a large number of hedgerows, mature trees and areas of woodland and is punctuated by farmsteads. Close to the site to |  |

| SA-MD-9 | Culm Garden Village |
| --- | --- |
| the northwest are Kingsmill Industrial Estate and Devon Business Park with an area of residential development south of Honiton Road west of the site.<br><br>It should be noted that this site includes the emerging allocation in the Mid Devon Local Plan Review and a wider development area identified through the GESP process which incorporates the Culm Garden Village proposal. It is considered appropriate to assess this development area as a whole because it will be master-planned and delivered as a coherent single development. Artificially dividing the development into various sections would increase the likelihood of a poorer form of development being delivered. | |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/-? | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, but the site contains two County Wildlife Sites, Aller Wood and Weekes Farm Orchard and is within 250m of Knight's Wood County Wildlife Site. The site contains three priority habitats, coastal and floodplain grazing marsh, deciduous woodland and traditional orchard. In addition, the site is flagged as Yellow in the HRA sensitivity work with regard to Culm Grasslands SAC and is approximately 21km from the SAC (designated for its heathland habitat and presence of the Marsh Fritillary Butterfly) which is sensitive to changes in air quality from nitrous oxide emissions. The site is within the 5 km great crested newt consultation zone. There are also two patches of ancient woodland at Aller Wood. There are various unconfirmed Wildlife Sites within the site to the north at Hayne Barton (possible floodplain grazing marsh), Aller Wood to the south (possible broadleaved woodland), on the southern boundary (possible orchards) and at East Culm House to the west centre of the site (pond). The area is also punctuated by isolated mature trees. As such, uncertain minor negative effects are expected.<br><br>Existing green infrastructure on the site, including ponds and woodland bands, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space and playing pitches that could mitigate the biodiversity impact of development. As such, significant positive effects are also expected.<br><br>Overall, mixed significant positive and uncertain minor negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is comprised predominantly of rural open countryside and so development would have an urbanisation effect on the environment. However, the site does contain some areas of development including the A373 road which passes through the centre of the site. Land within the site is considered to be Lowland Plains in landscape character.<br><br>Land in the west of the site is of low-medium landscape sensitivity as this area has already been influenced by development and is unlikely to be visually sensitive due to intervening topography and vegetation obscuring views of the site. Landscape sensitivity increases to medium where the countryside has a stronger sense of history and is largely unaffected by development. As such, uncertain minor negative effects are expected.<br><br>Landscape sensitivity within the site is medium-high where there is a presence of rivers and streams and a stronger historic sense of place which may be interrupted by development. Landscape sensitivity increases to high where development has the potential to compromise the fabric and setting of listed |

| SA Objective | SA Score | Justification |
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| | | buildings in close proximity at Aller, Moorhayes and Kingsford. As such, uncertain significant negative effects are expected.<br><br>Overall, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br><br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/-? | The site contains six Grade II listed buildings within its boundaries (Lower Moorhayes, Aller Restaurant, Higher Moorhayes Farmhouse, Maddock's Farmhouse, Aller Restaurant Farm Buildings and Peverstone Farmhouse). Further to this, the site is adjacent to Grade II listed buildings to the north (Lower Kingsford Farmhouse) and to the south-east (Little Hackland). There are further designated assets within 3km including Conservation Areas around 600m to the west in Cullompton and around 1km to the north-east in Kentisbeare, which both contain high concentrations of listed buildings as well as a Scheduled Monument (two Roman forts and two Roman camps at St Andrew's Hill) around 1km to the west. There is potential for development to compromise these historic environment assets. As such, uncertain minor negative effects are expected.<br><br>The site is of considerable size (>10ha) and should be able to respond appropriately to the existing heritage assets and buildings on the site. Any proposals would have to ensure new development is of a high quality, creates high quality public spaces and responds positively to heritage assets within the site. Development may need to accommodate buffering regions around heritage assets contained within the site boundaries. As such, uncertain minor positive effects are also expected.<br><br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | ++?/- | The site is within 1km of the Main Town of Cullompton and as such uncertain minor positive effects are expected.<br><br>The site is not located within 1km of railway stations or cycle routes. In addition, although the site is located within 500m of bus stops, these do not provide frequent services. Frequent bus services within Cullompton provide two or three buses per hour between Cullompton, Willand, Tiverton and Exeter, however these services are located more than 500m from the site. As such, due to the lack of frequent sustainable transport links located in proximity to the site, minor negative effects are expected.<br><br>As the site is expected to deliver over 4,000 homes, it is assumed that development of the site would provide significant sustainable transport, walking and cycle links and services. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain significant positive and minor negative effects are expected. |

| SA Objective | SA Score | Justification |
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| **5. CLIMATE CHANGE ADAPTATION**<br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and there is no significant flood risk within the area. However, multiple rivers in the centre of the site result in some areas being on flood zone 2 and flood zone 3. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br>To utilise our land resources efficiently and minimise their loss or degradation. | -- | The site is comprised of over 5ha of Grade 1 agricultural land as well as over 5ha of Grade 2 and Grade 3a agricultural land. As such, significant negative effects are expected due to the potential loss of high quality agricultural land during development. The remaining areas within the site are comprised of Grade 3b, Grade 4 and non-agricultural land.<br>The site is predominantly greenfield and does not offer any opportunities to use previously developed land.<br>The site is not located within any Minerals Safeguarding Areas.<br>Overall, significant negative effects are expected due to development on high quality agricultural land. |
| **7. WATER RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or degradation. | --? | Development should ensure no deterioration in the water quality of the River Ken, which passes through the site boundaries into the River Culm to the west, which then flows into the Exe Estuary SPA.<br>As such, uncertain significant negative effects are expected. |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | ++ | The area is extremely large and relatively level with only minor on-site constraints (in the context of its size) and therefore could provide a large amount of residential development as part of a new community. This would have an impact on general housing affordability in the area. Including the draft East of Cullompton allocation of the emerging Mid Devon LP Review, the site is likely to be able to accommodate about 12,493 – 16,120 dwellings. However the capacity is likely to reduce once account has been taken of the likely mitigation requirements, including those highlighted elsewhere in this assessment, which would include avoiding development in flood zones 2 and 3, on areas of ancient woodland and under pylons.<br>The site would also need to ensure a viable mix of homes (tenure and sizes) including a proportion of affordable housing to contribute towards meeting needs within the area. The mix of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom- build providers. The site is of a sufficient size to be able to support a high number of housing starts / completions from a number of different outlets around the site, which in turn will |

| SA Objective | SA Score | Justification |
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| | | ensure a good pace of delivery. Policy interventions and innovative delivery models could be used to increase affordable housing delivery and further increase positive impacts. The benefits would be significant and permanent. The area includes a number of sites submitted through the HELAA process which supports deliverability and there is significant landowner interest in residential development in the area.<br><br>In summary, the large, unconstrained nature of the area would allow for very large scale residential development, supported by emerging Local Plan allocations and the Culm Garden Village proposal which would provide major, positive impacts in terms of the provision of homes. Robust policy support and innovative delivery would be required for the most positive outcome to be achieved. There would be positive cumulative impacts associated with development at the existing North West Cullompton allocation and further development at the MD 6 SA area (Land at West Cullompton) and MD 7 SA area (Land at North West Cullompton) due to the scale of development and numbers of homes which could be delivered in combination. Impacts are likely to be permanent.<br><br>As such, significant positive effects are expected. |
| **9. HEALTH**<br><br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site is within 800m of Accessible Woodland and Open Access Land, both major open spaces. Also, the site contains and is within 400m of multiple Public Rights of Way. As such, significant positive effects are expected.<br><br>In addition, as the site is expected to deliver over 2,000 homes, it is assumed that development of the site would provide significant open space and active transport links. As such, significant positive effects are expected.<br><br>Overall, significant positive effects are expected. |
| **10. WELLBEING**<br><br>To support positive, safe and healthy communities. | -- | The site is within the Cullompton and 'areas surrounding Cullompton' Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment reporting of index of multiple deprivation, sees slightly lower levels of deprivation than compared to Devon and Mid Devon as a whole. It is likely that large residential development of this nature will provide potential improvements to the availability of homes in the area, which will provide broad wellbeing benefits. As such, negligible effects are expected.<br><br>The site is in close proximity to existing residential development, Cullompton, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. In addition, the site is crossed by an 'A' road. This feature may result in noise pollution affecting residents of the site in the longer term. As such, minor negative effects are also expected. |

| SA Objective | SA Score | Justification |
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| | | The site is adjacent to Cullompton AQMA. The main challenge for the site is its location in relation to Exeter, the only attractive route is by road, so this would encourage commuting to Exeter by car. As such, significant negative effects are expected.<br><br>Overall, significant negative effects are expected. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | --/+ | The western boundary of the site is located in good proximity (>1km) to Cullompton. However, the site is very large (802ha) and the majority of it is not located adjacent to a settlement. The presence of the M5 to the west severs access to services in Cullompton for the site. There are some services adjacent to the site at Kingsmill Industrial Estate and Devon Business Park. Kentisbeare to the east also provides some lower order facilities including a Post Office/shop, primary school and pub. As such, significant negative effects are expected.<br><br>The site is not located within 1km of a primary school but it is within 1km of a secondary school. The two primary schools in Cullompton are approximately 1 km from the western edge and 3.5km from eastern edge of the site while the college is approximately 0.6km from the western edge and 3km from the eastern edge. These are appropriate walking distances but are not measurements of direct routes; access is not attractive due to the M5. The primary school in Kentisbeare is approximately 1.8km from the eastern edge of the site and 4km from the western edge. As such, uncertain minor positive effects are expected.<br><br>Due to its size the area has varying broadband connectivity. Some areas have standard broadband connections with download speeds of up to 22Mbps, others are part of the provisional planned rollout of superfast broadband through future phases of the Connecting Devon and Somerset programme whilst others will be connected in 2019 commercially by private sector partners. Development in this area would be likely to be large scale and therefore it is anticipated that appropriate provision of high speed broadband (or similar in future) would be made as required. As such, negligible effects are expected.<br><br>The site is large, providing over 4,000 homes and therefore it is expected that the site will be likely to provide a primary and secondary school on site. Development of a new community would also provide the opportunity to comprehensively plan a large scale plan for new infrastructure and facilities. As such, significant positive effects are expected.<br><br>Overall, mixed significant negative and minor positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high | ++ | The site is not located directly adjacent to a settlement but it is within 1km of existing or proposed employment sites that could provide employment opportunities. As such, minor positive effects are expected. |

| SA Objective | SA Score | Justification |
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| quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | | Jobs would be created during the construction phase, and additional homes would create expenditure in the area. It is assumed that, as the site has the capacity to deliver over 2,000 homes, the site will also deliver large scale mixed use employment opportunities and a business park or employment estate as well as a town centre with shops, services and community buildings. As such, significant positive effects are expected.<br><br>The site is unlikely to have any negative impacts tourism.<br><br>Overall, significant positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br><br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | +/- | The site is not located within 1km of railway stations or cycle routes. In addition, although the site is located within 500m of bus stops, these do not provide frequent services. Frequent bus services within Cullompton provide two or three buses per hour between Cullompton, Willand, Tiverton and Exeter, however these services are located more than 500m from the site. As such, due to the lack of frequent sustainable transport links located in proximity to the site, minor negative effects are expected.<br><br>In addition, the site has capacity for more than 1,000 homes and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br><br>Overall, mixed minor positive and minor negative effects are expected. |

## SA-MD-10: Hartnoll Farm

| SA-MD-10 | Hartnoll Farm |
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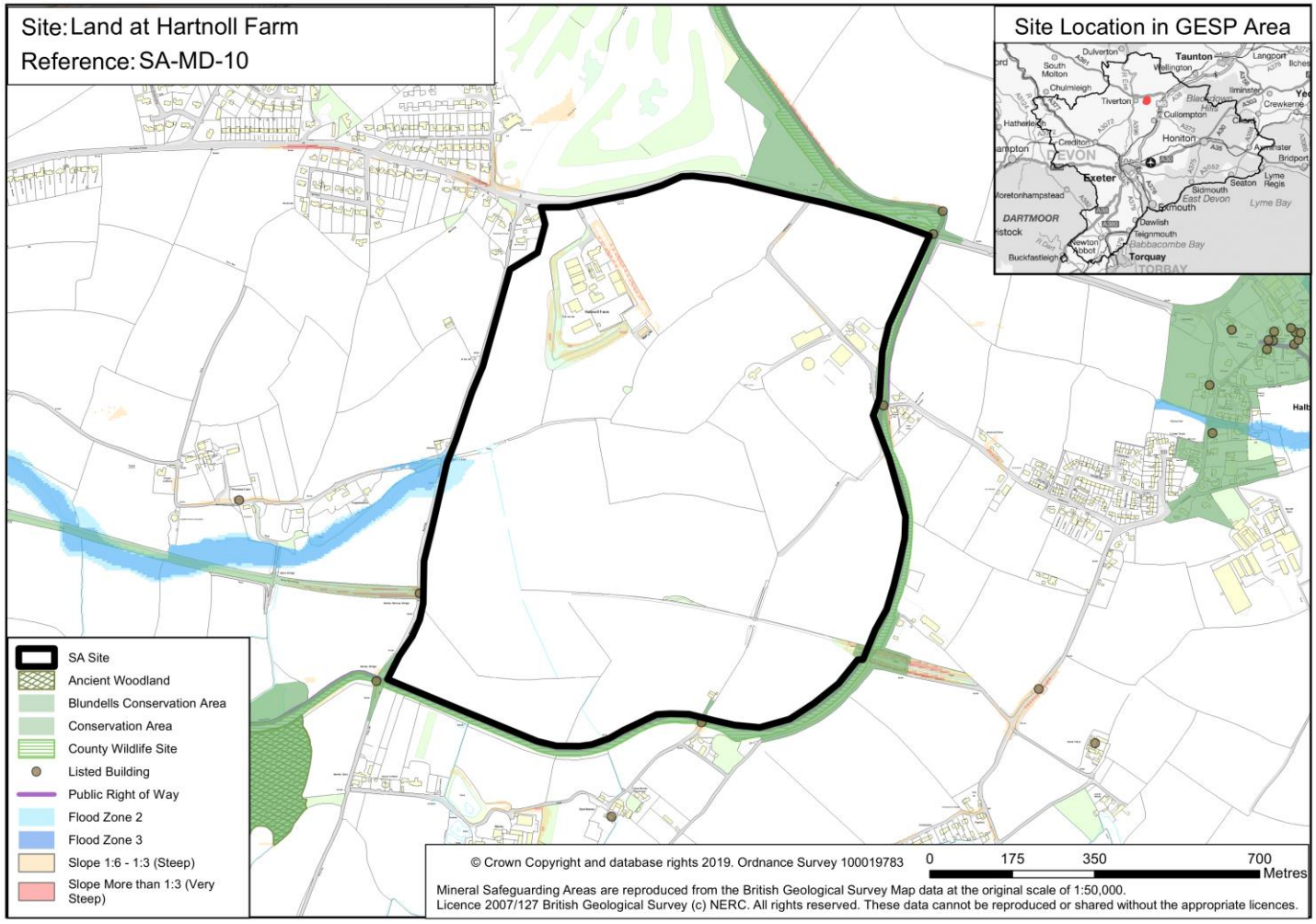
| **Authority Area:** Tarka Line / Mid Devon |  |
| **Site Area:** 101.1ha (Net 54.3ha) | |
| **Approximate total capacity:** 1,683-2,172 dwellings | |
| **Site status:** Potential site option | |
| **Outline description and context:** Large, site to the east of the Tiverton Eastern Urban Extension and west of Halberton. The site is predominantly flat and the Grand Western Canal borders the southern and eastern edges. Site is currently used as agricultural land. | |

| SA Objective | SA Score | Justification |
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| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/-? | The site is within 1km of Tidcombe Lane Fen, SSSI and the Grand Western Canal (County Wildlife Site, Local Nature Reserve and Country Park) runs along the eastern and southern edges of the site. The site is also within 250m of Snake's Wood County Wildlife Site. The site contains small patches of priority habitat, deciduous woodland within the southern section. In addition, the site is flagged as Yellow in the HRA sensitivity work with regard to Culm Grasslands SAC. Buildings and trees within the site offer potential roosting sites for bats; therefore, there is a potential risk in terms of demolition and potential dormouse/bat flight line impacts if there are to be any impacts to the hedgerows. There is also potential for otters to inhabit the canal running adjacent to site with records within 500m of the site from 2000. As such, uncertain minor negative effects are expected.<br><br>Existing green infrastructure on the site, including the canal and woodland bands, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space and playing pitches that could mitigate the biodiversity impact of development. As such, significant positive effects are also expected.<br><br>Overall, mixed significant positive and uncertain minor negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | -? | The site is comprised of rural open countryside and so development would have an urbanisation effect on the environment. The site is considered to be Lowland Plains in landscape character and is of medium landscape sensitivity. This is due the potential for development to compromise the intrinsic countryside character, beauty and tranquillity of the area, particularly away from main roads and within view of the Grand Western Canal Country Park on the south and east site edge. There is also some potential for development to compromise key landscape features like veteran trees as well as disrupt the setting of key heritage assets in the area.<br><br>As such, uncertain minor negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | --?/+? | The Grand Western Canal Conservation Area runs along the southern, eastern and part of the northern boundary of the site. The site is adjacent to five Grade II listed bridges which are contained within Grand Western Canal Conservation Area. There are further designated assets within 3km including a Scheduled Monument (long barrow immediately north of Blenheim House) around 700m to the north-west of the site as well as a Registered Park and Garden (Knightshayes Court) around 2.9km to the north west. There is potential for residential development to compromise these historic environment assets. As such, uncertain significant negative effects are expected.<br><br>The site is of considerable size (>10ha) and should be able to respond appropriately to the existing heritage assets and buildings on the site. Any proposals would have to ensure new development is of |

| SA Objective | SA Score | Justification |
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| | | a high quality, creates high quality public spaces and responds positively to heritage assets within the site. Development may need to accommodate buffering regions or green infrastructure around the Grand Western Canal Conservation Area. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain significant negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | + | The site is within 1km of the Main Town of Tiverton and as such uncertain minor positive effects are expected.<br><br>The site is not located within 1km of a railway station however the cycle route along the Grand Western Canal towpath passes adjacent to the site, which links from Sampford Peverell to Halberton. The site is also located within 500m of bus stops providing frequent bus services. As such, due to the proximity of bus stops and cycle paths, minor positive effects are expected.<br><br>As the site is expected to deliver over 1,000 homes, it is assumed that development of the site would provide sustainable transport links, walking and cycling routes and a road connecting to the nearest main settlement. As such, uncertain negligible effects are expected.<br><br>Overall, minor positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and there is no significant flood risk within the area. However, part of the site to west is on flood zone 2 and flood zone 3. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | -- | The site is comprised of over 5ha of Grade 1 agricultural land as well as over 5ha of Grade 2 and Grade 3 agricultural land. As such, significant negative effects are expected due to the potential loss of high quality agricultural land during development. The remaining areas within the site are comprised of Grade 3b and non-agricultural land.<br><br>The site is predominantly greenfield and would not make use of any previously developed land.<br><br>The site is not located within any Minerals Safeguarding Areas.<br><br>Overall, significant negative effects are expected due to development on high quality agricultural land. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or | --? | Development should ensure no deterioration in the water quality of the Grand Western Canal, which flows along the south and eastern boundaries of the site and into the Exe Estuary SPA via adjoining rivers. |

| SA Objective | SA Score | Justification |
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| degradation. | | As such, uncertain significant negative effects are expected. |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | ++ | The site could deliver between 1,683-2,172 dwellings within the plan period. However the capacity is likely to reduce once account has been taken of the likely mitigation requirements. The site would also need to ensure a viable mix of homes (tenure and sizes) including a proportion of affordable housing to contribute towards meeting needs within the area. The range of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom and self-build providers. The site is of a sufficient size to be able to support a high number of housing starts / completions from a number of different outlets around the site, which in turn will ensure a good pace of delivery.<br>As such, significant positive effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site is not within 800m of major open space, but is adjacent to the National Cycle Route and Public Rights of Way. As such, minor positive effects are expected.<br>However, as the site has capacity for more than 2,000 homes, it is assumed that development of the site would provide significant open space and active transport links. As such, significant positive effects are expected.<br>Overall, significant positive effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | - | The site is within the Middle Super Output Area covering villages to the East of Tiverton including Sampford Peverell which, according to the Devon Joint Strategic Needs Assessment reporting of index of multiple deprivation, sees below average levels of deprivation than compared to Devon as a whole. It is likely that a small residential development of this nature will provide potential improvements to the availability of homes in the area, which will provide broad wellbeing benefits. As such, negligible effects are expected.<br>The site is adjacent to allocated residential development and is in close proximity to existing residential development, the town of Tiverton, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. As such, minor negative effects are also expected.<br>Also, the site is not within 1km of an AQMA.<br>Overall, minor negative effects are expected. |
| **11. ACCESS TO SERVICES** | + | The site is not located directly adjacent to Tiverton (a Main Town) to the west but it is adjacent to Halberton (a Defined Village) to the east. At present there are no significant services at the site. |

| SA Objective | SA Score | Justification |
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| To provide accessible and attractive services and community facilities for all ages and interests. | | Tiverton town centre is located approximately 3km to the west and Halberton centre is approximately 0.8km to the east, which combined, would provide access to a wide range of services including GP surgeries and dentists and cultural buildings and facilities. Halberton is within a reasonable walking/cycling distance, whilst Tiverton town centre can be accessed by public transport via Post Hill or the National Cycle Route along the canal towpath. As such, minor positive effects are expected.<br><br>The site is within 1km of a primary school but it isn't within 1km of a secondary school. A new primary school would be required in relation to other sites proposed to the east of Tiverton. One option may be to relocate and expand Halberton Primary School. Secondary provision at Tiverton High School can be expanded to 1800 places, which involves relocating the school across the road. This is needed to accommodate other development sites in the area. Beyond this capacity (1800), some of the existing provision at the existing secondary school would need to be retained, in addition to the new provision across the road; this would result in a split site. As such, uncertain minor negative effects are expected.<br><br>Parts of the site only have access to standard broadband download speeds (7Mbps). However, the site is adjacent to an area where there is superfast broadband (80Mbps) which could be extended to the site should development come forward. As such, minor positive effects are expected.<br><br>The site is medium sized, providing over 500 homes, and therefore it is assumed that the site would be more likely to accommodate a primary school on site. As such, minor positive effects are expected.<br><br>Overall, minor positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | ++/- | The site is not located directly adjacent to a Main Town but it is within 1km of existing or proposed employment sites that could provide employment opportunities. As such, minor positive effects are expected.<br><br>Jobs would be created during the construction phase, and additional homes would create expenditure in the area. It is assumed that, as the site has capacity to deliver over 2000 homes, the site will also deliver large scale mixed use employment opportunities and a business park or employment estate as well as a neighbourhood hub with shops, services and a community building. As such, significant positive effects are expected.<br><br>There is potential for the site to negatively impact tourism at the Grand Western Canal. As such, uncertain minor negative effects are expected.<br><br>Overall, mixed significant positive and minor negative effects are expected. |
| **13. CITY AND TOWN CENTRES** | - | The site is not located adjacent to Exeter or a Main Town. Therefore, development will not impact |

| SA Objective | SA Score | Justification |
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| To safeguard and strengthen the vitality and viability of our city and town centres. | | directly upon diversity of a town or city centre economy.<br><br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | + | The site is not located within 1km of a railway station however a cycle route passes adjacent to the site, which links from Sampford Peverell to Halberton. The site is also located within 500m of bus stops providing frequent bus services. As such, due to the proximity of bus stops and cycle paths, minor positive effects are expected.<br><br>In addition, the site has capacity for more than 1,000 homes and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br><br>Overall, minor positive effects are expected. |

## SA-MD-11: Land off Crown Hill

| SA-MD-11 | Land off Crown Hill |
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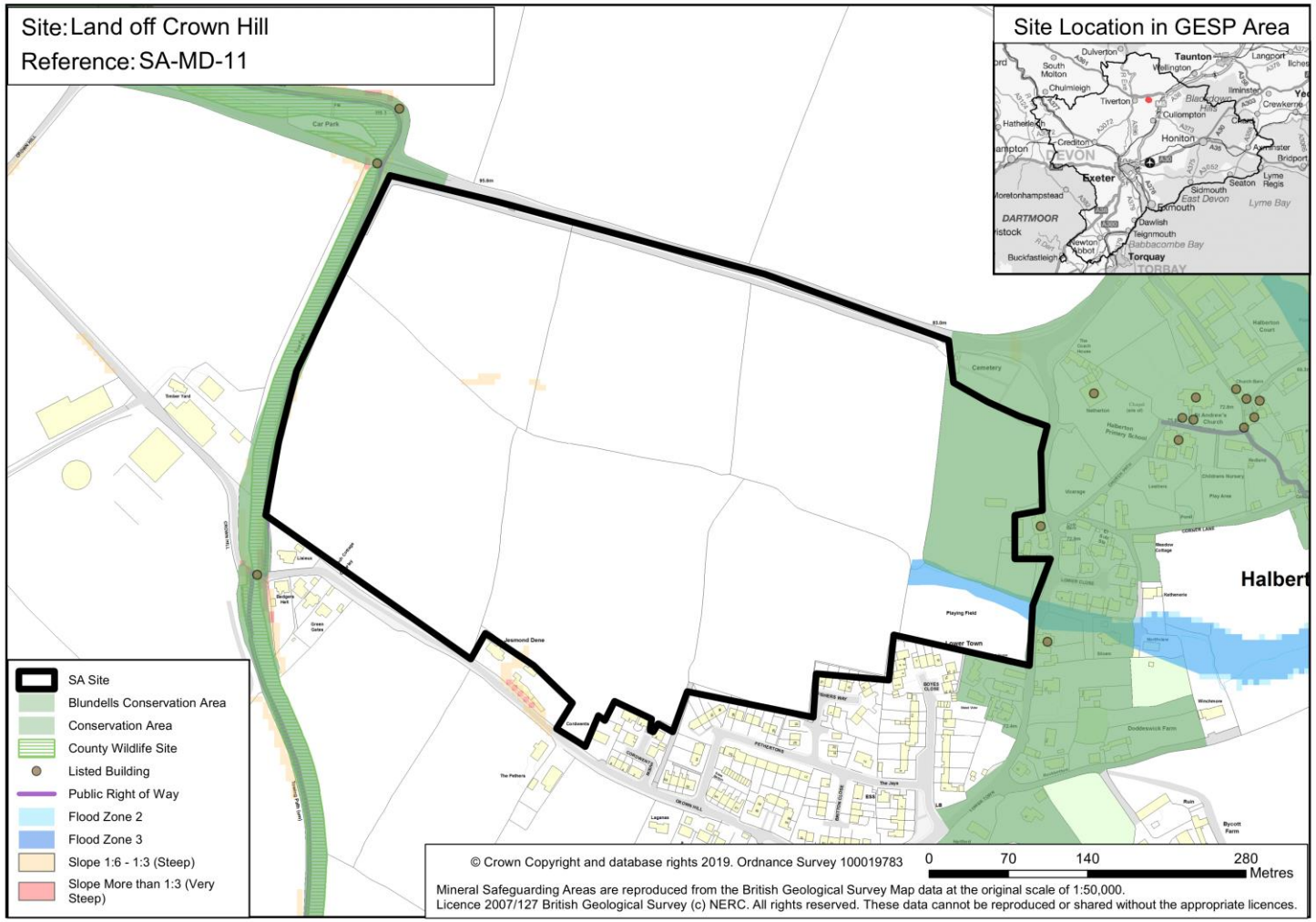
| **Authority Area:** Tarka Line / Mid Devon | |
| **Site Area:** 22.7ha (Net 12.6ha) | |
| **Approximate total capacity:** 391-504 dwellings | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:** This site is lies within an open, low-lying mostly flat landscape with some gentle undulations to the west of Halberton. It is comprised of productive agricultural fields with mature hedgerows and trees. The site is bounded by the Great Western Canal, Post Hill road, Crown Hill, and is adjacent to the Lower Town area of Halberton. The site is a combination of two HELAA sites including a small area of unsubmitted land in the centre of the site. |  |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | --?/+ | The Grand Western Canal (County Wildlife Site, Local Nature Reserve and Country Park) runs along the western edge of the site. The area contains various mature hedgerows and trees along field boundaries which can be a haven for wildlife and would be impacted. In addition, the site is flagged as Yellow in the HRA sensitivity work with regard to Culm Grasslands SAC. As such, uncertain significant negative effects are expected.<br>Existing green infrastructure on the site, including the canal, could also be lost to development. As such, uncertain minor negative effects are expected.<br>However, the site has capacity for less than 1,000 homes, and therefore is expected to provide local public open space that could mitigate the biodiversity impact of development. As such, minor positive effects are also expected.<br>Overall, mixed minor positive and uncertain significant negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is comprised of rural open countryside and so development would have an urbanisation effect on the environment. Land within the site is considered to be Lowlands Plains in landscape character. The landscape sensitivity within the site is predominantly low-medium as the area is already influenced by development to the east of the site. As such, uncertain minor negative effects are expected.<br>Overall, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | --?/+? | The Grand Western Canal Conservation Area runs along the western boundary of the site and part of Halberton Conservation Area is contained within the eastern region of the site. The site is adjacent to two Grade II listed bridges on the western boundary and is around 200m from multiple Grade II listed buildings to the east contained within Halberton Conservation Area. There are further designated assets within 3km of the site including a Scheduled Monument (long barrow immediately north of Blenheim House) located around 1.5km to the north-east of the site. There is potential for residential development to compromise the setting of these historic environment assets. As such, uncertain significant negative effects are expected.<br>The site is of considerable size (>10ha) and should be able to respond appropriately to the existing heritage assets and buildings on the site. Any proposals would have to ensure new development is of a high quality, creates high quality public spaces and responds positively to heritage assets within the site. Development may need to accommodate buffering regions or green infrastructure around the Grand Western Canal Conservation Area and the Halberton Conservation Area. As such, uncertain minor positive effects are expected.<br>Overall, mixed uncertain significant negative and uncertain minor positive effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **4. CLIMATE CHANGE MITIGATION**<br>To minimise greenhouse gas emissions. | --?/+ | The site is within 5km of the Main Towns of Tiverton and Cullompton and as such uncertain negligible effects are expected.<br>The site is not located within 1km of a railway station however a cycle route along the Grand Western Canal towpath passes adjacent to the site, which links from Sampford Peverell to Halberton. The site is also located within 500m of bus stops providing frequent bus services. As such, due to the proximity of bus stops and cycle paths, minor positive effects are expected.<br>However, as the site is expected to deliver less than 1,000 homes, it is assumed that development of the site would provide fewer sustainable transport, walking and cycle links, and services. As such, uncertain significant negative effects are also expected.<br>Overall, mixed minor positive and uncertain significant negative effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and there is no significant flood risk within the area. However, there is a river to the east of the site and as such, areas of the site are on flood zone 2 and flood zone 3. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br>To utilise our land resources efficiently and minimise their loss or degradation. | -- | The site is comprised of over 5ha of Grade 1 agricultural land. As such, significant negative effects are expected due to the potential loss of high quality agricultural land during development. The remaining land within the site is comprised of Grade 2 (>5ha) and non-agricultural land.<br>The does not contain any previously developed land.<br>The site is not located within any Minerals Safeguarding Areas.<br>Overall, significant negative effects are expected due to development on high quality agricultural land. |
| **7. WATER RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or degradation. | --? | Development should ensure no deterioration in the water quality of the Grand Western Canal, which flows along the western boundary of the site and into the Exe Estuary SPA via adjoining rivers.<br>As such, uncertain significant negative effects are expected. |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially | + | The site is likely to be able to accommodate 391-504 dwellings taking into account mitigation measures which would include avoiding development in flood zone 3, and provision of a buffer to the conservation areas. The site would also need to ensure a viable mix of homes (tenure and sizes) |

| SA Objective | SA Score | Justification |
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| accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | | including a proportion of affordable housing to contribute towards meeting needs within the area. The range of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom and self-build providers. The site is of a sufficient size to be able to support a number of housing starts / completions from a few different outlets around the site, which in turn will ensure a good pace of delivery. The site area includes a small housing allocation which is identified in the submission Mid Devon Local Plan Review for 10 dwellings. There is uncertainty over whether the site, with appropriate mitigation measures incorporated, will meet the strategic potential to deliver 500+ homes outside Exeter.<br><br>As such, minor positive effects are expected. |
| **9. HEALTH**<br><br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | + | The site is not within 800m of major open space, but is adjacent to the National Cycle Route and Public Rights of Way.<br><br>As such, minor positive effects are expected. |
| **10. WELLBEING**<br><br>To support positive, safe and healthy communities. | - | The site is within the Middle Super Output Area covering villages to the East of Tiverton including Sampford Peverell which, according to the Devon Joint Strategic Needs Assessment reporting of index of multiple deprivation, sees below average levels of deprivation than compared to Devon as a whole. It is likely that a small residential development of this nature will provide potential improvements to the availability of homes in the area, which will provide broad wellbeing benefits. As such, negligible effects are expected.<br><br>Also, the site is not within 1km of an AQMA The site is adjacent to residential development, including allocated and existing residential development, the village of Halberton and is in close proximity to Halberton Primary School, both of which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. As such, minor negative effects are also expected.<br><br>Also, the site is not within 1km of an AQMA.<br><br>Overall, minor negative effects are expected. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all | + | The site is located adjacent to Halberton (a Defined Village). Tiverton is located approximately 4km to the west and provides a wide range of community and cultural services. The capacity of existing local services in Halberton would need to be investigated to determine what provisions any development on |

| SA Objective | SA Score | Justification |
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| ages and interests. | | the site would require. The number of dwellings means there is scope to include some level of services or improve existing local services and facilities in Halberton. The closest GP surgery is located in neighbouring village of Sampford Peverell. Travel to major services such as Royal Devon & Exeter Hospital in Exeter would likely involve car use, although there is a regular (at least hourly) bus service to Exeter. There is also a bus service to Taunton. The site is approximately 5km from the railway station at Tiverton Parkway with direct access to the strategic rail network. As such, minor positive effects are expected.<br><br>The site is within 500m of a primary school but it is not within 1km of any secondary schools. A new primary school would be required in relation to other sites proposed to the east of Tiverton. One option may be to relocate and expand Halberton Primary School. Secondary provision at Tiverton High School can be expanded to 1800 places, which involves relocating the school across the road. This is needed to accommodate development previously identified. Beyond this capacity (1800), some of the existing provision at the existing school would need to be retained, in addition to the new provision across the road; this would result in a split site. As such, uncertain minor positive effects are expected.<br><br>The site is adjacent to an area where superfast broadband download speeds are available (80Mbps). As such, minor positive effects are expected.<br><br>The site is medium sized, providing just over 500 homes, and therefore it is assumed that the site would be more likely to accommodate a primary school on site. As such, minor positive effects are expected.<br><br>Overall, minor positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | +/- | The site is not adjacent to a Main Town but it is within 1km of existing or proposed employment sites which could provide employment opportunities. As such, minor positive effects are expected.<br><br>Jobs would be created during the construction phase, and additional homes would create expenditure in the area. It is assumed that, as the site has the capacity to deliver over 500 homes, the site will also deliver small scale mixed use employment opportunities as well as a small hub of shops and services. As such, minor positive effects are expected.<br><br>There is potential for the site to negatively impact tourism at the Grand Western Canal. As such, uncertain minor negative effects are expected.<br><br>Overall, mixed minor positive and minor negative effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the | - | The site is not located adjacent to Exeter or Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy. |

| SA Objective | SA Score | Justification |
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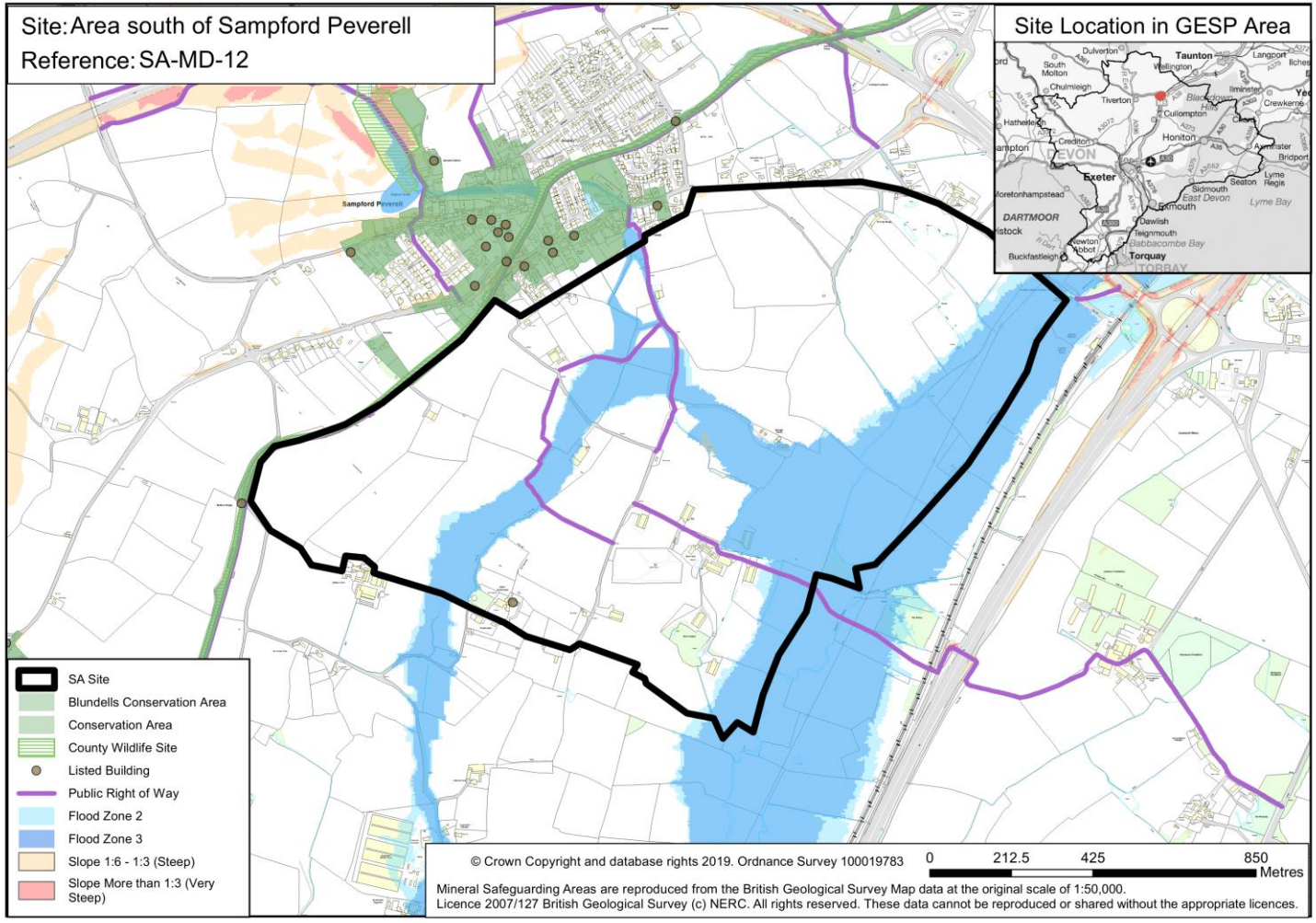
| vitality and viability of our city and town centres. | | As such, minor negative effects are expected |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | + | The site is not located within 1km of a railway station however a cycle route passes adjacent to the site, which links from Sampford Peverell to Halberton. The site is also located within 500m of bus stops providing frequent bus services.<br><br>As such, due to the proximity of bus stops and cycle paths, minor positive effects are expected. |

## SA-MD-12: Sampford Peverell South

| SA-MD-12 | Sampford Peverell South |
|---|---|
| **Authority Area:** Tarka Line / Mid Devon | |
| **Site Area:** 166.6ha (Net 69.3ha) | |
| **Approximate total capacity:** 2,148-2,772 dwellings | |
| **Site status:** Potential site option | |
| **Outline description and context:** Land south of Sampford Peverell includes a HELAA site and land not submitted and extends south of Lower Town road, north of the driving range, and as far south as Willand Road. This site is relatively flat throughout although is gently undulating in some areas. It is currently comprised of numerous small farmsteads and agricultural fields bounded by mature hedgerows and trees. | |



| SA Objective | SA Score | Justification |
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| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/--? | The Grand Western Canal (County Wildlife Site, Local Nature Reserve and Country Park) runs along the north western edge of the site. The site is also within 1km of Sampford Barton County Wildlife Site. The site contains three priority habitats, deciduous woodland, traditional orchard and coastal and floodplain grazing marsh. An area to the north is partly within a Great Crested Newt Consultation Zone. In addition, the site is flagged as Yellow in the HRA sensitivity work with regard to Culm Grasslands SAC. Air quality in relation to the Culm Grasslands SAC needs clarification due to the potential impact on habitat and therefore Marsh Fritillary populations as a result of nitrous oxide emissions from traffic. There is potential for dormouse/bat flight lines to be impacted due to the loss of hedgerows. There is also potential for bat roosts within buildings. Nesting birds, barn owls and badgers are likely to be present on site although this can be mitigated. As such, uncertain significant negative effects are expected.<br><br>Existing green infrastructure on the site, including the canal and woodland bands, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space and playing pitches that could mitigate the biodiversity impact of development. As such, significant positive effects are also expected.<br><br>Overall, mixed significant positive and uncertain significant negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is comprised of predominantly rural open countryside and so development would have urbanisation effect on the environment. The site is mostly considered to be of Lowland Plains landscape character. The majority of the site is of low-medium landscape sensitivity due to the existing influence of modern development including the M5. As such, uncertain minor negative effects are expected.<br><br>The east of the site is considered to be Sparsely Settled Farmed Valley Floors in landscape character and has medium-high landscape sensitivity due to the potential for development to interrupt the sparsely settled nature of this floodplain area. Landscape sensitivity is also considered to be medium-high in areas where low lying land associated with streams have a damp character consistent with floodplains. Landscape sensitivity rises to high within the site in areas where there is potential for development to compromise the fabric and setting of the Grand Western Canal and local listed buildings. As such, uncertain, significant negative effects are expected.<br><br>Overall, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT** | --?/+? | The Grand Western Canal Conservation runs along the western boundary of the site and there is a Grade II listed building (Higher Shutehanger Farmhouse) located in the southern area of the site. Sampford Peverell Conservation Area is adjacent to the north-western boundary of the site, which |

| SA Objective | SA Score | Justification |
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| To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | | contains multiple Grade II listed buildings and a Grade II* listed building. There are further designated assets within 3km of the site including a Registered Park and Garden (Bridwell) around 1.5km south-east of the site. There is potential for residential development to compromise these historic environment assets. As such, uncertain significant negative effects are expected.<br><br>The site is of considerable size (>10ha) and should be able to respond appropriately to the existing heritage assets and buildings on the site. Any proposals would have to ensure new development is of a high quality, creates high quality public spaces and responds positively to heritage assets within the site. Development may need to accommodate buffering regions or green infrastructure around the Grand Western Canal Conservation Area. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain significant negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | ++ | The site is within 5km of the Main Towns of Tiverton and Cullompton and as such uncertain negligible effects are expected.<br><br>The site is adjacent to Tiverton Parkway railway station. In addition, the National Cycle Route (Route 3) runs along the northern boundary of the site following the road and Grand Western Canal towpath. The site is also located within 500m of bus stops providing frequent bus services. As such, significant positive effects are expected.<br><br>As the site is expected to deliver over 2,000 homes, it is assumed that development of the site would provide sustainable transport, walking and cycle links and a road connecting the site to the nearest main settlement. As such, uncertain negligible effects are expected.<br><br>Overall, significant positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and there is no significant flood risk within the area. There are rivers in the centre and east of the site and as such, areas of the site are on flood zone 2 and flood zone 3. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | -- | The site is comprised of over 5ha of Grade 2 agricultural land as well as over 5ha of Grade 3a agricultural land. As such, significant negative effects are expected due to the potential loss of high quality agricultural land during development. The remaining areas within the site are comprised of Grade 3b, Grade 4 and non-agricultural land.<br><br>The site does not contain any previously developed land. |

| SA Objective | SA Score | Justification |
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| | | The site is not located within any Mineral Safeguarding Areas.<br><br>Overall, significant negative effects are expected due to development on high quality agricultural land. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or degradation. | --? | Development should ensure no deterioration in the water quality of Spratford Stream and the Grand Western Canal, which are adjacent to the east and west boundary of the site respectively and flow into the Exe Estuary via adjoining rivers. There are also further watercourses which pass through the site boundaries and into Spratford Stream.<br><br>As such, uncertain significant negative effects are expected. |
| **8. HOMES**<br><br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | ++ | The site could potentially accommodate 2,148-2,772 dwellings. However the figure is likely to be reduced following mitigation measures. Given the overall scale of the area, there is an opportunity to accommodate significant housing growth which would substantially boost the supply of housing in the Greater Exeter area. Housing development would be highly likely to provide a mixture of tenures and a significant proportion of the dwellings provided would be affordable.<br><br>As such, significant positive effects are expected. |
| **9. HEALTH**<br><br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site is not within 800m of major open space, but is adjacent to the National Cycle Route and contains Public Rights of Way. As such, minor positive effects are expected.<br><br>However, as the site is expected to deliver over 2,000 homes, it is assumed that development of the site would provide significant open space and active transport links. As such, significant positive effects are expected.<br><br>Overall, significant positive effects are expected. |
| **10. WELLBEING**<br><br>To support positive, safe and healthy communities. | - | The site is within the Middle Super Output Area covering villages to the East of Tiverton including Sampford Peverell which, according to the Devon Joint Strategic Needs Assessment reporting of index of multiple deprivation, sees below average levels of deprivation than compared to Devon as a whole. It is likely that a large residential development of this nature will provide potential improvements to the availability of homes in the area, which will provide broad wellbeing benefits. As such, negligible effects are expected.<br><br>The site is adjacent to existing residential development, the village of Sampford Peverell to the west, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. In addition, the site lies adjacent to a railway line. This feature may result in noise pollution affecting residents of the site in the longer term. As such, minor |

| SA Objective | SA Score | Justification |
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| | | negative effects are also expected.<br><br>Also, the site is not within 1km of an AQMA. However, part of the site is within close proximity to the M5 motorway which could result in additional air and noise pollution and car movements from the site would negatively impact Cullompton's AQMA. As such, minor negative effects are expected.<br><br>Overall, minor negative effects are expected. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | + | The site is adjacent to Sampford Peverell (a Defined Village) to the west, which has access to a range of local services including a doctor's surgery and community facilities including a local shop. As such, minor positive effects are expected.<br><br>The site is within 500m of a primary school but it is not within 1km of any secondary schools. The scale of the development proposed would require the relocation and expansion of the primary school, subject to usual statutory consultation. Secondary provision is at Uffculme. This currently takes children from out of area, which would be pushed back to their designated schools if this site came forward. This would put pressure on secondary schools in Tiverton and Cullompton. A strategy is needed for dealing with the additional capacity to the three secondary schools in the area - Uffculme, Tiverton and Cullompton. As such, uncertain minor positive effects are expected.<br><br>The site is adjacent to an area of superfast broadband download speeds (80Mbps) which could be extended to the site if development came forward. As such, minor positive effects are expected.<br><br>The site is medium sized, providing over 500 homes, and therefore it is assumed that the site would be more likely to accommodate a primary school on site. As such, minor positive effects are expected.<br><br>Overall, minor positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | ++/- | The site is not adjacent to a Main Town but it is within 1km of existing or proposed employment sites which could provide employment opportunities. As such, minor positive effects are expected.<br><br>Jobs would be created during the construction phase, and additional homes would create expenditure in the area. It is assume that, as the site has the capacity to deliver over 2000 homes, the site will also deliver large scale mixed use employment opportunities and a business park or employment estate as well as a neighbourhood hub with shops, services and community buildings. As such, significant positive effects are expected.<br><br>The site is adjacent to Bridwell Park Estate, which is a venue for weddings and corporate events. There is potential for development to have a negative impact on the setting of the park, and therefore negative impacts on tourism also. As such, minor negative effects are expected. |

| SA Objective | SA Score | Justification |
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| | | Overall, mixed significant positive and minor negative effects are expected. |
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | ++ | The site is adjacent to Tiverton Parkway railway station. In addition, the National Cycle Route (Route 3) runs along the northern boundary of the site following the road and Grand Western Canal towpath. The site is also located within 500m of bus stops providing frequent bus services. As such, significant positive effects are expected.<br>In addition, the site has capacity for more than 1,000 homes and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br>Overall, significant positive effects are expected. |

## SA-MD-13: Land North of Willand

| SA-MD-13 | Land North of Wiland |
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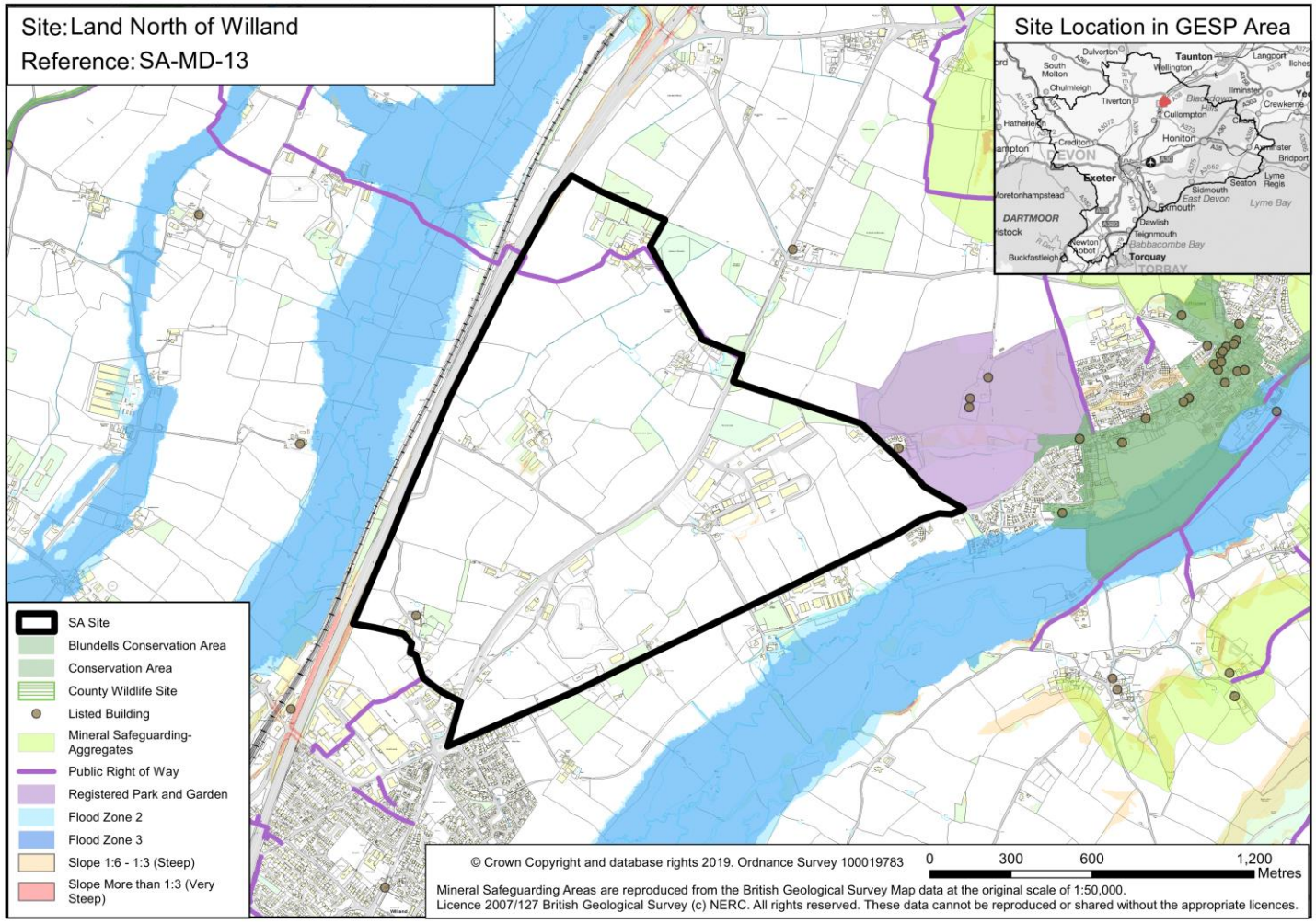
| **Authority Area:** Tarka Line / Mid Devon | |
| **Site Area:** 219.4ha (Net 119ha) | |
| **Approximate total capacity:** 3,689-4,760 dwellings | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:** Relatively flat area of land north of Willand and east of the M5. The area includes land adjacent to Four Crosses Way, Hitchcock's Business Park and Bridwell Works. The site is predominantly agricultural land although a number of employment uses already exist within the site. | |



| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/-? | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, or within 250m of a locally designated site. The site contains two priority habitats, traditional orchard and deciduous woodland. In addition, the site is flagged as Yellow in the HRA sensitivity work with regard to Culm Grasslands SAC. Air quality in relation to the Culm Grassland SAC will need clarification due to the potential impact on habitat and hence Marsh Fritillary populations as a result of nitrous oxide emissions from any cumulative traffic movements generated on the A361. A small area to the south east of the site falls within the Great Crested Newt Consultation Zone. There is potential for dormouse/bat flight lines to be impacted due to the loss of hedgerows. There is also potential for bat roosts within buildings. Nesting birds, barn owls and badgers are likely to be present on site although this can be mitigated. The site supports a number of mature hedgerows and trees. As such, uncertain minor negative effects are expected.<br><br>Existing green infrastructure on the site, including hedgerows and trees, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space and playing pitches that could mitigate the biodiversity impact of development. As such, significant positive effects are also expected.<br><br>Overall, mixed significant positive and uncertain minor negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is comprised of rural open countryside and so development would cause an urbanisation effect on the environment. Land within the site is considered to be Lowland Plains in landscape character. The majority of the site is of low-medium landscape sensitivity as there is unlikely to be intervisibility with the Blackdown Hills AONB due to there being sufficient intervening topography and vegetation. Landscape sensitivity within the site is also considered low-medium where the countryside has already been influenced by modern development such as the presence of the M5. As such, uncertain minor negative effects are expected.<br><br>Landscape sensitivity within the site increase to high where the setting of Bridwell Park registered historic park and associated listed buildings may be compromised by development. As such, uncertain significant negative effects are expected.<br><br>Overall, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and | +?/-? | The southern area of the site contains a Grade II listed building (Braddon's Farmhouse) within its boundaries and is adjacent to a Grade II listed building on its north-eastern boundary (Old Bridwell. Further to this, the site is adjacent to Bridwell Park (a Registered Park and Garden) on its north eastern which contains two Grade II* listed buildings (Chapel and Stables) There are further |

| SA Objective | SA Score | Justification |
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| historic assets and promote high quality architecture, design and accessibility in new build development. | | designated assets within 3km including Uffculme Conservation areas, which contains multiple listed buildings, 600m east of the site as well as Willand Conservation area 800m to the south, which also contains a high concentrations of listed buildings. There is potential for residential development to compromise these historic environment assets. As such, uncertain minor negative effects are expected.<br><br>The site is of considerable size (>10ha) and should be able to respond appropriately to the existing heritage assets and buildings on the site. Any proposals would have to ensure new development is of a high quality, creates high quality public spaces and responds positively to heritage assets within the site. Development may need to accommodate buffering regions around listed buildings contained within in the site and possibly between the site and Bridwell park. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | ++ | The site is within 5km of the Main Town of Cullompton and as such uncertain negligible effects are expected.<br><br>The site is crossed by a cycle path which crosses the adjacent motorway connecting the site to Tiverton Parkway railway station, located within 1km of site. In addition, the site is located within 500m of bus stops providing frequent bus services. As such, significant positive effects are expected.<br><br>As the site is expected to deliver over 4,000 homes, it is assumed that development of the site would provide significant sustainable transport links, walking and cycle routes and roads within the development connecting to the nearest settlement. As such, uncertain minor positive effects are expected.<br><br>Overall, significant positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and there is no significant flood risk within the area. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | -- | The site is comprised of over 5ha of Grade 3a agricultural land. As such, significant negative effects are expected due to the potential for loss of high quality agricultural land during development. The remaining land within the site is comprised of Grade 3 and non-agricultural land.<br><br>The land does is predominantly greenfield aside from some agricultural developments and a solar PV array. |

| SA Objective | SA Score | Justification |
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| | | The site is not located within any Minerals Safeguarding Areas.<br><br>Overall, significant negative effects are expected due to development on high quality agricultural land. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or degradation. | --? | Development should ensure no deterioration in the water quality of a watercourse, which passes through the centre of the site and into Spratford Stream, which then flows into the Exe Estuary SPA via adjoining rivers.<br><br>As such, uncertain significant negative effects are expected. |
| **8. HOMES**<br><br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | ++ | The site is likely to be able to accommodate about 3,689-4,760 homes. However, this may be further reduced when taking into account mitigation measures, which would include avoiding any adverse impacts on the setting of Bridwell Park. The site would also need to ensure a viable mix of homes (tenure and sizes) including a proportion of affordable housing to contribute towards meeting needs within the area. The range of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom and self-build providers. This site is of a sufficient size to be able to support a high number of housing starts / completions from a number of different outlets around the site, which in turn will ensure a good pace of delivery.<br><br>As such, significant positive effects are expected. |
| **9. HEALTH**<br><br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site is within 800m of Accessible Woodland, major open space, and contains Public Rights of Way and part of the National Cycle Route. As such, significant positive effects are expected.<br><br>In addition, as the site is expected to deliver over 2,000 homes, it is assumed that development of the site would provide significant open space and active transport links. As such, significant positive effects are expected.<br><br>Overall, significant positive effects are expected. |
| **10. WELLBEING**<br><br>To support positive, safe and healthy communities. | - | The site is within the Middle Super Output Area covering villages to the East of Tiverton including Sampford Peverell which, according to the Devon Joint Strategic Needs Assessment reporting of index of multiple deprivation, sees below average levels of deprivation than compared to Devon as a whole. It is likely that a large residential development of this nature will provide potential improvements to the availability of homes in the area, which will provide broad wellbeing benefits. As such, negligible effects are expected.<br><br>The site is adjacent to existing residential developments, the village of Uffculme to the north east and the village of Willand to the south which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. In addition, the site |

| SA Objective | SA Score | Justification |
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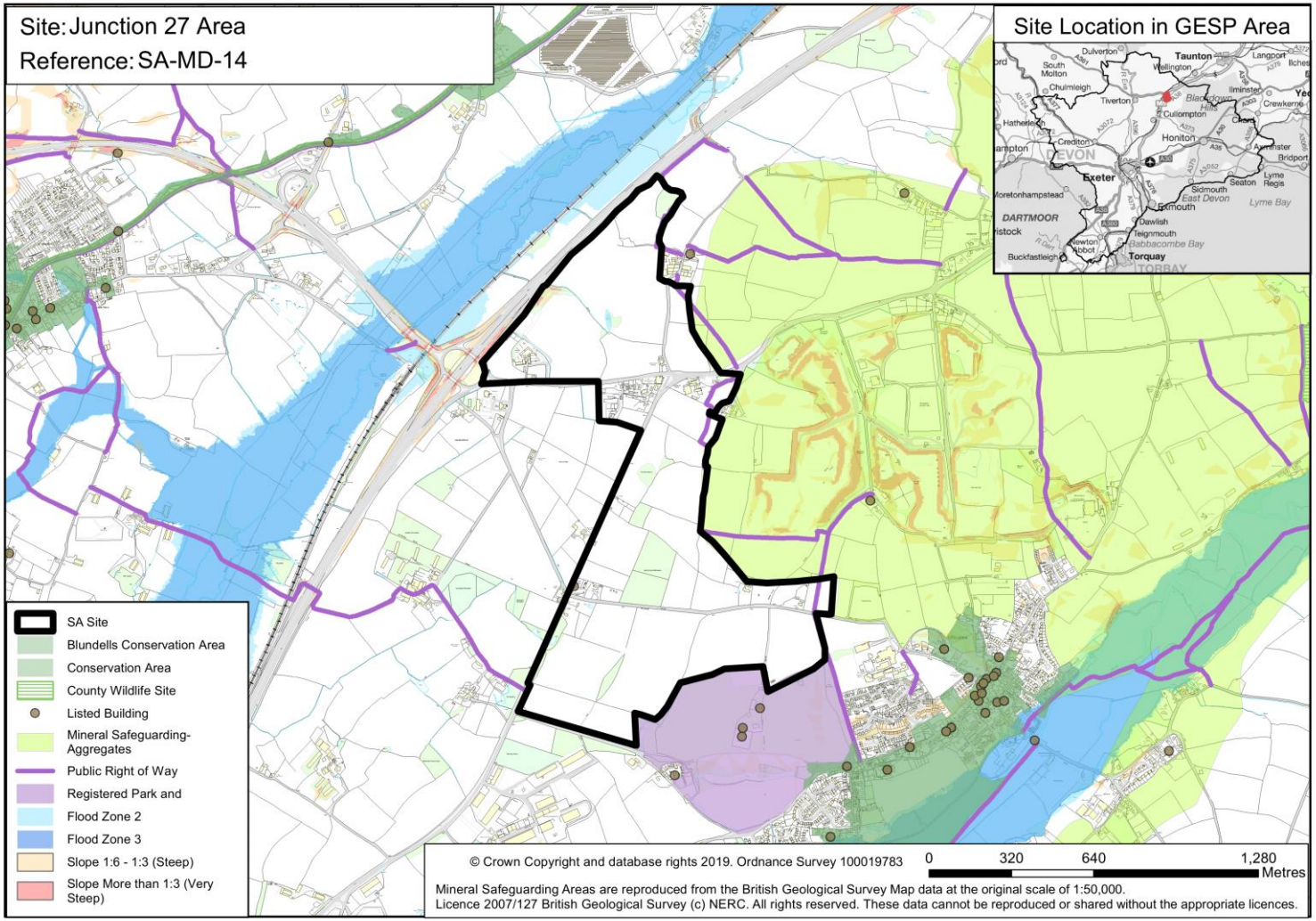
| | | lies adjacent to a railway line and the M5 motorway. These features may result in noise pollution affecting residents of the site in the longer term. As such, minor negative effects are also expected.<br><br>Also, the site is not within 1km of an AQMA. However, the site is adjacent to the M5 motorway which could result in additional air and noise pollution and car movements from the site would negatively impact Cullompton's AQMA. As such, minor negative effects are expected.<br><br>Overall, minor negative effects are expected. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | ++ | The site is located adjacent to Uffculme (a Defined Village) to the north east and Willand (a Defined Village) to the south. The site is accessed via the B3181, B3440 and M5 from J27, which runs along its western boundary. The closest community services and facilities are provided in Willand including a post office, local convenience stores, church and a pub. Larger scale retail and convenience services including some cultural facilities are available in Cullompton (4-5km away). There are also local services and facilities in Uffculme immediately to the east of the site. However, these local services are of a scale incommensurate with the area considered for development. As such, minor positive effects are expected.<br><br>The site is located within 500m of a primary school and within 1km of a secondary school. The nearest secondary schools are available at Tiverton, Cullompton and Uffculme. Secondary provision at Cullompton CC can be expanded but it would not support all the development identified within the catchment. If development comes forward which required more capacity than can be delivered on the existing site as well as the site already identified for expansion, additional land would be required. Uffculme School currently takes pupils from out of the area, which would be pushed back to their designated schools if this site came forward, but would put pressure on Tiverton and Cullompton secondary schools. A strategy is needed manage capacity at the three secondary schools in the area, taking into account the plan coming forward. As such, uncertain minor positive effects are expected.<br><br>The majority of the site currently has access to 22Mbps broadband download speeds. However, the site is adjacent to areas of superfast broadband which could be extended to the site if development came forward. As such, minor positive effects are expected.<br><br>The site is large, providing over 4,000 homes, and therefore it is assumed that the site would be more likely to accommodate a primary and secondary school on site. As such, significant positive effects are expected.<br><br>Overall, significant positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY** | ++ | The site is not adjacent to a Main Town but it is within 1km of existing or proposed employment sites |

| SA Objective | SA Score | Justification |
|---|---|---|
| To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | | which could provide employment opportunities. As such, minor positive effects are expected.<br><br>Jobs would be created during the construction phase, and additional homes would create expenditure in the area. It is assumed that, as the site has capacity to deliver over 2,000 homes, the site will also deliver large scale mixed use employment opportunities and a business park or employment estate as well as a neighbourhood hub with shops, services and community buildings. As such, significant positive effects are expected.<br><br>The site is unlikely to have any negative impacts on tourism.<br><br>Overall, significant positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br><br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | ++ | The site is crossed by a cycle path which crosses the adjacent motorway connecting the site to Tiverton Parkway railway station, located within 1km of site. In addition, the site is located within 500m of bus stops providing frequent bus services. As such, significant positive effects are expected.<br><br>In addition, the site has capacity for more than 1,000 homes and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br><br>Overall, significant positive effects are expected. |

## SA-MD-14: Junction 27 Area

| SA-MD-14 | Junction 27 area |
|---|---|
| **Authority Area:** Tarka Line / Mid Devon | |
| **Site Area:** 122.2ha (Net 70.4ha) | |
| **Approximate total capacity:** 2,182-2,816 dwellings | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:**<br><br>A large, irregular, angular shaped area east of the M5 adjacent to junction 27 and north west of Uffculme. The area is adjacent to the emerging Junction 27 commercial allocation in the draft Mid Devon Local Plan Review but extends further north and east. The site extends from north of Jersey Farm in the north to Bridwell Avenue in the south. The principal access is from the A38 which runs broadly east to west across the northern third of the area whilst the B3181 acts as the western boundary to the southern half of the site providing potential |  |

| SA-MD-14 | Junction 27 area |
| --- | --- |
| access. The majority of the site is fairly level or slightly undulating and is largely in pastural use although there is some arable farming on site. The site includes a large number of hedgerows, mature trees, a small area of woodland and includes a small number of farms and individual dwellings. In the northern area, the site includes a caravan park, nursery, garden centre and employment space at Jersey Farm. Close to the site to the northwest is a motorway service area whilst to the east is the large quarry at Hillhead. Broadpath landfill site is slightly further east. To the west, separated from the site by the M5 is Tiverton Parkway station. | |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/-? | The site is not located within 1km of an internationally designated biodiversity or nationally designated geodiversity site, but is within 1km of Grand Western Canal (County Wildlife Site, Local Nature Reserve and Country Park). The site contains priority habitat deciduous woodland. In addition, the site is flagged as Yellow in the HRA sensitivity work with regard to Culm Grasslands SAC and is approximately 19km from the SAC (designated for its heathland habitat and presence of the Marsh Fritillary Butterfly) which is sensitive to changes in air quality from nitrous oxide emissions. The majority of the area is within a Great Crested Newt Consultation Zone. There are unconfirmed county wildlife sites (broadland leafed woodland) at Houndaller Plantation, Old Bridwell and Mountstephen and Bridwell Park (parkland) adjacent to the site to the east and south. There are strong linear hedges throughout the area which include mature trees (including oak and ash) together with various areas of plantation. The area is also dotted with isolated mature trees. As such, uncertain minor negative effects are expected.<br><br>Existing green infrastructure on the site, including hedgerows and trees, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space and playing pitches that could mitigate the biodiversity impact of development. As such, significant positive effects are also expected.<br><br>Overall, mixed significant positive and uncertain minor negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is comprised of rural open countryside and so development would cause an urbanisation effect on the environment. Land within the site is considered to be Lowland Plains and Lower Rolling Farmed and Settled Valley Floors in landscape character. Areas within the site that are influenced by current and past mineral development are of low-medium landscape sensitivity. The landscape sensitivity within the site remains at medium where the countryside is unlikely to be negatively affected by modern development. As such, uncertain minor negative effects are expected.<br><br>The landscape sensitivity within the site increase to medium-high where, although influenced by the presence of the M5, some areas contribute to the 'patchwork' appearance of the countryside that forms a 'gateway' area into Devon. Additionally, there are mature hedgerow trees in high density in some areas that could be compromised by development. Landscape sensitivity increases to high in the south of the site where the rural setting of Bridwell Park registered historic park and associated listed building could be compromised by development. As such, uncertain significant negative effects are expected.<br><br>Overall, uncertain significant negative effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **3. HISTORIC AND BUILT ENVIRONMENT**<br><br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/-? | The southern part of the site contains one Grade II listed building (Leonard Moor Cottages) and the northern boundary of the site is adjacent to another Grade II listed building (Higher Hondaller Farmhouse). There are multiple designated assets within 3km including at the southern boundary of the site, which is adjacent to Bridwell Park (a Registered Park and Garden) and contains two Grade II* listed buildings (Chapel and Stables) and Uffculme Conservation Area, which is located around 500m south-east and contains a high concentration of listed buildings. There is potential for residential development to compromise these historic environment assets. As such, uncertain minor negative effects are expected.<br><br>The site is of considerable size (>10ha) and should be able to respond appropriately to the existing heritage assets and buildings on the site. Any proposals would have to ensure new development is of a high quality, creates high quality public spaces and responds positively to heritage assets within the site. Development may need to accommodate buffering regions around listed buildings contained within in the site and possibly between the site and Bridwell park. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | + | The site is within 5km of the Main Town of Cullompton and as such uncertain negligible effects are expected.<br><br>The site is crossed by frequent bus services and the site is also located within 1km of cycle routes and Tiverton Parkway Railway Station. However, it is noted that due to the severance created by the intervening M5 motorway, there may be limited access to the cycle paths and railway station. As such, due to the proximity of some accessible sustainable transport links, minor positive effects are expected.<br><br>As the site is expected to deliver over 1,000 homes, it is assumed that development of the site would provide sustainable transport links, walking and cycle routes and a road connecting the site to the nearest settlement. As such, uncertain negligible effects are expected.<br><br>Overall, minor positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and there is no significant flood risk within the area. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain minor negative effects can be expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **6. LAND RESOURCES**<br>To utilise our land resources efficiently and minimise their loss or degradation. | -- | The site is comprised of over 5ha of Grade 1 agricultural land as well as over 5ha of Grade 3a agricultural land. As such, significant negative effects are expected due to development on high quality agricultural land. The remaining land within the site is comprised of Grade 3b and non-agricultural land.<br><br>The site is predominantly greenfield and does not offer any opportunities for the use of previously developed land.<br><br>The eastern boundary of the site is partially (>50%) located within an Aggregate Minerals Safeguarding Area and without appropriate evidence there may be objection under Policy M2 of the Devon Minerals Plan to development that would sterilise or constrain this mineral resource. However, there could be an opportunity to extract the mineral resource prior to development going ahead. As such, uncertain minor negative effects are expected.<br><br>Overall, significant negative effects are expected due to development on high quality agricultural land. |
| **7. WATER RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or degradation. | 0 | The site is not adjacent to and does not contain any watercourses.<br><br>As such, negligible effects are expected. |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | ++ | The area is large and relatively level with limited constraints and therefore could provide a large amount of residential development, potentially alongside other uses. The site is likely to be able to accommodate about 2,182-2,816 dwellings. However the capacity is likely to reduce once account has been taken of the likely mitigation requirements, which would include avoiding existing development and mineral consultation areas. The site would also need to ensure a viable mix of homes (tenure and sizes) including a proportion of affordable housing to contribute towards meeting needs within the area. The range of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom build providers. The site is of a sufficient size to be able to support a reasonable number of housing starts / completions from more than one outlet around the site, which in turn will ensure a good pace of delivery.<br><br>Large scale residential development in this area would be relatively free standing given that the site is not part of or adjacent to an existing settlement and therefore the diversity and types of housing provided could be focused to meet the needs of the local/GESP area reflecting local demographics and household composition; affordable, open market, custom and self-build could all be provided here as a part of a diverse mix of dwellings. The benefits would be significant and permanent. The area includes a small number of sites submitted through the HELAA process which demonstrates interest in |

| SA Objective | SA Score | Justification |
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| | | development delivery, however the submissions were for employment or mixed uses which limits demonstrable interest in residential development in the area. These are limiting factors for the area in terms of opportunities. Development in the area would have a moderate positive impact on the delivery of homes and general housing affordability in the area. Further opportunities could be realised if a mixture of uses was provided, if specific action was taken to by the public sector to proactively deliver the site at a high quality with a mixture of tenures. This would have a major positive impact. In summary, the large, unconstrained nature of the area would allow for large scale residential development.<br><br>As such, significant positive effects are expected. |
| **9. HEALTH**<br><br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site is not within 800m of major open space, but it contains Public Rights of Way and is within 400m of the National Cycle Route. As such, minor positive effects are expected.<br><br>However, as the site is expected to deliver over 2,000 homes, it is assumed that development of the site would provide significant open space and active transport links. As such, significant positive effects are expected.<br><br>Overall, significant positive effects are expected. |
| **10. WELLBEING**<br><br>To support positive, safe and healthy communities. | - | The site is within the East of Tiverton and Willand Middle Super Output Areas which, according to the Devon Joint Strategic Needs Assessment reporting of index of multiple deprivation, sees lower levels of deprivation than compared to Devon and Mid Devon as a whole. It is likely that a large residential development of this nature will provide potential improvements to the availability of homes in the area, which will provide broad wellbeing benefits. As such, negligible effects are expected.<br><br>The site is in close proximity to existing residential developments, the village of Uffculme to the south east, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. In addition, the site is crossed by an 'A' road and lies adjacent to a railway line and the M5 motorway. These features may result in noise pollution affecting residents of the site in the longer term. As such, minor negative effects are also expected.<br><br>Also, the site is not within 1km of an AQMA. However, the site is adjacent to the M5 motorway which could result in additional air and noise pollution and car movements from the site would negatively impact Cullompton's AQMA. As such, minor negative effects are expected.<br><br>Overall, minor negative effects are expected. |
| **11. ACCESS TO SERVICES** | --/+ | Part of the eastern boundary of the site is within 500m of Uffculme (a Defined Village), which provides some local services including a post office, leisure centre, a library, a GP, churches and shops. The site |

| SA Objective | SA Score | Justification |
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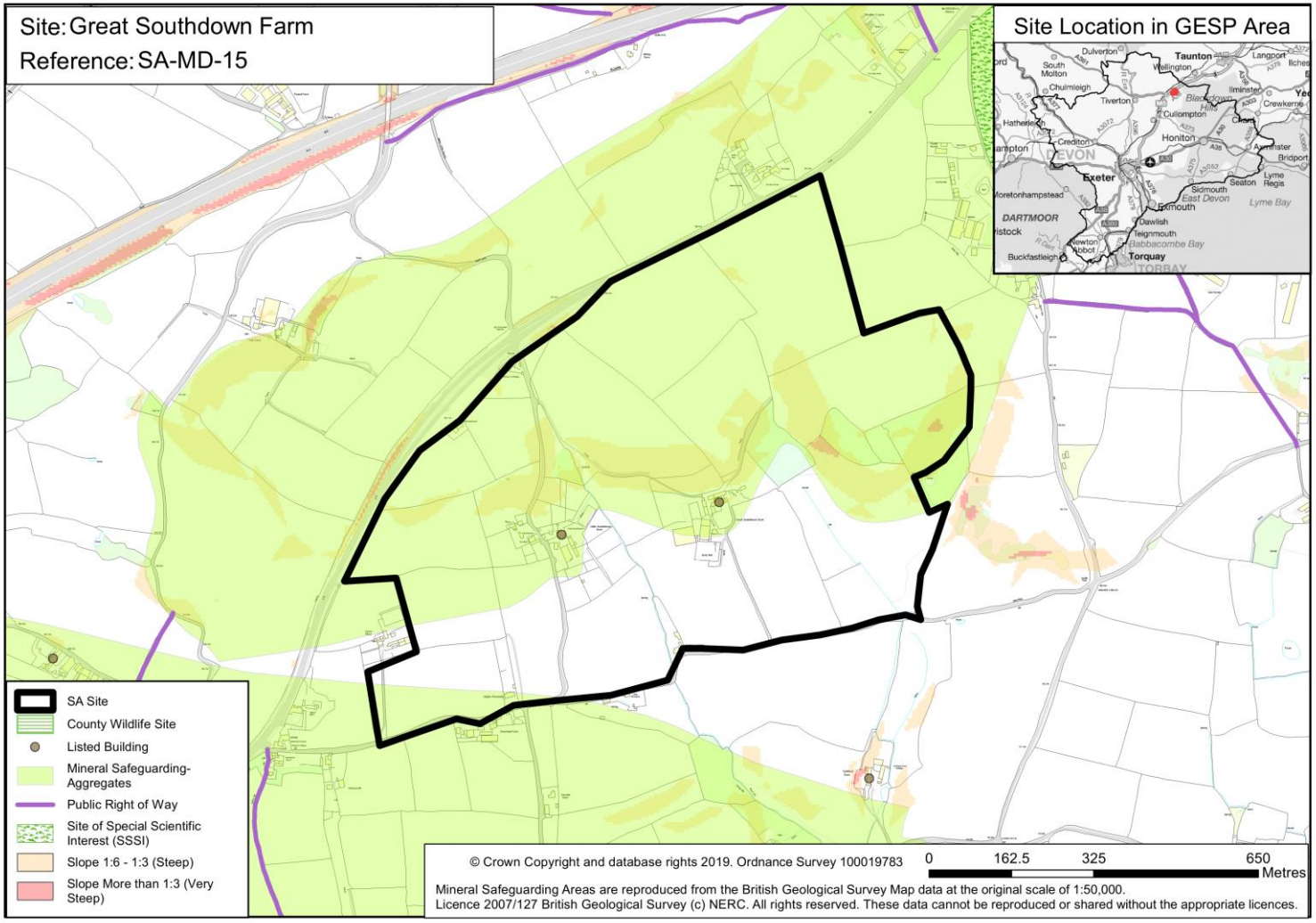
| To provide accessible and attractive services and community facilities for all ages and interests. | | itself and the area immediately to the northwest includes a garden centre, service station, motel and pub. However, the majority of the site is not located adjacent to any settlements which would provide direct access to services for the site. As such, significant negative effects are expected.<br><br>The site is located within 1km of a primary school and it is within 500m of a secondary school. These are all within walking distance, although improvements to walking routes would be required. As such, uncertain minor positive effects are expected.<br><br>The area within the site is currently restricted to broadband download speeds of less than 10Mbps and the site is not located directly adjacent too any areas of superfast broadband. Development in this area would be likely to be fairly large scale and therefore it is anticipated that appropriate provision of high speed broadband (or similar in future) would be required. As such, minor negative effects are expected.<br><br>The site is medium sized, providing over 500 homes, and therefore it is assumed that the site would be more likely to accommodate a primary school on site. As such, minor positive effects are expected.<br><br>Overall, mixed significant negative and minor positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | ++/-- | The site is not adjacent to a Main Town and is not within 1km of any existing or proposed employment sites. As such, significant negative effects are expected.<br><br>Jobs would be created during the construction phase, and additional homes would create expenditure in the area. It is assumed that, as the site has the capacity to deliver over 2,000 homes, the site will also deliver large scale mixed use employment opportunities and a business park or employment estate as well as a neighbourhood hub with shops, services and community buildings. As such significant positive effects are expected.<br><br>The site is unlikely to have any negative impacts on tourism.<br><br>Overall, mixed significant negative and significant positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br><br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT** | + | The site is crossed by frequent bus services and the site is also located within 1km of cycle routes and Tiverton Parkway Railway Station. However, it is noted that due to the severance created by the intervening M5 motorway, there may be limited access to the cycle paths and railway station. As such, |

| SA Objective | SA Score | Justification |
|---|---|---|
| To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | | due to the proximity of some accessible sustainable transport links, minor positive effects are expected.<br><br>In addition, the site has capacity for more than 1,000 homes and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br><br>Overall, minor positive effects are expected. |

## SA-MD-15: Great Southdown Farm

| SA-MD-15 | Great Southdown Farm |
|---|---|
| **Authority Area:** Mid Devon | |
| **Site Area:** 80.1ha (Net 47ha) | |
| **Approximate total capacity:** 1,457-1,880 dwellings | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:**<br><br>The site is located to the south of the A38, approximately 2.5km from junction 27 of the M5. It is a greenfield site predominantly consisting of agricultural pastureland with two farmsteads within the site area. The topography is variable with gentle gradients and flatter land in the northern and southern areas of the site – a sloping ridge across the centre of the site running east to west, incorporating some areas of woodland. The site is in a rural area, isolated from any existing settlement. | |



| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/--? | The site is within 250m of Maiden Down SSSI, a lowland dry and wet heath supporting a rich invertebrate wildlife which is recorded as in unfavourable-declining condition, and within 1km of Five Fords Fen County Wildlife Site, is connected by a number of water courses. Therefore, water quality changes may impact the County Wildlife Site. The site contains priority habitat deciduous woodland. In addition, the site is flagged as Yellow in the HRA sensitivity work with regard to Culm Grasslands SAC. Air quality in relation to the Culm Grassland SAC will need clarification due to the potential impact on habitat and hence Marsh Fritillary populations as a result of nitrous oxide emissions from any cumulative traffic movements generated on the A361. A small portion of the site is designated as an unconfirmed Wildlife Site (Broadleaved Woodland) and there is a total of approximately 9.7 acres of woodland on the site. Potential impacts on Great Crested Newts (the site is within a consultation zone for Great Crested Newts), bats, badgers and birds have been identified. As such, uncertain significant negative effects are expected.<br><br>Existing green infrastructure on the site, including woodland, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space and playing pitches that could mitigate the biodiversity impact of development. As such, significant positive effects are also expected.<br><br>Overall, mixed significant positive and uncertain significant negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is comprised of rural open countryside and so development would cause an urbanisation effect on the environment. The site is considered to be Lower Rolling Farmed and Settled Valley Slopes in landscape character. The site is of high landscape sensitivity as there is likely to be intervisibility between the site and the Blackdown Hills AONB which is less than 3km away to the east. Development would also be likely to interrupt the intrinsic character, beauty and tranquillity of the area.<br><br>As such, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/-? | The site contains two Grade II listed buildings within its boundaries (Great Southdown Farmhouse and Little Southdown Farmhouse), with further Grade II listed buildings being located in close proximity 300m to the south (Culliford Farmhouse) and around 600m to the west (Appledore Barton). There are further designated assets within 3km of the site including Conservation Areas located around 1.3km to the north (Grand Western Canal), around 1.6km to the south (Uffculme) and around 2.1km to the south-east (Culmstock). There is potential for residential development to compromise the setting of these historic environment assets. As such, uncertain minor negative effects are expected.<br><br>The site is of considerable size (>10ha) and should be able to respond appropriately to the existing |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | heritage assets and buildings on the site. Any proposals would have to ensure new development is of a high quality, creates high quality public spaces and responds positively to heritage assets within the site. Development may need to accommodate buffering regions around listed buildings contained within in the site. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | -- | The site is within 5km of the Main Town of Cullompton and as such uncertain negligible effects are expected.<br><br>The site is not located within 1km of cycle routes or railway stations and is not located within 500m of bus stops. As such, due to the distance from public transport options, significant negative effects are expected.<br><br>As the site has the capacity to deliver more than 1,000 homes, it is assumed that development of the site would provide some sustainable transport, walking and cycle links and services. As such, uncertain negligible effects are expected.<br><br>Overall, significant negative effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and there is no significant flood risk within the area. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | --? | The entirety of the site is comprised of Grade 3 agricultural land. However, it is unclear if it is Grade 3a or Grade 3b. As such, uncertain significant negative effects are expected.<br><br>The site is predominantly greenfield apart from some areas of agricultural development.<br><br>Over 50% of the site is located within an Aggregate Minerals Safeguarding Area and without appropriate evidence there may be objection under Policy M2 of the Devon Minerals Plan to development that would sterilise or constrain this mineral resource. However, there could be an opportunity to extract the mineral resource prior to development going ahead. As such, uncertain significant negative effects are expected.<br><br>Overall, uncertain significant negative effects are expected. |
| **7. WATER RESOURCES** | 0 | The site is not adjacent to and does not contain any watercourses. |

| SA Objective | SA Score | Justification |
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| To utilise our water resources efficiently and minimise their loss or degradation. | | As such, negligible effects are expected. |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | ++ | The site would be expected to deliver between 1,457-1,880 homes over the plan period. However the capacity is likely to reduce once account has been taken of the likely mitigation requirements. The site would also need to ensure a viable mix of homes (tenure and sizes) including a proportion of affordable housing to contribute towards meeting needs within the area. The range of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom and self-build providers. The site is of a sufficient size to be able to support a relatively high number of housing starts / completions from some different outlets around the site, which in turn will ensure a good pace of delivery.<br>As such, significant positive effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site is within 800m of Open Access Land and Accessible Woodland, both major open spaces. Also, the site is within 400m of Public Rights of Way and Registered common land. As such, significant positive effects are expected.<br>However, as the site is expected to deliver between 1,000 - 1,999 homes, it is assumed that development of the site would provide some open space and active transport links. As such, minor positive effects are expected.<br>Overall, significant positive effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | - | The site is within the 'E02004166' Middle Super Output Area covering Willand, Uffculme, Hemyock and surrounding areas which, according to the Devon Joint Strategic Needs Assessment reporting of index of multiple deprivation, sees below average levels of deprivation than compared to Devon as a whole. The area is above average for the sub-domains relating to geographic barriers (road distance to key services) and indoor environment (central heating availability/poor housing conditions). It is likely that a medium residential development of this nature will provide potential improvements to the availability of homes in the area, which will provide broad wellbeing benefits. As such, negligible effects are expected.<br>The site is not within close proximity to any existing residential developments, but the site lies adjacent to an 'A' road. This feature may result in noise pollution affecting residents of the site in the longer term. As such, minor negative effects are also expected.<br>Also, the site is not within 1km of an AQMA. However, the site is in close proximity to the M5 |

| SA Objective | SA Score | Justification |
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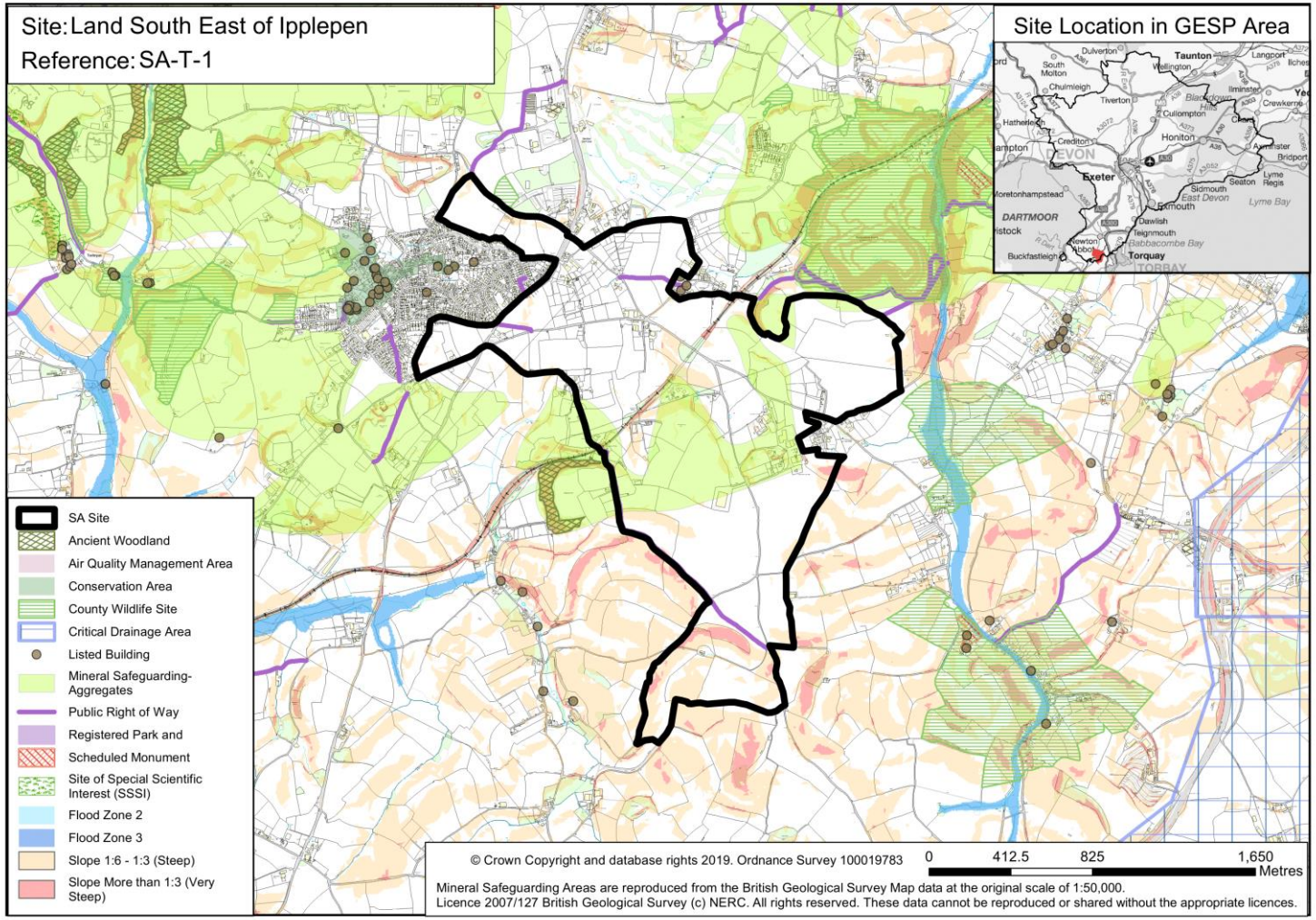
| | | motorway which could result in additional air and noise pollution and car movements from the site would negatively impact Cullompton's AQMA as well as the town of Tiverton and adjacent villages. As such, minor negative effects are expected.<br><br>Overall, minor negative effects are expected. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | --/+ | The site is not located adjacent to any settlements. The majority of services for this site would be provided in Tiverton the centre of which is located approximately 13.5 kilometres away by car or Cullompton, 9.5km away. Access to these services, and more specialist services located in Exeter would almost certainly require private car use. There are some basic services located in close by villages/small towns (Sampford Peverell, Willand and Uffculme). However, given the remote nature of the site, access to these would likely also require private car use. As such, significant negative effects are expected.<br><br>The site is not located within 1km of any primary or secondary schools. New primary provision to accommodate the level of development proposed would be required. Uffculme School (secondary) currently takes children from out of area, which would be pushed back to their designated schools if this site came forward. This would put pressure on other schools in the area (Tiverton and Cullompton). A strategy is needed for managing capacity at the three secondary schools in the area taking into account the plan coming forward. As such, uncertain minor negative effects are expected.<br><br>The area within the site currently only has access to broadband download speeds of less than 10Mbps and the site is not located adjacent to any areas of superfast broadband. Enhanced broadband connectivity would be required as part of the development of the site. As such, minor negative effects are expected.<br><br>The site is medium sized, providing over 500 homes, and therefore it is assumed that the site would be more likely to accommodate a primary school on site. As such, minor positive effects are expected.<br><br>Overall, mixed significant negative and minor positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | --/+ | The site is not adjacent to a Main Town and is not within 1km of any existing or proposed employment sites. As such, significant negative effects are expected.<br><br>Jobs would be created during the construction phase, and additional homes would create expenditure in the area. It is assumed that, as the site has capacity to deliver over 500 homes, the site will also deliver medium scale employment opportunities and a business park or employment estate as well as a neighbourhood hub with shops and services. As such, minor positive effects are expected.<br><br>The site is located within 2km of the Blackdown Hills AONB, which is an important tourist destination |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | for Mid Devon. Development at the site could potentially have negative impacts on the setting of the AONB. As such, minor negative effects are expected.<br><br>Overall, mixed significant negative and minor positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br><br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | --/+ | The site is not located within 1km of cycle routes or railway stations and is not located within 500m of bus stops. As such, due to the distance from public transport options, significant negative effects are expected.<br><br>In addition, the site has capacity for up to more than 1,000 homes and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br><br>Overall, mixed significant negative and minor positive effects are expected. |

## SA-T-1: Land South East of Ipplepen

| SA-T-1 | Land south east of Ipplepen |
|---|---|
| **Authority Area:** Teignbridge |  |
| **Site Area:** 265.3 ha (Net 109ha) | |
| **Approximate total capacity:** 3,400 – 4,360 dwellings | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:** Large area of land on southern boundary of plan area bordering Torbay. The site is made up of rolling agricultural land with some industrial and business uses close to Ipplepen / A381. The area may have potential scale to create new community if road / connectivity challenges could be met. | |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/--? | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, but is adjacent to a few Country Wildlife Sites. The site is flagged as Amber in the HRA sensitivity work with regard to South Hams SAC. A strategic Greater Horseshoe Bat flyway runs along the mainline railway through the centre of the site, and a further corridor runs past the far east of the area at Bulleigh Farm. The site has sufficient capacity to maintain dark flyways and important habitats. The wider area is also a Cirl Bunting and Greater Crested Newt consultation zone. Other protected species are also likely to be found, such as Dormouse. Some woodland priority habitat is located within the site and adjacent to the site. As such, uncertain significant negative effects are expected.<br><br>Existing green infrastructure on the site, including the watercourses and woodland blocks, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space and playing pitches on site that could mitigate the biodiversity impact of development. As such, significant positive effects are also expected.<br><br>Overall, mixed significant positive and uncertain significant negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The area has no special landscape designations and the rolling landscape contains scattered residential and industrial developments and pylons. The landscape character type is predominantly described as Open Inland Plateaux. The Dainton golf course lies to the north. The site is not close to the coast. The Revised Interim Landscape Sensitivity Assessment (LSA) has concluded that parts of the site have medium-high and parts of the site have high sensitivity (the site lying in close proximity to the Grade 1 listed building of Compton Castle).<br><br>As such, an uncertain significant negative effect is expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/-? | The area is adjacent to Dainton, which contains three listed buildings, and borders Ipplepen, which contains a number of listed buildings and a Conservation Area. An area of approximately 7 ha within the site is suspected to have been an iron age settlement, near Dainton Elms Cross, which would require further investigation. The nearest Scheduled monument is Compton castle, which lies 1.2km away, and may present challenges in connecting a development to Torbay (A380). The nearest Registered Park and Garden is the Grade II listed Italian Garden at Great Ambrook, located approximately 1.6km to the southwest of the site. As such, uncertain minor negative effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | It is likely that the area is of sufficient size (>10ha) to accommodate buffers / mitigation for all on site heritage assets. However, it is likely that setting of Dainton would be impacted by development on this scale. The site is of considerable size and should be able to respond appropriately to the existing heritage assets and buildings on the site. Any proposals would have to ensure new development is of a high quality, creates high quality public spaces and responds positively to heritage assets within the site. As such, uncertain minor positive effects are also expected.<br><br>Overall, mixed uncertain minor positive and uncertain minor negative effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | -- | The site is within 5km of the Main Town of Newton Abbot and as such uncertain negligible effects are expected.<br><br>Three bus services (177, X64, 41) pass through the northwest of the site at Ipplepen, however these cumulatively provide an hourly (not frequent) service towards Newton Abbot or Totnes. The site is not within 1km of a railway station or 1km or cycle routes. As such, significant negative effects are expected.<br><br>As the site is expected to deliver over 1,000 homes, it is assumed that development of the site would provide some sustainable transport, walking and cycle links and services. As such, uncertain negligible effects are expected.<br><br>Overall, significant negative effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The area is predominantly greenfield and there is no significant flood risk in the area. However, development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>As such, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | -- | The site comprises more than 5ha of Grade 2 and more than 5ha of Grade 3 agricultural land. The site includes a mix of uses including a number of small scale B2 and B8 uses of varying quality and condition. It is possible that a strategic scale development would see these areas redeveloped as new employment or residential uses. However, these areas are relatively small and the vast majority of the site is not previously developed, resulting in a significant negative effect.<br><br>In addition, the area is in a Minerals Safeguarding Area for aggregates (eg sand, gravel, limestone) and without appropriate evidence there may be objection under Policy M2 of the Devon Minerals Plan to development that would sterilise or constrain this mineral resource at the Straitgate Farm site allocated in Policy M11 of the Minerals Plan. However, there could be an opportunity to extract the mineral resource prior to development going ahead. As such, an uncertain significant negative effect is |

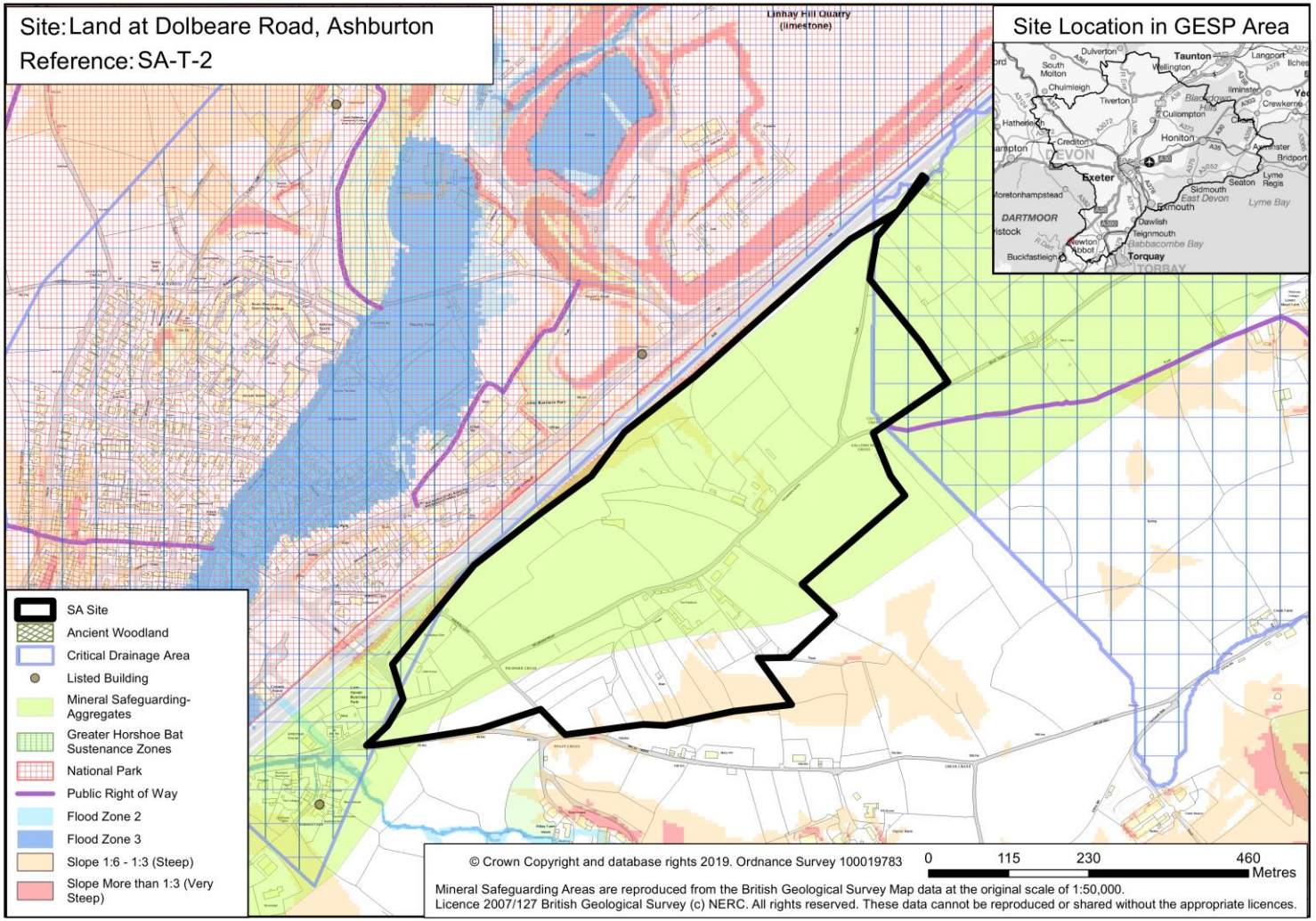
| SA Objective | SA Score | Justification |
|---|---|---|
| | | expected.<br><br>Overall, significant negative effects are expected. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or degradation. | -? | The site is adjacent to Aller Brook, which does not flow into the Exe Estuary SPA. Nonetheless, development of the site could lead to deterioration in the water quality of the watercourse.<br><br>As such, uncertain minor negative effects are expected. |
| **8. HOMES**<br><br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | ++ | The gross developable area excludes about 15 ha of the railway line. The site is likely to be able to accommodate about 3,400 – 4,360 homes. However this capacity is likely to reduce once account has been taken of the likely mitigation requirements, including those highlighted elsewhere in this assessment. The site would need to ensure a viable mix of homes (tenure and sizes) including a proportion of affordable housing to contribute towards meeting needs within the area. This range of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom and self build providers. This site is of a sufficient size to be able to support a high number of housing starts / completions from a number of different outlets around the site, which in turn would ensure a good pace of delivery. The area may be suitable for the creation of a mixed-use garden village.<br><br>As such, significant positive effects are expected. |
| **9. HEALTH**<br><br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site contains and is within 400m of Public Rights of Way and is within 800m of common land major open space. As such, significant positive effects are expected.<br><br>In addition, as the site is expected to deliver over 2,000 homes, it is assumed that development of the site would provide significant open space and active transport links. As such, significant positive effects are expected.<br><br>Overall, significant positive effects are expected. |
| **10. WELLBEING**<br><br>To support positive, safe and healthy communities. | - | It is likely that a large residential-led mixed use development of this nature will provide potential improvements to the availability of employment and homes in the area, which will provide broad wellbeing benefits. However, the site is within the 'Broadhempston/Ipplepen' Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees lower levels of deprivation than compared to Devon as a whole. Therefore, new development is less likely to have a positive effect on wellbeing locally as a result of increased investment in the area. As such, negligible effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | The site is adjacent to existing residential development, including that in Ipplepen, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. In addition, the site is crossed by an 'A' road and a railway line, and contains Buttlands Industrial Estate. These features may result in noise pollution affecting residents of the site in the longer term. It is also noted that the site adjoins and partially contains container self-storage sites to the north, however these sites are not considered to represent industrial areas that may result in long term noise pollution. As such, minor negative effects are expected.<br><br>This site is not within 1km of an AQMA. However, given the limited public transport and potential for loading of traffic onto the A381, this could have impacts at AQMAs in Newton Abbot and Totnes. If the new NA3 road (from Ogwell to Decoy) is built, this is anticipated to reduce the impact of traffic flow heading towards the Newton Abbot AQMA via Wolborough Street. Without the new NA3 road this proposed development would have a potentially high impact on the Newton Abbot AQMA. As such, minor negative effects are expected.<br><br>Overall, minor negative effects are expected. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | ++ | The area currently has poor access to services, facilities and cultural facilities. Ipplepen (a Defined Village) is adjacent and includes some area wide services and community facilities including a primary school which are appropriate for a village of its size. However they would not be sufficient to support a strategic development. The site is also not within 1km of a secondary school, a further education college or a university. As such, minor positive effects are expected.<br><br>Limited commercial community facilities such as a garden centre, golf course, petrol station and limited shops are also within 2km. The nearest supermarket is in Newton Abbot. The site is distant from cultural facilities such as a cinema or library, with the nearest being in Newton Abbot (5.5 km). Broadband availability in the locality is good with superfast broadband available nearby in Dainton (up to 72 mbps) and in the adjacent settlement of Ipplepen. As such, minor positive effects are expected.<br><br>The site is large, with the capacity to provide over 4,000 homes, and therefore it is assumed that development of the site would be more likely to provide a new primary school and secondary school onsite. As such, significant positive effects are expected.<br><br>Overall, minor positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support | ++ | The site is not located adjacent to a Main Town but is located within 1km existing or proposed employment sites, which could provide employment opportunities. As such, minor positive effects are expected.<br><br>This area would have the potential to make a contribution to employment creation and employment |

| SA Objective | SA Score | Justification |
|---|---|---|
| improved job opportunities and greater productivity in Greater Exeter. | | land in the Teignbridge area. The site is of a scale to generate a significant amount of construction based employment over a sustained period (10+ years). It is likely that a site of this scale and in this location would need to provide potentially both employment generating uses and employment sites to encourage job creation in the new community and reduce commuting. It is assumed that, as the site has capacity to deliver over 2,000 homes, the site will deliver large scale mixed use employment opportunities and a business park or employment estate. As such, significant positive effects are also expected.<br><br>Impact on tourism not considered likely.<br><br>Overall, significant positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | Although a new community or village in this location has access to Newton Abbot town centre, as well as Totnes and Torbay, the site is not located adjacent to Exeter or a Main Town.<br><br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | --/+ | The area is just 6km from the centre of Torquay and Newton Abbot. However, it currently has limited transport options, with just the A381 (Newton Abbot to Totnes) road serving the area, meaning many trips would be by car. Three bus services (177, X64, 41) pass through the northwest of the site at Ipplepen, however these cumulatively provide an hourly (not frequent) service towards Newton Abbot or Totnes. The site is not within 1km of a railway station or 1km or cycle routes. As such, significant negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br><br>Overall, mixed minor positive and significant negative effects are expected. |

## SA-T-2: Land at Dolbeare Road, Ashburton

| SA-T-2 | Land at Dolbeare Road, Ashburton |
|---|---|
| **Authority Area:** Teignbridge | |
| **Site Area:** 27.8ha (Net 14.4ha) | |
| **Approximate total capacity:** 446 – 576 dwellings | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:** Ashburton is in the national park and has a very restricted ability to grow. This 27ha site of agricultural land is in the far SW of the GESP area and adjacent to an A38 junction. The site is largely severed from the town with the road bridge being the only connection. The DNP lies on the other side of the A38. | |



| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | --?/+ | The site lies adjacent to Dartmoor National Park. The site is flagged as Amber in the HRA sensitivity work with regard to South Hams SAC and flagged as Yellow with regard to Dartmoor SAC. The site is also within South Hams SAC Greater Horseshoe Bat strategic flyway and Great Crested Newt consultation zone. Other protected species may exist, such as the Dormouse within the hedgerows. As such, uncertain significant negative effects are expected.<br>However, the site has capacity for less than 1,000 homes, and therefore is expected to provide local public open space on site that could mitigate the biodiversity impact of development. As such, minor positive effects are also expected.<br>Overall, mixed minor positive and uncertain significant negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is relatively flat and comprises of open rural countryside. Development would cause an urbanisation effect on the environment. The site is of medium-high landscape sensitivity due its proximity to Dartmoor National Park which is in part overridden by the presence of the A38.<br>As such, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/-? | The site does not contain any heritage assets within its boundaries. There are multiple designated assets within 3km of the site including at Ashburton to the south west, which contains over 30 listed buildings. Dolbeare farmhouse lies within 500m of the site and there is a possibility of archaeological remains on site associated with past uses (medieval quarry and gallows). The nearest scheduled monument is the earthworks in Boro' Wood, which is around 2km to the north east. As such, uncertain minor negative effects are expected due to the potential for development to compromise these historic environment assets.<br>It is likely that the site is of sufficient size (>10ha) to accommodate a well-designed development and create a new high quality built environment. It should be possible for development to respond appropriately to existing heritage assets in the area and minimise any disturbance to the historic environment. As such, uncertain minor positive effects are expected.<br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br>To minimise greenhouse gas | --? | The site is not located within 5km of a Main Town or Exeter City. As such, uncertain significant negative effects are expected.<br>The site is not located within 1km of a railway station but the site is located within 1km of a cycle path. The site is also located within 500m of bus stops however these are not served by frequent bus |

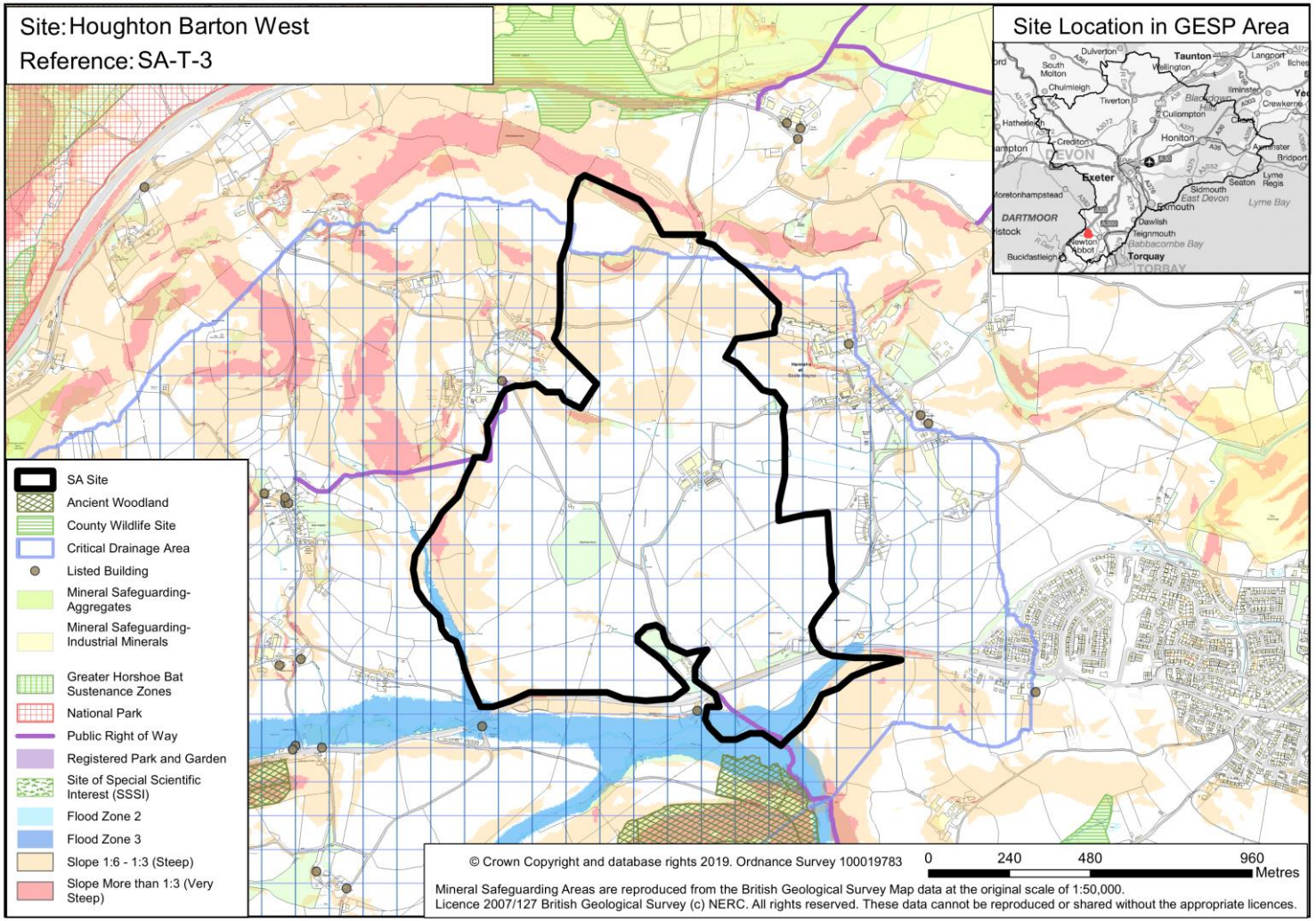
| SA Objective | SA Score | Justification |
|---|---|---|
| emissions. | | services. As such, due to the lack of accessible public transport links in proximity to the site, uncertain minor negative effects are expected.<br><br>As the site is expected to deliver less than 1,000 homes, it is assumed that development of the site would provide fewer sustainable transport, walking and cycle links, and services. As such, uncertain significant negative effects are also expected.<br><br>Overall, uncertain significant negative effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and there is no significant flood risk within the area. However, development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | --? | The area is located entirely on Grade 3 agricultural land, and as such contains more than 5ha of Grade 3 agricultural land. Development could have a significant negative effect on this SA objective due to the loss of high quality agricultural land. However, it is uncertain whether this is Grade 3a or Grade 3b agricultural land. As such, uncertain significant negative effects are expected.<br><br>Although the site does not include any previously developed land that could be reused, it is noted that the site contains some agricultural development buildings.<br><br>In addition, the majority of this area is located in a Minerals Safeguarding Area for aggregates (eg. sand, gravel and limestone) and without appropriate evidence there may be objection under Policy M2 of the Devon Minerals Plan to development that would sterilise or constrain this mineral resource. However, there could be an opportunity to extract the mineral resource prior to development going ahead. As such, uncertain significant negative effects are expected.<br><br>Overall, uncertain significant negative effects are expected. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or degradation. | 0 | The site is not adjacent to and does not contain any watercourse.<br><br>As such, negligible effects are expected. |
| **8. HOMES**<br><br>To provide and maintain a sufficient supply of good quality, financially | + | The western half of the site is being promoted by a volume housebuilder. The site is likely to be able to accommodate about 476-576 homes. However this capacity is likely to reduce once account has been taken of the likely mitigation requirements, including those highlighted elsewhere in this assessment |

| SA Objective | SA Score | Justification |
|---|---|---|
| accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | | (e.g. the need to provide significant ecological, landscape and drainage mitigation areas to ensure minimisation of impacts on the SAC, Dartmoor and the critical drainage area). The site would also need to ensure a viable mix of homes (tenure and sizes) including a proportion of affordable housing to contribute towards meeting needs within the area. The range of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom and self-build providers. The site is of a sufficient size to potentially be able to support a moderate number of housing completions from a number of different outlets around the site, which in turn will ensure a good pace of delivery. The need for significant infrastructure investment such as access improvements will further erode land values, and given the site is in multiple ownerships, this may challenge a joined up approach to site delivery.<br><br>As such, minor positive effects are expected. |
| **9. HEALTH**<br><br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | + | The site is not within 800m of major open space, but it is within 400m of Public Rights of Way.<br><br>As such, minor positive effects are expected. |
| **10. WELLBEING**<br><br>To support positive, safe and healthy communities. | - | The site is within the 'Ashburton and surrounding areas' Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees average levels of deprivation than compared to Devon as a whole. It is likely that medium residential development of this nature will provide potential improvements to the availability of homes in the area, which will provide broad wellbeing benefits. As such, negligible effects are expected.<br><br>The site is in close proximity to existing residential development, including that in Ashburton, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. In addition, the site lies adjacent to an 'A' road. This feature may result in noise pollution affecting residents of the site in the longer term. As such, minor negative effects are expected.<br><br>This site is not within 1km of an AQMA. However, given the limited public transport and potential for loading of traffic onto the A38, this could have impacts on air and noise pollution. As such, minor negative effects are expected.<br><br>Overall, minor negative effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **11. ACCESS TO SERVICES**<br>To provide accessible and attractive services and community facilities for all ages and interests. | --/+ | The site is not located adjacent to any Main Towns or Defined Villages. The closest services are located in Ashburton, which is located less than a 1km to the south west of the site and has a range of shops and facilities. However, pedestrian safety crossing the A38 slipways to access services is likely to be of a concern. It is not clear how this would be mitigated. As such, significant negative effects are expected.<br>The site is within 1km of a primary school and it is within 500m of a secondary school. Increased capacity may need to be planned for at schools in the area should development come forward. As such, uncertain minor positive effects are expected.<br>Currently, the area within the site only has access to standard broadband speeds (10-30Mbps). However, the site is adjacent to an area of superfast broadband (80-300Mbps) availability which could be extended to the site if development came forward. As such, minor positive effects are expected.<br>The site is medium sized, with the capacity to provide over 500 homes, and therefore it is assumed that the site would be more likely to accommodate a primary school on site. As such, minor positive effects are expected.<br>Overall, mixed significant negative and minor positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | --/+ | The site is not adjacent to a main town and is not within 1km of existing or proposed employment sites which could provide employment opportunities. As such, significant negative effects are expected.<br>Jobs would be created during the construction phase of the site, and any additional homes would create expenditure in the area. It is assumed that, as the site has capacity to deliver over 500 homes, it will also provide small scale mixed use employment opportunities and a small cluster of shops and services. As such, minor positive effects are effects are expected.<br>The site is unlikely to have a negative impact on tourism.<br>Overall, mixed significant negative and minor positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT** | -? | The site is not located within 1km of a railway station but the site is located within 1km of a cycle path. The site is also located within 500m of bus stops however these are not served by frequent bus |

| SA Objective | SA Score | Justification |
|---|---|---|
| To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | | services.<br><br>As such, due to the lack of accessible public transport in proximity to the site, uncertain minor negative effects are expected. |

## SA-T-3: Houghton Barton West

| SA-T-3 | Houghton Barton West |
|---|---|
| **Authority Area:** Teignbridge | |
| **Site Area:** 126.3 ha (Net 50ha) | |
| **Approximate total capacity:** 1,550 – 2,000 dwellings | |
| **Site status:** Potential site option | |
| **Outline description and context:** 120 hectare site adjacent to Seale Hayne and Teignbridge NA1 allocation. Site lies approximately 3.5km from Newton Abbot town centre, and 3km from Bickington. Site lies on the A383, with gently rolling countryside closer to the road, rising up Ingsdon Hill (c180m) to the north. |  |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/--? | The site is within 1km of Chipley Quarries and River Lemon Valley Woods, both SSSIs, and Dartmoor National Park. The site is also within 250m of Gorse Blossom Copse County Wildlife Site and within 1km of two County Wildlife Sites, Littlejoy Plantation and Holbeam Mill. The site contains priority habitat deciduous woodland. A small section in the southern part of the site lies within Strategic Nature Area, Woodland. The site lies within Greater Horseshoe Bat flyways, Cirl Bunting and Great Crested Newt consultation zones. A site of this size is likely to also contain other protected species such as Dormouse. The site is flagged as Amber in the HRA sensitivity work with regard to South Hams SAC. Development would need to avoid loss of existing hedgerows and woodlands, and ensure the use of buffers and creation of dark corridors to protect the integrity of the South Hams SAC Greater Horseshoe Bat strategic flyway which runs along southern edge of site adjacent to A383. As such, uncertain significant negative effects are expected.<br><br>Existing green infrastructure on the site, including the hedgerows and woodland blocks, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space and playing pitches on site that could mitigate the biodiversity impact of development. As such, significant positive effects are also expected.<br><br>Overall, mixed significant positive and uncertain significant negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is relatively flat and comprises of open rural countryside. Development within the site would cause an urbanisation effect on the environment. Part of the site is of low-medium landscape sensitivity as it is not considered such an integral part of the wider landscape. As such, uncertain minor negative effects are expected.<br><br>The remainder of the site forms an integral part of the wider landscape setting between Exeter and Topsham due to it being located on a prominent ridge and is considered to be of medium-high landscape sensitivity. Development should avoid developing on higher slopes (possibly above 80-90m) to avoid significant landscape impact. As such, uncertain significant negative effects are expected.<br><br>Overall, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and | +?/-? | The site does not contain any designated heritage assets but does contain a circular ditch near the highest point in the site (about 50m in diameter) which is thought to be prehistoric. There are multiple listed buildings within 3km of the site including the Grade II listed Seale Hayne campus to the east and Ingsdon Mill Mill House to the south (Grade II). The nearest scheduled monuments are Castle Dyke and Berry's Wood earthwork which are located around 2km to the south-east. Remaining heritage assets within 3km include East Ogwell Conservation Area located 2.5km south-east and Stover Park |

| SA Objective | SA Score | Justification |
|---|---|---|
| accessibility in new build development. | | (Registered Park and Garden), which is around 1.5km to the north-east. As such, uncertain minor negative effects are expected.<br><br>It is likely that the site is of sufficient size (>10ha) to accommodate a well-designed development and create a new high quality built environment. It should be possible for development to respond appropriately to existing heritage assets in the area and minimise any disturbance to the historic environment. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | - | The site is located within 5km of the Main Towns of Newton Abbot and Kinnsteignton. As such, uncertain negligible effects are expected.<br><br>The site is not located within 1km of a railway station or a cycle path. The site is located adjacent to a bus stop however this is not served by a frequent bus service. As such, due to the lack of accessible public transport links in proximity to the site, minor negative effects are expected.<br><br>As the site is expected to deliver over 1,000 homes, it is assumed that development of the site would provide some sustainable transport, walking and cycle links and services. As such, uncertain negligible effects are expected.<br><br>Overall, minor negative effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and there is no significant flood risk within the area. However, parts of the site are on flood zone 2 and flood zone 3 to the south east and south west. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | -- | The site is comprised of more than 5ha of Grade 2 agricultural land. As such, significant negative effects are expected due to the potential loss of high quality agricultural land during development. The remaining land within the site is Grade 3 agricultural land but it is unclear if it Grade 3a or Grade 3b.<br><br>The site does not contain any previously developed land.<br><br>The site is not located within any Mineral Safeguarding Areas.<br><br>Overall, significant negative effects are expected due to development on high quality agricultural land. |

| SA Objective | SA Score | Justification |
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| **7. WATER RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or degradation. | -? | Development should ensure no deterioration in the water quality of the River Lemon, which runs along the site's southern boundary but does not run into the Exe Estuary SPA.<br>As such, uncertain minor negative effects are expected. |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | ++ | The site has the capacity to deliver around 1,550 – 2,000 homes. However this capacity may reduce once account has been taken of the likely mitigation requirements, including those highlighted elsewhere in this assessment. The site would also need to ensure a viable mix of homes (tenure and sizes) including a proportion of affordable housing to contribute towards meeting needs within the area. The range of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom and self-build providers, although the site is all in one ownership, which may reduce the opportunity for the diversification of housing supply including from small developers. This site is of a sufficient size to be able to support a high number of housing starts / completions from a number of different outlets around the site, which in turn will ensure a good pace of delivery. The capacity may be reduced further due to other landscape constraints, particularly around the northwest of the site where the ridgelines and landscape may make development unsuitable. The site is adjacent to the existing NA1 allocation which includes a primary school.<br>As such, significant positive effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site is not within 800m of major open space, but does contain Public Rights of Way. As such, minor positive effects are expected.<br>However, as the site has the capacity to deliver 2,000 homes, it is assumed that development of the site would provide significant open space and active transport links. As such, significant positive effects are expected.<br>Overall, significant positive effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | - | The site is within the 'south and west of Newton Abbot' Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment reporting of index of multiple deprivation, sees average levels of deprivation than compared to Devon as a whole. It is likely that medium residential development of this nature will provide potential improvements to the availability of homes in the area, which will provide broad wellbeing benefits. As such, negligible effects are expected.<br>The site is within close proximity to the edge of existing residential development, Newton Abbot; however, it is not likely that the development will be affected by noise and light pollution from |

| SA Objective | SA Score | Justification |
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| | | development of the site. In addition, the site is crossed by an 'A' road. This feature may result in noise pollution affecting residents of the site in the longer term. As such, minor negative effects are also expected.<br><br>The site is not within 1km of an AQMA. If the forthcoming new road linking Hele Park to Forches cross is delivered prior to this development and provided upgrades to the bus route and improved links are made to the nearest train station, then this would alleviate the impact of traffic generated by this site, meaning there would likely be no significant impact on the Newton Abbot AQMA. However, car movements from the site could end up negatively impacting Newton Abbot's AQMA. As such, minor negative effects are expected.<br><br>Overall, minor negative effects are expected. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | --/+ | The site is not located adjacent to any Main Towns or Defined Villages. The site currently has limited access to any services or facilities, with the nearest shops, cultural facilities and health services being located at Newton Abbot which is 3-4 km from the site. As such, significant negative effects are expected.<br><br>The site is located within 1km of a primary school but it is not within 1km of a secondary school. Increased capacity may need to be planned for at schools in the area should development come forward. As such, uncertain minor positive effects are expected.<br><br>The area within the site currently has access to standard broadband speeds (10Mbps-30Mbps). The site is not located directly adjacent to an area of superfast broadband. As such, negligible effects are expected.<br><br>The site is medium sized, providing over 500 homes, and therefore it is assumed that the site would be more likely to accommodate a primary school on site. As such, minor positive effects are expected.<br><br>Overall, mixed significant negative and minor positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | ++ | The site is not adjacent to a main town but it is within 1km of existing or proposed employment sites which could provide employment opportunities. As such, minor positive effects are expected<br><br>Jobs would be created during the construction phase of the site, and any additional homes would create expenditure in the area. It is assumed that, as the site has capacity to deliver around 2,000 homes, the site will also deliver large scale mixed use employment opportunities and a business park or employment estate as well as a neighbourhood hub with shops, services and community buildings. As such, significant positive effects are expected. |

| SA Objective | SA Score | Justification |
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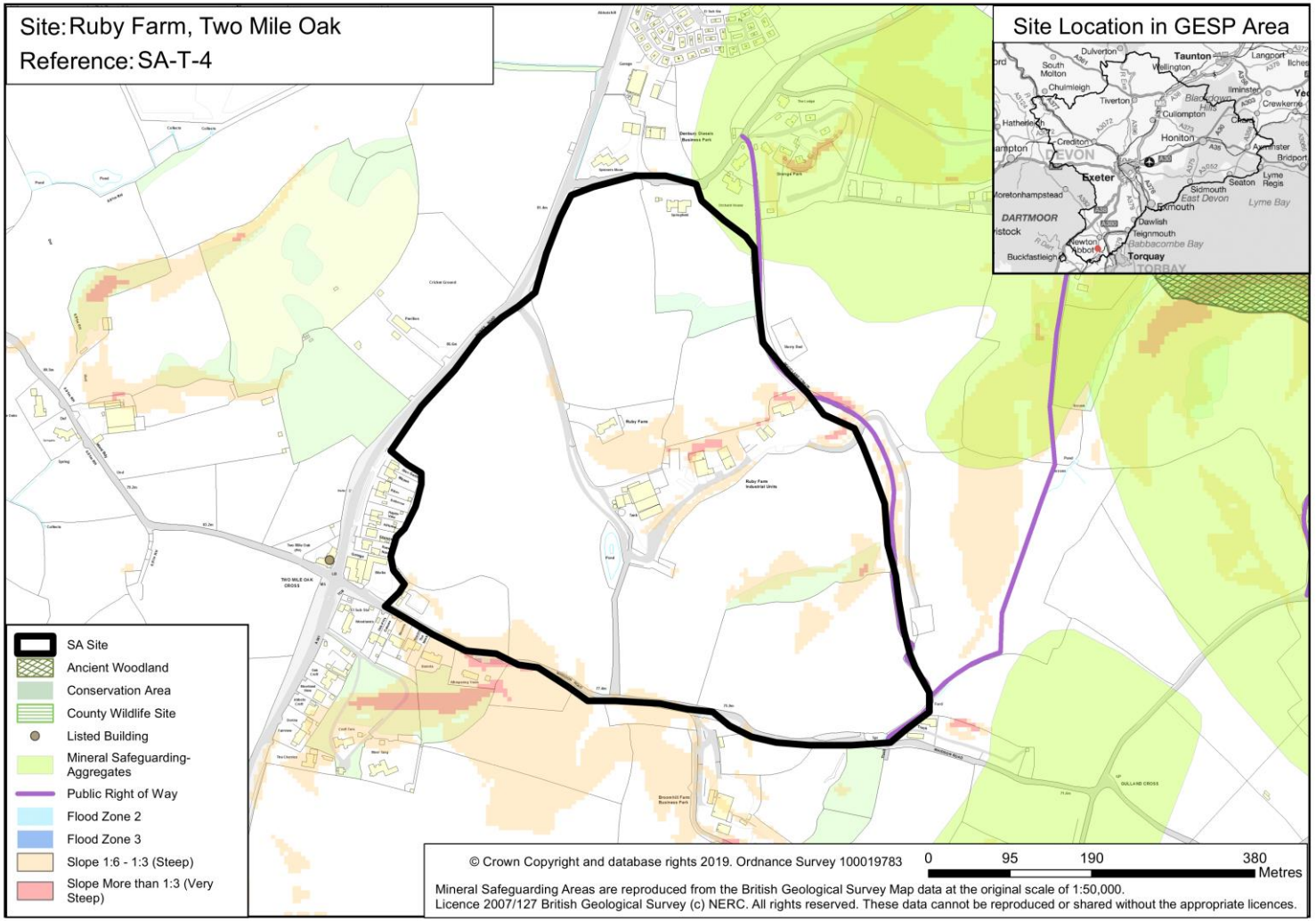
| | | The site is not likely to have any negative impacts on tourism.<br><br>Overall, significant positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br><br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | +/- | The site is not located within 1km of a railway station or a cycle path. The site is located adjacent to a bus stop however this is not served by a frequent bus service. As such, due to the lack of accessible public transport links in proximity to the site, minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br><br>Overall, mixed minor positive and minor negative effects are expected. |

## SA-T-4: Ruby Farm, Two Mile Oak

| SA-T-4 | Ruby Farm, Two Mile Oak |
|---|---|
| **Authority Area:** Teignbridge | |
| **Site Area:** 26.8ha (Net 12.6ha) | |
| **Approximate total capacity:** 390 – 504 dwellings | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:** The site lies 3.5km from Newton Abbot town centre on the A381. The land is currently rolling agricultural fields and is likely to include protected species / habitats including Greater Horseshoe Bats. The site is relatively small and may not accommodate 500 dwellings. The site is not served by any existing services and facilities, meaning residents would have to travel for all their needs, such as access to schools. |  |

| SA Objective | SA Score | Justification |
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| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | --?/+ | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, but is within 1km of six County Wildlife Sites, Conitor Copse, Ladywell Wood, Greater/Lower Shortleys, Whiddon Cross Fields, Ross Park and Stoneycombe Quarry and one County Geological Site Field nr Court Grange. The north western section of the site lies within Strategic Nature Area, woodland. The site is flagged as Amber in the HRA sensitivity work with regard to South Hams SAC. Half of the site is within flightpaths of Greater Horseshoe Bats. The site is entirely within Greater Crested Newt and Cirl Bunting consultation zones. The site also has a number of mature hedgerows and other species such as Dormouse could be present. As such, uncertain significant negative effects are expected.<br><br>Existing green infrastructure on the site, including woodland blocks, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for less than 1,000 homes, and therefore is expected to provide local public open space on site that could mitigate the biodiversity impact of development. As such, minor positive effects are also expected.<br><br>Overall, mixed minor positive and uncertain significant negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | -? | The site is comprised of open rural countryside and so development would have an urbanisation effect on the environment. The site is of medium landscape sensitivity as development may erode the relative nucleated character of settlement in the area.<br><br>As such, uncertain minor negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/-? | The site does not contain any designated heritage assets but there is a possibility of archaeological remains related to an unscheduled manor mentioned in a document of AD956 (Carswylee). The site is within 3km of multiple listed buildings including the Grade II listed Two Mile Oak Inn, which is to the immediate west. The nearest scheduled monuments are around 500m to the west and south-west (four barrows near Dornafield Farm). Additionally, Abbotskerswell Conservation Area is located around 500m to the north-east and contains multiple listed buildings. As such, uncertain minor negative effects are expected.<br><br>It is likely that the site is of sufficient size (>10ha) to accommodate a well-designed development and create a new high quality built environment. It should be possible for development to respond appropriately to existing heritage assets in the area and minimise any disturbance to the historic environment. As such, uncertain minor positive effects are expected.<br><br>Overall, uncertain minor negative and uncertain minor positive effects are expected. |

| SA Objective | SA Score | Justification |
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| **4. CLIMATE CHANGE MITIGATION**<br>To minimise greenhouse gas emissions. | --? | The site is located within 5km of the Main Towns of Newton Abbot and Kinkerswell. As such, uncertain negligible effects are expected.<br>The site is not located within 1km of cycle paths or railway stations. The site is located adjacent to a bus stop however this is not served by a frequent bus service. As such, due to the lack of accessible public transport links in proximity to the site, minor negative effects are expected.<br>As the site is expected to deliver less than 1,000 homes, it is assumed that development of the site would provide fewer sustainable transport, walking and cycle links, and services. As such, uncertain significant negative effects are also expected.<br>Overall, uncertain significant negative effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and there is no significant flood risk within the area. However, development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br>Therefore, uncertain minor negative effects can be expected. |
| **6. LAND RESOURCES**<br>To utilise our land resources efficiently and minimise their loss or degradation. | -- | The site contains over 5ha of Grade 2 agricultural land. As such, significant negative effects are expected to the potential loss of high quality agricultural land during development. The remaining 1.5ha of the site is comprised of Grade 3 agricultural land but it is unclear if it is Grade 3a or Grade 3b.<br>Although the site does not contain any previously developed land that could be reused, it is noted that the site contains some agricultural buildings.<br>A small part of the northern area of the site is located on a Mineral Safeguarding Area for aggregates (e.g. sand, gravel and limestone) and without appropriate evidence there may be objection under Policy M2 of the Devon Minerals Plan to development that would sterilise or constrain this mineral resource. As such, uncertain minor negative effects are expected, as there could be an opportunity to extract minerals before development goes ahead.<br>Overall, significant negative effects are expected. |
| **7. WATER RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or | 0 | The site is not adjacent to and does not contain any watercourses.<br>As such, negligible effects are expected. |

| SA Objective | SA Score | Justification |
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| degradation. | | |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | + | The site is likely to be able to deliver around 390 – 504 homes. However, this capacity is likely to reduce once account has been taken of the likely mitigation requirements. The site would also need to ensure a viable mix of homes (tenure and sizes) including a proportion of affordable housing to contribute towards meeting needs within the area. This range of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom and self-build providers. This site may be of a sufficient size to be able to support a moderate number of housing starts / completions from more than one outlet around the site, which may support pace of delivery.<br>As such, minor positive effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | + | The site is not within 800m of major open space, but lies adjacent to Public Rights of Way.<br>As such, minor positive effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | - | The site is within the 'Broadhempston/Abbotskerswell' Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment reporting of index of multiple deprivation, sees below average levels of deprivation than compared to Devon as a whole and therefore new development is less likely to have a positive effect on wellbeing locally as a result of increased availability of homes in the area. As such, negligible effects are expected.<br>The site is not within close proximity to existing residential developments, but the site lies adjacent to an 'A' road. This feature may result in noise pollution affecting residents of the site in the longer term. As such, minor negative effects are also expected.<br>The site is not within 1km of an AQMA. However, car movements from the site would negatively impact Newton Abbot's AQMA, especially since there are limited active travel options from the site. As such, minor negative effects are expected.<br>Overall, minor negative effects are expected. |
| **11. ACCESS TO SERVICES**<br>To provide accessible and attractive | --/+ | The site is not located adjacent to any Main Towns or Defined Villages. The site has poor existing access to area wide services such as schools and healthcare. The nearest healthcare services are in |

| SA Objective | SA Score | Justification |
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| services and community facilities for all ages and interests. | | Newton Abbot, which is accessible by car or bus. There is no safe segregated cycle route at present. There are limited community facilities nearby, with a pub at Two Mile Oak and a garden centre / Golf course 700m away, but these do not provide the essential services for a large residential development. Access to the community shop and hall at Abbotskerswell is 1km by road. As such, significant negative effects are expected.<br><br>The site is located within 1km of a primary school but it is not within 1km of any secondary schools. As such, uncertain minor positive effects are expected.<br><br>The area within the site currently has access to standard broadband download speeds (10-30Mbps) but it is not adjacent to any areas of superfast broadband. As such, negligible effects are expected.<br><br>The site is medium sized, providing just over 500 homes, and therefore it is assumed that the site would be more likely to include a primary school on site. As such, minor positive effects are expected.<br><br>Overall, mixed significant negative and minor positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | + | The site is not adjacent to a main town but it is within 1km of existing or proposed employment sites which could provide employment opportunities. As such, minor positive effects are expected.<br><br>Jobs would be created during the construction phase of the site, and any additional homes would create expenditure in the area. It is assumed that, as the site has the capacity to deliver just over 500 homes, the site will deliver small scale mixed use employment opportunities with a small cluster of shops and services. As such, minor positive effects are expected.<br><br>The site is unlikely to have any negative impacts on tourism.<br><br>Overall, minor positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br><br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, | - | The site is not located within 1km of cycle paths or railway stations. The site is located adjacent to a bus stop however this is not served by a frequent bus service.<br><br>As such, due to the lack of accessible public transport links in proximity to the site, minor negative effects are expected. |

| SA Objective | SA Score | Justification |
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| cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | | |

### SA-T-5: South of Priory Road

| SA-T-5 | South of Priory Road |
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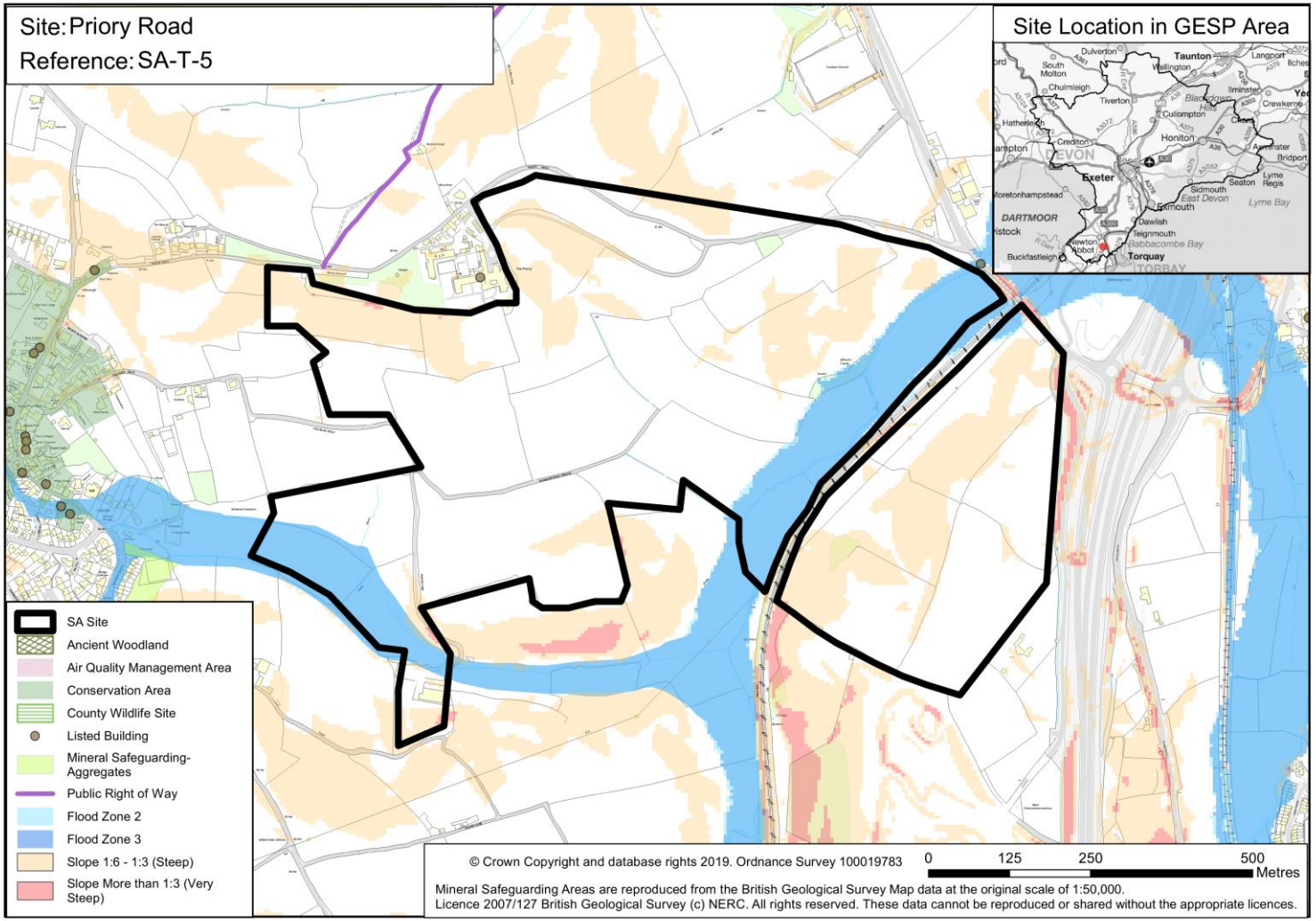
| **Authority Area:** Teignbridge |  |
| **Site Area:** 59ha | |
| **Approximate total capacity:** 706 – 912 dwellings | |
| **Site status:** Potential site option | |
| **Outline description and context:** Site south of Priory Road and NA3 allocation, 400m from the South Devon Link Road. The site has significant constraints, including the listed Priory, the railway line, wildlife corridors and access. The site may be capable of delivering strategic scale development if delivered to a sufficiently high quality.<br><br>East part of the site - Steep island of land between Railway and South Devon Link Road. The area is severed from wider area, with access limited to the north only. Steep hillside is likely to limit capacity and increase build costs and landscape impact. | |

| SA-T-5 | South of Priory Road | |
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| SA Objective | SA Score | Justification |
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | --?/+ | The site is within 1km of Wolborough Fen, SSSI, Aller Sand Pit, SSSI, and Decoy, Country Park. The site is within 250m of Forde Fields County Wildlife Site and within 1km of three County Wildlife Sites, Decoy Country Park & Stray Park Meadow, Yanndon Lane Fields and Ladywell Wood. The site is also within 1km of Field Court Grange County Geological Site. The site contains two priority habitats, good quality semi-improved grassland and deciduous woodland. In addition, the site is flagged as Amber in the HRA sensitivity work with regard to South Hams SAC. The site also contains strong hedgerows which include mature trees and is crossed by two Greater Horseshoe Bat strategic flyways. The site is within Greater Crested Newt and Cirl Bunting consultation zones. The site includes a tributary stream of the Aller Brook where Otter have been recorded. Other protected species may also be present such as Dormouse. As such, uncertain significant negative effects are expected.<br><br>Existing green infrastructure on the site, including the stream and woodland blocks, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>The site has capacity for fewer than 1,000 homes, and therefore is expected to provide local public open space on site that could mitigate the biodiversity impact of development. As such, minor positive effects are also expected.<br><br>Overall, mixed minor positive and uncertain significant negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is comprised of rural open countryside with landscape character that is is considered to be Lower Rolling Farmed and Settled Valley Slopes. Development would have an urbanisation effect on the environment. The site is of medium-high landscape sensitivity is it is located in a 'strategic local break' identified in the Teignbridge Local Plan. The west of the site is within a visually self-contained valley, which reduces wider landscape impact, but it is adjacent to the mainline railway, with views into it from The Priory and Abbotskerswell. The east of the site is located on a prominent hill, which can be seen from the A380 and railway line, meaning that development in this location would have particularly harmful local landscape impacts. Development of too high a density will erode the character of development around Newton Abbot.<br><br>As such, uncertain significant negative effects are expected. The sensitivity assessment for this site was based on a slightly different site boundary to that which has now been included in the SA, which contributes additional uncertainty to the potential effect identified. |
| **3. HISTORIC AND BUILT ENVIRONMENT** | +?/-? | There are no heritage assets contained within the site boundaries. There is an unscheduled 'ring ditch' in the north east of the site, which may make development not possible in this 0.14ha area. However, |

| SA-T-5 | South of Priory Road | |
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| To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | | there are multiple designated assets within 3km including at the northern boundary of the site, which is adjacent to the Grade II* listed St Augustines Priory and Grade II listed Langford Bridge. Additionally, there is a further Grade II listed building (Barn Owl) 400m to the east. The site is within 3km of multiple Conservation Areas to the north (Newton Abbot), east (Coffinswell), south (Kingkerswell) and west (Abbotskerswell), which contain multiple listed buildings. Additionally, there are scheduled monuments within 3km to the south (Prehistoric field system), north-east (Milber Down camp) and north-west (Berry's Wood earthwork). It is possible residential development could cause disturbance to these historic environment assets. As such, uncertain minor negative effects are expected.<br><br>It is likely that the site is of sufficient size (>10ha) to accommodate a well-designed development and create a new high quality built environment. It should be possible for development to respond appropriately to existing heritage assets in the area and minimise any disturbance to the historic environment. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | --?/+? | The site is located within 1km of the Main Towns of Newton Abbot and Kinkerswell. As such, uncertain minor positive effects are expected.<br><br>The site is not located within 1km of cycle routes or railway stations. The site is located within 500m of bus stops within Abbotskerswell, however these are not served by a frequent bus service. As such, due to the lack of accessible public transport links in proximity to the site, minor negative effects are expected.<br><br>As the site is expected to deliver less than 1,000 homes, it is assumed that development of the site would provide fewer sustainable transport, walking and cycle links, and services. As such, uncertain significant negative effects are also expected.<br><br>Overall, mixed uncertain significant negative and minor positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and on flood zone 1. Areas to the south west and to the east of the site are on flood zone 2 and flood zone 3. However, development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources | -- | The site contains over 5ha of Grade 2 agricultural land. As such, significant negative effects are expected due to the potential loss of high quality agricultural land during development. The remaining |

| SA-T-5 | South of Priory Road | |
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| efficiently and minimise their loss or degradation. | | land within the site is Grade 3a, Grade 3b and Grade 4 agricultural land.<br><br>The site does not contain any previously developed land and is not located within any Minerals Safeguarding Areas.<br><br>Overall, significant negative effects due to development on high quality agricultural land. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or degradation. | -? | Development should ensure no deterioration in the water quality of Aller Brook, which passes through the site boundaries but does not flow into the Exe Estuary SPA.<br><br>As such, uncertain minor negative effects are expected. |
| **8. HOMES**<br><br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | + | The site has the capacity to deliver around 706 – 912 homes. However, the capacity is likely to reduce once account has been taken of the likely mitigation requirements. The site would also need to ensure a viable mix of homes (tenure and sizes) including a proportion of affordable housing to contribute towards meeting needs within the area. The range of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom and self-build providers. The site is of a sufficient size to be able to support a high number of housing completions from potentially more than one outlet, which in turn may increase pace of delivery.<br><br>As such, minor positive effects are expected. |
| **9. HEALTH**<br><br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site is within 800m of Accessible Woodland, major open space, and is within 400m of Public Rights of Way.<br><br>As such, significant positive effects are expected. |
| **10. WELLBEING**<br><br>To support positive, safe and healthy communities. | -- | The west of the site is within the 'Broadhempston/Abbotskerswell' Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment reporting of index of multiple deprivation, sees below average levels of deprivation than compared to Devon as a whole and therefore new development is less likely to have a positive effect on wellbeing locally as a result of increased availability of homes in the area. The east of the site is located within the 'Kinkerswell and surrounding areas' Middle Super Output Area which sees average levels of deprivation compared to the Devon as a whole and therefore the potential benefits of new homes are also limited. As such, negligible effects |

| SA-T-5 | South of Priory Road | |
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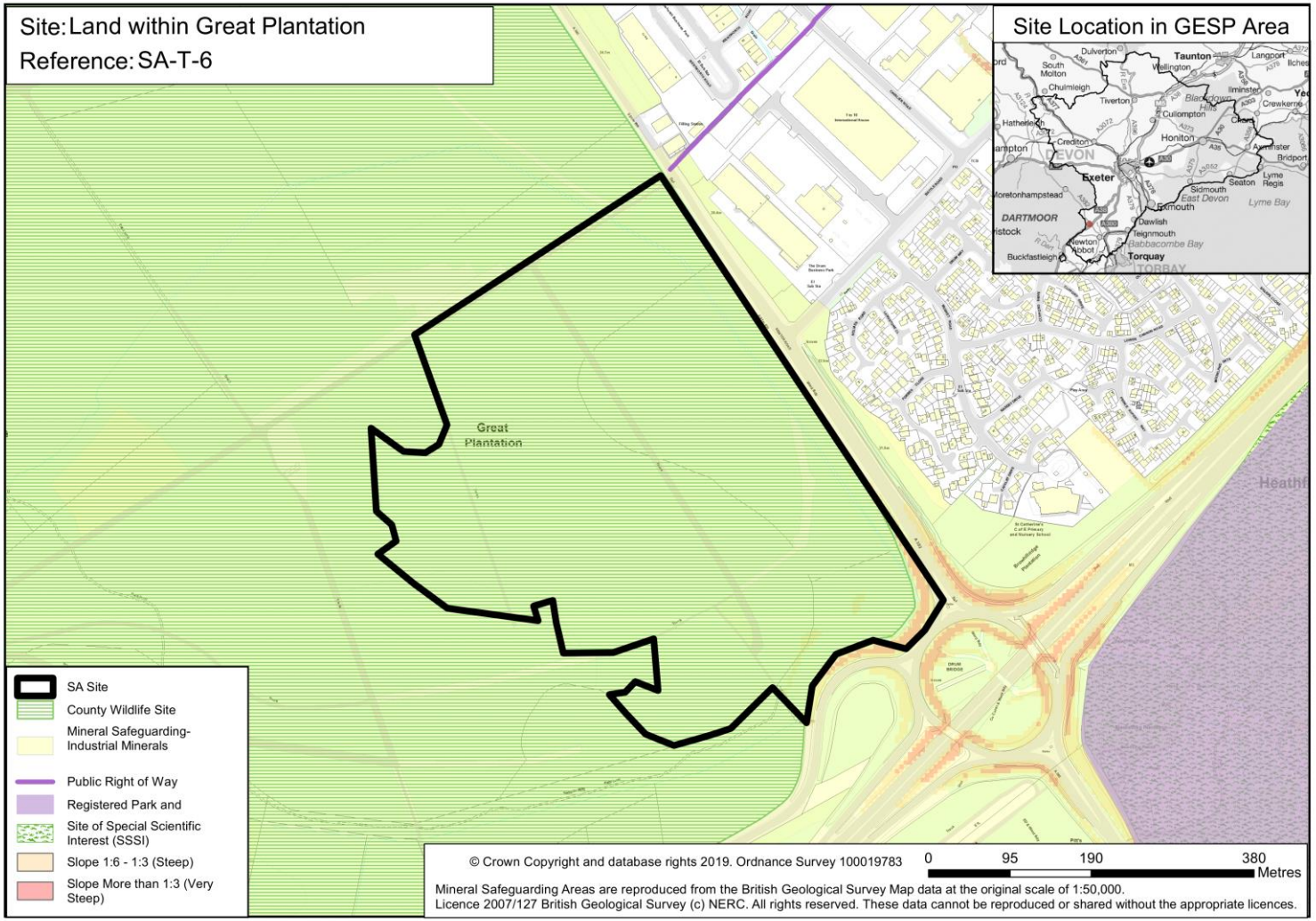
| | | are expected.<br><br>The site is in close proximity to the edges of existing residential development, Abbotskerswell to the west, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. The site also lies adjacent to a railway line on its eastern border. This feature may result in noise pollution affecting residents of the site in the longer term. As such, minor negative effects are also expected.<br><br>The site is within 1km of Kingskerswell AQMA, so additional car movements from the site would negatively impact the poor air quality of the AQMA. As such, significant negative effects are expected.<br><br>Overall, significant negative effects are expected. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | --/+ | The site is not located directly adjacent to any settlements. Abbotskerswell is located around 500m to the west and Kinkerswell is located within 1km to the south east. Improved cycling and walking access will be required to make the services located in these settlements accessible to the site. For a wider range of shops and facilities Newton Abbot is located within 3km to the north and is accessible by bus. As such, significant negative effects are expected.<br><br>The site is within 500m of Abbotskerswell Primary School but it is not within 1km of any secondary schools. Additional primary school capacity is available in Newton Abbot and Kinkerswell as well a secondary schools being located in Newton Abbot. However, access to these schools is likely to be reliant upon transport by car or bus. As such, uncertain minor positive effects are expected.<br><br>The site is adjacent to areas that have access to superfast broadband (80-300Mbps), which it is assumed could be extended to the site if development came forward. As such, minor positive effects are expected.<br><br>The site is medium sized, proving over 500 homes, and therefore it is assumed that development would be more likely to accommodate a primary school on site. As such, minor positive effects are expected.<br><br>Overall, mixed significant negative and minor positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater | + | The site is not directly adjacent to a Main Town but it is within 1km of existing or proposed employment sites which could provide employment opportunities. As such, minor positive effects are expected.<br><br>Jobs would be created during the construction phase of the site, and any additional homes would create expenditure in the area. It is assumed that, as the site has the capacity to deliver over 500 dwellings, the site will also provide small scale mixed use employment opportunities and small hub of |

| SA-T-5 | South of Priory Road | |
|---|---|---|
| Exeter. | | shops and services. As such, minor positive effects are expected.<br>The site is unlikely to have any negative impacts on tourism.<br>Overall, minor positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located directly adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | - | The site is not located within 1km of cycle routes or railway stations. The site is located within 500m of bus stops within Abbotskerswell, however these are not served by a frequent bus service.<br>As such, due to the lack of accessible public transport links in proximity to the site, minor negative effects are expected. |

### SA-T-6: Land within Great Plantation

| SA-T-6 | Land within Great Plantation |
|---|---|
| **Authority Area:** Teignbridge |  |
| **Site Area:** 24.5ha (Net 20ha) | |
| **Approximate total capacity:** 20ha employment | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:** Large flat site containing plantation forest and within the Ball Clay mineral safeguarding area. The site is promoted by Forestry Commission and contains a mix of coniferous and deciduous forest. The site borders the DNP to the west and the Heathfield industrial estate to the east. | |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | --? | The site lies within 250m of Stover Park, SSSI and Stover, Local Nature Reserve and Country Park and within 1km of Bovey Heathfield, SSSI and Local Nature Reserve. The site lies entirely within Great Plantation County Wildlife Site (which contains remnant heath and acid grassland habitats which support dormice, breeding nightjar and for breeding pearl-bordered and dingy skipper butterflies) and within 1km of two County Wildlife Sites, Heathfield Pennyroyal Site and Heathfield Butterfly Reserve. The site contains priority habitat deciduous woodland. In addition, the site is flagged as Amber in the HRA sensitivity work with regard to South Hams SAC and lies within South Hams SAC 4km buffer zone and partially within in the slight corridor of Greater Horseshoe Bats. The site is within Strategic Nature Area, coastal and floodplain grazing marsh. Bovery Heath SSSI is vulnerable to air pollution and to increased recreational use.<br><br>As such, uncertain significant negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | -? | The site is considered to have landscape character of Lowland Plains and is flat and heavily forested. Development within the site would have an urbanisation effect on the environment. The impact of development could be mitigated by retaining strategic areas of woodland and green space. The site is low-medium landscape sensitivity as there is likely to be negligible impact on the setting of Dartmoor National Park.<br><br>As such, uncertain minor negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/-? | There are no heritage assets located within the site boundaries. There are heritage assets within close proximity to the site including a 15th centruy tin workings in the area known as Ilford Park to the south and Stover Park which forms part of a Registered Park and Garden to the south east (about 400m), both of which are the other side of the A38. There are multiple listed buildings within 3km of the site and Bovey Tracvey Conservation is around 2.5km to the north and contains multiple listed buildings. The nearest scheduled monument is around 1km to the north of the site (earthwork on Bovey Heath). It is possible that employment development could cause disturbance to these historic environment assets. As such, uncertain minor negative effects are expected.<br><br>It is likely that the site is of sufficient size (>10ha) to accommodate a well-designed development and create a new high quality built environment. It should be possible for development to respond appropriately to existing heritage assets in the area and minimise any disturbance to the historic environment. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE** | + | The site is located within 5km of the Main Towns of Newton Abbot and Kingsteignton. As such, |

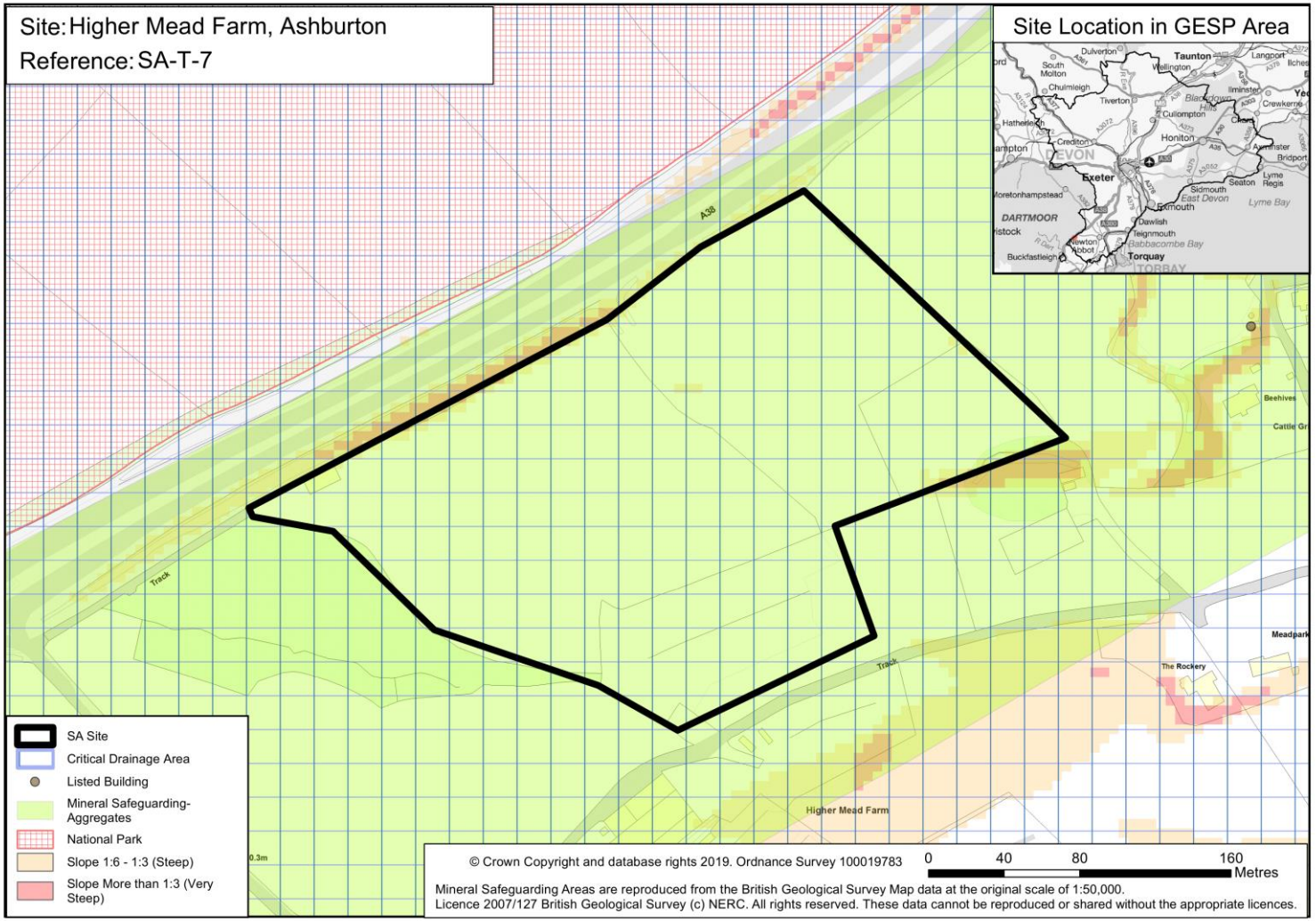
| SA Objective | SA Score | Justification |
|---|---|---|
| **MITIGATION**<br>To minimise greenhouse gas emissions. | | uncertain negligible effects are expected.<br>This site is located within 1km of a cycle path and a railway station, however this railway station is not currently in operation. In addition, the site is located adjacent to a bus stop providing frequent bus services. As such, due to the proximity of the site to bus stops and cycle routes, minor positive effects are expected.<br>As the site is expected to deliver 20ha of employment land, it is assumed that development of the site would provide sustainable transport, walking and cycle links and services. As such, uncertain minor positive effects are expected.<br>Overall, minor positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and there is no significant flood risk within the area. However, development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br>To utilise our land resources efficiently and minimise their loss or degradation. | --? | This site is located on land designated as 'non-agricultural'. It is presently assumed that the original presence of heathland (prior to the planting of conifers) would suggest the soil was of poor quality for agricultural purposes. As such, negligible effects are expected<br>The site does not contain any previously developed land.<br>The entirety of this site is located on an industrial Minerals Safeguarding Area (e.g. Ball Clay) and without appropriate evidence there may be objection under Policy M2 of the Devon Minerals Plan to development that would sterilise or constrain this mineral resource. As such, uncertain significant negative effects are expected, as there could be an opportunity to extract minerals before development goes ahead.<br>Overall, uncertain significant negative effects are expected. |
| **7. WATER RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or | -? | Development should ensure no deterioration of a small stream, which passes through the site boundaries and into Stover Country Park. However, it does not flow into the Exe Estuary SPA.<br>As such, uncertain minor negative effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| degradation. | | |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | 0 | The presence of Ball Clay means achieving any residential development is very unlikely, and were parts of the site to be developed it would be for employment uses with a restricted lifespan.<br>As such, negligible effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site lies entirely within Accessible Woodland and open access land, both are major open spaces. Also, the site is within 400m of Public Rights of Way. As such, significant positive effects are expected.<br>In addition, as the site is expected to deliver 20ha of employment land, it is assumed that development of the site would provide local green infrastructure and active transport links. As such, minor positive effects are also expected.<br>Overall, significant positive effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | - | While providing new jobs will have a positive impact on the health and wellbeing of workers, the site is within the 'Heathfield, Bickington, Ilsington' Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees on average lower levels of deprivation than Devon as a whole. As such, development in this area is unlikely to be significantly affected by deprivation and is less likely to have a positive effect on wellbeing locally as a result of increased investment in the area. As such, negligible effects are expected.<br>The site is adjacent to existing employment site Heathfield industrial estate, which could provide additional benefits. However, the site is adjacent to existing residential development, including the village of Heathfield, which could be adversely affected as a result of noise and light pollution from development of the site during the construction and operational phases. As such, minor negative effects are expected.<br>Overall, minor negative effects are expected. |
| **11. ACCESS TO SERVICES**<br>To provide accessible and attractive services and community facilities for all ages and interests. | --/+ | The site is located adjacent to Heathfield (an Undefined Village), which has poor access to services and facilities. Further facilities are available in Bovey Tracey, which is located around 3km to the north. As such, significant negative effects are expected.<br>The site is within 500m of a primary school (St Catherine's) but it is not within 1km of any secondary |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | schools. As such, uncertain minor positive effects are expected.<br><br>The site is adjacent to an area that has access to superfast broadband (80-300Mbps), which it is assumed could be extended to the site is development came forward. As such, minor positive effects are expected.<br><br>Overall, mixed significant negative and minor positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | + | It is assumed that, as the site has the capacity to deliver 20ha of employment space, the site will also contain one small shop. Jobs would be created during the construction phase of the site.<br><br>Overall, minor positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br><br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | + | This site is located within 1km of a cycle path and a railway station, however this railway station is not currently in operation. In addition, the site is located adjacent to a bus stop providing frequent bus services. As such, due to the proximity of the site to bus stops and cycle routes, minor positive effects are expected.<br><br>The site has capacity for 20ha of employment land and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br><br>Overall, minor positive effects are expected. |

## SA-T-7: Higher Mead Farm, Ashburton

| SA-T-7 | Higher Mead Farm, Ashburton |
|---|---|
| **Authority Area:** Teignbridge | |
| **Site Area:** 5.9ha (Net 5.8ha) | |
| **Approximate total capacity:** 5.8ha employment | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:** Small site adjacent to A38, lying 2 km NE of Ashburton. Site is flat field with limited access onto A38. Site is otherwise isolated from other substantial development. | |



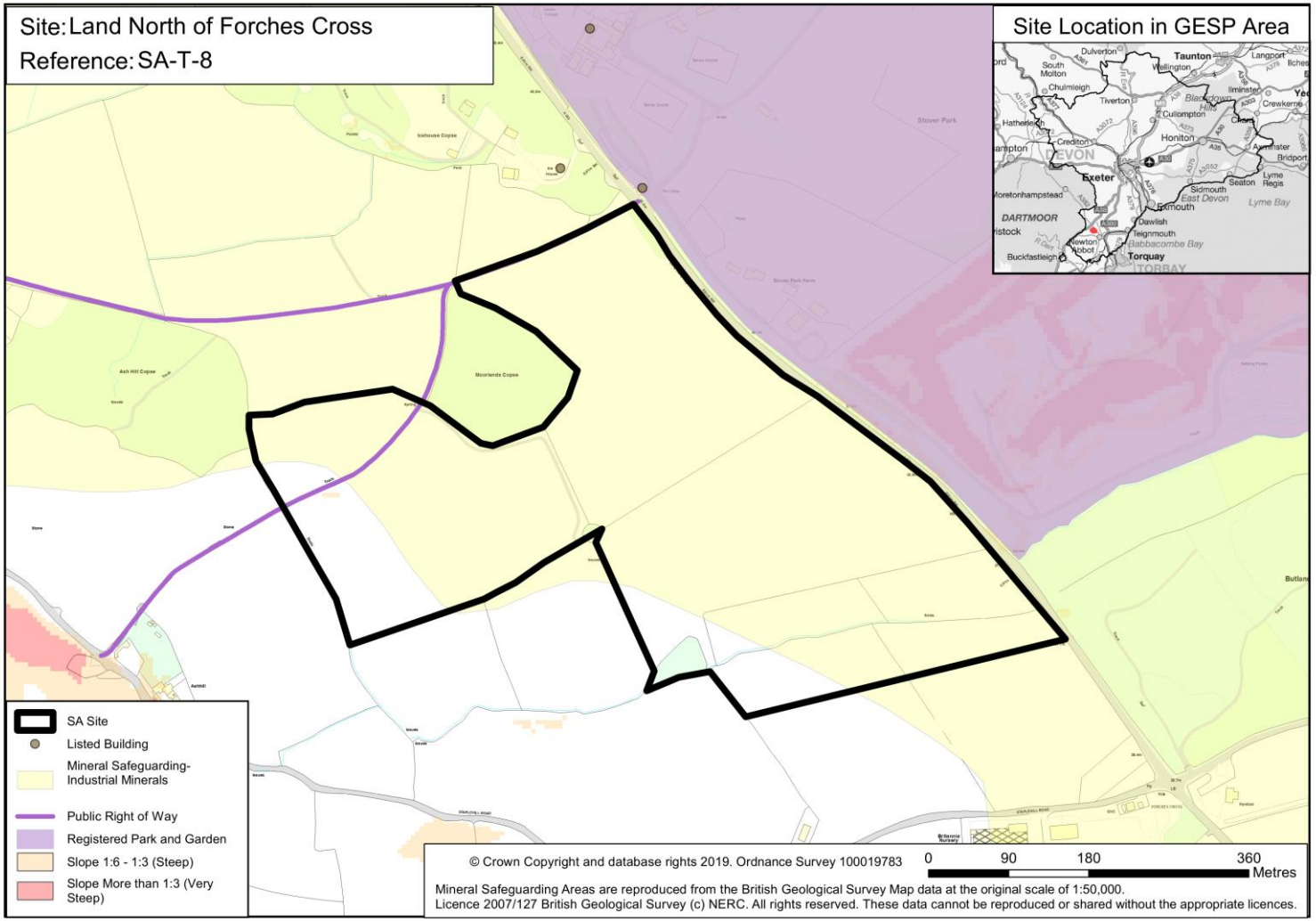
| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | --? | The site lies adjacent to Dartmoor, National Park. The site contains a small section of priority habitat deciduous woodland. In addition, the site is flagged as Amber in the HRA sensitivity work with regard to South Hams SAC and Yellow with regard to Dartmoor SAC. The site is also within a South Hams SAC Greater Horseshoe Bat strategic flyway, and in a Greater Created Newt consultation zone. In addition, the hedgerows within the site may support other protected species.<br>As such, uncertain significant negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is situated in rural open countryside with landscape character considered to be Upper Farmed and Wooded Valley Slopes. Development within the site would have an urbanisation effect on the environment. The site is considered to be of high landscape sensitivity as it abuts the A38 and would be experienced by highway users, many of whom would be sensitive to the amenity of the landscape in close context to and on the approach to Dartmoor National Park. The site also has potential to erode the character and tranquillity of the Devon countryside for visitors and may also erode the nucleated character of Ashburton.<br>As such, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | -? | There are no heritage assets contained within the site boundaries. There are multiple listed buildings within 3km of the site including a Grade II listed Limkiln around 100m to the east of the site. Additionally, there is Scheduled Monument around 2.7km west of the site (earthworks in Boro' Wood). It is possible that employment development may cause disturbance to these historic environment assets.<br>As such, uncertain minor negative effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br>To minimise greenhouse gas emissions. | --? | The site is not located within 5km of a Main Town or Exeter City. As such, uncertain significant negative effects are expected.<br>The site is not located within 1km of cycle paths or railway stations. The site is located within 500m of bus stops however these are not served by frequent bus services. As such, due to the lack of accessible public transport links in proximity to the site, uncertain minor negative effects are expected.<br>As the site is expected to deliver less than 10 ha of employment land, it is assumed that development of the site would provide fewer sustainable transport, walking and cycle links, and services. As such, uncertain significant negative effects are also expected.<br>Overall, uncertain significant negative effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **5. CLIMATE CHANGE ADAPTATION**<br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and there is no significant flood risk within the area. However, development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br>To utilise our land resources efficiently and minimise their loss or degradation. | --? | The entirety of the site is comprised of Grade 3 agricultural land. As such, there is potential for development to cause significant negative effects due to the removal of high quality agricultural land. However, it this is uncertain as it cannot be ascertained whether it is Grade 3a or Grade 3b agricultural land.<br>This site does not contain any previously developed land.<br>The whole of the site area is within an aggregate Mineral Safeguarding Zone (eg. sand, gravel and limestone) and without appropriate evidence there may be objection under Policy M2 of the Devon Minerals Plan to development that would sterilise or constrain this mineral resource. However, there could be an opportunity to extract the mineral resource prior to development going ahead. As this site is less than 10ha, uncertain minor negative effects are expected.<br>Overall, uncertain significant negative effects are expected. |
| **7. WATER RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or degradation. | 0 | The site is not adjacent to and does not contain any watercourses.<br>As such, negligible effects are expected. |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | 0 | The site is proposed for employment purposes.<br>As such, negligible effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | + | The site is not within 800m of major open space, but is within 400m of Public Rights of Way.<br>As such, minor positive effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | 0 | The site is within the 'Ashburton and surrounding areas' Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees average levels of deprivation than Devon and Mid Devon as a whole. As such, it is likely that a small employment development of this nature will provide potential improvements to the availability of employment in the area, which will provide broad wellbeing benefits. As such, negligible effects are expected.<br>The site is not in close proximity to an existing residential development. In addition, the site is not within 1km of an AQMA and has not been identified to have potential to result in increased traffic within an AQMA.<br>Overall, negligible effects are expected. |
| **11. ACCESS TO SERVICES**<br>To provide accessible and attractive services and community facilities for all ages and interests. | -- | The site is not located adjacent to any settlements which could provide services to the site. People working in this location would most likely travel to Ashburton town centre for most of their basic requirements (2.9 km) by car or cycle. It may be possible to improve the safety of Gale Road/Dolbeare Road to make it more attractive to cycle. As such, significant negative effects are expected.<br>Currently, the site only has access to standard broadband speeds (10-30Mbps). As such, negligible effects are expected.<br>Overall, significant negative effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | +? | It is assumed that, as the site has capacity to deliver less than 10ha of employment land, the site will contain no shops or services. Jobs would be created during the construction phase of the site.<br>As the site has capacity to deliver less than 5ha of employment space, uncertain minor positive effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | - | The site is not located within 1km of cycle paths or railway stations. The site is located within 500m of bus stops however these are not served by frequent bus services.<br>As such, due to the lack of accessible public transport links in proximity to the site, uncertain minor negative effects are expected. |

## SA-T-8: North of Forches Cross

| SA-T-8 | North of Forches Cross |
|---|---|
| **Authority Area:** Teignbridge |  |
| **Site Area:** 23ha | |
| **Approximate total capacity:** 10ha employment | |
| **Site status:** Potential site option | |
| **Outline description and context:** 23 ha of relatively flat fields on A382 1.7km north of Newton Abbot. Site could be well suited to providing strategic employment development for the Heart of Teignbridge area, subject to sensitive design and use of materials at this gateway location. In Mineral Safeguarding area for Ball Clay deposits. | |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | --? | The site is located within 1km of Stover Park SSSI (also known as Stover Country Park and Local Nature Reserve) and two County Wildlife Sites, Ventiford Meadows and Gorse Blossom Copse. The site has been flagged as Amber in the HRA sensitivity work with regard to South Hams SAC. The south eastern section of the site lies within Strategic Nature Area coastal and floodplain grazing marsh. The site borders the South Hams SAC sustenance zone for Greater Horseshoe Bats, and is within the Cirl Bunting consultation zone. The site also wraps around Moorland Copse (broadleaved woodland) which is an unconfirmed wildlife site.<br>As such, uncertain significant negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | -? | The site is situated in rural open countryside with landscape character considered to be Lowland Plains. Development within the site would have an urbanisation effect on the environment. The north of the site is considered to be of low-medium landscape sensitivity as there would be negligible impact on the setting of Dartmoor National Park. The south of the site is of medium landscape sensitivity due to there being potential for the nucleated character of Newton Abbot to be eroded by development.<br>As such, uncertain minor negative effects are expected. The sensitivity assessment for this site was based on a slightly different site boundary to that which has now been included in the SA, which contributes additional uncertainty to the potential effect identified. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/-? | The site does not contain any heritage assets within its boundaries. However, the site within 3km of multiple designated assets including Stover Park (Registered Park and Garden) immediately to the north, which contains multiple listed buildings including Grade II listed Stover School. The site is adjacent to and contains in part an unscheduled double ditched rectangular enclosure and linear cropmark shown on aerial photographs, which may require further archaeological investigation. Additionally, Castle Dyke (a Scheduled Monument) is around 1.8km to the south and Kingsteignton Conservation Area, which contains multiple listed buildings, is around 2.8km to the east. It is possible that employment development could cause disturbance to these historic environment assets. As such, uncertain minor negative effects are expected.<br>It is likely that the site is of sufficient size (>10ha) to accommodate a well-designed development and create a new high quality built environment. It should be possible for development to respond appropriately to existing heritage assets in the area and minimise any disturbance to the historic environment. This is of particular importance for this site as it is located in a visually prominent entry point to Newton Abbot. As such, uncertain minor positive effects are expected.<br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |

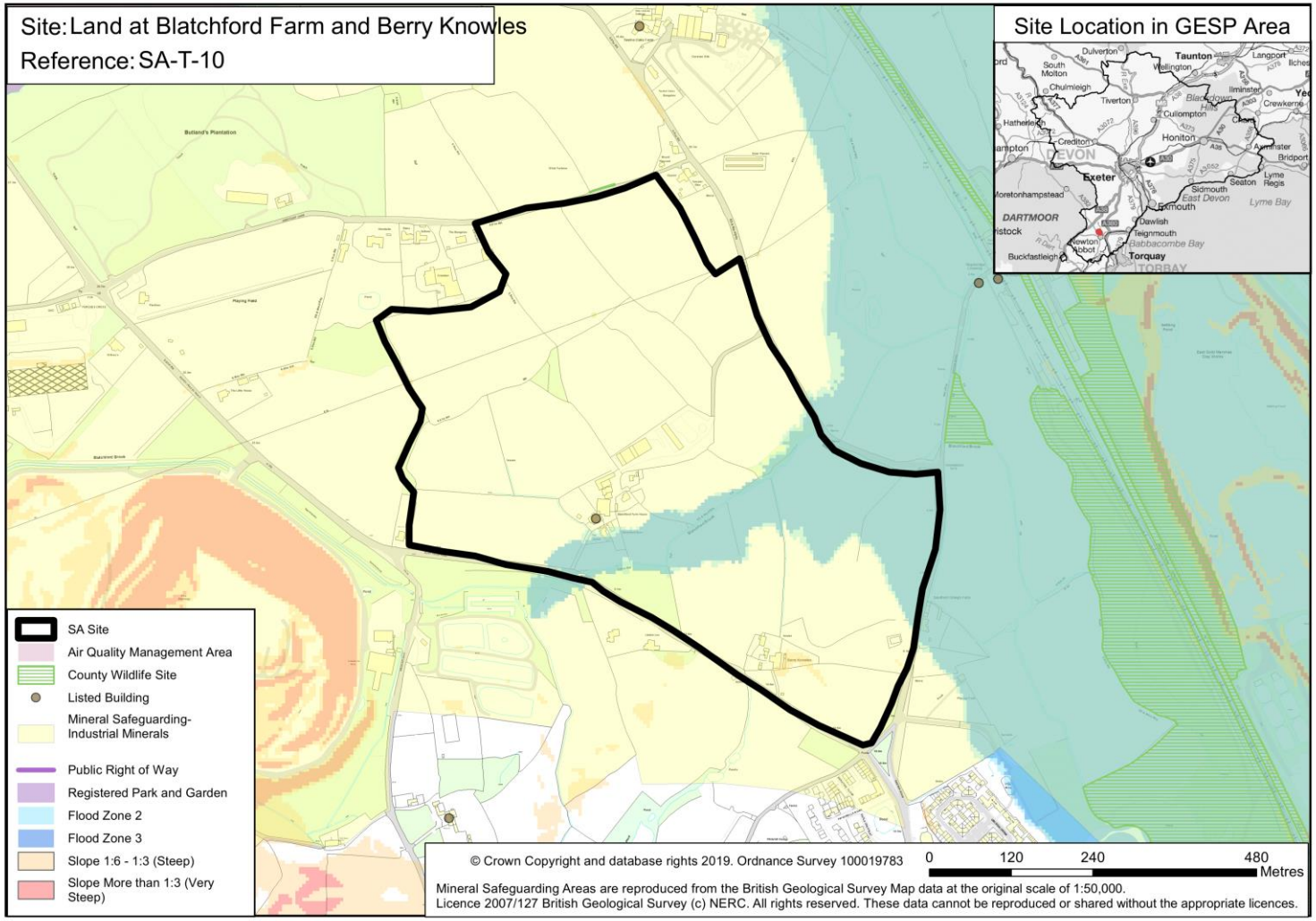
| SA Objective | SA Score | Justification |
|---|---|---|
| **4. CLIMATE CHANGE MITIGATION**<br>To minimise greenhouse gas emissions. | + | The site is located within 5km of the Main Towns of Newton Abbot and Kingsteighton. As such, uncertain negligible effects are expected.<br>The site is not located within 1km of existing cycle routes or railway stations. The site is however located within 500m of bus stops that provide frequent bus services. As such, due to the proximity of bus stops, minor positive effects are expected.<br>As the site is expected to deliver 10ha of employment land, it is assumed that development of the site would provide some sustainable transport, walking and cycle links and services. As such, uncertain negligible effects are expected.<br>Overall, minor positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and there is no significant flood risk within the area. However, development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br>To utilise our land resources efficiently and minimise their loss or degradation. | -- | The entirety of this site (23ha) is comprised of Grade 3 agricultural land. As such, significant negative effects are expedted as there is potential for development to result in the loss of high quality agricultural land. However, this effect is uncertain as it is unclear whether it is Grade 3a or Grade 3b agricultural land.<br>The majority of this site is located within an industrial Minerals Safeguarding Area (e.g. Ball Clay) and without appropriate evidence there may be objection under Policy M2 of the Devon Minerals Plan to development that would sterilise or constrain this mineral resource. In addition, the site is in close proximity to two Clay Workings at Teigngrace and Ringslade. It is expected that development would only be acceptable if the mineral deposits demonstrated to be unviable or if the development was deemed 'temporary' with the option to extract the clay after the lifetime of the development. As such, uncertain significant negative effects are expected, as there could be an opportunity to extract the minerals before development goes ahead.<br>The site does not contain any previously developed land.<br>Overall, uncertain significant negative effects are expected. |
| **7. WATER RESOURCES** | 0 | The site is not adjacent to and does not contain any watercourses. |

| SA Objective | SA Score | Justification |
|---|---|---|
| To utilise our water resources efficiently and minimise their loss or degradation. | | As such, negligible effects are expected. |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | 0 | The presence of the Ball Clay resource means that residential development is unlikely to be suitable without satisfying Mineral Plan policies, and the site would instead be more appropriate for employment uses. The site has good access to the highway network, which is set to improve.<br>As such, negligible effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | + | The site is not within 800m of major open space, but is within 400m of Public Rights of Way.<br>As such, minor positive effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | - | The site is within the 'South West Newton Abbot and areas to the West of Newton Abbot' Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees average levels of deprivation than Devon and Mid Devon as a whole. As such, it is likely that a large employment development of this nature will provide potential improvements to the availability of employment in the area, which will provide broad wellbeing benefits. As such, negligible effects are expected.<br>The site is not in close proximity to an existing residential development. Also, the site is not within 1km of an AQMA. However, car movements to and from the site are likely to increase traffic congestion to and from Newton Abbot which includes the Knowles Hill AQMA. As such, minor negative effects are also expected.<br>Overall, minor negative effects are expected. |
| **11. ACCESS TO SERVICES**<br>To provide accessible and attractive services and community facilities for all ages and interests. | --/+ | The site is not located adjacent to any settlements that could provide facilities to the site. If the site was developed for employment purposes it may benefit from the planned community hub allocation at NA1, which may include a small area of retail and other facilities, and is likely to be only a little over 1km away. Newton Abbot town centre is 2.8km away and includes a full range of services and |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | facilities. As such, significant negative effects are expected.<br><br>The site is adjacent to areas that have access to superfast broadband (80-300Mbps), which it is assumed could be extended to the site if development came forward. As such, minor positive effects are expected.<br><br>Overall, mixed significant negative and minor positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | + | It is assumed that, as the site has the capacity to deliver 10ha of employment land, the site will also contain one small shop. Jobs would be created during the construction phase of the site.<br><br>As the site has capacity to deliver over 5ha of employment space, minor positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br><br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | + | The site is not located within 1km of existing cycle routes or railway stations. The site is however located within 500m of bus stops that provide frequent bus services.<br><br>As such, due to the proximity of bus stops, minor positive effects are expected. |

## SA-T-10: Land at Blatchford Farm and Berry Knowles

| SA-T-10 | Land at Blatchford Farm and Berry Knowles |
|---|---|
| **Authority Area:** Teignbridge | |
| **Site Area:** 37.4ha (Net 25ha) | |
| **Approximate total capacity:** 25ha employment | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:** c35ha of gently rolling land adjacent to A382, Whitehills allocation and 2km from Newton Abbot centre. Site likely to benefit from highway improvements linking to Jetty Marsh. 3 land ownerships capable of accommodating strategic employment growth if Ball Clay issues can be resolved. | |



| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | +/-? | The site lies adjacent to Teigngrace Deptford Pink site County Wildlife Site and within 250m of West Golds & Jetty Marshes County Wildlife Site. The site is also within 1km of Churchills County Wildlife Site and Local Nature Reserve and three County Wildlife Sites, Stover Canal, Teigngrace and Bovey/Teign Confluence. The site contains a small section of priority habitat, deciduous woodland and almost entirely lies within Strategic Nature Area coastal and floodplain grazing marsh. The site is within the Cirl Bunting and Greater Created Newt consultation zones and contains mature hedgerows and a small area of trees which may provide a habitat for other priority species. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 20ha of employment land, and therefore is expected to retain and provide local green infrastructure that could mitigate the biodiversity impact of development. As such, minor positive effects are also expected.<br><br>Overall, mixed minor positive and uncertain minor negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is situated in rural open country side with some agricultural buildings and is considered to be predominantly Lowland Plains landscape character. Part of the site is of medium landscape sensitivity due to potential for eroding the nucleated character of Newton Abbot. As such, uncertain minor negative effects are expected.<br><br>The remaining area within the site is of medium-high landscape sensitivity due to higher potential to erode the nucleated character of Newton Abbot and its rural, undeveloped setting. As such, uncertain significant negative effects are expected.<br><br>Overall, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/-? | The site contains Blatchford Farmhouse, which is a Grade II listed building. The site also contains Berry Knowles Farmstead, which is a late 19th century, unscheduled monument. There are multiple designated assets within 3km of the site including Grade II listed buildings and Castle Dyke (a Scheduled Monument) is located around 1km to the south. Additionally, Stover Park (a Registered Park and Garden) is located around 500m north of the site. It is possible that employment development could cause disturbance to these historic environment assets. As such, uncertain minor negative effects are expected.<br><br>It is likely that the site is of sufficient size (>10ha) to accommodate a well-designed development and create a new high quality built environment. It should be possible for development to respond appropriately to existing heritage assets in the area and minimise any disturbance to the historic |

| SA Objective | SA Score | Justification |
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| | | environment. This will involve ensuring there is a sufficient buffer zone around the listed building contained within the site. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain minor negative effects and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | + | The site is located within 5km of the Main Towns of Newton Abbot and Kingsteighton. As such, uncertain negligible effects are expected.<br><br>This site is located within 1km of a cycle path and a railway station, however this railway station is not currently in operation. In addition, the site is located within 500m of bus stops that are served by regular bus services. As such, due to the proximity of bus stops and cycle routes, minor positive effects are expected.<br><br>As the site is expected to deliver over 20ha of employment land, it is assumed that development of the site would provide sustainable transport, walking and cycle links and services. As such, uncertain minor positive effects are expected.<br><br>Overall, minor positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly brownfield and there is no significant flood risk within the area. However, areas to the east and in the centre of the site are on flood zone 2 and flood zone 3. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | --? | The southern area of the site contain under 5ha of Grade 3a agricultural land whilst the north of the site contains over 5ha of Grade 3 agricultural land. As such, uncertain significant negative effects are expected as it is not clear whether land in the north of the site is Grade 3a or Grade 3b. The remaining land within the site is Grade 3b, Grade 4 and a small area of non-agricultural land.<br><br>The site contains over 5ha of Grade 3a agricultural land. As such, there is potential for a significant negative effect due to the loss of high quality agricultural land during development.<br><br>The site does not contain any previously developed land apart from a farm.<br><br>The entirety of this site is within an industrial Minerals Safeguarding Area (e.g. Ball Clay) and without appropriate evidence there may be objection under Policy M2 of the Devon Minerals Plan to development that would sterilise or constrain this mineral resource. However, there could be an |

| SA Objective | SA Score | Justification |
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| | | opportunity to extract the mineral resource prior to development going ahead. As such, uncertain significant negative effects are expected.<br><br>Overall, uncertain significant negative effects are expected, due to development on high quality agricultural land and development within a mineral safeguarding area. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or degradation. | -? | Development should ensure no deterioration in the water quality of Blatchford Brook, which passes through the centre of the site but does not flow into the Exe Estuary SPA.<br><br>As such, uncertain minor negative effects are expected. |
| **8. HOMES**<br><br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | 0 | The site is within the Ball Clay consultation zone, and therefore not suitable for residential development. However, the site may be suitable for employment purposes, subject to overcoming mineral concerns and other constraints.<br><br>As such, negligible effects are expected. |
| **9. HEALTH**<br><br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | + | The site is not within 800m of major open space, but is within 400m of the National Cycle Route. As such, minor positive effects are expected.<br><br>In addition, as the site is expected to deliver over 20ha of employment land, it is assumed that development of the site would provide local green infrastructure and active transport links. As such, minor positive effects are also expected.<br><br>Overall, minor positive effects are expected. |
| **10. WELLBEING**<br><br>To support positive, safe and healthy communities. | -- | While providing new jobs will have a positive impact on the health and wellbeing of workers, the site is within the 'South West Newton Abbot and areas to the West of Newton Abbot' Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees average levels of deprivation than Devon as a whole. It is likely that a large employment development of this nature will provide potential limited improvements to the availability of employment in the area, which will provide broad wellbeing benefits. As such, negligible effects are expected.<br><br>The site is not adjacent to existing residential development, but is in close proximity to Newton Abbot |

| SA Objective | SA Score | Justification |
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| | | to the south and Kingsteignton to the east, which could be adversely affected as a result of noise and light pollution from development of the site during the construction and operational phases. As such, minor negative effects are expected.<br><br>The site is within 1km of Newton Abbot AQMA. While upgrades to the public transport system are expected which would alleviate the impact of traffic generated by the site, car movements to and from this site could potentially contribute to worsening air quality within the AQMA. As such, significant negative effects are expected.<br><br>Overall, significant negative effects are expected. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | --/+ | The site is not located directly adjacent to any settlements that could provide services to the site. Newton Abbot (to the south) and Kingsteignton (to the east) are both within 3km of the site and could provide a range of services. However, access is limited due to there being a lack of footways and cycle paths. As such, significant negative effects are expected.<br><br>The site is located adjacent to areas that have access to superfast broadband (80-300Mbps), which it is assumed could be extended to the site if development came forward. As such, minor positive effects are expected.<br><br>Overall, mixed significant negative and minor positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | ++ | It is assumed that, as the site has capacity to deliver over 20ha of employment space, the site will provide a limited number of shops other services. Jobs would also be created during the construction phase of the site.<br><br>Overall, significant positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or a Main Town centre. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br><br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT** | + | This site is located within 1km of a cycle path and a railway station, however this railway station is not currently in operation. In addition, the site is located within 500m of bus stops that are served by regular bus services. As such, due to the proximity of bus stops and cycle routes, minor positive |

| SA Objective | SA Score | Justification |
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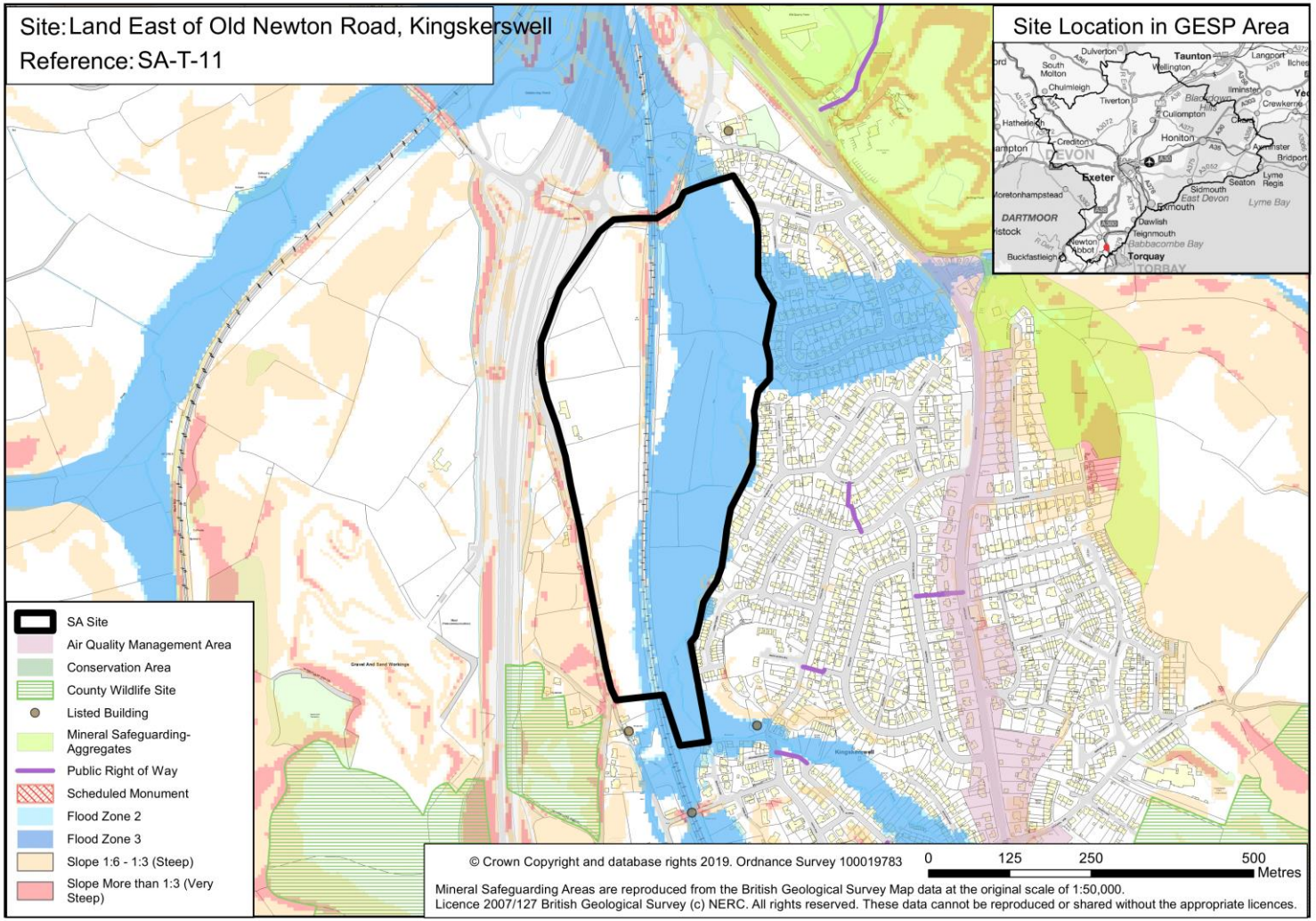
| To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | | effects are expected.<br><br>The site has capacity for over 20ha of employment land and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br><br>Overall, minor positive effects are expected. |

## SA-T-11: Land East of Old Newton Road, Kingskerswell

| SA-T-11 | Land East of Old Newton Road, Kingskerswell |
|---|---|
| **Authority Area:** Teignbridge |  |
| **Site Area:** 19.5ha (Net 6ha) | |
| **Approximate total capacity:** 6ha employment | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:** Flat land between Kingskerwell and A380 South Devon Highway. Over half the site (east of railway line) is in flood zone 3. A single dwelling with large 1.2ha curtilage occupies the western half of the site. | |

| SA Objective | SA Score | Justification |
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| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | --? | The site is within 1km of Aller Sand Pit, SSSI. The site is also within 250m of Yanndon Lane Fields County Wildlife Site and within 1km of three additional County Wildlife Sites, Forde Fields, Kerswell Down & Whilborough Common and Kerswell Hill. The site contains priority habitats, coastal and floodplain grazing marsh and traditional orchard. In addition, the site is flagged as Amber in the HRA sensitivity work with regard to South Hams SAC. The entire site falls within the Strategic Flyways for Greater Horseshoe Bats and Cirl Bunting and Greater Crested Newt consultation zones. Otter (European protected species) are recorded on site (in the Aller Brook) as well.<br>As such, uncertain significant negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | -? | The site is situated in rural open country side with a large residential area located to the east of the site. It is considered to be predominantly Settled Valley Floors in landscape character. Development within the site would have urbanisation effect on the environment. The site is of low-medium landscape sensitivity as the site is unlikely to have any significant landscape impacts.<br>As such, uncertain minor negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | -? | The site does not contain any statutorily designated heritage assets within its boundaries. However, there are mult there are four unscheduled monuments (a Palaeolithic flint find, irregular earthworks from clay extraction, a millpond and a possible cemetery), which may require further archaeological investigation. The site also contains an old surviving orchard around the 'Trees' property. Avoiding development on the orchard would reduce the developable area by 1.2 ha. There are designated assets within 3km including Kingkerswell Conservation Area, which is located 200m to the south and contains multiple listed buildings. Additionally, there are scheduled monuments around 600m to the south-west (a Prehistoric field system) and around 1km to the north-east (Milber Down camp). It is possible that employment development could cause disturbance to these historic environment assets.<br>As such, uncertain minor negative effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br>To minimise greenhouse gas emissions. | --?/+ | The site is located adjacent to the Main Town of Kingskerwell. As such, uncertain significant positive effects are expected.<br>The site is not located within 1km of cycle paths or a railway station. However, the site is located within 500m of bus stops on Kingskerswell Road that are served by regular bus services. As such, due to the proximity of bus stops, minor positive effects are expected.<br>As the site is expected to deliver under 10ha of employment land, it is assumed that development of the site would provide fewer sustainable transport, walking and cycle links, and services. As such, |

| SA Objective | SA Score | Justification |
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| | | uncertain significant negative effects are also expected.<br>Overall, mixed minor positive and uncertain significant negative effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br>To adapt to the possible effects of climate change. | --? | The site is predominantly greenfield and on flood zone 3. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br>Therefore, uncertain significant negative effects are expected. |
| **6. LAND RESOURCES**<br>To utilise our land resources efficiently and minimise their loss or degradation. | 0 | The majority of the site is located on Grade 4 agricultural land with patches of Grade 3b agricultural land in the west of the site as well as a strip of non-agricultural land that passes through the centre of the site. As such, negligible effects are expected.<br>Although the site does not contain any previously developed land that could be reused, it is noted that the site does contain a small area of agricultural development in the north west of the site.<br>The site is not located within any Minerals Safeguarding Areas.<br>Overall, negligible effects are expected. |
| **7. WATER RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or degradation. | -? | Development should ensure no deterioration in the water quality of Allller Brook, which passes through the boundaries of the site but does not flow into the Exe Estuary SPA.<br>As such, uncertain minor negative effects are expected. |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | 0 | Half the site is undevelopable for housing due to flood zone 3. The remaining 5.5ha area of land is too small to warrant being a GESP allocation, although it could be considered in the Local Plan process. The site is therefore being considered for employment land.<br>As such, negligible effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive | ++ | The site is within 800m of Accessible Woodland and Open access land, both major open spaces. The site is also within 400m of Public Rights of Way.<br>As such, significant positive effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| environments and opportunities to enjoy and experience them. | | |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | -- | While providing new jobs will have a positive impact on the health and wellbeing of workers, the site is within the 'Kingskerswell and surrounding areas' Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees average levels of deprivation than Devon as a whole. It is likely that a small employment development of this nature will provide potential limited improvements to the availability of employment in the area, which will provide broad wellbeing benefits. As such, negligible effects are expected.<br><br>The site is adjacent to existing residential development, the town of Kinkerswell, which could be adversely affected as a result of noise and light pollution from development of the site during the construction and operational phases. The site may experience additional localised noise and light pollution due to the proximity of the A380 and the railway line. The site is also adjacent to existing employment site, Aller Mill, Kingskerswell, which could have additional benefits. As such, minor negative effects are expected.<br><br>The site is within 1km of Kingskerswell AQMA. Car movements to and from this site could potentially contribute to worsening air quality within the AQMA. As such, significant negative effects are expected.<br><br>Overall, significant negative effects are expected. |
| **11. ACCESS TO SERVICES**<br>To provide accessible and attractive services and community facilities for all ages and interests. | + | The site is located adjacent to Kinkerswell (a Main Town), which provides shops and facilities. Additionally, the site lies about 3.5km from Newton Abbot town centre, about 6km from Torquay town centre, and 3.5km from the Torbay 'Willows' shopping centre. Both settlements have a wide range of services and facilities accessible by car or by bus. As such, minor positive effects are expected.<br><br>The site is adjacent to an area that has access to superfast broadband (80-300Mbps), which it is assumed could be extended to the site if development came forward. As such, minor positive effects are expected.<br><br>Overall, minor positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater | + | It is assumed that, as the site has the capacity to deliver less than 10ha of employment space, the site will not deliver any shops or services. Jobs would be created during the construction phase the site.<br><br>As the site has capacity to deliver over 5ha of employment space, minor positive effects are expected. |

| SA Objective | SA Score | Justification |
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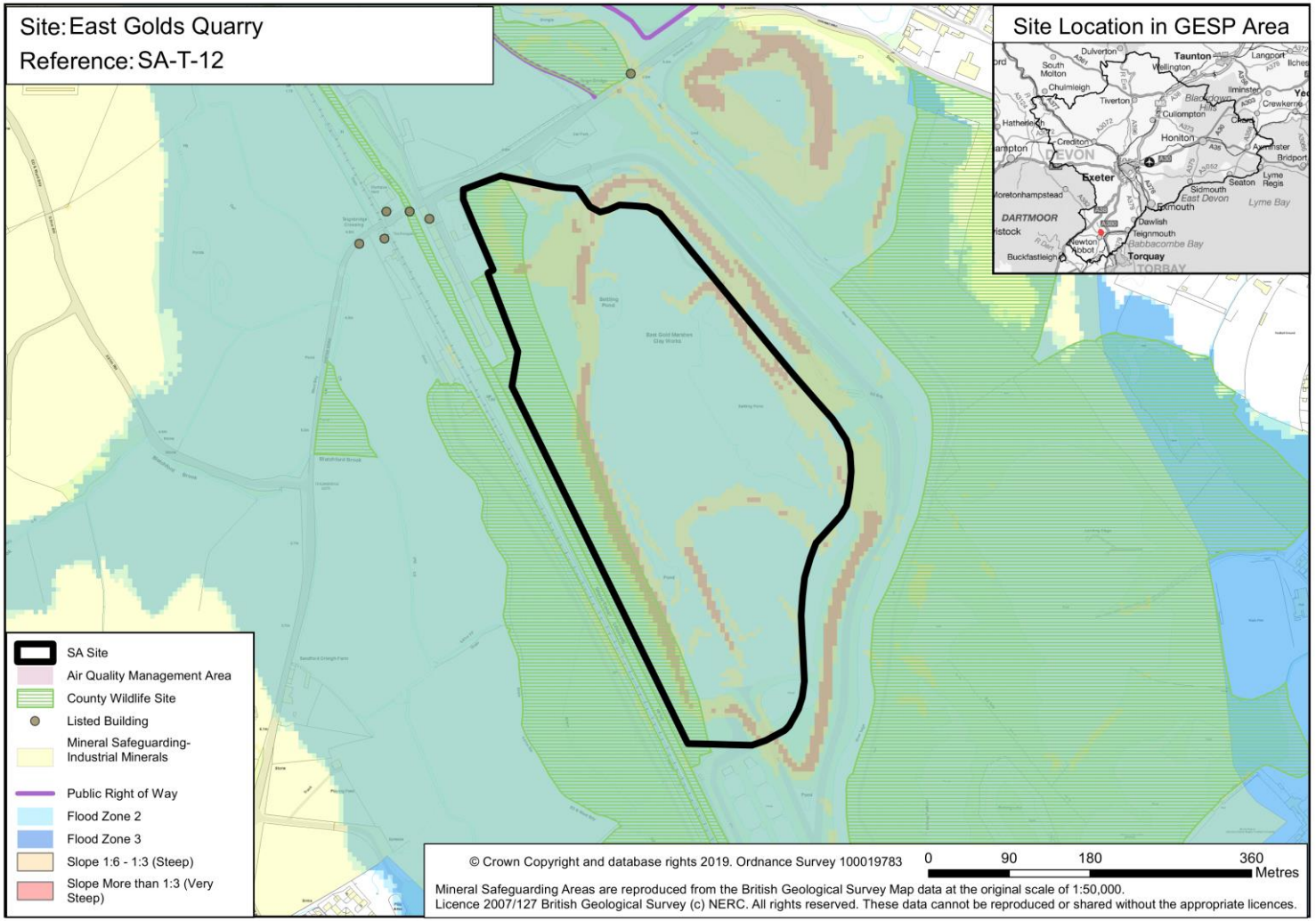
| Exeter. | | |
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and town centres. | + | The site is located adjacent to Kingskerswell (a Main Town). A new employment site may support the vitality and viability of the existing town centres by increasing the number of day-to-day visitors and supporting businesses and services there.<br>As such, minor positive effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | + | The site is not located within 1km of cycle paths or a railway station. However, the site is located within 500m of bus stops on Kingskerswell Road that are served by regular bus services.<br>As such, due to the proximity of bus stops, minor positive effects are expected. |

### SA-T-12: East Golds Quarry

| SA-T-12 | East Golds Quarry |
|---|---|
| **Authority Area:** Teignbridge |  |
| **Site Area:** 15.1ha (Net 6.6ha) | |
| **Approximate total capacity:** 204 – 264 dwellings | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:** 15 ha of Land near Teign Bridge, Kingsteignton, lying between the river Teign and the disused Stover Canal / old Heathfield railway branch line. The land is currently being quarried and in entirely in flood zone 3. The site is identified by landowner/promoter as not being available for 15 years. | |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | --?/+ | The site lies within West Golds & Jetty Marshes County Wildlife Site and adjacent to Stover Canal County Wildlife Site. The site is within 250m of two County Wildlife Sites, Rackerhayes Ponds and Bovey/Teign Confluence and within 1km of Churchills Local Nature Reserve and County Wildlife Site. The site contains priority habitat deciduous woodland and lies entirely within Strategic Nature Area coastal and floodplain grazing marsh. In addition, the site is flagged as Amber in the HRA sensitivity work with regard to South Hams SAC and as Yellow with regard to Dartmoor SAC. The site is also just outside the South Hams SAC 4km buffer zone, but is largely within a strategic flyway for Greater Horseshoe Bats which runs along the Teign. There are also many recordings of Otter in the area. The site also includes an unconfirmed wildlife site (Wetland habitat), and is in a Greater Crested newt consultation zone. As such, uncertain significant negative effects are expected.<br><br>Existing green infrastructure on the site, including the canal and woodland patches, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for less than 1,000 homes, and therefore is expected to provide local public open space on site that could mitigate the biodiversity impact of development. As such, minor positive effects are also expected.<br><br>Overall, mixed minor positive and uncertain significant negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is comprised of a previously used quarry with a wooded area in the west of the site. The landscape character of the site is considered to be Sparsely Settled Farmed Valley Floors. The site is of medium-high landscape sensitivity due to the potential for ground levels to be substantially raised during development which would increase the landscape impact, particularly given the site is in a largely undeveloped gap between two large settlements.<br><br>As such, uncertain, significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | -? | The site does not contain any designated heritage assets within its boundaries. There are multiple designated assets within 3km including The Old Teign Bridge and Arched Causeway to the immediate north-east, which are both Grade II listed. The impact of additional traffic on these structures is unknown, but could be negative given the bridges are old and have limited capacity. Kingsteignton Conservation Area is located around 1km to the east and contains multiple listed buildings. Additionally, Castle Dyke (a Scheduled Monument) is located around 1.5km to the south-west and Stover Park (a Registered Park and Garden) is located around 1km to the north-west of the site. It is possible that residential development could cause disturbance to these historic environment assets. |

| SA Objective | SA Score | Justification |
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| | | As such, uncertain minor negative effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br>To minimise greenhouse gas emissions. | --?/+? | The site is located within 1km of the Main Towns of Newton Abbot and Kingsteighton. As such, uncertain minor positive effects are expected.<br>The site is not located within 1km of railway stations. However, the site is located adjacent to the cycle path along the former Stover Canal, which provides good access south towards Jetty Marsh. The site is also located within 500m of the bus stop at Newton Abbot Hospital, which is served by a regular bus service between 9.35am and 3.30pm. However, the site is separated from the bus stop and cycle path by a railway line, which could prevent access in parts of the site. As such, due to the proximity to partially inaccessible bus and cycle links, uncertain minor positive effects are expected.<br>As the site is expected to deliver less than 1,000 homes, it is assumed that development of the site would provide fewer sustainable transport, walking and cycle links, and services. As such, uncertain significant negative effects are also expected.<br>Overall, mixed uncertain minor positive and uncertain significant negative effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br>To adapt to the possible effects of climate change. | -? | The site is predominantly brownfield and on flood zone 3. However, development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br>Therefore uncertain minor negative effects are expected |
| **6. LAND RESOURCES**<br>To utilise our land resources efficiently and minimise their loss or degradation. | 0 | The entirety of the site is located on non-agricultural land. As such, negligible effects are expected.<br>The site does not contain any previously developed land apart from mineral extraction sites which are excluded from the NPPF definition.<br>The whole of the site is located within an industrial Minerals Safeguarding Area (e.g. Ball Clay). However, the operator has stated that minerals extraction will have already taken place before development and that development on the site will not impact other mineral extraction sites nearby. As such, negligible effects are expected.<br>Overall, negligible effects are expected. |
| **7. WATER RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or | -? | Development should ensure no deterioration in the water quality of the River Teign, which runs adjacent to the sites eastern boundary but does not flow into the Exe Estuary SPA.<br>As such, uncertain minor negative effects are expected. |

| SA Objective | SA Score | Justification |
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| degradation. | | |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | 0 | The site has potential to accommodate 204 - 264 homes. However, given it is in flood zone 3, residential development would not be suitable here. The site is stated as not being available for 15 years, so is unlikely to come forward in the plan period.<br>As such, negligible effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | + | The site is not within 800m of major open space, but is within 400m of the National Cycle Route and Public Rights of Way.<br>As such, minor positive effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | -- | The site is within the 'South West Newton Abbot and areas to the West of Newton Abbot' Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment reporting of index of multiple deprivation, sees average levels of deprivation than compared to Devon as a whole. It is likely that a large residential development of this nature will provide potential improvements to the availability of homes in the area, which will provide broad wellbeing benefits. As such, negligible effects are expected.<br>The site is in close proximity to existing residential developments, Newton Abbot to the south and Kingsteignton to the east, both of which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. In addition, the site is adjacent to a railway line. This feature may result in noise pollution affecting residents of the site in the longer term. As such, minor negative effects are also expected.<br>The site is within 1km of Newton Abbot AQMA. Car movements from the site would negatively impact the AQMA through the increase of increased traffic and air pollution. As such, significant negative effects are expected.<br>Overall, significant negative effects are expected. |
| **11. ACCESS TO SERVICES**<br>To provide accessible and attractive | -- | The site is not located directly adjacent to any settlements and therefore has limited access to services. As such, significant negative effects are expected. |

| SA Objective | SA Score | Justification |
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| services and community facilities for all ages and interests. | | The site is within 1km of two primary schools (St Michael's and Kingsteignton) and Coombeshead Academy and Newton Abbot College are just over 1km away. A new primary school is planned nearby at Newcross in Kingsteignton, which could provide additional capacity to the site if necessary. As such, uncertain minor positive effects are expected.<br><br>The site is adjacent to an area that has access to superfast broadband (80-300Mbps), which it is assumed could be extended to the site if development came forward. As such, minor positive effects are expected.<br><br>The site is small, providing less than 500 homes, and therefore it is assumed that development would be less likely to accommodate schools on site. As such, minor negative effects are expected.<br><br>Overall, significant negative effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | + | The site is not located adjacent to a Main Town but it is within 1km of existing or proposed employment sites which could provide employment opportunities. As such, minor positive effects are expected.<br><br>Jobs would be created during the construction phase of the site and any new homes would create expenditure in the area. It is assumed that, as the site has the capacity to deliver less than 500 homes, the site will provide limited employment opportunities and no shops or services. As such, negligible effects are expected.<br><br>The site is unlikely to have any negative impacts on tourism.<br><br>Overall, minor positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br><br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road | +? | The site is not located within 1km of railway stations. However, the site is located adjacent to the cycle path along the former Stover Canal, which provides good access south towards Jetty Marsh. The site is also located within 500m of the bus stop at Newton Abbot Hospital, which is served by a regular bus service between 9.35am and 3.30pm. However, the site is separated from the bus stop and cycle path by a railway line, which could prevent access in parts of the site.<br><br>As such, due to the proximity to partially inaccessible bus and cycle links, uncertain minor positive |

| SA Objective | SA Score | Justification |
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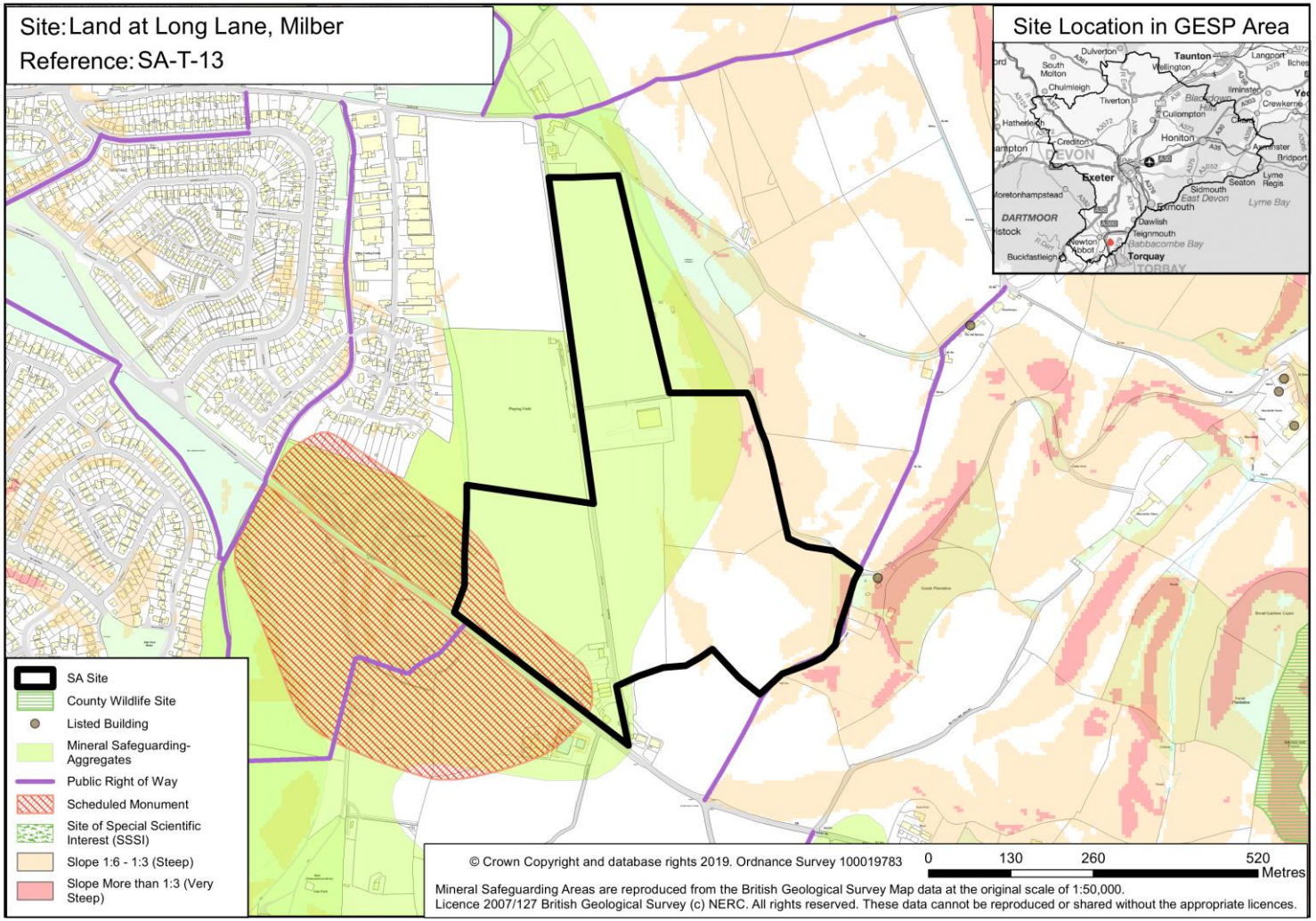
| networks and other transport infrastructure both within the Greater Exeter area and beyond. | | effects are expected. |

### SA-T-13: Land at Long Lane, Milber

| SA-T-13 | Land at Long Lane, Milber |
|---|---|
| **Authority Area:** Teignbridge | |
| **Site Area:** 25.1ha (Net 10.2ha) | |
| **Approximate total capacity:** 316 – 408 dwellings | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:** 24 ha of land on eastern side of Newton Abbot at top of Shaldon Road to the east of Milber. The site lies on top of the ridge in a prominent location, and includes a Scheduled Ancient Monument in the SW corner and a Roman Road. The fields on the eastern half of the site slope down towards the east. | |



| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | +/-? | The site is within 1km of Aller Sand Pit, SSSI and four County Wildlife Sites, Netherton, Netherton Fields, Church Town Farm and Forde Fields. The site contains a small patch of priority habitat deciduous woodland. The site is entirely within the Cirl Bunting and Greater Crested Newt consultation zones and a Greater Horseshoe Hat strategic flyway lies 400m to the east. As such, uncertain minor negative effects are expected.<br>Existing green infrastructure on the site, including woodland patches, could also be lost to development. As such, uncertain minor negative effects are expected.<br>However, the site has capacity for less than 1,000 homes, and therefore is expected to provide local public open space on site that could mitigate the biodiversity impact of development. As such, minor positive effects are also expected.<br>Overall, mixed minor positive and uncertain minor negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is situated on greenfield land with a large area of residential development to the west associated with Newton Abbot. The site's landscape character is considered to be Coastal Slopes with Combes with Settlement and development would cause an urbanisation effect in this environment. The site is of high landscape sensitivity as it is prominent in the landscape due to being positioned on the ridge of a hill. Therefore, it would be necessary to ensure appropriate landscaping and planting take place during development to minimise impacts.<br>As such, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | --?/+? | The south west of the site contains part a Scheduled Monument within its boundaries (Milber Down Camp). There are further designated assets within 3km of the site including at the eastern boundary of the site, which is adjacent to Wren Cottage, a Grade II listed building. There are multiple listed buildings contained within Coffinswell Conservation Area around 800m to the south of this site. Additionally, there are listed buildings located around 600m east and around 800m to the north-east of the site. Development has the potential to compromise the setting and fabric of these historic environment assets. As such, uncertain significant negative effects are expected.<br>It is likely that the site is of sufficient size (>10ha) to accommodate a well-designed development and create a new high quality built environment. It should be possible for development to respond appropriately to existing heritage assets in the area and minimise any disturbance to the historic environment. This will involve ensuring there is a sufficient buffer zone around the Scheduled Monument contained within the site. As such, uncertain minor positive effects are expected. |

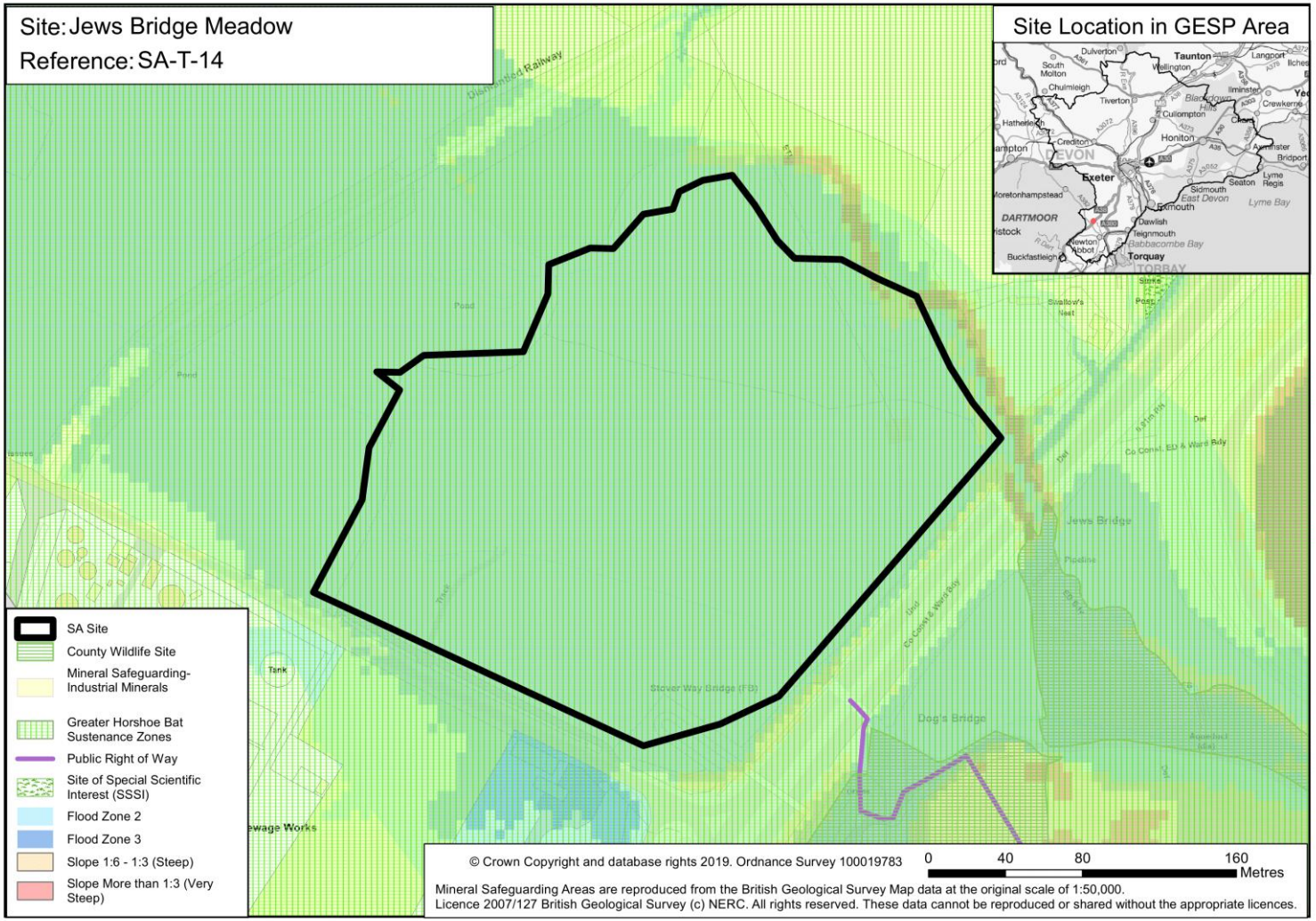
| SA Objective | SA Score | Justification |
|---|---|---|
| | | Overall, mixed uncertain significant negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br>To minimise greenhouse gas emissions. | --?/+? | The site is located within 1km of the Main Town of Newton Abbot. As such, uncertain minor positive effects are expected.<br>The site is not located within 1km of cycle routes or railway stations. Although the site is located within 500m of bus stops, these bus stops are only served by a frequent bus service between 9.35am and 3.30pm. As such, due to the proximity of partially frequent bus stops, uncertain minor positive effects are expected.<br>As the site is expected to deliver less than 1,000 homes, it is assumed that development of the site would provide fewer sustainable transport, walking and cycle links, and services. As such, uncertain significant negative effects are also expected.<br>Overall, mixed uncertain minor positive and uncertain significant negative effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and there is no significant flood risk within the area. However, development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br>To utilise our land resources efficiently and minimise their loss or degradation. | --? | Over 5ha of the site is comprised of Grade 2 agricultural land. As such, significant negative effects are expected due to the potential for loss of high quality agricultural land during development. The remaining land within the site is consists of Grade 3 agricultural land.<br>The site does not contain any previous development apart from agricultural buildings.<br>Over 50% of the site is located within an aggregate Minerals Safeguarding Area and without appropriate evidence there may be objection under Policy M2 of the Devon Minerals Plan to development that would sterilise or constrain this mineral resource. However, there could be an opportunity to extract the mineral resource prior to development going ahead. As such, uncertain significant negative effects are expected.<br>Overall, uncertain significant negative effects are expected. |
| **7. WATER RESOURCES** | -? | The site is not adjacent to and does not contain any watercourses. |

| SA Objective | SA Score | Justification |
|---|---|---|
| To utilise our water resources efficiently and minimise their loss or degradation. | | As such, negligible effects are expected. |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | + | The site is likely to be able to accommodate about 316 – 408 homes. However the capacity is likely to reduce once account has been taken of the likely mitigation requirements, including those highlighted elsewhere in this assessment. The site would also need to ensure a viable mix of homes (tenure and sizes) including a proportion of affordable housing to contribute towards meeting needs within the area. This range of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom and self-build providers. The site is of a sufficient size to be able to support a high number of housing starts / completions from a number of different outlets around the site, which in turn will ensure a good pace of delivery.<br>As such, minor positive effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site is within 800m of Accessible Woodland, major open space, and lies adjacent to Public Rights of Way.<br>As such, significant positive effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | -- | The site is within the 'South West Newton Abbot and areas to the West of Newton Abbot' Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment reporting of index of multiple deprivation, sees average levels of deprivation than compared to Devon as a whole. It is likely that a large residential development of this nature will provide potential improvements to the availability of homes in the area, which will provide broad wellbeing benefits. As such, negligible effects are expected.<br>The site is adjacent to existing residential developments, Newton Abbot to the west, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. As such, minor negative effects are also expected.<br>The site is within 1km of Kingskerswell AQMA. Car movements from the site would negatively impact the AQMA through the increase of increased traffic and air pollution. In addition, the nearby Milber employment estate may be an additional significant source of noise, light and air pollution. As such, significant negative effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | Overall, significant negative effects are expected. |
| **11. ACCESS TO SERVICES**<br>To provide accessible and attractive services and community facilities for all ages and interests. | -- | The site is not located directly adjacent to any settlements. Newton Abbot is located to the west; however, limited services are available in this part of the town. The site lies 3.5km from Newton Abbot town centre which provides a wide range of services and community services. Exeter is accessible by road or rail and includes higher education and secondary health services as well as additional cultural facilities. As such, significant negative effects are expected.<br>The site is not within 1km of any primary schools or secondary schools. Haytor View Primary School is the closest school to the site at around 2km away. Other schools are further away in Newton Abbot. As such, uncertain minor negative effects are expected.<br>Currently, the site only has access broadband speeds of less than 10Mbps. As such, minor negative effects are expected.<br>The site is small, providing less than 500 homes, and therefore it is assumed that development would be less likely to accommodate any schools on site. As such, minor negative effects are expected.<br>Overall, significant negative effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | + | The site is not directly adjacent to a Main Town but it is within 1km of existing or proposed employment sites that could provide employment opportunities. As such, minor positive effects are expected.<br>Jobs would be created during the construction phase of the site and any new homes would create expenditure in the area. It assumed that, as the site has the capacity to deliver less than 500 homes, the site will provide limited employment opportunities with no shops or services. As such, negligible effects are expected.<br>The site is unlikely to have any negative impacts on tourism.<br>Overall, minor positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located directly adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND** | +? | The site is not located within 1km of cycle routes or railway stations. Although the site is located |

| SA Objective | SA Score | Justification |
|---|---|---|
| **TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | | within 500m of bus stops, these bus stops are only served by a frequent bus service between 9.35am and 3.30pm.<br><br>As such, due to the proximity of partially frequent bus stops, uncertain minor positive effects are expected. |

## SA-T-14: Jews Bridge Meadow

| SA-T-14 | Jews Bridge Meadow |
|---|---|
| **Authority Area:** Teignbridge | |
| **Site Area:** 6.2ha (Net 5.5ha) | |
| **Approximate total capacity:** 5.5ha employment | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:** The site is made up of flat fields with mature hedgerows adjacent to the A38, the Heathfield industrial estate, with a national cycle route and bridge to the south. It is entirely within FZ 3 and crossed by a number of pylons. The site is within an area that is currently a pinchpoint for greater horseshoe bats, is within the minerals Safeguarding area for ball clay, and is generally unsuitable and likely to be unviable for most forms of development. |  |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | --? | The site is within 250m of Chudleigh Knighton Heath SSSI and within 1km of three additional SSSIs, Brocks Farm, Bovery Heathfield (also a Local Nature Reserve) and Stover Park (also known as Stover Country Park and Local Nature Reserve). The site is also within 250m of Teigngrace Meadows and Bovey/Teign Confluence, both County Wildlife Sites. In addition, there are a few County Wildlife Sites within 1km of the site. The site lies entirely within priority habitat coastal and floodplain grazing marsh with small sections also within deciduous woodland. In addition, the site is flagged as Amber in the HRA sensitivity work with regard to South Hams SAC. The site is within the 500m buffer zone for bats (including greater horseshoe bats), with significant radio-tracking evidence of bat flight routes through the site. Other European protected species recorded on or near the site include Dormouse, Greater Crested Newt and Otter.<br>As such, uncertain significant negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is situated on greenfield land with industrial development to the south and the A38 immediately due to east. The majority of the site is considered to be Sparsely Settled Farmed Valley Floors and development would have an urbanisation effect on this environment. The site is of medium-high landscape sensitivity due to it containing woodland that may be lost to development.<br>As such, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | -? | The site does not contain any heritage assets within its boundaries. There are multiple designated assets within 3km including New Bridge, a Grade II listed building around 1km to the east and Brocks Farmhouse, which is located around 850m to the south-east. There are also five further Grade II listed buildings located in Chudleigh Knighton, which is around 1.2km north-east of the site. The nearest Scheduled Monument is an earthwork on Bovey Heath located around 1.4km to the west of the site. Additionally, Stover Park, (a Registered Park and Garden) is located 600m to the south of the site. Development has the potential to compromise these historic environment assets. Bovey Tracey Conservation Area, which contains multiple listed buildings, is located within 3km of the site to the north-west but there is less potential for intervisibility with the site due to this area already being surrounded by development.<br>As such, uncertain minor negative effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br>To minimise greenhouse gas emissions. | --?/+ | The site is located within 5km of the Main Towns of Newton Abbot, Kingsteignton, Bovey Tracey and Chudleigh. As such, uncertain negligible effects are expected.<br>The site is located within 1km of a railway station and the site is adjacent to a cycle path. However the site is not located within 500m of bus stops. As such, minor positive effects are expected. |

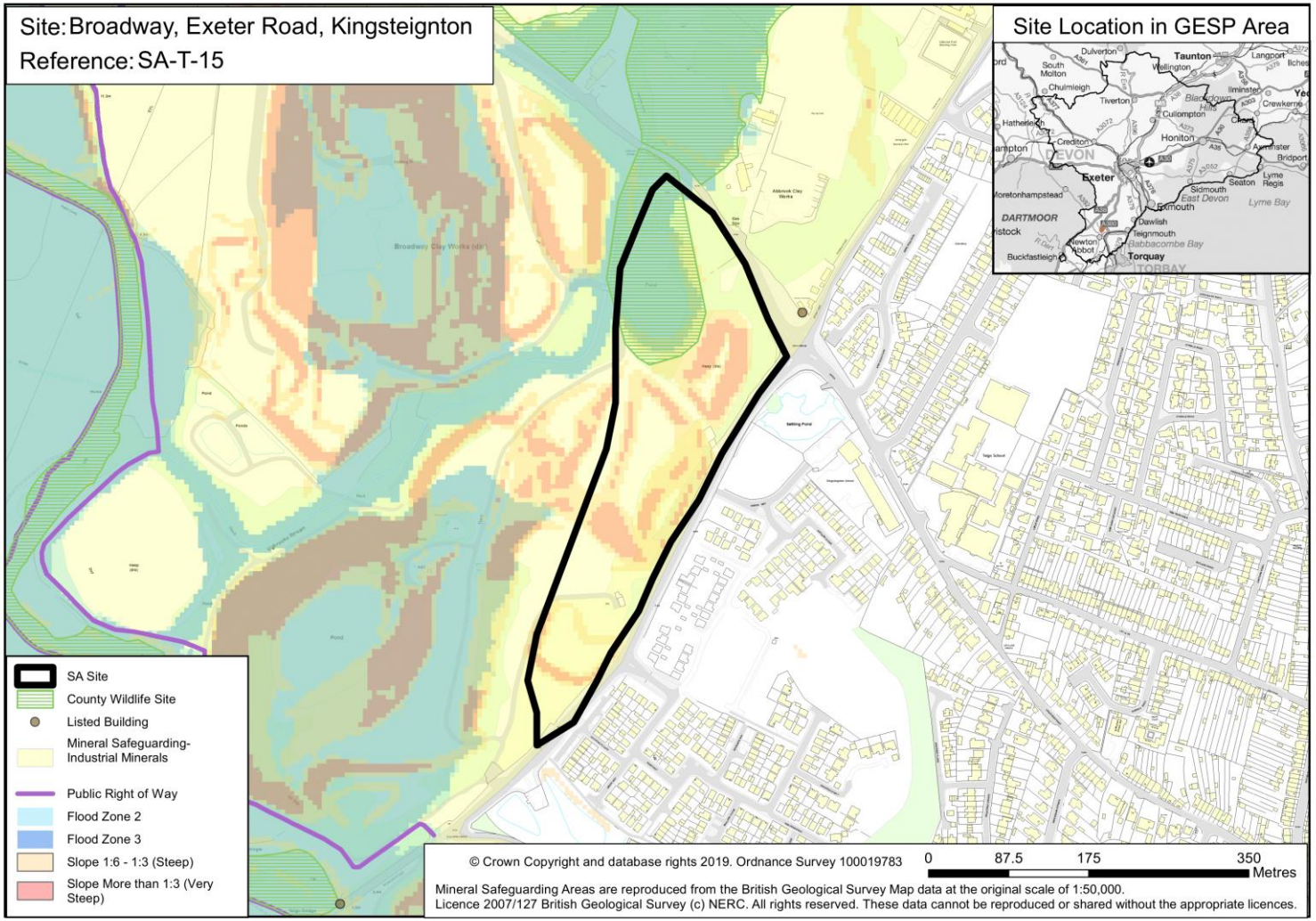
| SA Objective | SA Score | Justification |
|---|---|---|
| | | As the site is expected to deliver under 10ha of employment land, it is assumed that development of the site would provide fewer sustainable transport, walking and cycle links, and services. As such, uncertain significant negative effects are also expected.<br><br>Overall, mixed minor positive and uncertain significant negative effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | --? | The site is predominantly greenfield and on flood zone 3. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain significant negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | --? | The entirety of the site (6.2ha) is comprised of Grade 3 agricultural land. As such, significant negative effects are expected due to the potential for loss of high quality agricultural land during development. However, the effect is uncertain as it is unclear if it is Grade 3a or Grade 3b agricultural land.<br><br>The site does not contain any previously developed land.<br><br>The whole of the site is located in an industrial Mineral Safeguarding Area (e.g. Ball Clay) and without appropriate evidence there may be objection under Policy M2 of the Devon Minerals Plan to development that would sterilise or constrain this mineral resource. However, there could be an opportunity to extract the mineral resource prior to development going ahead. As this site is less than 10ha, uncertain minor negative effects are expected.<br><br>Overall, uncertain significant negative effects are expected. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or degradation. | -? | Development should ensure no deterioration in the water quality of the River Bovey, which flows adjacent to the northern boundary of the site and also pass across a small section of the site boundaries. However, it does not flow into the Exe Estuary SPA.<br><br>As such, uncertain minor negative effects are expected. |
| **8. HOMES**<br><br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | 0 | The site is proposed for employment uses. The site is not proposed for housing as it would be unsuitable due to being located in flood zone 3.<br><br>As such, negligible effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site is within 800m of Accessible Woodland and Open access land, both major open spaces. The site is also within 400m of the National Cycle Route and Public Rights of Way.<br>As such, significant positive effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | - | While providing new jobs will have a positive impact on the health and wellbeing of workers, the site is within the 'Heathfield/Bickington/Ilsington' Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees below average levels of deprivation than Devon as a whole. As such, development in this area is unlikely to be significantly affected by deprivation and is less likely to have a positive effect on wellbeing locally as a result of increased investment in the area. As such, negligible effects are expected.<br>The site is adjacent to existing residential development, Heathfield, which could be adversely affected as a result of noise and light pollution from development of the site during the construction and operational phases. The site is adjacent to existing employment development, Heathfield, which could provide additional benefits. As such, minor negative effects are expected due to the potential for adverse effects on existing residential development.<br>The site has not been identified to have potential to result in increased traffic within an AQMA. As such, negligible effects are expected.<br>Overall, minor negative effects are expected. |
| **11. ACCESS TO SERVICES**<br>To provide accessible and attractive services and community facilities for all ages and interests. | --/+ | The site is located next to Heathfield (an Undefined Village) where there is limited access to services. The nearest shop is 1.4km away with wider range of services being provided 3.6km away in Bovey Tracey. As such, significant negative effects are expected.<br>The site is adjacent to an area that has access to superfast broadband (80-300Mbps), which it is assumed could be extended to the site if development came forward. As such, minor positive effects are expected.<br>Overall, mixed significant negative and minor positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br>To foster a strong and entrepreneurial economy and increased access to | + | The site has capacity for over 5ha of employment land. As such, minor positive effects are expected.<br>Overall, minor positive effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | | |
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | + | The site is located within 1km of a railway station and the site is adjacent to a cycle path. However the site is not located within 500m of bus stops.<br>As such, minor positive effects are expected. |

## SA-T-15: Broadway, Exeter Road, Kingsteignton

| SA-T-15 | Broadway, Exeter Road, Kingsteignton |
|---|---|
| **Authority Area:** Teignbridge | |
| **Site Area:** 6.9ha (Net 6ha) | |
| **Approximate total capacity:** 6ha employment | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:** Small linear site coming to end of its life as a mineral extraction / dumping site near Newcross, Kingsteignton. The site contains some areas of flood zone 3 and is close to the secondary site. A high pressure gas pipeline runs under the B3193 which may require consideration. The landowner is proposing leisure and retail uses. The site is being assessed for employment uses. | |



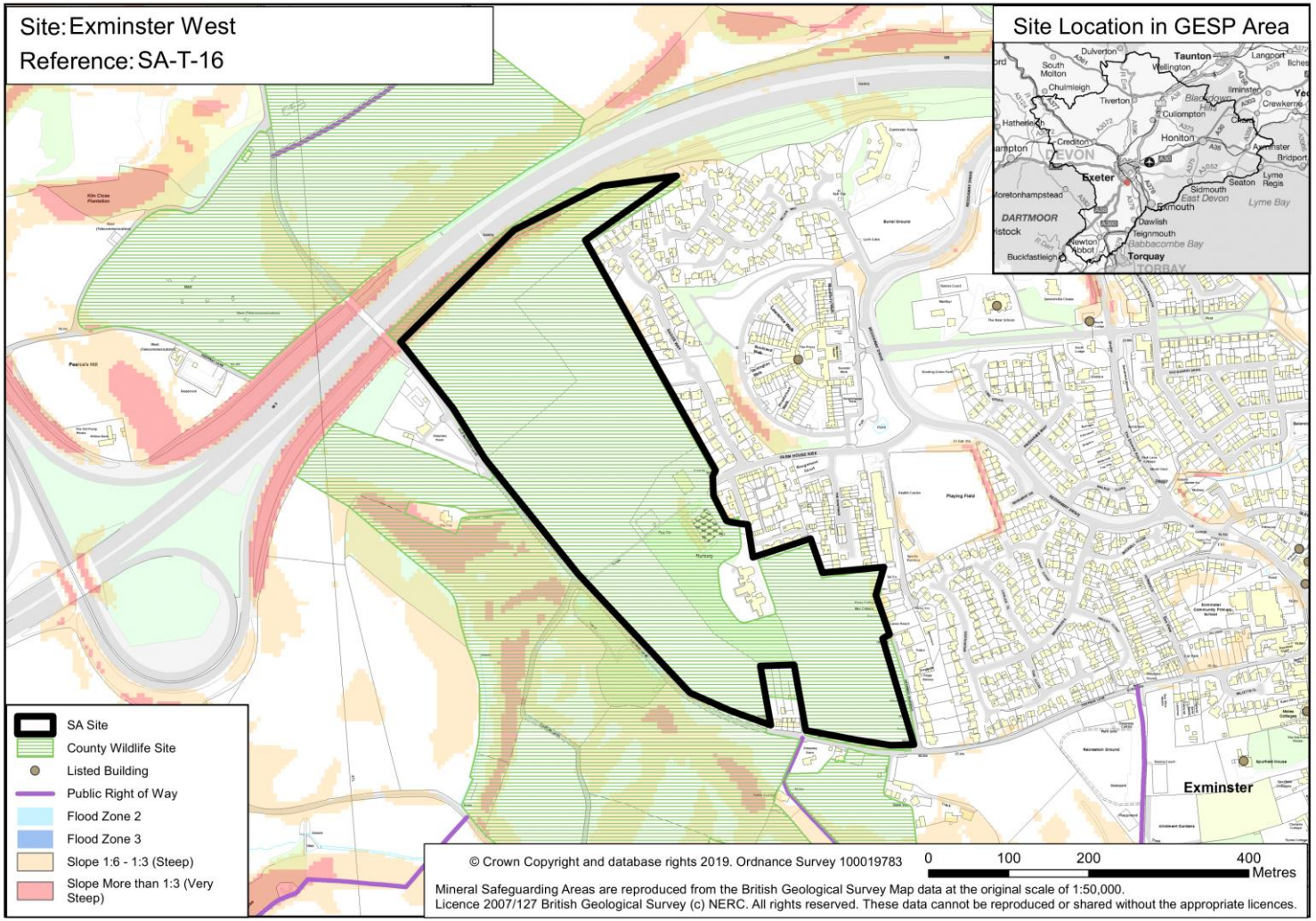
| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | --? | The site is within 1km of Southacre Clay Pits SSSI. The site lies within Netherexe County Wildlife Site and adjacent to Abbrook Pond and Woodland. The site is also within 250m of Rackerhayes Ponds County Wildlife Site and within 1km of four additional County Wildlife Sites, Bovey/Teign Confluence, Stover Canal, West Golds & Jetty Marshes and Teigngrace. The site contains priority habitat deciduous woodland and lies entirely within Strategic Nature Area coastal and floodplain grazing marsh. In addition, the site is flagged as Amber in the HRA sensitivity work with regard to South Hams SAC. The site is also within a Greater Crested Newt consultation zone and Otter have been recorded in close proximity. The site lies outside of the Greater Horseshoe Bat strategic flyway (along the Teign), but within the South Hams SAC 4km buffer.<br><br>As such, uncertain significant negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is comprised of a quarry area situated on land considered to be Sparsely Settled Farmed Valley Floors with urban development to the east. Due to its proximity to Kingsteignton, the site is considered to be of medium-high landscape sensitivity.<br><br>As such, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | -? | The site does not contain any heritage assets within its boundaries. There are multiple designated assets within 3km including a Grade II listed building on the north-eastern boundary (New Cross Cottage). There are further Grade II listed buildings located around 400 to the south-west, 1km to the east and 600m to the north west. Stover Park (a Registered Park and Garden) is located around 1.3km to the west of the site. There is potential for development to compromise the setting of these historic environment assets. There is also a Conservation Area (Kingsteignton) located around 1km to the south-east and a Scheduled Monument (Castle Dyke) located around 2.2km to the south-west of the site. However, there is less potential for development to cause disturbance to these heritage assets due to them already being surrounded by development.<br><br>As such, uncertain minor negative effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br>To minimise greenhouse gas emissions. | ++?/--? | The site is adjacent to the Main Town of Kingsteignton. As such, uncertain significant positive effects are expected.<br><br>The site is not located within 1km of a railway station, however the site is located within 1km of a cycle route. The site is also located within 500m of bus stops, however these are not served by frequent bus services. As such, due to the lack of accessible public transport links in proximity to the site, minor negative effects are expected.<br><br>As the site is expected to deliver under 10ha of employment land, it is assumed that development of |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | the site would provide fewer sustainable transport, walking and cycle links, and services. As such, uncertain significant negative effects are also expected.<br><br>Overall, mixed uncertain significant positive and uncertain significant negative effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | 0? | The site is predominantly brownfield and there is no significant flood risk within the area. Areas of the site to the north are on flood zone 3 and 2. However, development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain negligible effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | 0 | The entirety of the site is comprised of non-agricultural land. I addition, this site does not contain any previously developed land as former quarry sites with restoration conditions are excluded from this.<br><br>As such, negligible effects are expected.<br><br>The whole of this site is located within an industrial Minerals Safeguarding Area (e.g. Ball Clay). However, it is thought that mineral deposits have already been extracted. As such, negligible effects are expected.<br><br>Overall, negligible effects are expected. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or degradation. | -? | Development should ensure no deterioration in the water quality of Ugbrooke Stream, which flows adjacent to the north western boundary of the site but does not run into the Exe Estuary SPA.<br><br>As such, uncertain minor negative effects are expected. |
| **8. HOMES**<br><br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | 0 | Housing development is not proposed.<br><br>As such, negligible effects are expected. |
| **9. HEALTH**<br><br>To support healthy and active communities where people can enjoy | + | The site is not within 800m of major open space, but is within 400m of Public Rights of Way.<br><br>As such, minor positive effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| healthy lives with access to attractive environments and opportunities to enjoy and experience them. | | |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | -- | The site is located within the south-west and north-west Newton Abbot Middle Super Output Area, which according to the Devon joint Strategic Needs Assessment index of multiple deprivation, sees lower than average levels of deprivation than compared to Devon as a whole.<br>The site is adjacent to existing residential development, Kingsteignton the east of the site, which could be adversely affected as a result of noise and light pollution from development of the site during the construction and operational phases. As such, minor negative effects are expected.<br>The site is within 1km of Newton Abbot's AQMA. Car movements to and from this site could potentially contribute to worsening air quality in the Newton Abbot AQMA by increasing traffic congestion. As such, significant negative effects are expected.<br>Overall, significant negative effects are expected. |
| **11. ACCESS TO SERVICES**<br>To provide accessible and attractive services and community facilities for all ages and interests. | ++ | The site is adjacent to the Main Town of Kingsteignton, which provides access to a range of services and facilities including shops within the town centre. As such, significant positive effects are expected.<br>The site is adjacent to an area that has access to superfast broadband (30-300 Mbps), which it is assumed could be extended to support the site. Therefore, minor positive effects are expected.<br>Overall, significant positive effects are expected due to the site's close proximity to existing services. |
| **12. JOBS AND LOCAL ECONOMY**<br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | + | It is assumed that, as the site has capacity to deliver less than 10ha of employment space, the site will deliver no shops or services. Jobs would be created during the construction phase of the site.<br>As the site has the capacity to deliver over 5ha of employment space, minor positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and town centres. | + | The site is located adjacent to Kingsteignton (a Main Town). A new employment site may support the vitality and viability of the existing town centre by increasing the number of day-to-day visitors and supporting businesses and services there.<br>As such, minor positive effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | - | The site is not located within 1km of a railway station, however the site is located within 1km of a cycle route. The site is also located within 500m of bus stops, however these are not served by frequent bus services.<br><br>As such, due to the lack of accessible public transport links in proximity to the site, minor negative effects are expected. |

### SA-T-16: Exminster West

| SA-T-16 | Exninster West |
|---|---|
| **Authority Area:** Teignbridge |  |
| **Site Area:** 16.8ha (Net 9.6ha) | |
| **Approximate total capacity:** 297 – 384 dwellings | |
| **Site status:** Potential site option | |
| **Outline description and context:** Land to the west of Exminster with the M5 to its north and Days Pottles Lane to the south west. Site is 600m from school and village centre with access into A379. Land is mainly gently sloping and rises up a hillside to the west of the Exe, with potential for landscape impacts. Site is approximately 4.8km from Exeter City Centre and has therefore been considered within the Exeter urban fringe study. | |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | --?/+ | The site is within 1km of Exe Estuary (SSSI, SPA and Ramsar site). The site lies entirely within The Farm (Exminster) County Wildlife Site and is within 1km of two County Wildlife Sites, Wraccombe Farm and Matford Marshes and Exminster Quarry County Geological Site. The site contains a small patch of priority habitat deciduous woodland. In addition, the site is flagged as Amber in the HRA sensitivity work with regard to Dawlish Warren SAC and Exe Estuary SPA and is within the Recreational Zone for Exe Estuary SPA and Dawlish Warren SAC; mitigation would be required (likely to include a requirement for 4ha of SANGS). The site is also within the Cirl Bunting and Greater Crested Newt Consultation zones. As such, uncertain significant negative effects are expected.<br><br>However, the site has capacity for less than 1,000 homes, and therefore is expected to provide local public open space on site that could mitigate the biodiversity impact of development. As such, significant positive effects are also expected.<br><br>Overall, mixed minor positive and uncertain significant negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | -? | The site is located greenfield land with some agricultural buildings present and residential development to the east. The landscape character of land within the site is considered to be Lower Rolling Farmed and Settled Valley Slopes. Development within site would have an urbanisation effect on the environment. The site is of medium landscape sensitivity due to it being located within a 'Strategic and Local Break' as allocated in the Teignbridge Local Plan. Planting and consideration of density, building heights and how far up the hill development goes would be required to minimise the potential for landscape impacts within the Exe Estuary and on Haldon.<br><br>As such, uncertain minor negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | -? | The site does not contain any heritage assets within its boundaries. There are multiple designated assets within 3km including Grade II listed buildings located within Exminster, which is adjacent to the eastern boundary of the site. There are also four further Grade II listed buildings in close proximity (400m) to the southern boundary of the site. (Blackalls, Spurway Farmhouse, Damerosehay Cottage and Towsington). There are Scheduled Monuments located around 500m north and south of the site (earthwork enclosure, NE of Church Path Hill Plantation and earthwork enclosure south of Blackall's Copse) as well as two further scheduled monuments located to the 1km to the east and 1.7km to the north-east (enclosures NE of Peamore Cottage and linear round barrow cemetery at Castle Park). Powderham Castle (a Registered Park and Garden is located just within 3km to the south east of the site. Additionally, Topsham and Alphington Conservation Areas lie within 3km of the site, but there is less potential for intervisibility due to there being existing development between the site and these assets. There is greater potential for intervisibility between the site and Kenn Conservation Area, which |

| SA Objective | SA Score | Justification |
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| | | is around 2.5km to the south-west and contains multiple Grade II listed buildings.<br><br>As such, uncertain minor negative effects are expected due to the potential for development to compromise the setting of these historic environment assets. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | --?/+ | The site is located within 5km of Exeter City. As such, uncertain negligible effects are expected.<br><br>The site is not located within 1km of cycle routes or railway stations. The site is however located within 500m of bus stops that provide regular bus services into Exeter (and towards Dawlish/Teignmouth). As such, due to the proximity of bus stops, minor positive effects are expected.<br><br>As the site is expected to deliver less than 1,000 homes, it is assumed that development of the site would provide fewer sustainable transport, walking and cycle links, and services. As such, uncertain significant negative effects are also expected.<br><br>Overall, mixed minor positive and uncertain significant negative effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and there is no significant flood risk within the area. However, development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | -- | Over 5ha of the site is comprised of Grade 3a agricultural land. As such, significant negative effects are expected due to the potential loss of high quality agricultural land during development. The remaining land within the site is designated as non-agricultural land.<br><br>Although the site does not contain any previously developed land that could be reused, it is noted that the site contains horticultural use land and a previous hospital building which is now used for B1 uses.<br><br>The site is not located within any Minerals Safeguarding Areas.<br><br>Overall, significant negative effects are expected. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or | 0 | The site is not adjacent to and does not contain any watercourses.<br><br>As such, negligible effects are expected. |

| SA Objective | SA Score | Justification |
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| degradation. | | |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | + | The site is likely to be able to accommodate around 297-384 homes in this edge of village location on the fringes of Exeter. However the capacity is likely to reduce once account has been taken of the likely mitigation requirements. The site would also need to ensure a viable mix of homes (tenure and sizes) including a proportion of affordable housing to contribute towards meeting needs within the area. The site has limited infrastructure demands and favourable topography, meaning a policy compliant proportion of affordable housing should be delivered. The range of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom and self-build providers. This relatively small site would have limited enabling infrastructure and so more likely to come forward early in the plan period, helping early delivery.<br>As such, minor positive effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | + | The site is not within 800m of major open space, but is with 400m of Public Rights of Way.<br>As such, minor positive effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | - | The site is within the Exminster, Kennford and Kenton Middle Super Output Area, which according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees lower than average levels of deprivation than compared to Devon as a whole.<br>Development of homes benefits the people who are housed. The site is adjacent to existing residential development, Exminster to the east of the site, which contains the Exminster Community Primary School, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. In addition, the site is adjacent to the motorway. This feature may result in noise pollution affecting residents of the site in the longer term. As such, minor negative effects are expected.<br>The site is not within 1km of an AQMA. However, car movements emanating from the site could potentially contribute to worsening air quality as a result of traffic congestion. As such, minor negative effects are expected.<br>Overall, minor negative effects are expected. |

| SA Objective | SA Score | Justification |
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| **11. ACCESS TO SERVICES**<br>To provide accessible and attractive services and community facilities for all ages and interests. | +/- | The site is located adjacent to Exminster (a Defined Village), which provides a range of services and facilitites. Larger cultural and leisure facilities are available relatively close in Exeter (less than 5km). As such, minor positive effects are expected.<br>The site is within 500m of Exminster Community Primary School but it is not within 1km of any secondary schools. The planned nearby South West Exeter (Matford Barton) development will include a new all through school also (within 2km). As such, uncertain minor positive effects are expected.<br>The site is adjacent to an area that has access to superfast broadband (80-300Mbps), which it is assumed could be extended to the site if development came forward. As such, minor positive effects are expected.<br>The site is small, providing less than 500 homes, and therefore it is assumed that development would be less likely to accommodate any schools on site. As such, minor negative effects are expected.<br>Overall, mixed minor positive and minor negative effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | + | The site is not adjacent to a Main Town but it is within 1km of existing or proposed employment sites that would provide employment opportunities. As such, minor positive effects are expected.<br>Jobs would be created during the construction phase of the site and any new homes would create expenditure in the area. It is assumed that, as the site has the capacity to deliver less than 500 homes, the site will provide limited employment opportunities and no shops or services. As such, negligible effects are expected.<br>The site is unlikely to have any negative impacts on tourism.<br>Overall, minor positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br>To connect people and businesses digitally and physically through the provision of broadband, walking, | + | The site is not located within 1km of cycle routes or railway stations. The site is however located within 500m of bus stops that provide regular bus services into Exeter (and towards Dawlish/Teignmouth).<br>As such, due to the proximity of bus stops, minor positive effects are expected. |

| SA Objective | SA Score | Justification |
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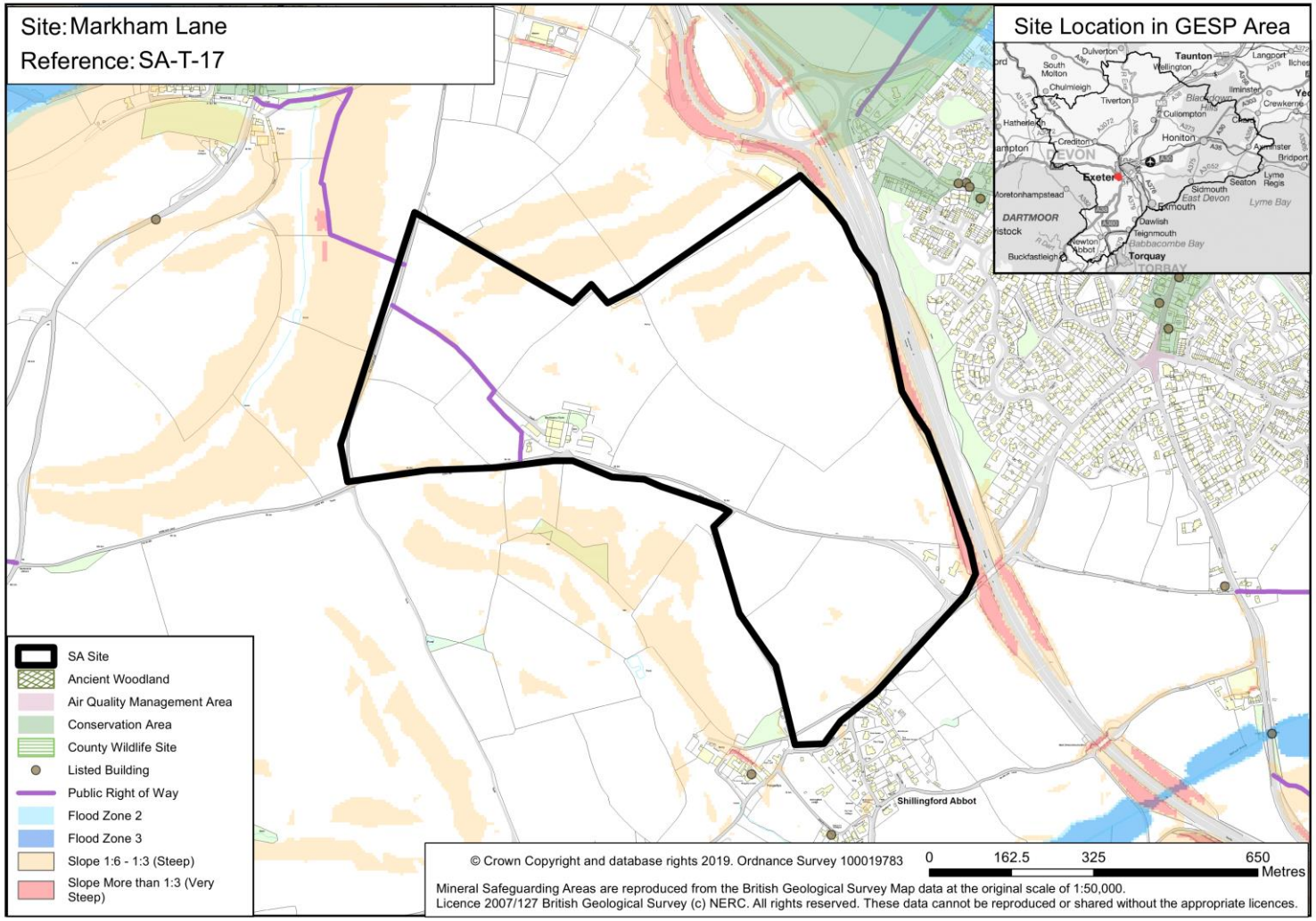
| cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | | |

### SA-T-17: Markham Lane

| SA-T-17 | Markham Lane |
|---|---|
| **Authority Area:** Teignbridge | |
| **Site Area:** 66.1ha (Net 32ha) | |
| **Approximate total capacity:** 1,004 – 1,280 dwellings | |
| **Site status:** Potential site option | |
| **Outline description and context:** This site lies on a steep hill on the south-western fringe of Exeter. The hill may form part of the landscape setting of the city, although it has not been established from where in the city it can be seen. The site is currently served by country lanes, but benefits from a nearby junction onto the A30 and a road bridge over the A30 into Alphington. The site is just 3.5km from the City Centre, making it highly accessible by non-car means. The gradients of the site may mean a significant proportion of the value of the scheme is likely to be spent on engineering works and abnormal build costs. |  |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/--? | The site is within 1km of Alphinbrook County Wildlife Site. In addition, the site is flagged as Amber in the HRA sensitivity work with regard to Exe Estuary SPA and is within the Recreational Zone for Exe Estuary SPA; mitigation would be required (likely to include a requirement for 20ha of SANGS depending upon the estimated housing/population). The site is within a Greater Crested Newt consultation zone. As such, uncertain significant negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space and playing pitches on site that could mitigate the biodiversity impact of development. As such, significant positive effects are also expected.<br><br>Overall, mixed significant positive and uncertain significant negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is situated in rural open countryside with residential development to the east associated with Exeter. The landscape character of the site is considered to be predominantly Upper Farmed and Wooded Valley Slopes and sod development would have an urbanisation effect on the environment. The site is of high landscape sensitivity as the western part of the site is located on a ridge and will be visually prominent forming part of the skyline when seen from Exeter.<br><br>As such, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/-? | The site does not contain any heritage assets within its boundaries. There are multiple designated assets within 3km including at the southern boundary of the site where there are two Grade II listed buildings (No. 1,2 and 3 Hamlyn Cottages and Pengelly's Farmhouse) within 200m. Additionally, the northern boundary of the site is around 300m away from Alphinbrook Conservation Area and 500m away from Ide Conservation Area which contains multiple Grade II listed buildings. The nearest Scheduled Monuments are located around 700m to the east (linear round barrow cemetery at Castle Park) and around 1km to the south-east (enclosures NE of Peamore Cottage). There is potential for development to compromise the setting of these historic environment assets. As such, uncertain minor negative effects are expected.<br><br>It is likely that the site is of sufficient size (>10ha) to accommodate a well-designed development and create a new high quality built environment. It should be possible for development to respond appropriately to existing heritage assets in the area and minimise any disturbance to the historic environment. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **4. CLIMATE CHANGE MITIGATION**<br>To minimise greenhouse gas emissions. | ++?/-? | The site is adjacent to Exeter City. As such, uncertain significant positive effects are expected.<br>The site is not located within 1km of cycle routes or railway stations. The site is located within 500m of bus stops within Ide, however these are not served by frequent bus services. The site is also within 500m of bus stops within Alphington, which are served by regular bus services. However, these bus stops are located beyond the A30 adjacent to site, and as such access to these bus stops may be limited. As such, due to the proximity to partially inaccessible bus links, uncertain minor negative effects are expected.<br>As the site is expected to deliver over 1,000 homes, it is assumed that development of the site would provide some sustainable transport, walking and cycle links and services. As such, uncertain negligible effects are expected.<br>Overall, mixed uncertain significant positive and uncertain minor negative effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and there is no significant flood risk within the area. However, development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br>To utilise our land resources efficiently and minimise their loss or degradation. | -- | The entirety of the site is comprised of Grade 2 agricultural land. As such, significant negative effects are expected due to the potential loss of high quality agricultural land during development.<br>Although the site does not contain any previously developed land that could be reused, it is noted that it does contain some agricultural use buildings.<br>The site is not located within any Minerals Safeguarding Areas.<br>Overall, significant negative effects are expected. |
| **7. WATER RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or degradation. | 0 | The site is not adjacent to and does not contain any watercourses.<br>As such, negligible effects are expected. |
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially | ++ | The site is likely to be able to accommodate around 1,004 – 1,280 homes. However this capacity is likely to reduce once account has been taken of the likely mitigation requirements, including those highlighted elsewhere in this assessment. The net developable area may also vary subject to further |

| SA Objective | SA Score | Justification |
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| accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | | information regarding engineering works to ensure access and build platforms within the topography, the need to minimise landscape impacts and other requirements such as SANGS.<br><br>The site would also need to ensure a viable mix of homes (tenure and sizes) including a proportion of affordable housing to contribute towards meeting needs within the area.<br><br>A range of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom and self-build providers. This site is of a sufficient size to be able to support a high number of housing starts / completions from a number of outlets around the site, which in turn could raise the pace of delivery.<br><br>As such, significant positive effects are expected. |
| **9. HEALTH**<br><br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site is within 800m of Alphington Whitestone Valley Park, major open space. The site also contains and lies adjacent to Public Rights of Way. As such, significant positive effects are expected.<br><br>In addition, as the site is expected to deliver between 1,000 – 1,999 homes, it is assumed that development of the site would provide some open space and active transport links. As such, minor positive effects are expected.<br><br>Overall, significant positive effects are expected. |
| **10. WELLBEING**<br><br>To support positive, safe and healthy communities. | -- | The site is within the Tedburn St Mary, Shillingford St George and West of Exeter Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees lower than average levels of deprivation than compared to Devon as a whole.<br><br>The site is adjacent to existing residential developments, Alphington and Exeter City to the east and north east of the site, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. In addition, the site is adjacent to an 'A' road. This feature may result in noise pollution affecting residents of the site in the longer term. As such, minor negative effects are expected.<br><br>The site is within 1km of the Exeter AQMA. Car movements emanating from the site could potentially contribute to worsening air quality as a result of congestion on the A30 and in the Exeter AQMA. As such, significant negative effects are expected.<br><br>Overall, significant negative effects are expected. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive | ++ | The site is located adjacent to Exeter City, which provides an extensive range of services and cultural/leisure facilities. The site is also within 2km of a large supermarket. As such significant positive |

| SA Objective | SA Score | Justification |
|---|---|---|
| services and community facilities for all ages and interests. | | effects are expected.<br><br>The site is within 500m of a Alphington Primary School and it is within 1km of West Exe Secondary School. There is likely to be a greater need for secondary school capacity in this region of Exeter. A new all-through school is planned a Matford Barton (2.5km), although presently there is no safe or direct walking route. As such, uncertain minor positive effects are expected.<br><br>The site is adjacent to an area that has access to superfast broadband (80-300Mbps), which it is expected could be extended to the site if development came forward. As such, minor positive effects are expected.<br><br>The site is medium sized, providing over 500 homes, and therefore it is assumed that development would be more likely to accommodate a primary school on site. As such, minor positive effects are expected.<br><br>Overall, significant positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | ++ | The site is adjacent Exeter city and is within 1km of existing or proposed employment sites that would provide employment opportunities. As such, significant positive effects are expected.<br><br>Jobs would be created during the construction phase of the site and any new homes would create expenditure in the area. It is assumed that, as the site has the capacity to deliver over 500 homes, the site will provide medium scale mixed use employment opportunities and a business park or employment estate as well as a neighbourhood hub with shops and services. As such, minor positive effects are expected.<br><br>The site is unlikely to have any negative impacts on tourism.<br><br>Overall, significant positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | ++ | The site is located adjacent to Exeter City and will deliver less than 4,000 homes, which is a scale not expected to detract visitors from the current town centre. A new residential site may support the vitality and viability of the existing city centre by increasing the number of day-to-day visitors and supporting businesses and services there.<br><br>As such, significant positive effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses | +/-? | The site is not located within 1km of cycle routes or railway stations. The site is located within 500m of bus stops within Ide, however these are not served by frequent bus services. The site is also within 500m of bus stops within Alphington, which are served by regular bus services. However, these bus stops are located beyond the A30 adjacent to site, and as such access to these bus stops may be |

| SA Objective | SA Score | Justification |
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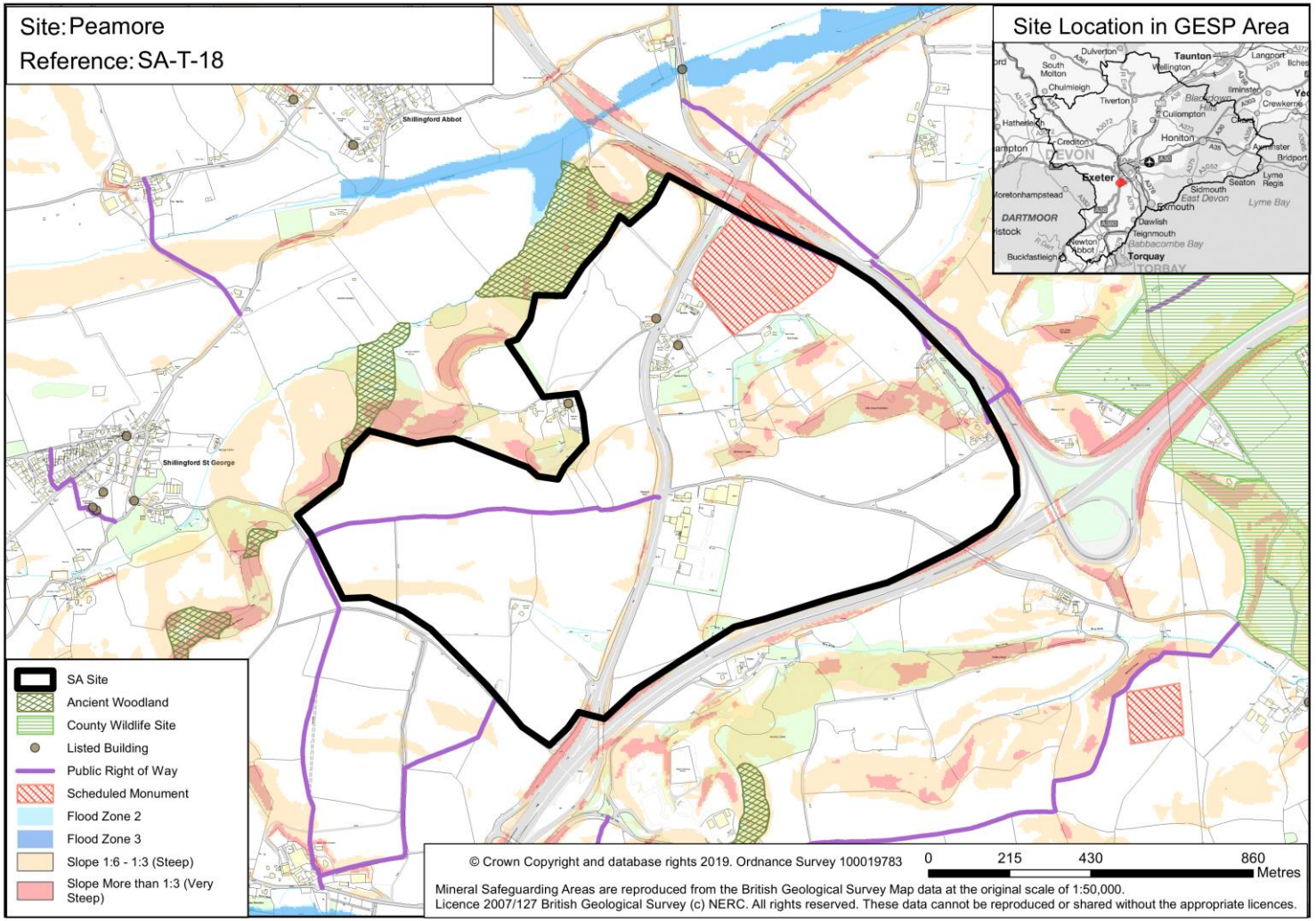
| digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | | limited. As such, due to the proximity to partially inaccessible bus links, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br><br>Overall, mixed minor positive and uncertain minor negative effects are expected. |

## SA-T-18: Peamore

| SA-T-18 | Peamore |
|---|---|
| **Authority Area:** Teignbridge |  |
| **Site Area:** 146ha (Net 52ha) | |
| **Approximate total capacity:** 1,612 – 2,080 dwellings | |
| **Site status:** Potential site option | |
| **Outline description and context:** This SA area is severed from the city and surrounding countryside and dissected by main roads (A30 / A38 / A379). The remaining land has a significant number of further constraints including listed buildings/monument, scheduled monument and steep topography. However, the overall location is only 4 – 5 km from the city centre meaning a good proportion of trips by bus and cycle are possible. The site is adjacent to the South West Exeter urban extension, which will include a new all-through school and SANGS. The SA area includes a substantial permitted employment estate. | |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/--? | The site is not located within 1km of an internationally or nationally designated biodiversity or geodiversity site, but is adjacent to Wobbly wheel Road Cutting County Geological Site. The site is also within 250m of The Farm (Exminster). The site contains patches of priority habitat deciduous woodland. In addition, the site is flagged as Amber in the HRA sensitivity work with regard to Dawlish Warren SAC and Exe Estuary SPA. The area is within the Recreational Zone for Exe Estuary SPA and borders the 10km buffer zone for the Dawlish Warren SAC; mitigation would be required (likely to include a requirement for SANGS on or adjacent to the site). The site is within a Cirl Bunting consultation zone and partially within a Greater Crested Newt consultation zone. As such, uncertain significant negative effects are expected.<br><br>Existing green infrastructure on the site, including the pond and woodland blocks, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space and playing pitches on site that could mitigate the biodiversity impact of development. As such, significant positive effects are also expected.<br><br>Overall, mixed significant positive and uncertain significant negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is situated in rural open countryside aside from a plantation and wooded area around fishpond. The landscape character of the site is considered to be Lower Rolling Farmed and Settled Valley Slopes and development would cause an urbanisation effect on the environment. Land at Peamore Farm and Little Silver is of medium landscape sensitivity as there is likely to be less impact on the surrounding landscape due to development at these locations. As such, uncertain minor negative effects are expected.<br><br>Despite the presence of the A379, the area around Peamore House is considered to be of high landscape sensitivity as the setting has importance to the historic landscape. Therefore, uncertain significant negative effects are expected.<br><br>Overall, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and | --?/+? | The northern half of the site contains two Grade II listed buildings (Peamore Cottage and Peamore War Memorial) and a Scheduled Monument (Enclosures NE of Peamore Cottage) within its boundaries. There are also further designated assets within 3km of the site including at the western boundary of the site, which is adjacent to Peamore House, a Grade II listed building. Further Grade II listed buildings within 3km are located in Shillingford St George around 500m to the west, Kennford around |

| SA Objective | SA Score | Justification |
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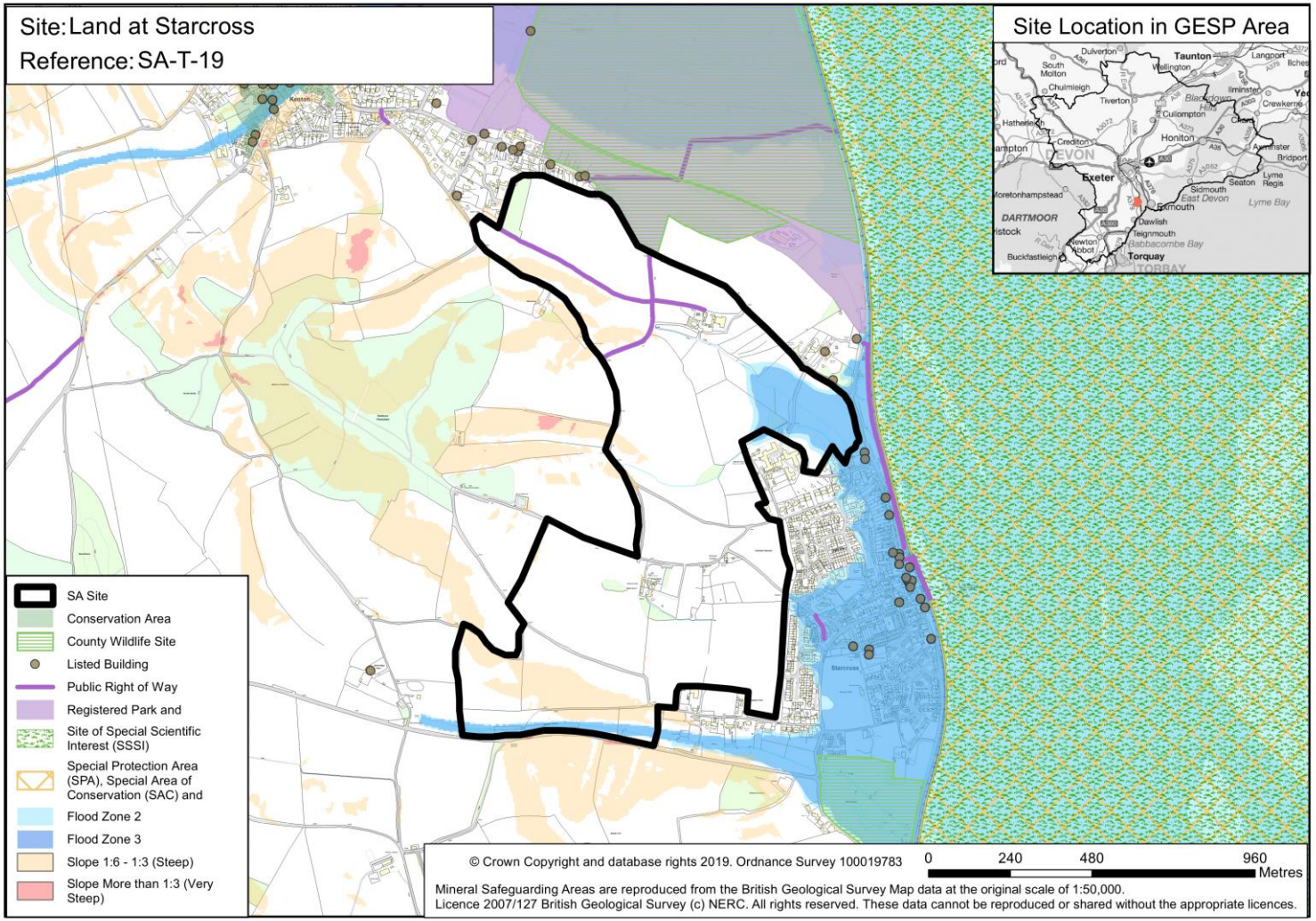
| accessibility in new build development. | | 600m to the south and Kenn Conservation Area around 1.5km to the south. There is potential for residential development to significantly compromise the setting and fabric (for heritage assets onsite) of these historic environment assets. As such, uncertain significant negative effects are expected.<br><br>It is likely that the site is of sufficient size (>10ha) to accommodate a well-designed development and create a new high quality built environment. It should be possible for development to respond appropriately to existing heritage assets in the area and minimise any disturbance to the historic environment. This will require buffering regions around heritage assets contained within and adjacent to the site. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain significant negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | + | The site is located within 1km of Exeter City. As such, uncertain minor positive effects are expected.<br><br>The site is not located within 1km of cycle routes or railway stations. The site does however contain bus stops that provide frequent bus services. As such, due to the presence of bus stops on site, minor positive effects are expected.<br><br>As the site is expected to deliver over 1,000 homes, it is assumed that development of the site would provide some sustainable transport, walking and cycle links and services. As such, uncertain negligible effects are expected.<br><br>Overall, minor positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and there is no significant flood risk within the area. However, development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain minor negative effects can be expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | -- | The majority of this site (>5ha) is located on Grade 2 agricultural land. As such, significant negative effects are expected due to the potential loss of high quality agricultural land during development. The remaining land within the site is comprised of Grade 3 agricultural land as well as small patches of Grade 4 agricultural land located on the western boundary of the site.<br><br>The site contains over 5ha of employment land that would be retained in its existing use with an extension of further employment land permitted. There is some other developed land but this is mainly residential or associated with farming. |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | The site is not located within any Minerals Safeguarding Areas.<br><br>Overall, significant negative effects are expected. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or degradation. | --? | Development should ensure no deterioration in the water quality of Matford Brook which passes through the north eastern boundary of the site and flows into the Exe Estuary SPA.<br><br>As such, uncertain significant negative effects are expected. |
| **8. HOMES**<br><br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | + | The site is likely to be able to accommodate 1,612 – 2,080 homes. The site would also need to ensure a viable mix of homes (tenure and sizes) including a proportion of affordable housing to contribute towards meeting needs within the area. The range of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom and self-build providers. The site is of a sufficient size to be able to support a high number of housing starts / completions from a number of different outlets around the site, which in turn will ensure a good pace of delivery.<br><br>The number of homes is unlikely to be sufficient to support significant new services beyond small convenience retail and possibly a primary school (which would further reduce the sites housing capacity, although a new community hub and school is being constructed close by at SWE1).<br><br>The existing site / constraints do not offer a contiguous, integrated or easy to develop area. Much of the land is either adjacent to significant busy roads or elevated above the A38 and may be visible from Haldon Ridge. Significant severance issues are likely.<br><br>As such, minor positive effects are expected. |
| **9. HEALTH**<br><br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site is within 800m of Accessible Woodland, major open space, and contains and lies adjacent to Public Rights of Way. As such, significant positive effects are expected.<br><br>In addition, as the site is expected to deliver over 2,000 homes, it is assumed that development of the site would provide significant open space and active transport links. As such, significant positive effects are expected.<br><br>Overall, significant positive effects are expected. |
| **10. WELLBEING**<br><br>To support positive, safe and healthy | -- | The site is within the Exminster, Kennford and Kenton Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees lower than average levels of deprivation than compared to Devon as a whole. |

| SA Objective | SA Score | Justification |
|---|---|---|
| communities. | | The site is not adjacent to existing residential development. However, the site is crossed by three 'A' roads, A38, A30 and A379. These features may result in noise pollution affecting residents of the site in the longer term. As such, minor negative effects are expected.<br><br>The site is within 1km of the Exeter AQMA. Car movements emanating from the site could potentially contribute to worsening air quality as a result of congestion on the A30 and in the Exeter AQMA. In addition, the area is not very accessible by public transport. As such, significant negative effects are expected.<br><br>Overall, significant negative effects are expected. |
| **11. ACCESS TO SERVICES**<br><br>To provide accessible and attractive services and community facilities for all ages and interests. | --/+ | The site is not located adjacent to any settlements. Overall the site is not within walking distance of most services, even though it is close to Exeter and Exminster (a Defined Village). As such, significant negative effects are expected.<br><br>The site is within 1km of Kenn Primary School but it is not wthin 1km of any secondary schools. Additional primary school capacity is locate in Exminster (within 2km) and secondary school capacity is located in Exeter (within 5km). As such, uncertain minor positive effects are expected.<br><br>Currently the site only has access to standard broadband speeds (10-30Mbps). As such, negligible effects are expected.<br><br>The site is medium sized, providing over 500 homes, and therefore it is assumed that development would be more likely to accommodate a primary school on site. As such, minor positive effects are expected.<br><br>Overall, mixed significant negative and minor positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | ++ | The site is not adjacent to a Main Town but it is within 1km of existing or proposed employment sites that could provide employment opportunities. As such, minor positive effects are expected.<br><br>Jobs would be created during the construction phase of the site and any new homes would create expenditure in the area. It is assumed that as the site has the capacity to deliver over 2000 homes, the site will provide large scale mixed use employment opportunities and a business park or employment estate as well as a neighbourhood hub with shops, services and community building. As such, significant positive effects are expected.<br><br>The site is unlikely to have any negative impacts on tourism.<br><br>Overall, significant positive effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | + | The site is not located within 1km of cycle routes or railway stations. The site does however contain bus stops that provide frequent bus services. As such, due to the presence of bus stops on site, minor positive effects are expected.<br>In addition, the site has capacity for more than 1,000 homes and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br>Overall, minor positive effects are expected. |

## SA-T-19: Land at Starcross

| SA-T-19 | Land at Starcross |
|---|---|
| **Authority Area:** Teignbridge |  |
| **Site Area:** 97.4ha (Net 43ha) | |
| **Approximate total capacity:** 1,339-1,720 dwellings | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:** This large area of land is adjacent to Starcross and its mainline railway station with direct services to Exeter. Whilst Starcross is only about 12km from the centre of Exeter and benefits from excellent existing public transport services and cycling infrastructure, it lies adjacent to the Exe Estuary SPA. Any potential development would have to come with appropriate mitigation measures to ensure no impact on the protected wildlife. | |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/--? | The site lies adjacent to the Exe Estuary (SSSI, SPA and Ramsar site) and Powderham County Wildlife Site. The site is within 1km of Starcross Golf Range and Cockwood Harbour, both County Wildlife Sites. The site is also partly within Strategic Nature Area, mudflats. In addition, the site is flagged as Red in the HRA sensitivity work with regard to Exe Estuary SPA and as Amber with regard to Dawlish Warren SAC. The area is within the Recreational Zone for Exe Estuary SPA and Dawlish Warren SAC; mitigation would likely be required (likely to include a requirement for SANGS). The site supports an area of semi-improved grassland and a number of mature hedgerows. The site could potentially also include areas of land which are functionally linked to the Exe Estuary, such as high tide roosts. As such, uncertain significant negative effects are expected.<br><br>Existing green infrastructure on the site, including hedgerows and copses, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space and playing pitches on site that could mitigate the biodiversity impact of development. As such, significant positive effects are also expected.<br><br>Overall, mixed significant positive and uncertain significant negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is situated in rural open country side with residential development to the south east and north west. The landscape character of the site is considered to be Lower Rolling Farmed and Settled Valley Slopes and so development would have an urbanisation effect on the environment. The site is of high landscape sensitivity as it is in close proximity to the Grade II* listed Registered Park and Garden of Powderham Castle. The site is on higher land than that of the park, which means that development would be visible and likely to have an adverse impact on the setting of the park.<br><br>As such, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/-? | The site does not contain any designated heritage assets within its boundaries. However, there are various unconfirmed historic monuments within the site including ponds, quarries and clay pits, which may require attention. There are multiple designated assets within 3km including at the eastern boundary of the site, where there are Grade II listed buildings and the northern boundary where there are multiple Grade II listed buildings and one Grade II* listed building (Leslie House) contained within Kenton Conservation Area. The northern boundary of the site is also adjacent to Powderham Castle Registered Park and Garden, which contains multiple Grade II* listed buildings. There is potential development to compromise the setting of these historic environment assets. As such, uncertain minor negative effects are expected.<br><br>It is likely that the site is of sufficient size (>10ha) to accommodate a well-designed development and |

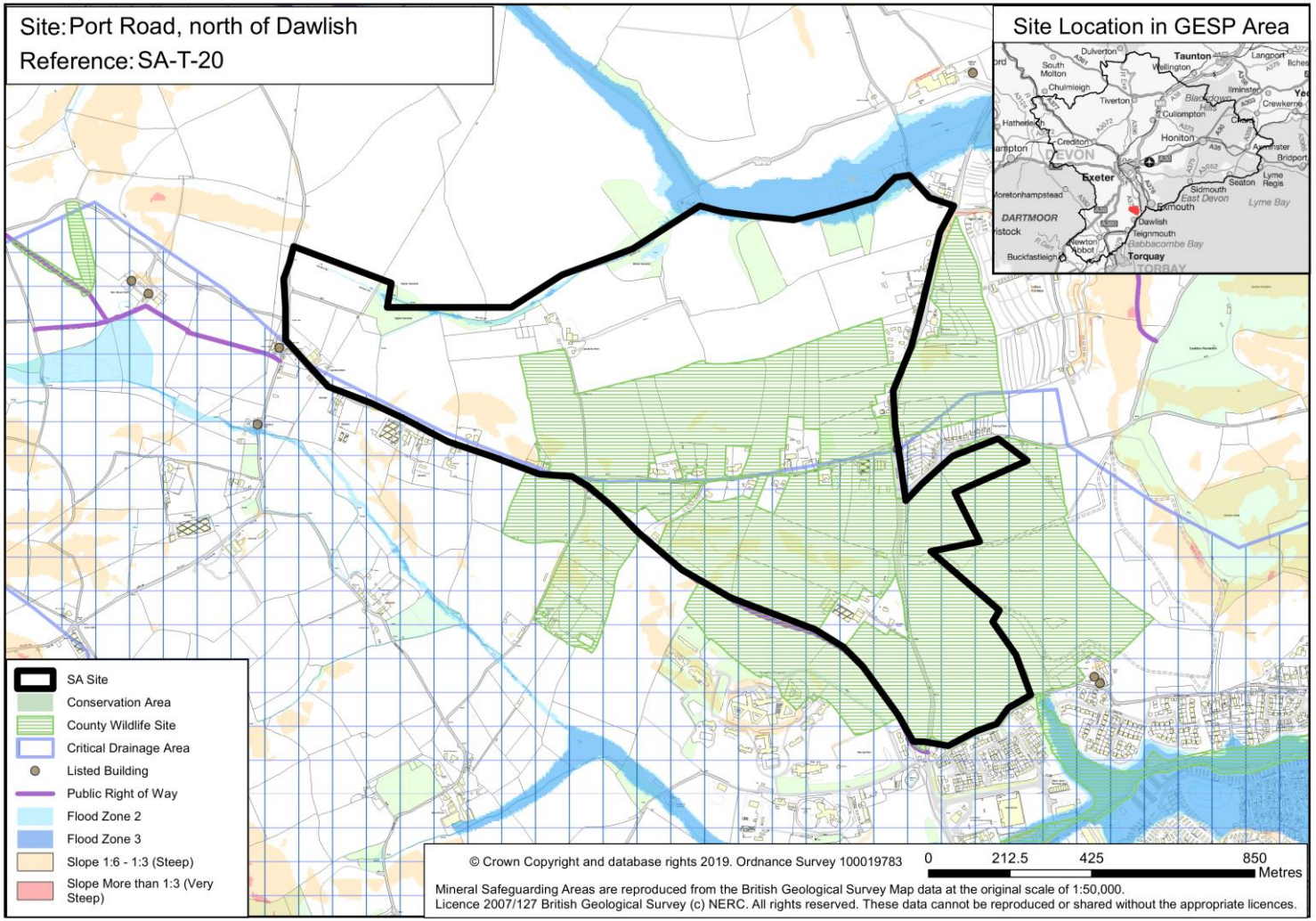
| SA Objective | SA Score | Justification |
|---|---|---|
| | | create a new high quality built environment. It should be possible for development to respond appropriately to existing heritage assets in the area and minimise any disturbance to the historic environment. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | ++ | The site is within 5km of the Main Town of Dawlish. As such, uncertain negligible effects are expected.<br><br>The site is located within 1km of Starcross railway station and Exe Estuary cycle path which goes to Exeter and Dawlish. The site is also adjacent to bus stops that are served by frequent bus services. As such, significant positive effects are expected.<br><br>As the site is expected to deliver over 1,000 homes, it is assumed that development of the site would provide some sustainable transport, walking and cycle links and services. As such, uncertain negligible effects are expected.<br><br>Overall, significant positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and there is no significant flood risk within the area. However to the east and south areas of the site are on flood zone 2 and flood zone 3. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | -- | The site comprised of over 5ha of Grade 1 and Grade 2 agricultural land. As such, significant negative effects are expected due to the potential for loss of high quality agricultural land during development. Remaining land within the site is comprised of Grade 3a, Grade 3b, Grade 4 and non-agricultural land.<br><br>The site does not contain any previously developed land.<br><br>The site is not located within any Minerals Safeguarding Areas.<br><br>Overall, significant negative effects are expected. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or degradation. | --? | Development should ensure no deterioration in the water quality of the River Exe which is located adjacent to the eastern boundary of the site and flows directly into the Exe Estuary SPA.<br><br>As such, uncertain significant negative effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | ++ | The site has the potential to accommodate 1,339-1,720 homes. However the capacity is likely to be at the lower end of the scale once account has been taken of the likely mitigation requirements, including those highlighted elsewhere in this assessment.<br>The site would need to ensure a viable mix of homes (tenure and sizes) including a proportion of affordable housing to contribute towards meeting needs within the area. The range of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom and self-build providers.<br>The site is of a sufficient size to be able to support a high number of housing starts / completions from a number of different outlets around the site, which in turn will ensure a good pace of delivery.<br>As such, significant positive effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | + | The site is not within 800m of major open space, but contains Public Rights of Way. The site is also within 400m of the National Cycle Route, the National Trail (South West Coast Path) and additional Public Rights of Way. As such, minor positive effects are expected.<br>In addition, as the site is expected to deliver between 1,000 – 1,999 homes, it is assumed that development of the site would provide some open space and active transport links. As such, minor positive effects are expected.<br>Overall, minor positive effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | - | The site is within the Exminster, Kennford and Kenton Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees lower than average levels of deprivation than compared to Devon as a whole<br>The site is adjacent to existing residential developments, Starcross to the east and Kenton to the north of the site, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. In addition, the site is adjacent to an 'A' road and in close proximity to a railway line. These features may result in noise pollution affecting residents of the site in the longer term. As such, minor negative effects are expected.<br>The site is not within 1km of an AQMA. However, car movements emanating from the site could potentially contribute to worsening air quality as a result of congestion on the A379 and on the Dawlish and Exeter AQMAs. As such, minor negative effects are expected.<br>Overall, minor negative effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **11. ACCESS TO SERVICES**<br>To provide accessible and attractive services and community facilities for all ages and interests. | + | The site is located adjacent to Starcross and Kenton (both Defined Villages), which have limited access to services and facilities. Further services and facilities are available in Exeter and Dawlish, which can be accessed through good public transport links in the area. As such, minor positive effects are expected.<br>The site is within 500m of Starcross Primary School to the east but it is not within 1km of any secondary schools. The site is also within 1km of Kenton Primary School to the north-east. Secondary School access would require travelling to Dawlish or Exeter. As such, uncertain minor positive effects are expected.<br>The site is adjacent to areas that have access to superfast broadband (80-300Mbps), which it is assumed could be extended to the site if development came forward. As such, minor positive effects are expected.<br>The site is medium sized, providing over 500 homes, and therefore it is assumed that development would be more likely to accommodate a primary school on site. As such, minor positive effects are expected.<br>Overall, minor positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | --/+ | The site is not adjacent to a Main Town and is not within 1km of any existing or proposed employment sites that could provide employment opportunities. As such, significant negative effects are expected.<br>Jobs would be created during the construction phase of the site and any new homes would create expenditure in the area. It is assumed that, as the site has capacity to deliver over 500 homes, the site will provide medium scale mixed use employment opportunities and a business park or employment estate as well as a neighbourhood hub with shops and services. As such, minor positive effects are expected.<br>The site is unlikely to have any negative impacts on tourism.<br>Overall, mixed significant negative and minor positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND** | ++ | The site is located within 1km of Starcross railway station and Exe Estuary cycle path which goes to |

| SA Objective | SA Score | Justification |
|---|---|---|
| **TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | | Exeter and Dawlish. The site is also adjacent to bus stops that are served by frequent bus services. As such, significant positive effects are expected.<br><br>In addition, the site has capacity for more than 1,000 homes and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br><br>Overall, significant positive effects are expected. |

## SA-T-20: Port Road, north of Dawlish

| SA-T-20 | Port Road, north of Dawlish |
|---|---|
| **Authority Area:** Teignbridge | |
| **Site Area:** 129ha (Net 66ha) | |
| **Approximate total capacity:** 2,046 – 2,640 dwellings | |
| **Site status:** Reasonable alternative site | |
| **Outline description and context:** Large area of gently rolling mixed agricultural, horticultural and residential land to the north west of Dawlish Warren. The site has the capacity to accommodate a new community subject to provision of suitable infrastructure provision including mitigation measures to avoid harm to the designated Exe Estuary and Dawlish Warren areas. The site is close to the DA2 allocation and the Dawlish County Park (SANGS), as well as the railway station, Exe Estuary cycle trail and A379. |  |

| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | ++/--? | The site lies within Port Road County Wildlife Site and adjacent to Shutterton Brook County Wildlife Site. The site is also within 1km of New House Farm County Wildlife Site. The site contains patches of priority habitat deciduous woodland. In addition, the site is flagged as Amber in the HRA sensitivity work with regard to Dawlish Warren SAC and Exe Estuary SPA. The eastern edge of the site is less than 2km from the Exe Estuary SPA and Dawlish Warren SAC; mitigation would likely be required however, a SANGS already exists adjacent to the site. The area is within a Cirl Bunting consultation zone with breeding pairs in the area. As such, uncertain significant negative effects are expected.<br><br>Existing green infrastructure on the site, including patches of woodland, could also be lost to development. As such, uncertain minor negative effects are expected.<br><br>However, the site has capacity for more than 1,000 homes, and therefore is expected to provide strategic and local public open space and playing pitches on site that could mitigate the biodiversity impact of development. As such, significant positive effects are also expected.<br><br>Overall, mixed significant positive and uncertain significant negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | --? | The site is situated in rural open countryside and so development would have an urbanisation effect on the environment. The site's landscape character is considered to be Lower Rolling Farmed and Settled Valley Slopes with the site on lower ground being designated as medium-high landscape sensitivity due to less potential for intervisibility with Mamhead Park, a Grade II* Registered Park and Garden. The parts of the site on higher ground are designated as high landscape sensitivity due to the increased potential for intervisibility with the park and the adverse impacts this could have on its setting. There could be potential to mitigate this with woodland planting.<br><br>Overall, uncertain significant negative effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/-? | The site contains one Grade II listed building (Milestone at Junction with Port Road) onsite located on the eastern perimeter. There are multiple designated assets within 3km including a Grade II listed building on the western boundary (Basket Lodge). Additionally, Cockwood Sod Conservation Area is located around 1km to the north-east of the site and Mamhead Park (a Registered Park and Garden) is around 1km to the north-west. There is potential for residential development to compromise the setting of these historic environment assets. As such, uncertain minor positive effects are expected.<br><br>It is likely that the site is of sufficient size (>10ha) to accommodate a well-designed development and create a new high quality built environment. It should be possible for development to respond appropriately to existing heritage assets in the area and minimise any disturbance to the historic environment. This may involve accommodating buffering regions around heritage assets contained |

| SA Objective | SA Score | Justification |
|---|---|---|
| | | onsite. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |
| **4. CLIMATE CHANGE MITIGATION**<br><br>To minimise greenhouse gas emissions. | + | The site is within 1km of the Main Town of Dawlish. As such, uncertain minor positive effects are expected.<br><br>The site is not located within 1km of a railways station however the site is within 1km of cycle routes and adjacent to bus stops served by regular bus services towards Exeter and Newton Abbot. As such, due to the proximity of bus stops and cycle routes, minor positive effects are expected.<br><br>As the site is expected to deliver over 1,000 homes, it is assumed that development of the site would provide some sustainable transport, walking and cycle links and services. As such, uncertain negligible effects are expected.<br><br>Overall, uncertain minor positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br><br>To adapt to the possible effects of climate change. | --? | The site is predominantly greenfield and there is no significant flood risk within the area. However, the south of the site contains a critical drainage area. Areas in the north of the site are on flood zone 2 and flood zone 3. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br><br>Overall, uncertain significant negative effects are expected. |
| **6. LAND RESOURCES**<br><br>To utilise our land resources efficiently and minimise their loss or degradation. | -- | Around half of the site (>5ha) is comprised of Grade 1 agricultural land. As such, significant negative effects are expected due to the potential for loss of high quality agricultural land during development. Remaining land within the site is comprised of Grade 2, Grade 3a, Grade 3b and non-agricultural land.<br><br>Existing developed land areas within the site are agricultural, horticultural or residential in nature with no brownfield sites present.<br><br>The site is not located within any Minerals Safeguarding Areas.<br><br>Overall, significant negative effects are expected. |
| **7. WATER RESOURCES**<br><br>To utilise our water resources efficiently and minimise their loss or degradation. | --? | Development should ensure no deterioration in the water quality of a stream which passes along the northern boundary of the site and flows directly into the Exe Estuary SPA.<br><br>As such, uncertain significant negative effects are expected. |

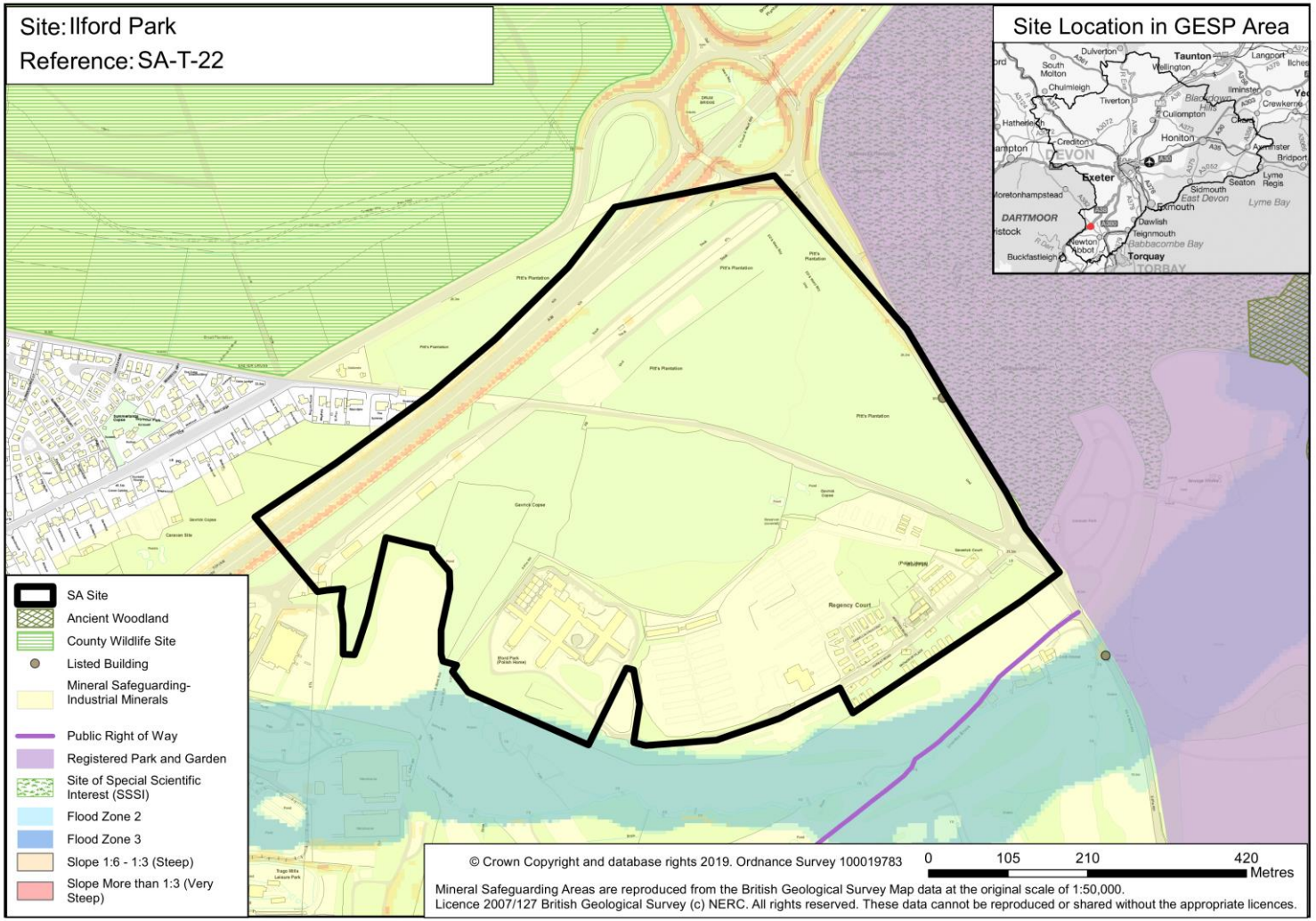
| SA Objective | SA Score | Justification |
|---|---|---|
| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | ++ | The site is likely to be able to accommodate about 2,046 – 2,640 homes. The capacity may change once account has been taken of the likely mitigation requirements.<br>The site would need to ensure a viable mix of homes (tenure and sizes) including a proportion of affordable housing to contribute towards meeting needs within the area. The range of homes may be provided by a diverse range of providers including SME house building companies, housing associations and custom and self-build providers. The site is of a sufficient size to be able to support a high number of housing starts / completions from a number of different outlets around the site, which in turn will ensure a good pace of delivery.<br>As such, significant positive effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site contains a small section of and lies adjacent to Dawlish SANGS, major open space. The site is also within 400m of Public Rights of Way. As such, significant positive effects are expected.<br>In addition, as the site is expected to deliver over 2,000 homes, it is assumed that development of the site would provide significant open space and active transport links. As such, significant positive effects are expected.<br>Overall, significant positive effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | +/- | The site is within the north and east Dawlish and Dawlish Warren Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees higher than average levels of deprivation than compared to Devon as a whole. As such, minor positive effects are expected as development at the site could result in increased investment in the area and new services and facilities.<br>The site is in close proximity to existing residential development, Dawlish Warren to the south of the site and existing employment site Shutterton, Dawlish to the south, which could be adversely affected as a result of noise and light pollution from development of the site, particularly during the construction phase. In addition, the site is crossed by an 'A' road. This feature may result in noise pollution affecting residents of the site in the longer term. As such, minor negative effects are expected.<br>The site is not within 1km of an AQMA. However, car movements emanating from the site could potentially contribute to worsening air quality as a result of congestion on the A379 and on the Dawlish and Exeter AQMAs. As such, minor negative effects are expected.<br>Overall, mixed minor negative and minor positive effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **11. ACCESS TO SERVICES**<br>To provide accessible and attractive services and community facilities for all ages and interests. | --/+ | The site is not located adjacent to any settlements and access to services would require travelling to Dawlish centre (2km south). As such, significant negative effects are expected.<br>The site is not within 1km of any primary or secondary schools. Gatehouse primary school is located around 1.5km to the south, which already has growth commitments and so further primary school capacity will be required. Secondary school provision is located in Dawlish Community College to the south but capacity is likely to be an issue. As such, uncertain minor negative effects are expected.<br>Parts of the site are adjacent to areas that have access to superfast broadband (80-300Mbps), which it is assumed could be extended to support the site if development came forward. As such, minor positive effects are expected.<br>The site is large, providing over 500 homes, and therefore it is assumed that development would more likely to accommodate a primary school on site. As such, minor positive effects are expected.<br>Overall, mixed significant negative and minor positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | ++/- | The site not adjacent to Exeter or a Main Town but it is within 1km of existing or proposed employment sites that could provide employment opportunities. As such, minor positive effects are expected.<br>Jobs would be created during the construction phase of the site and any new homes would create expenditure in the area. It is assumed that, as the site has the capacity to deliver over 2000 homes, the site will provide large scale mixed use employment and a business park or employment estate as well as a neighbourhood hub with shops, services and community buildings. As such, significant positive effects are expected.<br>The site may potentially have a small negative impact on existing tourist businesses such as the nearby holiday lodge / caravan businesses, particularly during construction. As such, minor negative effects are expected.<br>Overall, significant positive and minor negative effects are expected. |
| **13. CITY AND TOWN CENTRES**<br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT** | + | The site is not located within 1km of a railways station however the site is within 1km of cycle routes and adjacent to bus stops served by regular bus services towards Exeter and Newton Abbot. As such, |

| SA Objective | SA Score | Justification |
|---|---|---|
| To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | | due to the proximity of bus stops and cycle routes, minor positive effects are expected.<br><br>In addition, the site has capacity for more than 1,000 homes and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br><br>Overall, minor positive effects are expected. |

## SA-T-22: Land at Ilford Park, Drumbridges

| SA-T-22 | Land at Ilford Park, Drumbridges |
|---|---|
| **Authority Area:** Teignbridge | |
| **Site Area:** 45.9ha (Net 40ha) | |
| **Approximate total capacity:** 40ha employment | |
| **Site status:** Potential site option | |
| **Outline description and context:** | |



| SA Objective | SA Score | Justification |
|---|---|---|
| **1. NATURAL ENVIRONMENT**<br>To conserve and enhance the habitat and wildlife of our natural environment. | --?/+ | The site lies adjacent to Stover Park SSSI (also known as Stover Country Park and Local Nature Reserve) and is within 250m of Great Plantation County Wildlife Site. The site is also within 1km of two County Wildlife Sites Ventiford Meadows and Gorse Blossom Copse. The site contains patches of priority habitat deciduous woodland. In addition, the site is flagged as Amber in the HRA sensitivity work with regard to South Hams SAC and is almost entirely within the South Hams SAC buffer zone for Greater Horseshoe Bats. As such, uncertain significant negative effects are expected.<br><br>However, the site has capacity for more than 20ha of employment land, and therefore is expected to retain and provide local green infrastructure that could mitigate the biodiversity impact of development. As such, minor positive effects are also expected.<br><br>Overall, mixed minor positive and uncertain significant negative effects are expected. |
| **2. LANDSCAPE**<br>To conserve and enhance the landscapes/seascapes of our natural environment. | 0? | The site is considered to be Lowland Plains in landscape character with low landscape sensitivity. The site lies on the approach to, and what forms the perceived setting of, Dartmoor National Park as well as lying in close proximity to Stover Park (Registered Park and Garden). These considerations would suggest that the relative sensitivity of the site should be increased from low to medium. However, the presence of the A38 highway, neighbouring large scale development, existing consent for employment development and the 420KV overhead powerlines, collectively erode the character of the area and counters the sense in increasing the level of sensitivity.<br><br>As such, uncertain negligible effects are expected. |
| **3. HISTORIC AND BUILT ENVIRONMENT**<br>To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. | +?/-? | The site does not contain any heritage assets within its boundaries. There are multiple designated assets within 3km including Stover Park (a Registered Park and Garden), which contains multiple listed buildings including three Grade II* designated assets (Stover House, Clock House and Former Stables to Stover House) and is within 500m of the site. There are Scheduled Monuments around 1.5km to the north-west of the site (earthwork on Bovey Heath) and around 2.9km south-east of the site (Castle Dyke). There is potential for development to compromise the setting of these historic environment assets. As such, uncertain minor negative effects are expected.<br><br>It is likely that the site is of sufficient size (>10ha) to accommodate a well-designed development and create a new high quality built environment. It should be possible for development to respond appropriately to existing heritage assets in the area and minimise any disturbance to the historic environment. As such, uncertain minor positive effects are expected.<br><br>Overall, mixed uncertain minor negative and uncertain minor positive effects are expected. |

| SA Objective | SA Score | Justification |
|---|---|---|
| **4. CLIMATE CHANGE MITIGATION**<br>To minimise greenhouse gas emissions. | + | The site is within 5km of the Main Towns of Newton Abbot and Kingsteignton. As such, uncertain negligible effects are expected.<br>The site is not located within 1km of cycle paths or railway stations. The site contains bus stops providing infrequent bus services and the site is adjacent to bus stops providing frequent bus services. As such, due to the proximity of the site to bus stops, minor positive effects are expected.<br>As the site is expected to deliver over 20ha of employment land, it is assumed that development of the site would provide sustainable transport, walking and cycle links and services. As such, uncertain minor positive effects are expected.<br>Overall, minor positive effects are expected. |
| **5. CLIMATE CHANGE ADAPTATION**<br>To adapt to the possible effects of climate change. | -? | The site is predominantly greenfield and there is no significant flood risk within the area. However, there are areas to the south of the site which are on flood zone 2. Development of any scale is assumed to provide appropriate flood risk management, such as sustainable drainage systems (SuDS).<br>Therefore, uncertain minor negative effects are expected. |
| **6. LAND RESOURCES**<br>To utilise our land resources efficiently and minimise their loss or degradation. | ++/--? | The vast majority of the site is located on non-agricultural land, with only a small (<1ha) area of Grade 3 agricultural land located in the south-western corner of the site. As such, negligible effects are expected.<br>The southern half of the site contains over 5ha of previously developed land that offers opportunity for regeneration if employment development came forward. As such, significant positive effects are expected.<br>The entirety of the site is located within Bovey Basin Minerals Safeguarding Area and without appropriate evidence there may be objection under Policy M2 of the Devon Minerals Plan to development that would sterilise or constrain this mineral resource. However, there could be an opportunity to extract the mineral resource prior to development going ahead. As such, uncertain significant negative effects are expected.<br>Overall, mixed significant positive and uncertain significant negative effects are expected. |
| **7. WATER RESOURCES**<br>To utilise our water resources efficiently and minimise their loss or degradation. | 0 | The site is not adjacent to and does not contain any watercourses.<br>As such, negligible effects are expected. |

| SA Objective | SA Score | Justification |
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| **8. HOMES**<br>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure, suitable to meet the needs of Greater Exeter. | 0 | The site has been allocated from employment uses.<br>As such, negligible effects are expected. |
| **9. HEALTH**<br>To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them. | ++ | The site lies adjacent to Accessible Woodland and is within 800m of Open access land, both major open spaces. The site is also within 400m of Public Rights of Way. As such, significant positive effects are expected.<br>In addition, as the site is expected to deliver over 20ha of employment land, it is assumed that development of the site would provide local green infrastructure and active transport links. As such, minor positive effects are also expected.<br>Overall, significant positive effects are expected. |
| **10. WELLBEING**<br>To support positive, safe and healthy communities. | - | The site is within the south-west and north-west Newton Abbot Middle Super Output Area which, according to the Devon Joint Strategic Needs Assessment index of multiple deprivation, sees lower than average levels of deprivation than compared to Devon as a whole.<br>The site is adjacent to existing employment site Heathfield industrial estate, which could provide additional benefits. However, the site is in close proximity to existing residential development, including the village of Heathfield, which could be adversely affected as a result of noise and light pollution from development of the site during the construction and operational phases. As such, minor negative effects are expected.<br>The site is not within 1km of an AQMA. However, car movements to and from this site could potentially contribute to worsening air quality at the Newton Abbot AQMA. As such, minor negative effects are expected.<br>Overall, minor negative effects are expected. |
| **11. ACCESS TO SERVICES**<br>To provide accessible and attractive services and community facilities for all ages and interests. | --/+ | The site is not located adjacent to any settlements and therefore does not have direct access to services. As such, significant negative effects are expected.<br>The site is located adjacent to an area that has access to superfast broadband (80-300Mbps), which it is assumed could be extended to support the site if development came forward. As such, minor |

| SA Objective | SA Score | Justification |
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| | | positive effects are expected.<br><br>Overall, mixed significant negative effects and minor positive effects are expected. |
| **12. JOBS AND LOCAL ECONOMY**<br><br>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity in Greater Exeter. | ++ | It is assumed that, as the site has capacity to deliver over 20ha of employment space, the site would provide a limited number of shops and services. Jobs would be created during the construction phase of the site.<br><br>As the site has capacity to deliver over 20ha of employment space, significant positive effects are expected. |
| **13. CITY AND TOWN CENTRES**<br><br>To safeguard and strengthen the vitality and viability of our city and town centres. | - | The site is not located adjacent to Exeter or a Main Town. Therefore, development will not impact directly upon diversity of a town or city centre economy.<br><br>As such, minor negative effects are expected. |
| **14. CONNECTIVITY AND TRANSPORT**<br><br>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within the Greater Exeter area and beyond. | + | The site is not located within 1km of cycle paths or railway stations. The site contains bus stops providing infrequent bus services and the site is adjacent to bus stops providing frequent bus services. As such, due to the proximity of the site to bus stops, minor positive effects are expected.<br><br>The site has capacity for more than 20ha of employment land and therefore is assumed to provide sustainable transport links, including a new bus route. As such, minor positive effects are expected.<br><br>Overall, minor positive effects are expected. |

# Appendix 7
# Audit trail of decision making for site options and policy options

**Table A7.1: Audit trail of Greater Exeter Authorities' decision making for site options considered for inclusion in the GESP Draft Policies and Site Options Consultation document**

*Green highlighting denotes those sites taken forward for inclusion in the Draft Policies and Site Options Consultation document, while those sites marked with an 'X' have been discounted given that they have been judged by the Councils as failing to meet the highlighted criteria. The SA findings have also contributed to decision-making.*

| Site Reference / Name | 1 Strategy | 2 Capacity | 3 Euro sites | 4 Environment | 5 Process | 6 Minerals | Reasons for discounting as Potential Site Option in the GESP Consultation document | Reasons for the inclusion as Potential Site Option in the GESP Consultation document |
|---|---|---|---|---|---|---|---|---|
| SA-ED-1 Venn's Farm, Sowton | | | | | | | | The site is well located in relation to Exeter and in accordance with the spatial development strategy and existing employment. It has the potential to deliver high tech transformational employment and wage rises in line with the overarching GESP Vision. |
| SA-ED-2 Oil Mill Lane | | | | | | | | The location of the site is in accordance with the spatial development strategy on a swathe of relatively flat and constraint free land in close proximity to existing employment. It is of a potential scale to deliver services and facilities alongside green space to mitigate its impact on European Protected sites. |
| SA-ED-3 Hill Barton | | | | | | | | The location of the site is in accordance with the spatial development strategy on a swathe of relatively flat and constraint free land in close proximity to existing employment, and of a potential scale to deliver services and facilities alongside green space to mitigate its impact on European Protected sites. |
| SA-ED-4 North East Lympstone | X | | | X | | | The site does not accord with the spatial development strategy in light of its proximity to the Exe Estuary and concerns over its high landscape impact. | |
| SA-ED-5 North of Exeter Airport (Employment) | | | | | | | | The location of the site is in accordance with the spatial development strategy near to existing employment at an accessible location and Exeter Airport. It has the potential to deliver high tech transformational employment and wage rises in line with the overarching GESP Vision. |
| SA-ED-6 Cranbrook South-East | | | | | X | | Detailed consideration of the majority of the site is currently being undertaken through the Cranbrook development plan document so the | |

| Site Reference / Name | 1 Strategy | 2 Capacity | 3 Euro sites | 4 Environment | 5 Process | 6 Minerals | Reasons for discounting as Potential Site Option in the GESP Consultation document | Reasons for the inclusion as Potential Site Option in the GESP Consultation document |
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| | | | | | | | site is excluded on this basis. | |
| SA-ED-7 Higher Greendale | | | | | | | | The location of the site is in accordance with the spatial development strategy on a swathe of relatively flat and constraint free land in close proximity to existing employment. It is of a potential scale (alongside other sites) to deliver services and facilities alongside green space to mitigate its impact on European Protected sites. |
| SA-ED-8 Airport Business Park | | | | | | | | The location of the site is in accordance with the spatial development strategy near to existing employment at an accessible location and Exeter Airport. It has the potential to deliver high tech transformational employment and wage rises in line with the overarching GESP Vision. |
| SA-ED-9 Greendale Business Park | X | | | | | | Not considered to be to be able to deliver GESP vision objectives to expand in key transformational sectors. The site also currently has poor accessibility and is not well served by public transport. | |
| SA-ED-10 Exmouth East | X | | X | X | | | The site does not accord with the spatial development strategy in light of its proximity to the East Devon Pebblebed Heaths and concerns over its high landscape impact. There are also significant concerns over access for a site of this scale. | |
| SA-ED-11 Rockbeare Hill | X | | | X | | | The site is not in accordance with the spatial development strategy in an isolated location. The site could have an unacceptable impact upon the East Devon AONB and heritage assets. | |
| SA-ED-12 Whimple | | | | | | | | The location of the site is in accordance with the spatial development strategy on a swathe of relatively flat land in close proximity to an existing settlement with services and facilities including a railway station. It is of a potential capacity to deliver sufficient homes plus services and facilities alongside green space to mitigate its impact on European Protected sites. The site has infrastructure challenges in terms of access and flooding but these may be able to be overcome through masterplanning. |
| SA-ED-13 Daisymount | X | | | X | | | The site is not in accordance with the spatial development strategy in an isolated location likely to lead to car dominant travel patterns and | |

| Site Reference / Name | 1 Strategy | 2 Capacity | 3 Euro sites | 4 Environment | 5 Process | 6 Minerals | Reasons for discounting as Potential Site Option in the GESP Consultation document | Reasons for the inclusion as Potential Site Option in the GESP Consultation document |
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| | | | | | | | would likely have an unacceptable landscape impact. | |
| SA-ED-14 Bicton College | X | X | | X | | | The site is not in accordance with the spatial development strategy in an isolated location and situated within the AONB. Impact on landscape, ecology and heritage would be unacceptable. Unlikely to be of a capacity / scale to deliver sufficient infrastructure to serve a new community. | |
| SA-ED-15 Feniton | | | | | | | | The location of the site is in accordance with the spatial development strategy, situated on a swathe of relatively flat and constraint free land in close proximity to an existing settlement with services and facilities including a railway station. It is of a potential scale to deliver services and facilities alongside green space to mitigate its impact on European Protected sites. Development contributions could also seek to address existing flooding issues in the village. |
| SA-ED-16 Fairmile | X | | | X | | | The site is not in accordance with the spatial development strategy in an isolated location likely to lead to car dominant travel patterns and would likely have unacceptable landscape and heritage impacts. | |
| SA-ED-17 Ottery St Mary South/East | X | | | X | | | The site is not in accordance with the spatial development strategy away from the main public transport corridors. The site is likely to have significant landscape and AONB impacts. | |
| SA-ED-18 Honiton East | | | | | | | | The location of the site is in accordance with the spatial development strategy, adjacent to an existing Town with services and facilities including a railway station. |
| SA-ED-19 Axminster South | | | | | | | | The location of the site is in accordance with the spatial development strategy adjacent to an existing Town with services and facilities including a railway station. If impact was established on the River Axe SAC it is considered that mitigation would be possible. |
| SA-ED-20 Axminster North-East | | | | | X | | Detailed consideration of majority of site is currently being undertaken through the Axminster Masterplan relating to the existing adjacent Local Plan allocation. The area of the site not likely to be covered under the masterplan | |

| Site Reference / Name | 1 Strategy | 2 Capacity | 3 Euro sites | 4 Environment | 5 Process | 6 Minerals | Reasons for discounting as Potential Site Option in the GESP Consultation document | Reasons for the inclusion as Potential Site Option in the GESP Consultation document |
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| | | | | | | | is too small to be considered as a strategic GESP allocation. | |
| SA-ED-21 Ottery St Mary West | X | | | X | | | The location of the site is not in accordance with the spatial development strategy away from the main public transport corridors. Site is likely to have significant landscape and AONB impacts. | |
| SA-ED-22 Adjacent Newcourt Barton | X | X | | X | | | The location of the site is not in accordance with the spatial development strategy. The site is small with no strategic development potential. Much of the site is within and the Clyst Marshes County Wildlife Site. | |
| SA-ED-23 Adjoining Woodbury Business Park | X | | | | | | Not considered to be to be able to deliver GESP vision objectives to expand in key transformational sectors. The site would also fail to satisfy the vision because of its poor accessibility with limited scope for being well served by public transport. | |
| SA-ED-24 Broadclyst South | X | X | | X | | | The site has flooding concerns, which also limits its capacity. The site lies to the east of the Clyst meaning it is on the periphery of the spatial development strategy. | |
| SA-ED-25 Westclyst & Mosshayne Farms | | | | | | | | The location of the site is in accordance with the spatial development strategy being well located to Exeter, key transport routes and existing employment. |
| SA-ED-26 Cowley | | | | | | | | The location of the site is in accordance with the spatial development strategy lying on the north-west fringe of Exeter, with the potential to deliver homes close to the city. The A377 corridor would benefit from a park and ride facility, which would ensure high quality public transport to the new and existing homes. It is anticipated that impacts on the Exe Estuary SPA can be mitigated. |
| SA-ED-27 Javishayes and Politmore | | | | | | | | The site's location provides one of the few opportunities for providing a replacement Motorway Service Station near Exeter, relieving congestion particularly at Junction 30. |
| SA-ED-28 Hand and Pen | X | | | X | | | The site is not in accordance with the spatial development strategy in an isolated location | |

| Site Reference / Name | 1 Strategy | 2 Capacity | 3 Euro sites | 4 Environment | 5 Process | 6 Minerals | Reasons for discounting as Potential Site Option in the GESP Consultation document | Reasons for the inclusion as Potential Site Option in the GESP Consultation document |
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| | | | | | | | likely to lead to car dominant travel patterns and lacks strategic location and scale. | |
| SA-EX-1 Atwells Farm, Exwick | | | | | | | | The site accords with the spatial development strategy, being adjacent to the north-west fringe of Exeter. It provides an opportunity to deliver homes within cycling distance of the city centre, supported by publically accessible GI. Improvements to sustainable transport infrastructure will help to mitigate the impact on the Exeter AQMA. It is anticipated that impacts on the Exe Estuary SPA can be mitigated. |
| SA-EX-2 Oaklands Riding School | | | | X | | | Greenfield site largely within Flood Zone 3 and Conservation Area. | |
| SA-EX-3 Land between M5 and Topsham | | | | | | | | The location of the site accords with the spatial development strategy, providing an opportunity to deliver homes with good existing and potential for improved access to facilities in Topsham and Exeter. Low car parking provision and improvements to sustainable transport infrastructure will help to mitigate the impact on the Exeter AQMA. It is expected that impacts on the Exe Estuary SPA and East Devon Pebblebed Heaths SPA/SAC can be mitigated, with an existing built up barrier between the site and the estuary to the south. |
| SA-EX-4 North of Stoke Hill | | | | | | | | The location of the site accords with the spatial development strategy, being adjacent to the northern fringe of Exeter, with the potential for relatively short commuting trips to key employment areas and services. The site could provide opportunities for publically accessible GI. Improvements to sustainable transport infrastructure will help to mitigate the impact on the Exeter AQMA. It is expected that impacts on the Exe Estuary SPA and flooding can be mitigated. |
| SA-EX-5 Exeter St David's Station | | | | | | | | The location of the site accords with the spatial development strategy, being within the built-up area of Exeter and with excellent access to jobs/facilities by sustainable modes of transport. Development provides an opportunity to make more efficient use of brownfield land and significantly improve the quality of the build environment. Car-free development and improvements to sustainable transport infrastructure will help to mitigate the impact on the Exeter AQMA. It is expected that impacts on the Exe Estuary SPA and flooding can be mitigated. |
| SA-EX-6 Water Lane Regeneration | | | | | | | | The location of the site accords with the spatial development strategy, being within the built-up area of Exeter and with good access to |

| Site Reference / Name | 1 Strategy | 2 Capacity | 3 Euro sites | 4 Environment | 5 Process | 6 Minerals | Reasons for discounting as Potential Site Option in the GESP Consultation document | Reasons for the inclusion as Potential Site Option in the GESP Consultation document |
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| Area | | | | | | | | jobs/facilities by sustainable modes of transport. Development provides an opportunity to make more efficient use of brownfield land and significantly improve the quality of the build environment. Car-free development and improvements to sustainable transport infrastructure will help to mitigate the impact on the Exeter AQMA. It is expected that impacts on the Exe Estuary SPA and flooding can be mitigated. |
| SA-EX-7 North Gate | | | | | | | | The location of the site accords with the spatial development strategy, being within the built-up area of Exeter and with good access to jobs/facilities by sustainable transport modes. Development provides an opportunity to make more efficient use of a brownfield site and significantly improve the quality of the built environment. Car-free development and improvements to sustainable transport infrastructure will help to mitigate the impact on the Exeter AQMA. It is expected that impacts on the Exe Estuary SPA can be mitigated. |
| SA-EX-8 South Gate | | | | | | | | The location of the site accords with the spatial development strategy, being within the built-up area of Exeter and with good access to jobs/facilities by sustainable transport modes. Development provides an opportunity to make more efficient use of a brownfield site and significantly improve the quality of the built environment. Car-free development and improvements to sustainable transport infrastructure will help to mitigate the impact on the Exeter AQMA. It is expected that impacts on the Exe Estuary SPA can be mitigated. |
| SA-EX-9 Howell Road Car Park | | | | | | | | The location of the site accords with the spatial development strategy, being within the built-up area of Exeter and with good access to jobs/facilities by sustainable transport modes. Development provides an opportunity to make more efficient use of a brownfield site and significantly improve the quality of the built environment. Car-free development and improvements to sustainable transport infrastructure will help to mitigate the impact on the Exeter AQMA. It is expected that impacts on the Exe Estuary SPA can be mitigated. |
| SA-EX-10 Marsh Barton | | | | | | | | The location of the site accords with the spatial development strategy, being within the built-up area of Exeter and with good access to jobs/facilities by sustainable transport modes. Development provides an opportunity to make more efficient use of a brownfield site and is likely to improve the quality of the built environment. Improvements to sustainable transport infrastructure will help to mitigate the impact |

| Site Reference / Name | 1 Strategy | 2 Capacity | 3 Euro sites | 4 Environment | 5 Process | 6 Minerals | Reasons for discounting as Potential Site Option in the GESP Consultation document | Reasons for the inclusion as Potential Site Option in the GESP Consultation document |
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| | | | | | | | | on the Exeter AQMA. It is expected that impacts on the Exe Estuary SPA and flooding can be mitigated. |
| SA-EX-18 Pinhoe Trading Estate | | | | | | | | The location of the site accords with the spatial development strategy, being within the built-up area of Exeter and with good access to jobs/facilities by sustainable transport modes. Development provides an opportunity to make more efficient use of a brownfield site and significantly improve the quality of the built environment. Low car parking provision and improvements to sustainable transport infrastructure will help to mitigate the impact on the Exeter AQMA. It is expected that impacts on the Exe Estuary SPA, East Devon Pebblebed Heaths SPA/SAC and flooding can be mitigated. |
| SA-EX-19 East Gate | | | | | | | | The location of the site accords with the spatial development strategy, being within the built-up area of Exeter and with good access to jobs/facilities by sustainable transport modes. Development provides an opportunity to make more efficient use of a brownfield site and significantly improve the quality of the built environment. Car-free development and improvements to sustainable transport infrastructure will help to mitigate the impact on the Exeter AQMA. It is expected that impacts on the Exe Estuary SPA can be mitigated. |
| SA-EX-22 West Gate | | | | | | | | The location of the site accords with the spatial development strategy, being within the built-up area of Exeter and with good access to jobs/facilities by sustainable transport modes. Development provides an opportunity to make more efficient use of a brownfield site and significantly improve the quality of the built environment. Car-free development and improvements to sustainable transport infrastructure will help to mitigate the impact on the Exeter AQMA. It is expected that impacts on the Exe Estuary SPA and flooding can be mitigated. |
| SA-EX-23 Land between South Street, Market Street and Fore Street | | | | | | | | The location of the site accords with the spatial development strategy, being within the built-up area of Exeter and with good access to jobs/facilities by sustainable transport modes. Development provides an opportunity to make more efficient use of a brownfield site and significantly improve the quality of the built environment. Car-free development and improvements to sustainable transport infrastructure will help to mitigate the impact on the Exeter AQMA. It is expected that impacts on the Exe Estuary SPA can be mitigated. |
| SA-EX-26 Sandy Gate | | | | | | | | The location of the site accords with the spatial development strategy, being within the built-up area of Exeter and with good access to |

| Site Reference / Name | 1 Strategy | 2 Capacity | 3 Euro sites | 4 Environment | 5 Process | 6 Minerals | Reasons for discounting as Potential Site Option in the GESP Consultation document | Reasons for the inclusion as Potential Site Option in the GESP Consultation document |
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| | | | | | | | | jobs/facilities by sustainable transport modes. Development provides an opportunity to make more efficient use of a brownfield site. Improvements to sustainable transport infrastructure will help to mitigate the impact on the Exeter AQMA. It is expected that impacts on the Exe Estuary SPA and East Devon Pebblebed Heaths SPA/SAC can be mitigated. |
| SA-MD-1 Copplestone | | | | X | | | Site is not in accordance with spatial development strategy and distant from significant employment, services and facilities. Potential impact on Crediton AQMA from significant car use. | |
| SA-MD-2 West of Crediton | | | | X | | | The location of the site on the western edge of the town is likely to generate an increase in car dependency and negatively affect the Crediton AQMA. Due to the sloping topography of the site, parts of the site have high landscape sensitivity. | |
| SA-MD-3 South of Crediton | | | | | | | | The location of the site is in accordance with the spatial development strategy. It is strategic in scale and located next to the southern boundary of Crediton. This site is well connected by public rights of way and close to the train station. The location should avoid negative impacts on the AQMA. |
| SA-MD-4 Newton St Cyres and Sweetham | | | | | | | | The location of the site is in accordance with the spatial development strategy. It is significant in scale with the opportunity for a new village development on the key transport corridor of the Tarka Line railway, close to the A377, and the proposed strategic cycle route between Crediton and Exeter. |
| SA-MD-5 Land East of Tiverton | | | | X | | | Combination of environmental constraints including landscape sensitivity and impacts on heritage assets. The location of the site also has accessibility and connectivity constraints to access services, employment and the strategic road network. | |
| SA-MD-6 West of Cullompton | | | | X | | | Site is on periphery of spatial development strategy. With existing allocations in Cullompton and at Culm Garden Village there is the potential limited demand. The site is also likely to have traffic impacts on Cullompton and air quality | |

| Site Reference / Name | 1 Strategy | 2 Capacity | 3 Euro sites | 4 Environment | 5 Process | 6 Minerals | Reasons for discounting as Potential Site Option in the GESP Consultation document | Reasons for the inclusion as Potential Site Option in the GESP Consultation document |
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| | | | | | | | impacts on the Cullompton AQMA. | |
| SA-MD-7 Land North West of Cullompton | | | | X | | | Site is on periphery of spatial development strategy. With existing allocations in Cullompton and Culm Garden Village there is the potentially limited demand. The site also has topographic and landscape sensitivity constraints and is likely to have traffic impacts on Cullompton and air quality impacts on the Cullompton AQMA. | |
| SA-MD-8 Land South of Hartnoll Farm | | | | X | | | The site has areas of high landscape sensitivity. It is also relatively isolated from Tiverton and would require significant infrastructure, and generate significant trips by car. | |
| SA-MD-9 Culm Garden Village, east of Cullompton | | | | | | | | The location of the site is in accordance with the spatial development strategy and has been granted Garden Village status by the government and part is allocated in the Mid Devon Local Plan Review (in the post-hearing stages of examination). The site is located close to the market town of Cullompton adjacent to the M5 and there are ambitions to re-open the Cullompton train station. |
| SA-MD-10 Hartnoll Farm | | | | | | | | The location of the site is in accordance with the spatial development strategy, located to the east of Tiverton adjacent to the Tiverton Eastern Urban Extension (EUE) allocation. It is well connected to Tiverton by road and public rights of way, including a national cycle route. Accessibility to the A361 and M5 will improve as the EUE junction to the A361 is completed to provide the northern phase of the junction. |
| SA-MD-11 Land off Crown Hill | | X | | X | | | The site is unlikely to be of a scale to deliver strategic growth and there is the risk of coalescence between Tiverton and Halberton. Potential impact on designated heritage assets. | |
| SA-MD-12 South of Sampford Peverell | | | | | | | | The location of the site is in accordance with the spatial development strategy and is located to the south of an existing settlement and adjacent to the Tiverton Parkway train station on the Great Western main railway line. It is also close to the A361 and J27 of the M5. The site is relatively unconstrained, in an accessible location, subject to infrastructure requirements to improve accessibility to the A361 and M5. |

| Site Reference / Name | 1 Strategy | 2 Capacity | 3 Euro sites | 4 Environment | 5 Process | 6 Minerals | Reasons for discounting as Potential Site Option in the GESP Consultation document | Reasons for the inclusion as Potential Site Option in the GESP Consultation document |
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| SA-MD-13 North of Willand | X | | | | | | Site is not in accordance with spatial development strategy and unlikely to make a positive contribution to meeting GESP Vision. | |
| SA-MD-14 Junction 27 Area | X | | | | | | Site is not in accordance with spatial development strategy and unlikely to make a positive contribution to meeting GESP Vision. The site is isolated and likely to generate a fairly significant need to travel by car to access employment, services and facilities. | |
| SA-MD-15 Great Southdown Farm | X | | | X | | | Site is not in accordance with spatial development strategy and unlikely to make a positive contribution to meeting GESP Vision. The site is isolated and is not considered to be of a scale or strategically located to deliver a new community. It is also within the setting of the Blackdown Hills AONB. | |
| SA-T-1 South east of Ipplepen | X | | | | | | Site is not in accordance with spatial development strategy and is fairly remote from main towns or service centres. | |
| SA-T-2 Dolbeare Road, Ashburton | X | X | | | | | Site sits outside southern growth area identified in spatial strategy. Located near Ashburton (Dartmoor). Capacity may be fewer than 500. | |
| SA-T-3 West of Houghton Barton | | | | | | | | The location of the site is in accordance with the spatial development strategy and lies adjacent to existing growth area (Local Plan NA1 allocation) west of Newton Abbot, which is delivering significantly improved infrastructure including transport and education. The site contains a hilltop which offers opportunity for green infrastructure. It is expected that impacts on the South Hams SAC can be mitigated. |
| SA-T-4 Ruby Farm, Two Mile Oak | | X | | X | | | Site on periphery of spatial development strategy, is slightly isolated and too small to deliver strategic growth or the necessary infrastructure (especially education), creating vehicle trips to schools. May impact AQMA on A381 into Newton Abbot. | |
| SA-T-5 Priory Road south | | | | | | | | The location of the site is broadly in accordance with the spatial development strategy being approximately 3km to the south of |

| Site Reference / Name | 1 Strategy | 2 Capacity | 3 Euro sites | 4 Environment | 5 Process | 6 Minerals | Reasons for discounting as Potential Site Option in the GESP Consultation document | Reasons for the inclusion as Potential Site Option in the GESP Consultation document |
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| | | | | | | | | Newton Abbot with potential for active travel and shared infrastructure with nearby local plan allocation. It is expected that impacts on the South Hams SAC can be mitigated. |
| SA-T-6 Great Plantation, Drumbridges (Employment) | X | | | X | | | Site sits outside of southern growth area as identified in spatial strategy. Existing forest with wildlife and amenity value. | |
| SA-T-7 Higher Mead Farm, Ashburton (Employment) | X | | | | | | Site is not in accordance with spatial development strategy. Isolated small site with poor junction access. Potential impact on Dartmoor National Park. | |
| SA-T-8 North of Forches Cross (Employment) | | | | | | | | The location of the site is in accordance with the spatial development strategy. It is recommended for inclusion because the site is adjacent to the A382 (currently being improved) and the site is proposed for employment development meaning that the minerals are a manageable constraint, with potential for development to be considered as 'temporary' with the option to extract clay after the lifetime of the development. It is expected that impacts on the South Hams SAC can be mitigated. |
| SA-T-10 Blatchford Farm and Berry Knowles (Employment) | | | | X | | | Site contains 5 ha of flood zone 3. | |
| SA-T-11 East of Old Newton Road, Kingskerswell (Employment) | X | | | X | | | Site is not in accordance with spatial development strategy. Small site with 50% flood zone 3 and railway line through middle. | |
| SA-T-12 East Golds Quarry | X | X | | X | | X | Site is not in accordance with spatial development strategy. Small site in middle of Flood zone 3 area. Land owner states it is not available for 15 years. Minerals Safeguarding Area for Ball Clay. The river Teign and railway line cause severance issues. | |
| SA-T-13 Long Lane, Milber | X | X | | X | | | Site is not in accordance with spatial development strategy. Small site containing | |

| Site Reference / Name | 1 Strategy | 2 Capacity | 3 Euro sites | 4 Environment | 5 Process | 6 Minerals | Reasons for discounting as Potential Site Option in the GESP Consultation document | Reasons for the inclusion as Potential Site Option in the GESP Consultation document |
|---|---|---|---|---|---|---|---|---|
| | | | | | | | scheduled ancient monument. | |
| T-14 Jews Bridge, Heathfield (Employment) | X | | X | X | | | Site is not in accordance with spatial development strategy. Small site in flood zone 3 with significant environmental and infrastructure constraints. The sites access is constrained by a poor A38 junction and a narrow railway bridge which causes severance issues. Within South Hams SAC sustenance zone, with radio-tracked GHB flightpaths within site. | |
| SA-T-15 Broadway, Exeter Road, Kingsteignton (Employment) | X | | | | | | Site is not in accordance with spatial development strategy. | |
| SA-T-16 West of Exminster | | | | | | | | The location of the site is in accordance with the spatial development strategy. It lies on the southern fringe of Exeter with good access to the city and facilities within the village. It is expected that impacts on the Exe Estuary SPA and Dawlish Warren SAC can be mitigated (also close to south west Exeter SANG). Would need to provide new primary school. |
| SA-T-17 Markham Lane | | | | | | | | The location of the site is in accordance with the spatial development strategy as it borders the city. Would need to overcome potential severance concerns relating to A30. It is expected that impacts on the Exe Estuary SPA can be mitigated |
| SA-T-18 Peamore | | | | | | | | The location of the site is in accordance with the spatial development strategy and lies on western fringe of Exeter with potential for improved active travel access into the city. It is expected that impacts on the Exe Estuary SPA can be mitigated |
| SA-T-19 Starcross | X | | X | | | | The site does not accord with the spatial development strategy and is close to the Exe Estuary | |
| SA-T-20 Port Road, north of Dawlish | X | | | | | | Site is not consistent with growth locations of spatial strategy. | |
| SA-T-22 Ilford Park, | | | | | | | | The location of the site is in accordance with the spatial development strategy. Recommended for inclusion as there is good road access and |

| Site Reference / Name | 1 Strategy | 2 Capacity | 3 Euro sites | 4 Environment | 5 Process | 6 Minerals | Reasons for discounting as Potential Site Option in the GESP Consultation document | Reasons for the inclusion as Potential Site Option in the GESP Consultation document |
|---|---|---|---|---|---|---|---|---|
| Drumbridges (Employment) | | | | | | | | a large area of the site is already permitted for employment development. Potentially considered as 'temporary' with the option to extract clay after the lifetime of the development. |

## Table A7.2: Audit trail of policy development for the GESP Draft Policies and Site Options Consultation

| Proposed policy in the Reg. 18 GESP | Reasonable alternative options considered | Justification |
|---|---|---|
| **GESP1: Sustainable Development**<br>In planning for the future of the Greater Exeter area, Local Planning Authorities and Neighbourhood Planning bodies will deliver sustainable development and resilience through the preparation and implementation of development plan documents which:<br>A. Help build a strong, responsive, competitive economy across the Greater Exeter area;<br>B. Support strong, vibrant and healthy communities; and<br>C. Protect and enhance our natural, built and historic environment.<br>Policies in Local Plans and Neighbourhood Development Plans should take local circumstances into account, to reflect the character, needs and opportunities of each area. | **None.** | No alternative to be considered by SEA. The policy reiterates national policy objectives, setting out high level and non-specific objectives to be considered during the production of localised development plan policies. |
| **GESP2: Climate Emergency**<br>To accord with the advice of the Intergovernmental Panel on Climate Change (IPCC), carbon emissions from the Greater Exeter area will need to decrease to net-zero by 2040 at the latest. Decisions on infrastructure investment and development applications will consider their impact on achieving this target. | **1. Target below 100%**<br>**2. Target earlier than 2040** | The policy proposes an evidenced 100% reduction in carbon emissions in order to meet the Climate Change Act 2008 (as amended) target by 2040. This should be met by all sectors, some of which can be achieved through the GESP.<br><br>The alternative of a target below 100% may be more deliverable. However, this would seem unambitious and conflict with the part that the Greater Exeter area needs to play in meeting the UK Climate Change Act (as amended) carbon reduction requirements.<br><br>The alternative of bringing forward the target earlier than 2040 across the GESP area as a whole appears to potentially be undeliverable given that new housing and planning decisions will only play a small role in delivering on this target. |
| **GESP3: Net-zero Carbon Development**<br>To ensure that developments within Greater Exeter contribute towards meeting the overarching net-zero target set out in policy GESP1, applicants for all developments which propose the construction of new home(s) or non-residential floorspace or change of use will be required to submit to the local planning authority a carbon statement for approval and implementation. The Carbon Statement will demonstrate that proposals are designed, constructed and will perform to deliver net-zero carbon emissions, taking account of emissions from primary energy use and transport, broadly in compliance with the energy hierarchy.<br>In meeting the above requirement, proposals will demonstrate that they meet the sustainable and active transport targets which apply to the site | **1. Be more demanding**<br>**2. Only "major" development** | This proposed policy sets a trajectory for reducing carbon emissions from new residential and non-residential buildings to achieve net-zero carbon buildings. This is an ambitious policy approach which is designed to be achieved through an energy hierarchy of interventions. This advocates a fabric first approach to minimise energy demand, but there is flexibility as to how the carbon reduction target is met. This will help to meet the GESP vision and priorities.<br>The alternative of being more demanding (i.e. energy positive development) is likely to present more significant deliverability and viability challenges.<br><br>The alternative of only applying the policy to major developments would |

| Proposed policy in the Reg. 18 GESP | Reasonable alternative options considered | Justification |
|---|---|---|
| and:<br>A. Minimise energy demand across the development and avoid temperature discomfort through:<br>a) Passive design, solar masterplanning and effective use of on-site landscaping and Green Infrastructure<br>b) The "fabric first" approach to reduce energy demand and minimise carbon emissions necessary for the operation of the building<br>c) Low carbon solutions where additional energy is required for building services such as heating, ventilation and air conditioning.<br>B. Maximise the proportion of energy from renewable or low carbon sources through:<br>a) Ensuring that opportunities for on-site or nearby renewable energy generation or connection to a local decentralised energy scheme are exploited<br>b) Ensuring that the ability to install future solar PV or vehicle-to-grid connections is not precluded<br>c) Storage of on-site renewable energy generation.<br>C. Ensure in-use performance is as close as possible to designed intent through:<br>a) Use of a recognised building quality regime and consistent approach to calculating both, the designed and in-use performance<br>b) Ensuring that at least 10% of buildings on major developments deliver in-use energy performance and generation and carbon emissions data to home owners, occupiers, developers and the local authority for a period of 5 years, clearly identifying regulated and unregulated energy use and any performance gap. Where a performance gap is identified in the regulated use, appropriate remedial action will be required.<br><br>Where it is not feasible or viable to deliver carbon reduction requirements on-site, methods such as off-site provision will be considered. This will need to be through a specific deliverable proposal or financial contributions to an accredited carbon offsetting fund.<br><br>Development proposals should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions. | | focus the policy on developments which are more likely to be able to viably deliver the necessary carbon reductions. However, all developments contribute to carbon emissions and action is needed across the board. Small developments have contributed a significant number of completions across the Greater Exeter area in the past and will likely continue to do so in the future. This could have a big impact on the carbon reduction that could be achieved in the area. The flexibility of the policy helps to ensure viability where reasonable. |

| Proposed policy in the Reg. 18 GESP | Reasonable alternative options considered | Justification |
|---|---|---|
| **POLICY GESP4: Low Carbon Energy**<br>Development of low carbon and renewable energy schemes, and smart energy networks will be supported in principle. Community owned low/zero carbon energy projects, which maximise the use of the resource, will, in particular be considered favourably, and are encouraged to be included in neighbourhood plans. Proposals should avoid, or where reasonable, minimise and mitigate impacts upon local amenity and the and natural and historic environment. Proposals will need to demonstrate no likely significant effect on the integrity of Natura 2000 sites. | **1. Be more prescriptive** | The policy proposes to support the development of low carbon and renewable energy schemes in principle, particularly community owned schemes. This provides a flexible approach to enable further detail or site allocations for such schemes to come forward through Local Plans or Neighbourhood Plans. It is also sufficiently flexible to allow for a range of renewable and low carbon technologies available which may be appropriate depending on their individual opportunities, whilst ensuring that adverse impacts are addressed satisfactorily.<br><br>The alternative of a more prescriptive policy might entail consideration for specific technologies and more specific smart energy development types under certain criteria. This would require a more focused evidence base to assess specific sites and areas. It may improve certainty for applicants and therefore their willingness to make applications, and may result in a higher level of renewable energy generation across the area. However, it may also stifle innovation in a fast changing policy area which needs an element of flexibility. It may be difficult to gain political and community support, the latter of which is required for wind development. |
| **POLICY GESP5 Heat Networks**<br><br>Opportunities to connect to or deploy heat networks and utilise waste heat will be taken where viable and feasible. In particular:<br>A. If a heat network exists or is proposed within a 1km radius, connection will be required from:<br>a. Major development<br>b. Development proposals that produce more than 1 Megawatt thermal of waste heat<br>B. If no heat network currently exists or is proposed:<br>a. New heat networks or combined heat and power (CHP) plants utilising low carbon energy sources should be deployed where developments (either alone or in combination) propose at least 1,200 homes or 10 hectares of commercial<br>b. Development proposals that produce more than 1 Megawatt thermal of waste heat will incorporate measures to enable future connection to a heat network<br>A project level HRA will be required if there is potential for a proposal to affect a Natura 2000 site. | **1. Be more prescriptive**<br>**2. Be less prescriptive** | The policy proposes the key parameters for the deployment or connection to heat networks. This evidence based approach sets a reasonable quantum of development where the potential for such systems should be evaluated.<br><br>The alternative of a more prescriptive policy might require deployment/connection to a heat network for smaller developments of fewer than 1,200 homes or 10 hectares of commercial floor space. This would however be contrary to the evidence base which recommends that sites (either individually or combined) over 1,200 homes or 10ha commercial should be required to evaluate the use of heat networks and CHP where economically viable.<br><br>The alternative of a less prescriptive policy might require developments to consider deployment / connection to heat networks but not necessarily require. This may result in opportunities to enable the use of waste heat from new or existing industrial sources being lost. |

| Proposed policy in the Reg. 18 GESP | Reasonable alternative options considered | Justification |
|---|---|---|
| **POLICY GESP6 Suitable Areas for Solar PV Development**<br><br>Proposals for solar photovoltaic (PV) development will be supported where, taking account of the carbon emission benefits of the proposal:<br>A: The proposal lies within the 'areas identified as suitable for solar PV development' as shown on the Policies Map<br>B: There is no unacceptable landscape and visual impact, including cumulative impact<br>C: there is no unacceptable harm to the significance of heritage assets and their settings<br>D: There is no likely significant effect or no adverse effect on the integrity of Natura 2000 sites<br>E: Provision is made to ensure that the installation are removed when no longer in use and the land is restored to its previous use. | **1. Allocate specific sites** | The proposed policy seeks to identify suitable areas for solar PV development in the GESP area based on solar resource evidence. Identified areas are based on resource mapping which models a wide range of constraints.<br><br>The alternative of allocating sites would be complex and require detailed work in association with landowners, western power distribution and other relevant stakeholders. Following this detailed process it is likely provide greater certainty of delivery on a specific allocated sites in the short term but would not provide an overarching proactive strategic policy across the GESP area. |
| **POLICY GESP7: Suitable Areas for Onshore Wind Development**<br><br>Proposals for onshore wind development will be supported where, taking account of the climate change benefits of the proposal:<br><br>A: The proposal lies within the 'areas identified as suitable for onshore wind development' as shown on the Policies Map<br>B: There is no unacceptable impact on residential amenity from noise, vibration, visual intrusion and shadow flicker effects<br>C: There is no unacceptable landscape and visual impact, including cumulative impact<br>D: There is no unacceptable harm to the significance of heritage assets and their settings<br>E: There is no likely significant effect or no adverse impact on the integrity of Natura 2000 sites.<br>F: There are no significant adverse impacts on air traffic operations, radar and air navigational installations<br>G: Provision has been made for the removal of the facilities and reinstatement of the site when it has ceased to be operational. | **1. Allocate specific sites** | The proposed policy seeks to identify suitable areas for onshore wind development in the GESP area. Identified areas are based on resources mapping which models a wide range of constraints.<br><br>The alternative of allocating sites would likely provide greater certainty of delivery on a specific allocated site in the short term but would not provide an overarching proactive strategic approach to onshore wind based on wind resource evidence across the GESP area. |
| **POLICY GESP8: Energy Storage**<br><br>Proposals for renewable and low carbon energy storage will be supported in principle. Development should be sited:<br><br>A. At a suitable distance from residential areas and avoid, or where reasonable, minimise and mitigate impacts upon local amenity | **1. Be more prescriptive** | The proposed policy provides a flexible approach to energy storage, in recognition that this is crucial to increasing the proportion of renewable and low carbon energy.<br><br>The alternative of a more prescriptive approach that identifies specific sites for energy storage would provide a level of certainty in the short term. However, this would be more inflexible when considering the |

| Proposed policy in the Reg. 18 GESP | Reasonable alternative options considered | Justification |
|---|---|---|
| B. Where an acceptable standard of road safety can be achieved<br>C. Where landscape and visual impacts can be satisfactorily managed<br>D. Where there is no unacceptable harm to the significance of heritage assets<br>E. Where they do not have an adverse impact on the integrity of European sites.<br><br>In addition, applicants will need to demonstrate that there are no excessive noise impacts resulting from the proposal, including from heating, ventilation, and air conditioning systems and cumulative noise. | | evolving nature of this technology, the planning issues that are prevalent and opportunities that may arise across the GESP area as a whole. |
| **POLICY GESP9: Economic Targets**<br>In order to improve wellbeing and raise the standard of living in the Greater Exeter area the following targets are set for the economy by 2040:<br>A. Double the size of the economy to £20 billion<br>B. Increase average earnings to above the national average (median)<br>C. Increase the number of jobs by 35,000 | **None** | The proposed policy would be in line with the GESP vision, while being suitably ambitious but still achievable.<br>The alternative of a higher more ambitious economic target is not considered to be achievable. Equally, lower targets would undermine the GESP vision priorities and would not accord with the Local Enterprise Partnership strategies and evidence. |
| **POLICY GESP10: Transformational Sectors**<br>To enhance the ability of the Greater Exeter area to expand in key transformational sectors and deliver productivity improvements with high quality well-paid jobs:<br>A. Significant weight in planning decisions will be given to the positive economic impact of investment in the following transformational sectors, including use of a gateway policy to control future uses in appropriate situations:<br>a. Data analytics<br>b. Environmental futures<br>c. Smart transport<br>d. Health Innovation<br>e. Other digital future businesses<br>f. Other sectors defined in a local plan<br>B. The GESP allocates about 70 hectares of employment land to meet the development needs of the transformational sectors<br>C. Provision of one or more Digital Exchanges will be supported<br>D. The Greater Exeter councils will work together to support the expansion of these sectors through appropriate reform of planning processes, improvements to digital and other infrastructure, improved education and training and "soft landing" packages<br>E. Continued investigations will be undertaken into potential barriers to investment and appropriate further actions taken | 1. **Encourage Different Sectors**<br>(The identified sectors accord broadly with those advanced in the emerging Local Enterprise Partnership local industrial strategy.)<br>2. **Limit to specific allocations**<br>(Limit allocations to specific areas/locations, likely to be principally in and around Exeter). | The proposed policy supports the allocation of land and provides policy support for employment uses, particularly those in identified transformational sectors which is key to delivering the overall GESP vision.<br><br>The alternative of encouraging different sectors may not deliver against the GESP vision to improve productivity and increase average earnings. The evidence indicates that shifts away from traditional manufacturing towards digital focussed sectors is more likely to be consistent with likely changes in the economy. Exeter may struggle to attract other high productivity sectors such as finance.<br><br>The alternative of limiting allocations for economic growth to specific locations would reduce the impact of the policy overall. –This would underplay the Greater Exeter area's economic potential as indicated by the distribution of existing tech businesses |

| Proposed policy in the Reg. 18 GESP | Reasonable alternative options considered | Justification |
|---|---|---|
| **POLICY GESP11: Employment Land**<br>To ensure the potential for growth in jobs and incomes and for improved economic prosperity are not constrained, the GESP target is to develop about 150 hectares of land for B1, B2 and B8 uses in the Greater Exeter area by 2040.<br>Delivery to meet this target is proposed from the following sources (which allow for a headroom of approximately 200% against the overall target):<br>**A.** Approximately 130 hectares on GESP allocations, providing for transformational sectors or strategic scale employment growth or to develop self-contained new neighbourhoods within GESP allocations<br>B. Approximately 330 hectares on existing planning commitments, subject to further assessment and review in local plan preparation<br>C. Further sites allocated in future local and neighbourhood plans which achieve an appropriate combination of the following objectives:<br>a. Improve the choice of sites and buildings available for employment uses<br>b. Rebalance local or sub-regional economies<br>c. Maintain a flexible and competitive market in employment land and buildings<br>d. Support viability and deliverability<br>e. Take advantage of local economic potential<br>f. Meet other local needs or objectives<br>g. Take advantage of existing or proposed heat networks | **1. Higher targets**<br>(Uncertain need. The demand is based on evidence)<br>**2. Lower targets**<br>(Since much of the total is existing commitments, this would leave limited amounts of land to allocate via GESP strategic sites, including specifically for transformational sectors. | The proposed policy would allocate sufficient employment land with appropriate headroom to maximise the likelihood that sufficient employment land is delivered.<br><br>The alternative of higher targets would provide greater headroom beyond 200%, which is unlikely to be necessary, even if the conversion rate from allocation site to real delivery is relatively low.<br><br>The alternative of lower targets would potentially provide insufficient employment allocations headroom (below 200%) to allow for flexibility, with some risk that insufficient employment sites will be available to meet need. |
| **POLICY GESP12: Economic Delivery**<br>The Greater Exeter Councils will work together with other delivery bodies to encourage new economic investment and development in the area. Planning will be one of the tools in an integrated delivery to include:<br>A. Keeping the Exeter and Heart of Devon Shared Economic Strategy or equivalent document under review and up to date as a material consideration in the consideration of planning applications<br>B. Prioritising and coordinating strategic, site specific and local plan infrastructure investment to start or speed up economic development sites which contribute to the targets in this plan<br>C. Using planning obligations or other planning controls to ensure that the economic elements of mixed use developments occur in a timely fashion, including cross subsidy from housing and a backstop of land transfer to enable public sector direct delivery<br>D. Monitoring existing policies and site allocations, and if they are not delivering against GESP's economic targets, the extent to which planning applications for economic development uses support the delivery of the targets will be given significant weight | **None** | GESP12 contains statements of broad objectives and sets out the potential approaches to be taken by the Greater Exeter Councils to support economic investment and development in the area. These are aimed at supporting the delivery of the GESP Vision and no particular appropriate alternatives in approach were identified. |
| **POLICY GESP13: Strategic Economic Assets**<br>To protect key strategic economic assets from loss to other uses the following assets will be retained and proposals for enhancement | **1. Shorter list of assets**<br>(Fewer assets listed, concentrating investment | The proposed policy would protect key identified economic assets helping to encourage investment, and protect these areas from unsuitable redevelopment. |

| Proposed policy in the Reg. 18 GESP | Reasonable alternative options considered | Justification |
|---|---|---|
| supported:<br>A. Established, allocated and permitted employment areas:<br>a. Heathfield, Bovey Tracey<br>b. Brunel Road, Newton Abbot<br>c. Exeter Airport Business Park extended<br>d. Heathpark, Honiton<br>e. Greendale, Woodbury Salterton<br>f. Hill Barton, Cat and Fiddle<br>g. Matford/Matford Green, Exeter<br>h. Marsh Barton , Exeter (subject to specific development proposals in this plan)<br>i. Sowton, Exeter<br>j. Exeter Business Park<br>k. Pynes Hill, Exeter<br>l. Tiverton Business Park<br>m. Kingsmill/Stoneyford, Cullompton<br>n. Lords Meadow, Crediton<br>o. Mid Devon Business Park, Willand<br>p. Hitchcocks Business Park, Willand<br>q. Houghton Barton , Newton Abbot<br>r. Peamore, Exeter<br>s. Sands Copse, Kingsteignton<br>t. Milber, Newton Abbot<br>u. Intermodal interchange, Cranbrook<br>v. Skypark Business Park<br>w. Exeter Science Park<br>B. GESP employment allocations [to be defined in Draft GESP]<br>C. Allocated leisure destination at Junction 27, M5 Motorway<br>D. Other key economic assets:<br>a. Exeter International Airport<br>b. University of Exeter<br>**c.** Meteorological (Met) Office | into the largest and most strategically important.) | The alternative of a shorter list of assets is likely to result in the policy safeguarding / encouraging investment in fewer sites, with potential for loss or erosion of some key strategic assets. |
| **Policy GESP14: Exeter Airport**<br>To support the role of Exeter Airport in the economic success of the area the Greater Exeter councils will support investment in and work with the airport and other relevant stakeholders to define an Airport Development Zone (ADZ). A masterplan for the ADZ will be prepared to promote and guide developments that deliver on the following issues while maintaining the safe operation of the airport:<br>A. Surface access, including:<br>a. Active travel routes from nearby growth areas and Exeter<br>b. Improved, dedicated, regular and high quality public transport routes from nearby growth areas, Exeter and the wider region including links to and from Cranbrook | **1. Remove any policy support for the airport in the strategic plan.**<br><br>(Remove this policy and offer no support for the airport). | The proposed policy supports improvements and investment. The authorities do not consider that it would be appropriate to include policies that would seek to undermine investment and opportunities to support the only airport in the area.<br><br>The alternative of having no policy has been considered. However, given that the airport is an existing economic asset providing important connectivity and could be improved in a number of ways, this approach would be a missed opportunity to supporting and improving an important economic asset in the region. |

| Proposed policy in the Reg. 18 GESP | Reasonable alternative options considered | Justification |
|---|---|---|
| train station<br>c. Improved vehicular access via a high quality gateway from the A30<br>d. Improved car parking<br>B. Airport operation, including:<br>a. Improved/expanded/new terminal building<br>b. New or improved hangar and other freight services<br>c. Airfield safety, security and emergency infrastructure<br>d. Aviation training and back-office support development<br>C. Developments which support the aim to become a zero carbon airport and decarbonise aviation travel<br>D. Supporting ancillary development, including:<br>a. New employment development to (including aviation and transformational sector related development in particular)<br>b. New hotel and conferencing development<br>c. New ancillary passenger retail with the terminal building<br>d. Redevelopment of existing employment areas (including net loss of employment space) in order to facilitate delivery of the above | | |
| **POLICY GESP15: Inclusive Employment and Skills**<br>To promote wider access to jobs and address skills shortages:<br>A. Major planning applications should be accompanied by proposals to invest in construction skills. For the larger development schemes, the submission of an Employment and Skills Plan will be sought, covering their construction phase in line with the National Skills Academy for Construction client based approach or similar recognised scheme<br>B. Larger businesses expanding, starting up or moving into the area will be encouraged to sign up to an agreement to deliver links to local education providers, apprenticeships, training programmes and other measures to support people into work from the local area. | **1. A less flexible requirement for new businesses**<br>(Seek to compel new applications / expanding businesses to provide a minimum level of skills training and other training programmes.) | The proposed policy supports the GESP vision and priorities by seeking to support the development of construction skills and encourages large employers to make links to local education providers by providing apprenticeship places, etc.<br><br>The alternative of a less flexible requirement for new businesses may lead to greater links with schools but may equally act to deter new investment/expansion if requirements seen as an unnecessary cost or burden. |
| **GESP16: Housing Target and Distribution**<br>The Greater Exeter councils will target the delivery of 2,663 homes per year in the Greater Exeter area (53,260 total) between 2020 and 2040. From the date of adoption of the GESP, the Housing Delivery Test and five year housing land supply calculations will be assessed against this target on a Greater Exeter area wide basis.<br>Delivery to meet this target is proposed from the following sources (which allow for a headroom of about 20% against the overall target):<br>A. Approximately 33,390 homes from existing planning commitments<br>B. Approximately 18,500 homes on GESP allocations [*locations to be determined after this consultation and identified in the Draft Plan*]<br>C. Approximately 12,000 homes to be identified in future local and neighbourhood plans [*distribution between local planning authorities to be determined after this consultation and identified in the Draft* | **1. Lower GESP allocations** / Higher proportion of development to be allocated in Local and Neighbourhood Plans.<br><br>**2. Higher GESP allocations** / Lower proportion of development to be allocated in Local and Neighbourhood Plans. | The proposed policy sets out the housing target (based on the government's standard method) and explains from what sources this target will be met, including the residual for local plans to provide.<br><br>The alternative to allocate a higher proportion of development through Local and Neighbourhood Plans could be pursued. However, there would be a risk that this would result in a less structured and strategic distribution of growth and loss of subsequent environmental and economic benefits. This may also increase uncertainty of housing delivery for the period of time between the adoption of GESP and future Local/Neighbourhood Plans.<br><br>The alternative to allocate a lower proportion of development to be delivered through Local or Neighbourhood Plans was also considered. |

| Proposed policy in the Reg. 18 GESP | Reasonable alternative options considered | Justification |
|---|---|---|
| *Plan*]<br>D. Local plans should allocate additional housing sites to make up for any under-provision in planning commitments within a local planning authority against the assumptions contained in A above<br>E. Local plans may vary housing supply from these figures when justified by overall planning and sustainability considerations provided that any reductions are made in the context of effective duty to cooperate agreements with other local planning authorities which do not reduce the overall GESP housing delivery | | However, should this approach be taken there would be a risk of development being overly concentrated in a few key areas within very large GESP allocations, thereby potentially not meeting the needs of many of the existing communities where development is not being pursued in GESP. It could increase risk by making the delivery of housing overly reliant on larger scale sites to come forward, which are typically delivered at a slower pace over a longer period of time. It could also possibly make the NPPF requirement to ensure that 10% of the housing requirement is delivered on smaller sites more challenging to meet. |
| **GESP17: Affordable Homes**<br>To ensure access to housing for people whose needs are not met by the market the GESP and local plans will give a high priority to providing affordable housing. Affordable housing delivery will be from the following sources:<br>A. Approximately 9,970 from existing planning commitments<br>B. Approximately [*figure to be determined after this consultation and viability assessment*] on Greater Exeter Strategic Plan allocations, provided in accordance with individual targets contained in each allocation policy and summarised as follows:<br>a. Approximately [*figure to be determined after this consultation and identified in the Draft Plan*] social and affordable homes for rent, to be let at no more than Local Housing Allowance levels in perpetuity<br>b. Approximately [*figure to be determined after this consultation and identified in the Draft Plan*] homes for affordable homeownership, sold with at least a 20% discount from market values in perpetuity<br>C. Affordable homes on other housing sites in accordance with the policies and allocations of local and neighbourhood plans. | **None** | The proposed policy will identify the number of affordable homes that will be delivered over the plan period. The exact numbers will be determined through the process of viability assessment of the plan. |
| **GESP18: Build to Rent Homes**<br>To help meet the need for high quality homes for private rent in the Greater Exeter area, each phase of development of the following GESP site allocations will include a percentage (to be determined after this consultation and identified in the Draft Plan) of Build to Rent homes:<br>[SITES TO BE INSERTED HERE]<br>Each Build to Rent scheme provided in the GESP site allocations listed above will include (and maintain in perpetuity) an amount of affordable housing that accords with targets provided in the relevant GESP site allocation policy.<br>Outside the GESP site allocations listed above, every Build to Rent development of 10 or more homes will provide (and maintain in perpetuity) an amount of affordable housing that accords with policies and allocations in the relevant local and/or neighbourhood plan. | **None** | The proposed policy will set out a build to rent target (TBD) within GESP identified allocations. The policy will help to drive diversity in the housing market, supporting choice of tenure and build out rates on large sites. The target will need to balance build to rent with the needs and demand of other types and tenures of housing. |

| Proposed policy in the Reg. 18 GESP | Reasonable alternative options considered | Justification |
|---|---|---|
| Affordable homes provided on all Build to Rent schemes must be:<br>A. For Affordable Private Rent, secured in perpetuity<br>B. Let with rents set at Local Housing Allowance level<br>C. Owned and managed by the same landlord as the market Build To Rent homes<br>D. Fully integrated into the development and built to the same standards as the market Build to Rent homes<br>E. Let to eligible households registered with Devon Home Choice | | |
| **GESP19 Custom and Self Build**<br>As part of the housing target in policy GESP15, approximately 5,000 plots for custom and self build homes will be provided from the following sources:<br>A. Approximately 2,100 plots from small windfall sites<br>B. At least 900 serviced plots from GESP allocations, equating to a minimum 5% of the allocations' yields<br>C. At least 5% of serviced plots on all sites of 20 homes or more, including local and neighbourhood development plan allocations and windfalls. Local and neighbourhood plans will also consider the potential for allocations to contain up to 100% custom and self build plots<br>D. Affordable homes, particularly affordable home ownership products, which may be suitable for provision as custom or self build housing<br><br>For B and C, developers will supply at least 5% of serviced plots for sale to custom and self builders within the early phases of the site's development, as follows:<br>a. Suitable adopted or adoptable road access must be delivered at an early stage in the development (prior to 25% occupation of the relevant phase in which the serviced plots are located, as agreed at planning application stage)<br>b. A range of plots sizes must be provided having regard to local demand. Plots for detached homes must have scaffolding margins within the plot boundary<br>c. Plots must be free of party wall requirements unless they are to be developed to provide apartments, or semi-detached or terraced homes<br>d. Prior to marketing, on-plot services must be provided and each plot must be developable by a custom or self builder, with no issues prevent immediate purchase and development. The local authority must be satisfied that legal access and servicing will be possible for potential plot purchasers before outline of full planning permission is granted | **1. Higher site targets** | The proposed policy identifies the target and delivery mechanisms for the provision of sufficient custom and self build plots, in order to satisfy local demand and be consistent with the NPPF.<br><br>The alternative of higher site targets may potentially enable more provision of custom built homes over time, but this would see less delivery of other housing products (such as for open market sale, affordable and build to rent) and potentially result in lower infrastructure funding (due to CIL self build exemptions). There is little evidence to suggest that there is a need for a higher proportion to come forward. |

| Proposed policy in the Reg. 18 GESP | Reasonable alternative options considered | Justification |
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| e. Each plot must be marketed for at least 36 months from when the plot is fully serviced and developable, at a realistic plot valuation and in accordance with a marketing strategy to be approved by the local planning authority<br>f. Sites or clusters of 5 or more serviced plots should be delivered with the use of a design code which should provide suitable flexibility to allow for design variation, taking account of local circumstances | | |
| **GESP20: Accessible Homes**<br>All housing developments must include the following proportions of accessible homes unless the applicant can demonstrate there are site specific reasons why this is not feasible:<br>A. Market homes within the development: at least 25% built to M4(3a) standard, with the remainder built to M4(2) standard<br>B. Affordable homes within the development: at least 25% built to M4(3b) standard, with the remainder built to M4(2) standard | 1. **Reduced targets** | The proposed policy sets requirements for the proportion of homes that should be designed to be accessible and adaptable and wheelchair adaptable/accessible, which will contribute to the significant existing and long-term need for such properties.<br><br>The alternative of reduced targets would not provide sufficient accessible homes to meet the existing a projected demand and would also provide fewer benefits to health, wellbeing and housing. However, this approach may allow more affordable housing and/or infrastructure expenditure as a result of lower build costs. |
| **GESP21 Accommodation for the Gypsy and Traveller Communities**<br>To provide access to appropriate accommodation for the gypsy and traveller communities, the following will be provided between 2020 and 2040:<br>A. 116 additional permanent gypsy and traveller pitches from the following sources:<br>a. Approximately 70 pitches from existing commitments<br>b. Approximately 46 pitches on the following GESP site allocations: [sites to be determined following this consultation identified in the Draft Plan]. Off-site provision will only be supported if the applicant can demonstrate that this will achieve a more favourable outcome for gypsy and traveller communities<br>B. 3 transit sites for gypsy and traveller communities totalling 20 pitches to be allocated in local plans close to key road corridors in accordance with the duty to cooperate<br>C. A site providing 12 plots for travelling showpeople to be allocated in a local plan in accordance with the duty to cooperate | 1. **Higher Targets** | The proposed policy identifies the target number and types of pitches required, to enable provision of suitable accommodation opportunities for traveller communities.<br><br>A higher target could be provided to allow for flexibility of supply although this would then not utilise the best available evidence on demand. |

| Proposed policy in the Reg. 18 GESP | Reasonable alternative options considered | Justification |
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| **POLICY GESP22: Transport Strategy**<br>To support the sustainable growth of Greater Exeter and the development of a net zero carbon, efficient transport network the following outcomes will be sought from transport investment and all relevant planning decisions:<br>A. Creating a healthy, active city region by delivering an integrated network of active travel routes within and between our towns and cities, providing for walking, cycling and emerging modes.<br>B. Improving Sustainable Transport connectivity by achieving a reliable, low-carbon and consistent standard of sustainable travel between Exeter, selected main towns and growth locations, including half hourly rail, quarter hourly bus and strategic cycle routes as indicated on the transport strategy diagram.<br>C. Enhancing transport choices and alternatives to car ownership by expanding shared mobility (e.g. car clubs and bike hire), requiring their provision in all suitable developments and supporting innovations including a single ticketing system combining low emission modes.<br>D. Supporting a step-change in digital communications and digital connectivity by investing in a gigabit capable full fibre regional spine and requiring ducting in new developments.<br>E. Protecting and enhancing the function of the area as the strategic rail, road and air gateway to the south west peninsular through investments in critical infrastructure. | 1. **Deliver strategic public transport infrastructure:**<br>A reasonable alternative is to take a more ambitious approach to provision of new and improved public transport, for example through the provision of new tram or light rail routes from Exeter to key growth areas. | The proposed policy aligns with the GESP vision and sets the strategic objectives for transport investments and planning decisions.<br><br>The alternative of delivering strategic public transport infrastructure via 'big ticket' transport infrastructure is hindered by a number of factors including the build-out timeframe and the cost. The timeframe to deliver such infrastructure (including planning, financing, designing, construction) is estimated to be at least a decade. The cost to deliver such transport infrastructure is considered to be unachievable without relinquishing other development requirements (such as affordable housing). |
| **POLICY GESP23: Sustainable Travel in New Developments**<br>To support the sustainable transport strategy and carbon reduction targets, minimise environmental harm and support health and wellbeing, more than half of trips (or higher where specified in allocation policies) from major developments will need to be made by active and sustainable travel modes. Travel planning and investments will be based on the following priority order of Active Travel followed by Sustainable Travel and finally travel by private car, as detailed below:<br>A. Provision for active travel (walking and cycling) by:<br>a. Providing a dense and permeable network of walking and cycling routes within developments, including avoiding cul-de-sacs where they prevent permeability, and connecting into the wider active movement network beyond the development site;<br>b. Creating an environment which is safe and attractive to pedestrians and cyclists by providing a network of streets which prioritise active travel, using modal filters to reduce car traffic and create quieter, slower and safer streets, or segregated cycle routes on busier streets; | **1. Remove prioritisation of active travel and sustainable transport.** | The proposed policy sets a transport hierarchy, encouraging development proposals to prioritise the planning and funding of measures to encourage active travel first and sustainable travel second. This contributes to the GESP vision.<br><br>The alternative of removing the prioritisation of active travel and sustainable transport would mean that new road capacity and improvements are equally as important as the active travel and sustainable transport objectives. This could see a continued promotion of car dominated planning and less encouragement of alternatives such as cycling. This approach is considered to be contrary to the GESP vision. |

| Proposed policy in the Reg. 18 GESP | Reasonable alternative options considered | Justification |
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| c. Including secure private cycle storage for all dwellings and secure public cycle parking;<br>B. Provision for sustainable travel (buses, rail, shared mobility and other public transport) including:<br>a. Densities, design and layouts which allow provision of efficient public transport services to, and where relevant, within and through the site;<br>b. Appropriate well located bus stops, with raised kerbs for easy bus access and where appropriate suitable routes for bus priority;<br>c. Allocate spaces for shared mobility vehicles, including car clubs and e-bikes in central and accessible locations and to create new local multi-modal transport hubs and interchanges, making best use of existing bus and rail routes;<br>d. Providing private and public charging points for electric vehicles;<br>C. Highway enhancements will be supported where they are necessary for safety or where they promote an overall reduction in car journeys.<br>D. Provision of new local road capacity will be supported only where severe development impacts on the transport network cannot be avoided by the active and sustainable travel investments proposed with the development. | | |
| **GESP24: Travel Planning**<br>The submission of Travel Plans for approval and implementation will be required for all new purpose built student accommodation and developments incorporating at least 100 dwellings or 1000 sq m of non-housing floorspace. As a minimum travel plans should include:<br>A. Residential Travel Plans - site specific proposals including information on nearby facilities and sustainable travel modes, travel vouchers and post implementation monitoring and reporting. This could be delivered either by the developer or through financial contribution to the Local Transport Authority<br>B. Employee Travel Plans - site specific proposals including information on nearby sustainable travel modes, facilities and incentives to be provided for sustainable travel by staff and visitors and an agreed approach to implementation and monitoring of the Travel Plan | 1. **Policy with reduced threshold** incorporating all major (10+) housing developments.<br>2. **Policy with increased threshold** for requiring travel plans to sites of 500 or more dwellings or 2500 sq m or more employment. | The proposed policy of requiring travel plans for all PBSA, large residential developments and major non-housing development seeks to help developers plan for and achieve modal shift by offering alternative travel options, infrastructure, programmes and incentives.<br>A lower threshold could be set, capturing more smaller schemes to require travel plans. This is considered to create an unnecessary burden for smaller scale developments where comparatively few movements will be generated.<br>The alternative of an increased development size threshold for travel plans would reduce the number of developments required to prepare a travel plan. Whilst this would reduce burdens on developers it is also likely to result in significant numbers of missed opportunities, which could cumulatively have a significant impact on travel decisions; potentially leading to more car-dependent journeys. |

| Proposed policy in the Reg. 18 GESP | Reasonable alternative options considered | Justification |
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| **POLICY GESP25: Long Distance Strategic Trails**<br>The following trails will be identified and safeguarded to form part of the Strategic Walking & Cycle Network linking key towns to the existing strategic trail network, as identified on the relevant policies map and to be detailed in the Infrastructure Delivery Plan [*policies map and Infrastructure Delivery Plan to be published with draft GESP*]:<br>a. Teign Estuary Trail; Newton Abbot - Bishopsteignton - Teignmouth - Dawlish<br>b. Clyst Valley Trail; Killerton - Exe Estuary<br>c. East of Exeter Trail; Whimple - Cranbrook - Mosshayne - Exeter<br>d. Boniface Trail; Crediton – Exeter<br>e. Mid Devon Trail; Tiverton – Tiverton Parkway - Willand - Cullompton | **1. Active Travel policy without identification of specific trails.** | The proposed policy suggests a number of strategic trails to increase active travel provision and deliver part of the connected city region. Including a list of active travel infrastructure provides a 'statement of intent' which provides an indication of the broad location and range of potential projects.<br><br>The alternative of Active Travel without the identification of specific trails would promote the broad objective without identifying the specific trails within the Plan. Specific trails would be worked up at a later stage. This option would not be strategic or as helpful in guiding the location of new routes. The plan should include at least an indication of the broad route to allow further consideration and more detailed designs to emerge. |
| **POLICY GESP26: Rail and Bus Projects**<br>The following will be identified on the policies map to be allocated and/or safeguarded for the provision of public transport routes, rail stations and infrastructure [*policies map to be published with draft GESP*]:<br>1. New rail stations at<br>a. Marsh Barton<br>b. Monkerton<br>c. Cullompton<br>d. Cranbrook East<br>2. Rail Frequency and Resilience Enhancements including<br>a. Land at Dawlish Warren and Dawlish – rail resilience<br>b. Waterloo passing loop – additional tracks and capacity on London Waterloo Line<br>c. Tarka Line passing loop – to enable half hourly services to Crediton<br>3. Bus reliability and priority enhancements necessary to achieve 15 minute bus frequency will be identified including;<br>a) A3052 to M5 J30<br>b) Heavitree Road – environmental enhancement and bus priority<br>c) A379 South West Exeter<br>d) Exe Bridges / Alphington Road | **None** | The proposed policy identifies public transport projects which require allocation or safeguarding, contributing to the creation of a reliable public transport network as set out in the GESP vision and priorities.<br><br>No alternative or additional public transport proposals have been identified as these are likely to be linked to future growth areas. This can only be tested when these are known, when the potential sites identified in the GESP Options Consultation have been consulted upon and the most suitable taken forward as site allocations in the Draft GESP. |
| **POLICY GESP27: Park and Ride around the City**<br>Park and ride (and park and change) facilities will be allocated and delivered along the following corridors, as identified on the relevant policies map and to be detailed in the Infrastructure Delivery Plan [*policies map and Infrastructure Delivery Plan to be published with draft GESP*]:<br>1. B3181 Pinhoe Road corridor<br>2. A30 / Heavitree Road corridor<br>3. A376 / A3052 Clyst St Mary corridor<br>4. A38 - A379 – Matford corridor | **1. Provide more park and ride facilities,** including into Tiverton.<br>**2. Provide fewer park and ride facilities** and prioritise capital investment in increasing road capacity. | The proposed policy identifies park and ride facilities to be allocated and delivered. This will ensure all key corridors into the city have a park and ride option, contributing to the creation of a reliable public transport network as set out in the GESP vision and priorities.<br><br>The alternative of providing more park and ride facilities may provide facilities where there is insufficient need / demand or where it is less likely that a commercial bus route could operate, potentially wasting infrastructure funding and revenue. |

| Proposed policy in the Reg. 18 GESP | Reasonable alternative options considered | Justification |
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| 5. A30 – A377 Alphington Road corridor<br>6. A377 Cowley Bridge Road corridor<br>All facilities will include sufficient car parking, cycle storage and electric vehicle charging facilities. | | The alternative of fewer park and ride facilities with prioritisation of investment in increasing road capacity would result in insufficient provision of alternatives to driving into the city centre, continuing congestion and pollution challenges. This would not help achieve the GESP vision and priorities. |

| Proposed policy in the Reg. 18 GESP | Reasonable alternative options considered | Justification |
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| **POLICY GESP28: Electric Vehicles**<br>Residential and commercial development proposals will include the infrastructure to be ready for electric vehicles (EV-ready), in accordance with the following:<br>1. Each off-highway parking space in new residential developments will be fitted with an electric vehicle charging point or ducted circuit in a suitable position to enable an electric vehicle charging point to be easily installed in the future<br>2. Where residential development only provides parking on highways, a plan will be required, setting out how sufficient charging infrastructure is to be provided and maintained<br>3. Non-residential developments with 10 or more off-highway vehicle parking spaces will include at least 30% with electric vehicle charging points or a proportion equal to electric vehicle market share (whichever is higher at time of reserved matters/full application)<br>4. Developers promoting strategic scale development will work with energy companies to ensure the development of relevant and appropriate and smart energy infrastructure is planned to provide current and future electric vehicle capacity (for example land for sub-stations, energy storage and renewable generation)<br>5. All dwellings with a likely maximum load in excess of 7.5kW will be connected to the grid with a three phase electricity connection, which will extend to electric vehicle charging points, to enable improved management of electricity supply during periods of high demand<br>6. The provision of fast electric vehicle charging points, particularly in highly accessible locations will be supported. New or significantly altered petrol filling stations will include provision of at least 2 fast electric vehicle chargers<br>7. The infrastructure is sited to integrate positively with he built environment and not affect the significance, character, setting or local distinctiveness of a heritage asset | 1. **Require all parking spaces to provide EV charging points on all parking spaces (both private and public)** | The proposed policy requires the provision of EV ready parking spaces for private residential spaces and charging points for commercial developments. This will enable the provision of appropriate infrastructure to support the uptake of EV vehicles and their potential emissions benefits (minimising carbon emissions and improving air quality). Having all spaces as EV Ready is considered to be a reasonable approach that will allow people to install a charger to suit their needs relatively easily.<br><br>The alternative of requiring all parking spaces to be EV ready with provision of an EV changing point may be unnecessary. Whilst their numbers are predicted to rise rapidly, EV's currently make up a small proportion of the car market. Charging technology and type varies and is likely to evolve rapidly, risking new infrastructure becoming obsolete. Requiring installation on the public highway presents a management cost for local authorities. |
| **POLICY GESP29: Highway Links and Junction Improvements**<br>The following projects have been identified as the principal highway improvements on the strategic and major road network. This plan will safeguard land where necessary:<br>A. Strategic Road Network:<br>a. M5 J27 - A361 including Tiverton Parkway junction all movements junction to provide access to Parkway railway station and remove trips from the motorway junction<br>b. M5 J28 and Cullompton Town Centre Relief Road to provide extra capacity and/or remove trips from the motorway junction<br>c. Improved capacity and resilience between M5 J29 to M5 J31, including enhancements to local routes from Clyst | None | The proposed policy identifies highway improvement links which have all been included on the basis of traffic modelling. These demonstrate that the roads/junctions in that location are in need of more highway capacity, or where improvements works are considered possible and necessary to improve the flow or improvements the safety of traffic movements in that area. Later stages of the GESP and Local Plans will be free to add further highway improvement works as required and based on local plan allocations and/or further modelling. |

| Proposed policy in the Reg. 18 GESP | Reasonable alternative options considered | Justification |
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| Road to A376 to reduce local traffic on M5 J30<br>d. Relocation of M5 J30 and J28 motorway services to one new "on-line" site<br>e. A30/A303 improvements – Honiton to Devonshire Inn; Devonshire Inn to Marsh<br>B. Major and local Road Network:<br>a. A382 (Newton Abbot to Drumbridges) – widening of highway from Jetty Marsh Road with addition of cycle routes and improved junctions including new roundabout at Forches Cross and link road to A383<br>b. A30 (Clyst Honiton) to A3052 link - new main road allowing local north – south movement without the need to use the motorway junctions<br>c. Junction of A379 at Peamore with A38 to create north bound onslip<br>d. | | |
| **GESP30 Gigabit-Ready Developments**<br>To ensure that residents and businesses in new buildings have access to a choice of fixed and mobile internet services with a potential for reliable and resilient gigabit per second speeds, new developments will:<br>A. Incorporate digital infrastructure as one of the essential utilities, with routing and phasing planned comprehensively alongside the other utilities in a Utility Network Plan<br>B. Provide a network of open access ducting (open to all fibre providers) suitable for and including full-fibre connections to each building. Ducting must have capacity to accommodate and enable multi-operator fibre to the premise to encourage competition and choice for consumers<br>C. Demonstrate that suitable arrangements have been made for the ownership, management and maintenance of the open access ducting, for instance through transfer to a "Dig Once Trust" mutual<br>D. Make financial contributions [TBC] towards improving off-site digital infrastructure, where necessary and viable<br>Sites of at least 500 dwellings or 5ha of employment will ensure resilience by providing at least two physically separate external connections points. | **1. Requirement for fibre-optic cabling without instillation of open access ducting.** | The proposed policy will ensure all new development includes open access ducting connections to include fibre optic connections to all new buildings, helping meet the GESP vision and priorities. Requiring open access ducting opens up the market to competition from different suppliers and significantly increases the likelihood of full coverage.<br><br>The alternative of requiring fibre optic cabling without open access ducting, would seemingly allow all new homes to be connected to broadband, but is likely to be undertaken by a single data service provider where feasible. However, experience has shown that connections from new housing areas into the wider network can be haphazard and can leave significant areas of new housing development with little or no internet coverage. |
| **POLICY GESP31: Digital Spine**<br>To support the digital and economic transformation of the Greater Exeter area the Greater Exeter councils will work together with public and private sector partners to develop a regional fibre spine as indicated on the Key Diagram. The regional fibre spine will:<br>A. Provide gigabit-capable full-fibre connectivity to key public sector assets along their routes<br>B. Provide a network of open access ducting with capacity to | **1. Increase the scope of the digital spine** | The proposed policy seeks to deliver a regional digital fibre optic spine, connecting towns and key public assets (such as hospitals) and allowing any users such as existing rural communities to plug into the superfast fibre optic network. This helps to achieve the GESP vision and priorities.<br><br>An alternative approach could be to increase the scope of the digital spine. However, this would in turn increase the potential costs of delivery for the Greater Exeter Councils in a time of economic pressures. |

| Proposed policy in the Reg. 18 GESP | Reasonable alternative options considered | Justification |
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| accommodate multiple fibre optic cables and/or sub-ducting<br>C. Enable the development of carrier neutral Digital Exchanges at key nodes<br>D. Be owned, managed and maintained by the Greater Exeter Digital Infrastructure Cooperative | | The current spine proposal connects what is considered initially to be the key strategic locations taking on board existing opportunities, but does not preclude its expansion in the future. |

| Proposed policy in the Reg. 18 GESP | Reasonable alternative options considered | Justification |
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| **POLICY GESP32: Movement in Exeter**<br>The City's movement and public transport networks and infrastructure will be improved by:<br>**A.** Focussing on quality of place by requiring and enabling streets and corridor improvements to reduce the dominance of cars and support city centre vitality. The public realm, including in the following corridors will be improved to create people focussed urban areas with safer cycling and walking, improved air quality and reduced dominance of cars;<br>a. City Centre streets, including South Street, Fore Street, Paris Street and Queen Street<br>b. Heavitree Road<br>c. Cowick Street<br>**B.** Building a comprehensive pedestrian and cycle network within Exeter. This includes the following cycle routes which will be delivered as allocated or identified on the relevant policies map and to be detailed in the Infrastructure Delivery Plan [*policies map and Infrastructure Delivery Plan to be published with draft GESP*]:<br>a. St Davids - University of Exeter - Redhayes Bridge<br>b. City Centre - Heavitree - Redhayes Bridge<br>c. City Centre - Wonford - Newcourt – Topsham<br>d. Pennsylvania - Polsloe Bridge - Heavitree - Wonford - River Exe<br>e. SW Exeter - Alphington - City Centre<br>**C.** Improving cross-city bus corridors and bus access to edge of city growth locations and employment areas will be achieved by developing Park and Ride sites on all key road corridors into Exeter, doubling the number of spaces serving the city. This is set out in policy GESP27.<br>**D.** Expanding Shared Mobility provision across the City, linking with Electric charging and supporting the creation of a new zero-emission transport subscription service | **None** | The policy identifies measures which will help the City to achieve the GESP Vision and the broader transport strategy as set out in GESP22 (Transport Strategy). There is potential to expand this list of projects as further detail on site options emerge and via other measures such as the Exeter Local Plan. |
| **POLICY GESP33: Settlement Specific Enhancements**<br>Key towns, including in particular those with strategic growth proposals, will be improved by:<br>A. Building a comprehensive pedestrian and cycle network within identified towns, including in Newton Abbot, Cranbrook, Crediton, Cullompton, Dawlish, Exmouth, Honiton, Teignmouth, Tiverton and the GESP allocations. These will be identified on the relevant policies map and to be detailed in the Infrastructure Delivery Plan.<br>B. Focussing on quality of place by requiring and enabling streets and corridor improvements to reduce the dominance of cars, support town centre vitality and create people focussed urban areas. [*Locations to be determined after this consultation and identified in the Draft Plan*] | **None** | This policy sets out proposals for the main settlements, including pedestrian and cycle networks, street improvement and improving local bus networks. This policy will help main settlements to work towards achieving the GESP Vision and the broader transport strategy as set out in GESP22 (Transport Strategy). Further more detailed proposals can be added as site options are determined/decided and via Local Plans and the IDP. |

| Proposed policy in the Reg. 18 GESP | Reasonable alternative options considered | Justification |
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| C. Achieving a modern, reliable and low carbon bus route network within and between the main settlements and growth areas. This will include through improved bus routes and services, as well as Park and ride facilities to be allocated and delivered in growth areas and main towns along the following corridors, as identified on the relevant policies map and to be detailed in the Infrastructure Delivery Plan. [*Locations to be determined after this consultation and identified in the Draft Plan*] | | |
| **GESP34: Rebuilding Biodiversity**<br>Major development proposals will demonstrate at least 10% net gain in biodiversity compared with the pre-development situation by including or funding biodiversity enhancements, as appropriate. Biodiversity losses, compensation and enhancements will be calculated using the most recent nationally endorsed biodiversity metric, taking into account any adopted local authority guidance. Compensation and enhancements will be delivered in accordance with the Local Nature Recovery Strategy and Network [*emerging*] and secured by planning conditions and/or planning obligations. | **1. Higher target**<br>**2. Lower target** | The proposed policy will secure a 10% biodiversity net gain on all 'major' development, helping to deliver the GESP vision and priorities.<br><br>The alternative of a higher net gain target would go beyond the national consultation / evidence on mandating net gain and is likely to require further evidence to justify a higher target. The costs would also be have to be balanced against the likely impact on viability and/or infrastructure funding.<br><br>The alternative of a lower target is likely to be feasible. 5% is likely to be the lowest target which would still achieve net gain. A lower 5% target is likely to modestly improve viability, but would conflict with Government proposals to mandate a 10% improvement and would also do little to rebuild biodiversity in line with the GESP vision given the scale of species loss in recent decades |
| **GESP35: Woodland Creation**<br>To accord with the advice of the Committee on Climate Change (CCC), 10,000 hectares of new woodland will be created within the GESP area by 2040.<br>The Councils will seek to encourage or deliver appropriate woodland creation in areas identified in Figure 9.1 below as offering the highest opportunity to expand and connect existing woodland. Development proposals located within these areas of higher priority will maximise opportunities to undertake woodland creation. | **1. 50% Higher target**<br>**2. 50% Lower target** | The proposed policy seeks to deliver 10,000 ha of new woodland across the area by the end of the plan period. The figure was chosen on the basis of the best available evidence and advice from the Climate Change Commission.<br><br>Although a higher target would deliver a higher level of carbon savings, it is not considered appropriate on deliverability ground given the enormous upscale in woodland creation that the current target envisages when compared to past delivery.<br><br>A lower target, although perhaps more deliverable would not be appropriate as it would conflict with other policies requiring net-zero carbon emissions in the GESP area. |
| **GESP36: Exe Estuary, Dawlish Warren and East Devon Pebblebed Heaths**<br>To mitigate additional pressure on the Exe Estuary Special Protection Area and Ramsar site, Dawlish Warren Special Area of Conservation and East | None | Non-compliance with Habitat Regulations Assessment Regulations (including Habitats Directive and Birds Directive) is not an option. Policy ensures appropriate mitigation is provided to ensure no adverse effect upon the Exe Estuary, Dawlish Warren and East Devon Pebblebed Heath |

| Proposed policy in the Reg. 18 GESP | Reasonable alternative options considered | Justification |
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| Devon Pebblebed Heaths Special Area of Conservation and Special Protection Area (the 'protected sites'), the following limitations and requirements will apply to development:<br>A. Additional residential development will not be permitted within 400m of the East Devon Pebblebed Heaths Special Protection Area and Special Area of Conservation<br>B. Development will only be permitted within 400m of the Exe Estuary Special Protection Area and Dawlish Warren Special Area of Conservation where an Appropriate Assessment can show there will be no adverse effects to those sites, including effects arising from urbanisation impacts<br>C. Development of residential or holiday accommodation within 10km of one of more of the protected sites, as shown on Figure 9.2, will be required to pay a Strategic Access Management and Monitoring (SAMM) fee per additional dwelling or tourist bedspace, to be calculated annually based on the most up to date South East Devon Habitats Mitigation Strategy (or equivalent) and its implementation plan<br>D. Development of residential or holiday accommodation within 10km of one of more of the protected sites, as shown on Figure 9.2, will be required to provide and maintain Suitable Alternative Natural Greenspace (SANG) in perpetuity, either:<br>a. In accordance with SANG provision as set out in a development plan allocation, at the expense of the development and early in the delivery of the site, or<br>b. Where development is without an associated SANG identified in an allocation policy, pay a financial contribution to the Local Planning Authority sufficient to provide and maintain 180 square metres of SANG per dwelling or tourist bedspace in an appropriate strategic location<br>E. Provide any other specific measures to avoid residual impacts identified from Appropriate Assessment | | Natura 2000 sites. |
| **GESP37: Clyst Valley Regional Park**<br>Land is designated on the policies map as the Clyst Valley Regional Park (*indicated in Figure 9.4*). The Regional Park will provide high quality, accessible natural green space and enhance biodiversity, landscape quality and the historic environment. Developer contributions, the Community Infrastructure Levy and other sources will fund its delivery. A masterplan will be prepared, setting out how the Regional Park will deliver:<br>A. Suitable Alternative Natural Greenspace (SANG) to mitigate the recreational impact of development on Natura 2000 sites<br>B. A network of multi-use trails providing recreational and commuting routes from homes to employment and recreation sites in Exeter and the West End of East Devon | **1. Different area designated and different delivery requirements** | The proposed policy allows the allocation of the appropriate deliverable land for the regional park in the context of new GESP allocations and continuing housing growth in the area, ensuring any development proposals in this area contributes to and does not conflict with the stated objectives. The delivery requirements and area as defined is based on evidence gathered and considered as part of the Greater Exeter Green Infrastructure Strategy. The delivery requirements respond to the natural characteristics of the area and maximise environment and wellbeing benefits for those living/visiting the area.<br><br>The alternative of allocating a different area and delivery mechanism would need to be based on appropriate evidence and justification. This |

| Proposed policy in the Reg. 18 GESP | Reasonable alternative options considered | Justification |
|---|---|---|
| C. An increase in the amount of priority habitats<br>D. An increase in the population of protected or priority species by ensuring that breeding, resting and feeding sites are protected and enhanced<br>E. An improvement in the health and wellbeing of residents in East Devon and Exeter<br>F. A reduction in flood risk by implementing natural flood management<br>G. An improvement in the water quality of the River Clyst and tributaries, thereby achieving Water Framework Directive targets<br>H. The conservation and enhancement of heritage assets, particularly those 'at risk'<br>I. Opportunities for the public to understand and enjoy the natural and cultural heritage of the Park and contribute to its conservation and enhancement<br><br>Development within the designated area will not be permitted unless it contributes to the achievement of these objectives.<br>Where irreconcilable conflicts exist between the conservation of priority habitats or species and public enjoyment, then conservation interest will take priority. | | may emerge following the site options consultation. |
| **POLICY GESP38: Great Places**<br>The strategic allocations contained in the GESP require a comprehensive approach to delivering high quality development with coordinated infrastructure provision. This will be managed by a series of plans supporting each allocation including illustrative concept plans which form part of each allocation policy. In addition, the following plans will be produced:<br>A. Masterplans for GESP allocations:<br>a. Before outline or full permission is granted the local planning authority will prepare, consult on and approve the masterplan working with the site promoters.<br>b. The masterplan will be informed by the illustrative concept plan and will further define the requirements for the creation of a high quality new place, including the phasing of development, associated infrastructure and delivery mechanisms<br>c. The masterplan will identify the detailed elements of residential, commercial, employment and community uses for the site together with the environmental, Green Infrastructure (including SANGs where necessary), community and design requirements<br>d. For all GESP allocations the masterplan will include an allocation-wide design code commensurate with the scale of the development proposed. | **1. Masterplan only approach** | The proposed policy seeks to ensure the agreement of master plans, parcel plans and, where relevant, design codes for all GESP allocations. These will help deliver a comprehensive approach to delivering high quality strategic development in line with the GESP vision and priorities.<br><br>The alternative of a masterplan only approach is likely to fail to allow the consideration of critical details for individual phases / parcels of development. Agreeing fundamental urban design details at this level is critical to place making. This alternative approach risks delivering moderate to poor quality development. |

| Proposed policy in the Reg. 18 GESP | Reasonable alternative options considered | Justification |
|---|---|---|
| e. The masterplan will identify the information and documentation which will be submitted alongside all planning applications<br>f. Conditions or planning obligations imposed on outline and hybrid planning consents will ensure that future planning applications, and the resulting development, conform with the masterplan<br>B. Parcel plans for each phase of GESP allocations:<br>a. The parcel plan will promote the highest quality design and amplify in detail the relevant development plan policies and the content of the masterplan<br>b. The parcel plan will include a detailed layout plan at an appropriate scale<br>c. For all GESP allocations the parcel plan will include a phase-specific design code.<br>d. The parcel plan will be prepared by the site promoters and the local planning authority will be actively involved in its preparation<br>e. Outline planning consents will include conditions requiring that a parcel plan for each phase of development is submitted to and approved by the local planning authority<br>f. Reserved matters or full planning applications will only be permitted where they accord with the parcel plan which has been approved by the local planning authority | | |
| **POLICY GESP39: Delivering homes and communities**<br>To deliver the homes needed at a faster pace and at a higher quality, a series of mechanisms will be put in place. The Greater Exeter Councils will:<br>A. Establish publicly accountable, locally-led development corporations to pursue quality, certainty and pace of development delivery<br>B. Proactively bid for and, if appropriate, establish, joint ventures to secure further external infrastructure funding<br>C. Seek additional legal powers and planning freedoms where these would support delivery<br>D. Where abnormal development and early infrastructure costs are proven to significantly undermine development viability, consider the provision of short term, repayable financial support, in conjunction with Homes England or other bodies, to enable early starts and faster delivery<br>E. Where feasible, consider direct involvement in land assembly, to bring forward sites more quickly and comprehensively<br>F. Apply a proactive approach to preparing masterplans, infrastructure planning, development management, | None | No alternative to be considered by SEA. The policy sets out the potential approaches to be taken by the Greater Exeter Councils in supporting higher quality development at a higher pace. The policy does not set out requirements of development or developers and does not directly include land use matters. |

| Proposed policy in the Reg. 18 GESP | Reasonable alternative options considered | Justification |
|---|---|---|
| investment and delivery | | |
| **POLICY GESP40: Garden City Principles**<br>The Greater Exeter Councils will pursue the delivery of high quality development applying Garden City principles to GESP allocations<br><br>**A.** Residential and mixed use allocations will be delivered in accordance with garden city principles to:<br>a. Create distinctive, local identities through strong visions<br>b. Ensure well designed, vibrant, mixed uses places including a range of local facilities<br>c. Support healthy lifestyles and provide local healthcare for everyday needs<br>d. Provide a variety of high quality and flexible affordable and market homes<br>e. Deliver appropriately phased and designed infrastructure which plays a positive role in place-making and building communities<br>f. Support a wide range of accessible, local jobs and provide the education and skills to support local employment<br>g. Enhance the natural and historic environment and provide comprehensive green infrastructure, facilitating and encouraging recreation use within site<br>h. Ensure that all new residential, employment and commercial development will deliver net zero carbon emissions and is resilient to the effects of climate change<br>i. Deliver high quality, integrated, multi-modal and low carbon transport options<br>j. Ensure development is future proofed and resilient to change<br>**B.** The Greater Exeter Councils will deliver a series of garden communities at:<br>a. Culm Garden Village<br>b. Exeter and East Devon Garden Communities<br>c. Newton Abbot<br>**C.** The garden communities will follow the garden city principles and will also:<br>a. Provide an appropriate scale of development for the communities to maximise self-sufficiency<br>b. Foster community engagement in the planning process and local governance<br>c. Ensure a legacy of community stewardship for the ownership and maintenance of assets and infrastructure<br>**D.** The garden communities will be delivered in an innovative way through:<br>a. One or more locally-led development corporations<br>b. Capturing a greater proportion of land value uplift | None | This policy sets out a commitment to Garden Communities (depending on growth distribution) to be delivered according to Garden City principles. Such principles are set out within the NPPF as being a way of directing a large supply of new homes in an appropriate way and are included within the MHCLG garden communities prospectus. This policy should provide sufficient steer with regard to the expectations of quality for large scale new developments and settlements, which are likely to form a key component of the development strategy for the GESP. |

| Proposed policy in the Reg. 18 GESP | Reasonable alternative options considered | Justification |
|---|---|---|
| c. Accessing finance and private sector investment<br>d. The preparation of a detailed delivery strategy provided by the site promoter | | |
| **POLICY GESP41: Infrastructure Classification**<br>In order to make robust decisions on infrastructure funding and delivery the Greater Exeter councils will employ a clear and consistent classification of infrastructure:<br>A. Strategic infrastructure: Required to deliver the vision and priorities for the Greater Exeter area/or multiple GESP site allocations. This infrastructure is identified in policy GESP42 and the GESP Infrastructure Delivery Plan [*Infrastructure Delivery Plan to be published with draft GESP*]. It is part funded by monies administered by a joint board considering the Greater Exeter area<br>B. GESP site infrastructure: Required to support individual GESP allocations. This infrastructure is identified in the GESP allocations policies and the GESP Infrastructure Delivery Plan. It is funded by a varied package including CIL, planning obligations, Council monies and external sources<br>C. Local plan infrastructure: Required to deliver the vision of local plans, support local plan allocations and community priorities. This infrastructure is identified in local plan infrastructure delivery plans. It is funded through a package identified by the local planning authority | None | No alternative to be considered by SEA.<br>The policy classifies the three different ways in which planning infrastructure identified in plans the Greater Exeter area will be delivered. This will provide clarity to Councils, infrastructure providers, developers, landowners, the community and other stakeholders about how infrastructure will be planned, prioritised and delivered. The policy does not set out requirements of development or developers and does not directly include land use matters. As such it does not require specific assessment of alternatives through the SEA process |
| **POLICY GESP42: Strategic infrastructure**<br>The Greater Exeter councils will secure the delivery of a series of strategic infrastructure proposals for the Greater Exeter area in order to achieve the GESP vision, its priorities and/or multiple GESP allocations. The strategic infrastructure proposals are timetabled to be delivered in the period up to 2040. They are:<br>[PROJECTS TO BE INSERTED DEPENDING ON GROWTH DISTRIBUTION]<br><br>These proposals are included on the key diagram, the policies map, where applicable in GESP allocation policies, and in the GESP Infrastructure Delivery Plan [*all to be published within/alongside the draft GESP*]. The GESP Infrastructure Delivery Plan includes an infrastructure investment strategy to provide more detail on the mechanisms for delivering the strategic infrastructure proposals [*to be published with the draft GESP*]. The list of strategic infrastructure proposals may be amended as part of any future GESP review process, by a GESP Infrastructure Delivery Plan update or by agreement by the joint board referred to in GESP41 and below.<br>Funding for these proposals will be provided by:<br>• A joint board for the Greater Exeter area<br>• Where applicable, a locally-led New Town Development Corporation | None | No alternatives to be considered by SEA at this stage.<br>The policy sets out the critical infrastructure to be delivered in the Greater Exeter area. Projects will be listed in future iterations of the plan depending on growth distribution.<br>The rationale for including the policy is to clearly identify the infrastructure priorities and explain the way in which they will be funded and delivered. The projects listed here are likely to have been identified through other policies in the plan. As such, they, and their associated justification, will have been assessed elsewhere through the SEA process. This means that the infrastructure priorities themselves do not require specific assessment of alternatives through the SEA process here. |

| Proposed policy in the Reg. 18 GESP | Reasonable alternative options considered | Justification |
|---|---|---|
| • Planning obligations and/or CIL<br>• Government/Local Enterprise Partnership<br>• Local authorities<br>• Infrastructure providers<br>Decisions over the prioritisation, funding and delivery of the strategic infrastructure proposals will be made by the joint board which will:<br>• Define the strategic infrastructure proposals<br>• Manage a joint strategic infrastructure budget including a joint, recyclable Strategic Infrastructure Fund and<br>• Maintain the GESP Infrastructure Delivery Plan | | |
| **POLICY GESP43: Viability**<br>To ensure that developments provide the necessary, planned requirements to create and maintain sustainable settlements and neighbourhoods, deviation from policy requirements on grounds of viability will only be considered appropriate where the following have occurred to a significant degree since the adoption of the GESP and/or relevant local plan(s):<br>A. Increases in infrastructure or abnormal development costs which could not reasonably have been foreseen at the time of the GESP's and/or local plan's adoption<br>B. Adverse changes in building costs relative to sales values<br>C. Worsening of local market conditions such as a prolonged recession or an extraordinary local event demonstrably affecting incomes and development values<br><br>A viability appraisal of the development proposal will need to be submitted by the applicants explaining the circumstances which have led to the changes in viability since the GESP and/or local plan adoption. Any variation from the proposed policy requirements, and deviation from the assumption that site-specific infrastructure will be funded by development, will need to be justified.<br><br>The Greater Exeter councils will recover from applicants their reasonable costs associated with an independent assessment of submitted viability appraisals where a deviation from policy requirements is sought. The submitted viability appraisal and the independent review will be published by the local planning authority with the planning application documentation.<br><br>Where policy requirements are not met due to an agreed viability reason the viability of the proposal will be reviewed every three years in accordance with the requirements of this policy to seek to achieve full policy compliance in later development phases. | None | This policy sets out the expectations regarding viability appraisal in line with the NPPF and revisions to the NPPG. It clarifies the circumstances in which further viability appraisals may be accepted at application stage and the need for information to be made publically available. If this policy was omitted there would be insufficient clarity regarding the expectations of the councils. This could lead to suggestions of the need for further viability appraisal and, indirectly, the provision of development which does not comply with all relevant policies. Such development may be considered inappropriate. |

FOOTPRINT ECOLOGY



# Initial Habitats Regulations Assessment Report

## Greater Exeter Strategic Plan - Draft Policies and Site Options Consultation

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# Summary

This report is an initial report to inform the Habitats Regulations Assessment (HRA) of the Greater Exeter Strategic Plan (GESP) and has been produced alongside an early draft of the Draft Policies and Site Options Consultation. It has been undertaken in the early stages of the preparation of the GESP in recognition of the risks posed to European sites as a result of new growth in the Greater Exeter area. The HRA will continue to develop alongside future iterations of the GESP.

This report has been prepared by Footprint Ecology on behalf of the GESP partners (East Devon, Exeter, Teignbridge and Mid Devon councils). HRA is a step by step process of ensuring that a plan or project being undertaken by, or permitted by, a public body will not adversely affect the ecological integrity of a European site. European sites include Special Protection Areas (SPAs), which are classified for their bird populations of European interest, and Special Areas of Conservation (SACs), which are designated for habitats and species of European interest. The legislation sets out a clear step by step approach for decision makers considering any plan or project.

GESP relates to an area of some 2,200 $km^2$ with a population of over 450,000. The area is broadly aligned with the Exeter Travel to Work Area, reflecting the core role of the city in providing employment. As such it makes sense for the 4 local authorities to work together for strategic planning. The Plan area extends as far as the Dorset border in the east, to the Exmoor/Somerset border in the north-east and to Torbay and Dartmoor to the south-west. The GESP will set out the large, strategic pieces of infrastructure and large-scale development, including large housing allocations across the relevant authorities. The Draft Policies and Site Options consultation identifies that in total the GESP area should provide for some 35,000 new jobs and 53,260 new homes over the period 2020-2040 (including existing commitments in Local Plans).

It is important to stress that the GESP will go through further work and refinement and this report has been produced alongside policies and options for sites that are still in draft and for consultation. The HRA will be finalised at adoption and will go through various iterations alongside each version of the Plan. In this report we follow the HRA process but – given the relatively early stages and emerging evidence base – the focus is on highlighting further steps, evidence gathering and checks that will be necessary to inform the next iteration of the HRA and further refinement of GESP.

## Initial Screening for Likely Significant Effects

This report includes an initial screening for likely significant effects. This looks at policies and options prior to any avoidance, reduction/mitigation measures in line with the CJEU judgment in Case C-323/17 People Over Wind v Coillte Teoranta. Draft policies and

components of the consultation for which likely significant effects cannot be ruled out at this stage are:

- GESP9: Economic Targets
- GESP10: Transformational Sectors
- GESP11: Employment Land
- GESP14: Exeter Airport
- GESP16: Housing Target and Distribution
- GESP21: Accommodation for the Gypsy and Traveller Communities
- GESP25: Long Distance Trails
- GESP29: Highway Links and Junction Improvements
- GESP31: Settlement Specific Enhancements.
- Chapter 12: Site Options

As part of the initial screening for likely significant effects a number of recommendations and minor changes relating to the wording of policies or supporting text have also been made, in some cases highlighting where there are opportunities to clarify the policy in relation to the HRA or where maps or diagrams that have not yet been incorporated into the plan should highlight particular information. These minor points and checks relate to the following draft policies:

- GESP1: Sustainable Development
- GESP4: Low Carbon Energy
- GESP5: Heat Networks
- GESP6: Suitable Areas for Solar PV Development
- GESP7: Suitable Areas for Onshore Wind Development
- GESP13: Strategic Economic Assets
- GESP21: Accommodation for the Gypsy and Traveller Communities
- GESP34: Rebuilding Biodiversity
- GESP36: Exe Estuary, Dawlish Warren and East Devon Pebblebed Heaths
- GESP37: Clyst Regional Park
- GESP38: Great Places
- GESP39: Garden City Principles

Amendments to these were made prior to the Draft Policies and Site Options Consultation.

It is too early to undertake a full appropriate assessment as the site options are still to be finalised and key pieces of evidence are still to be collated. Following the screening, topics for appropriate assessment are highlighted to advise on the scope of the appropriate assessment and inform the evidence that will need to be gathered as the plan progresses. These topics will be assessed in detail within the appropriate assessment at the Draft Plan stage, when more detail and evidence are available.

## Appropriate assessment topics:

### *General urbanisation effects*

Urbanisation effects relate to issues where development is close to the European site boundary and is an umbrella term relating to impacts such as light, noise, cat predation, fly tipping, increased fire risk, spread of invasive species (e.g. from gardens and garden waste) and vandalism.
There are two site options with potential risks relating to urbanisation effects:

- **SA-EX-3 Land between M5 and Topsham** lies within 200m of the Exe Estuary SPA/Ramsar. Risks from the general urban effects at this site seem low. If this site option is included within the GESP, given the proximity of the site option to the Estuary and the scale of the development, it will be important that any master planning or site plans take into account the risk to the Estuary and further checks should be undertaken when further details are available to ensure the site can be delivered without adverse effects on integrity from urban effects. At project-level HRA it will then be necessary to ensure any necessary design features and mitigation are in place, in-line with draft Policy GESP36 (Exe Estuary, Dawlish Warren and East Devon Pebblebed Heaths).
- **SA-ED-19 Axminster South** is around 400m from the River Axe SAC. Risks here relate to the possibility of invasive species being spread through construction and urbanisation. Adverse effects on integrity to the River Axe SAC could be avoided through survey work to inform the layout and design, vegetation management (ensuring species of concern are not present within and around the site), site design (to ensure no risk of invasive species spreading along the ditch running from the application site) and carefully planned construction, with necessary site checks and controls in place. Some of these issues can safely be deferred to project level HRA, however if this site is progressed within GESP it will be necessary to have confidence that the issues can be addressed and there is no uncertainty.

### *Bat SACs and loss of supporting habitat, fragmentation and collision risk*

Bats can roam widely in the landscape, utilising different locations for roosting through the year and around the roost sites where they fly out in darkness to feed, often ranging considerable distances from the roost. Loss of feeding areas, loss of connectivity within the landscape and risks of collision from roads and other structures pose particular risks.

The following site options and draft policy pose risks for the South Hams SAC:

- **SA-T-3 Land West of Houghton Barton;**
- **SA-T-5 Priory Road;**
- **SA-T-8 Land North of Forches Cross;**
- **SA-T-18 Peamore;**
- **SA-T-22 Ilford Park;**
- **GESP 29 Highway Links and Junction Improvements.**

All lie within or very close to the landscape connectivity zone - within which the bat interest is expected to occur in low numbers and be more widely dispersed. Nonetheless, the site options could all have the potential to severely restrict the movements of bats at a landscape scale.

For all site options, survey work will be required to check for the presence and use of the area by Greater Horseshoe Bats. The results from the survey work will need to feed into the master planning and the boundary or scale of the site option may need to be revised. For SA-T-8 and SA-T-22 it will be necessary for the survey work to check the use of the mitigation features and ensure they can continue to function in the long-term. For all 5 housing site options, if progressed into the plan, a tailored bat mitigation plan is likely to be required to ensure adverse effects on integrity can be ruled out, for the sites alone or in-combination. It may be necessary to consider the potential impacts of the site options together and it is recommended that the survey work is co-ordinated across the various sites. Survey work and the information collected will need to conform to the relevant guidance. For the relevant road junctions, further details of the improvements for these locations are required before adverse effects on integrity can be ruled out.

### *Loss/impacts to supporting habitat around European sites (non-bat sites)*

There is no information on off-site foraging use by Nightjars around the East Devon Heaths SPA. The risks relate to:

- The direct loss of foraging habitat that is functionally linked to the SPA;
- Flight paths and access to foraging habitat being blocked or restricted by the presence of built development.

The following site options fall within 7km of the SPA (7km reflecting the distances Nightjar have been shown to fly in Dorset) (sites are listed in order of proximity):

- **SA-ED-7 Higher Greendale;**
- **SA-ED-3 Hill Barton;**
- **SA-ED-2 Oil Mill Lane;**
- **SA-ED-8 Airport Business Park;**
- **SA-ED-12 Whimple;**
- **SA-ED-5 North of Exeter Airport;**
- **SA-ED-15 Feniton;**
- **SA-EX-3 Land between M5 and Topsham.**

Together these site options represent a total of 22,100 new houses and significant employment development. Furthermore, some lie between the SPA and other sites that support breeding Nightjar, potentially creating barriers to movement by the birds. In order to rule out adverse effects on integrity in relation to off-site foraging by Nightjar it will be necessary to check the extent to which Nightjars roam from the SPA, the habitats they use and the relative importance of the land within any of the 9 site options listed above if progressed into the draft GESP. At this stage in the plan making process it is important that the issue is identified and surveys done prior to any master planning to

ensure any areas important to foraging Nightjar or routes used can be protected and enhanced. This may reduce the amount of housing feasible in particular locations. Results from recent studies in Dorset, using GPS tags on Nightjars around Poole, may provide further insights and understanding, when available. Policy wording for these site options will need to highlight the off-site foraging issue for Nightjars.

Marsh Fritillaries can disperse 15-20km. The following site options are within 20km of either the Culm Grasslands SAC and the Quants SAC:

- **SA-MD-12 Area south of Sampford Peverell;**
- **SA-MD-9 East of Cullompton;**
- **SA-MD-18 Honiton East;**
- **SA-MD-15 Feniton;**
- **SA-MD-10 Land at Hartnoll Farm.**

Checks need to be made by a suitably qualified ecologist for any suitable Marsh Fritillary habitat and a more detailed and thorough check made for records of the species. This will need to feed into later iterations of the HRA and will inform whether the plan will have no effect at all (ruling out adverse effects alone or in-combination) or whether the appropriate assessment will have to be extended to consider the possible cumulative effects alongside other plans or projects. Given that the site options are located well away from the relevant SACs, the risks are low and will mean the sites are likely to be deliverable without adverse effects on the integrity of the Culm Grasslands SAC and the Quants SAC, through the loss of supporting habitat. Masterplans may need to take into account the need to protect particular habitat and ensure connectivity.

### *Recreation*

Together, the site options involve a marked housing change around the East Devon Pebbelebed Heaths (potentially a 41% increase within 5km), the Exe Estuary (potentially a 32% increase within 5km) and Dawlish Warren SAC (13% increase within 10km). Not all the site options will progress into the draft GESP, so this illustrates the most extreme case. These site options fall within an area covered by an existing mitigation strategy and this strategy is being updated to address any potential additional growth. It will be essential that the strategy is finalised alongside GESP so that mitigation requirements are clear and suitable mechanisms for timely delivery are secured. Draft policy GESP36 is the relevant policy which sets out mitigation requirements and this cross-references to the strategy.

Depending on the size and location of the site options progressed a significant quantum of suitable alternative natural greenspace (SANG) will need to be secured. This will be set out in the updated mitigation strategy.
**Draft policy GESP 25 Long Distance Trails** sets out a network of strategic long distance cycle trails and these include the Clyst Valley Trail, which links directly to the Exe Estuary SPA/Ramsar. Further information on the location, route and how this will link with the

existing cycle trails around estuary will be necessary. These design elements will need to feed into the next iteration of the HRA.

**Draft Policy GESP 31 Settlement Specific Enhancements** includes comprehensive pedestrian and cycle networks at locations including Exmouth, with risks to the Exe Estuary SPA/Ramsar, Dawlish Warren SAC and the East Devon Pebblebed Heaths SAC/SPA. Further details of design and likely use are necessary to feed into the next iteration of the HRA.

**The River Axe SAC and Site Option SA-ED-19**

SA-ED-19 Axminster South is an allocation for a potential of 540 houses and is just 400m from the River Axe SAC. Risks from recreation pressure for the SAC in the vicinity of the allocation will need to be resolved through an access and visitor management plan. The appropriate assessment for the GESP will need this to be progressed sufficiently to ensure adverse effects on integrity can be ruled out. Any plan will need to be finalised and agreed with Natural England prior to submission of a planning application to allow project level HRA to rule out adverse effects on integrity.

**Dartmoor SAC and South Dartmoor Woods SAC**

There are no GESP site options within the immediate vicinity of either of the Dartmoor SACs. However, recent research has flagged nature conservation issues with recreation use across Dartmoor National Park. Further discussion is necessary with the National Park and potentially neighbouring authorities and some further policy wording and agreed mitigation approach is likely to be necessary.

### *Water-related issues*

Run-off, outflow from sewage treatments and overflow from septic tanks can result in increased nutrient loads and contamination of water courses. This can have consequences for European sites which contain wetland or aquatic features, as the pollution will affect the ability of the site to support the given interest. Furthermore, abstraction and land management can influence water flow and quantity, resulting in reduced water availability at certain periods or changes in the flow. This can exacerbate issues relating to water quality. These impact pathways can be specific to particular parts of European sites or particular development locations and are also relevant to the overall quantum of development.

Once site options are confirmed, checks are necessary with South West Water and the Environment Agency to ensure that the forecasts in the Water Resources Management Plan do include the quantum of growth set out in GESP and that there are no issues with water supply for any European site. Given that the Water Resources Management Plan does rely on helping customers reduce their water consumption, water efficiency measures could be given greater emphasis in the GESP, in accordance with South West Water advice.

In addition, checks should be made with the Environment Agency and Natural England regarding the following sites or site specific issues related to water.

- Culm Grasslands SAC and water availability;

- Dartmoor SAC and Salmon (which migrate along rivers and therefore also occur outside the SAC), checking water flow in particular;
- Exe Estuary SPA/Ramsar and water quality;

**Site option SA-ED-19** is the only site option within the Axe catchment. For this option to go ahead it will be necessary to have confidence that there will be no net increase in Phosphorous and other nutrients into the Axe. In addition, site option SA-ED-19 is 400m from the River Axe SAC and is likely to have direct hydrological surface links to the SAC. As such there are potential risks from pollution events during construction, from run-off and contamination from sewage overflow. If the site progresses into the draft GESP, it will be necessary to have confidence that these issues can be addressed and detailed site design at the masterplan level will be necessary to inform project-level HRA.

### *Air quality*

Nine of the European sites that are within 20km of the GESP area have roads within 200m of the site boundary. These are the Culm Grasslands SAC, Exe Estuary SPA/Ramsar, East Devon Pebblebed Heaths SPA/SAC, Dartmoor SAC, Exmoor Heaths SAC, Exmoor and Quantock Oakwoods SAC, River Axe SAC, South Dartmoor Woods SAC and South Hams SAC. For these sites it will be necessary to understand the potential increase in traffic as a result of GESP and in-addition the in-combination increase with other relevant plans, in context with any background traffic growth forecasts. If, in-combination, traffic volumes increase by more than 1000 AADT on roads within 200m of a European site, air quality modelling will be required. Issues will be particularly important where existing critical loads for N deposition are already exceeded or approaching exceedance. Without this traffic modelling it will not be possible to rule out adverse effects on integrity.

Further understanding of the impacts of the airport growth on air quality are necessary and it may be that any modelling work needs to also consider the implications of draft policy **GESP14 Exeter Airport**.

Modelling results should be checked with Natural England and in addition advice will be sought from Natural England regarding the progress with the Site Nitrogen Action Plans referred to in the relevant Site Improvement Plans and to clarify how to interpret any modelling results with respect to those species and habitats for which there are not critical loads, including water courses, Barbestelle and Bechstein's bats.

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# 1. Introduction

## Context

1.1 This report is an initial report to inform the Habitats Regulations Assessment (HRA) of the Greater Exeter Strategic Plan (GESP) and has been produced alongside an early draft of the Draft Policies and Site Options Consultation. The report has been prepared by Footprint Ecology on behalf of the GESP local authorities. It considered the potential implications of the emerging plan contents for European sites in the vicinity of Greater Exeter area. This report has been written with the benefit of ongoing discussions with officers within the Greater Exeter councils.

1.2 GESP is a joint statutory plan for East Devon, Exeter, Mid Devon and Teignbridge local authorities, excluding Dartmoor National Park. Devon County Council is working in partnership with the project. It will provide the overall spatial strategy and level of housing and employment land required in the period to 2040, together with key aspirations for the environment, infrastructure and digital communications. As such it will provide the high-level strategic planning for a broad area.

1.3 Local plans for each authority will continue to be prepared, and these will contain more local policies and allocations for smaller scale development. The role of GESP is therefore to set the overall vision, provide the spatial development strategy, set the overall amount of growth and allocate large strategic sites[1] and identify district local plan residual development requirements.

1.4 HRA is a key piece of evidence to support a plan and is added to and refined throughout the plan making process, informing and informed by the developing plan. This HRA report therefore will continue to be worked on with the planning officers and other stakeholders, only providing a final HRA after Examination in Public when any final modifications to the plan are checked.

1.5 An HRA evaluates the impact of plans or projects on the qualifying features of European sites. In this instance the HRA is undertaken at a very strategic level. HRA will also be required for individual local authority plans,

[1] Allocations of at least 100 homes or 1ha of employment land in Exeter City or allocations of 500 or more home or 5ha of employment land outside Exeter, which may include brownfield sites, urban extensions and new settlements

neighbourhood plans and development projects coming forward in the future in accordance with the Local Plan. An explanation of the HRA assessment process is summarised in this section below.

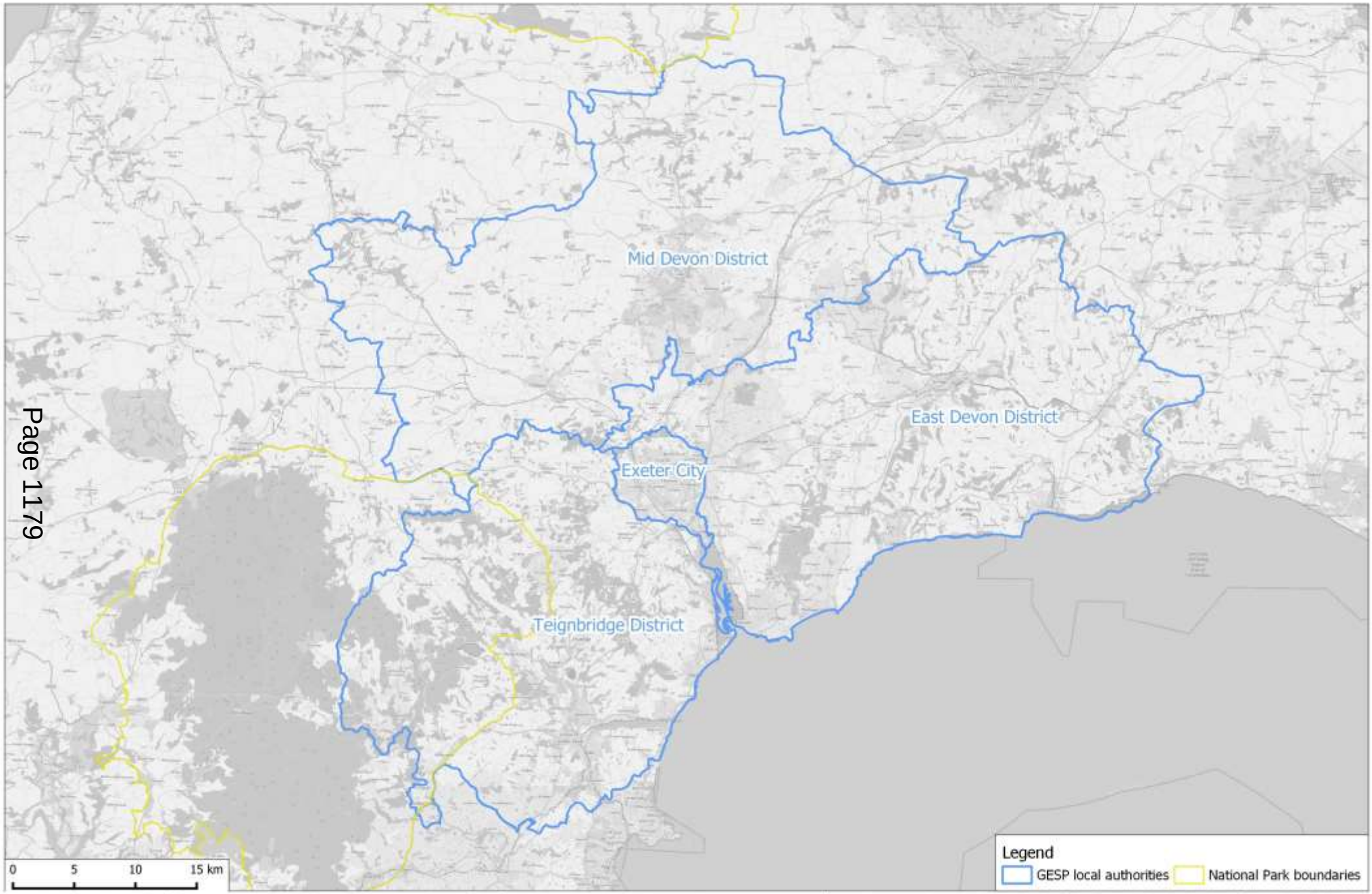
## *GESP*

1.6 The GESP relates to an area of some 2,200 $km^2$ with a population of over 450,000. The area is broadly aligned with the Exeter Travel to Work Area, reflecting the core role of the city in providing employment. As such it makes sense for the 4 local authorities to work together for strategic planning.

1.7 The Plan area (see Map 1) extends as far as the Dorset border in the east and to the Somerset border in the north-east. It includes a length of coastline, from Lyme Regis to Torquay, including the estuaries of the Exe and the Dart.

1.8 Besides Exeter, larger settlements include Newton Abbot, Exmouth, Tiverton, Crediton, Cullompton, Honiton, with a number of other smaller market and seaside towns.

**Map 1: GESP plan area**

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## Habitats Regulations Assessment process

1.9 The designation, protection and restoration of European wildlife sites is embedded in the Conservation of Habitats and Species Regulations 2017, as amended which are commonly referred to as the 'Habitats Regulations.' The most recent version of the Habitats Regulations does not affect the principles of European site assessment as defined by the previous Regulations, and which forms the focus of this report. Regulation numbers have changed from the 2010 Regulations. A further update was made in 2018.

1.10 The Habitats Regulations are in place to transpose European legislation set out within the Habitats Directive (Council Directive 92/43/EEC), which affords protection to plants, animals and habitats that are rare or vulnerable in a European context, and the Birds Directive (Council Directive 2009/147/EC), which originally came into force in 1979, and which protects rare and vulnerable birds and their habitats. These key pieces of European legislation seek to protect, conserve and restore habitats and species that are of utmost conservation importance and concern across Europe.

### *European sites*

1.11 The European Directives operate on the basis that sites are in place to serve as an ecologically functioning network, and ultimately it is the preservation of that network as a whole that is the overall aim of the European Directives. The network is often referred to as the Natura 2000 Network or 'N2K.'

1.12 N2K sites include Special Areas of Conservation (SACs) designated under the Habitats Directive and Special Protection Areas (SPAs) classified under the Birds Directive. The suite of sites includes those in the marine environment as well as terrestrial, freshwater and coastal sites. These N2K sites have the benefit of the highest level of legislative protection for biodiversity. Member states have specific duties in terms of avoiding deterioration of habitats and species for which sites are designated or classified, and stringent tests have to be met before plans and projects can be permitted, with a precautionary approach embedded in the legislation, i.e. it is necessary to demonstrate that impacts will not occur, rather than they will. The overarching objective is to maintain sites and their interest features in an ecologically robust and viable state, able to sustain and thrive into the long term, with adequate resilience against natural influences. Where sites are not achieving their potential, the focus should be on restoration.

1.13 The UK is also a contracting party to the Ramsar Convention, which is a global convention to protect wetlands of international importance, especially those wetlands utilised as waterfowl habitat. In order to ensure compliance with the requirements of the Convention, the UK Government expects all competent authorities to treat listed Ramsar sites as if they are part of the suite of designated European sites, as a matter of government policy, as set out in paragraph 176 of the National Planning Policy Framework (NPPF). Most Ramsar sites are also a SPA or SAC, but, importantly, the Ramsar features and boundary lines may vary from those for which the site is designated as a SPA or SAC.

1.14 The NPPF requires decision makers to apply the same protection and process to Ramsar sites as that set out in legislation for European sites. Formally proposed sites, i.e. sites proposed for European designation (potential SPAs, candidate SACs and Sites of Community Importance) and going through the designation process, and those providing formal compensation for losses to European sites, are also given the same protection.

1.15 This report refers to all the above sites as 'European sites' for assessment purposes, as the legislation is applied to all such sites, either directly or as a result of policy.

### *Process*

1.16 The step by step process of HRA is summarised in Figure 1.

1.17 Within the Habitats Regulations, local planning authorities, as public bodies, are given specific duties as 'competent authorities' with regard to the protection of sites designated or classified for their species and habitats of European importance. Competent authorities are any public body or individual holding public office with a statutory remit and function, and the requirements of the legislation apply where the competent authority is undertaking or implementing a plan or project, or authorising others to do so. Regulation 63 of the Habitats Regulations sets out the HRA process for plans and projects, which includes development proposals for which planning permission is sought. Additionally, Regulation 105 specifically sets out the process for assessing emerging land use plans.

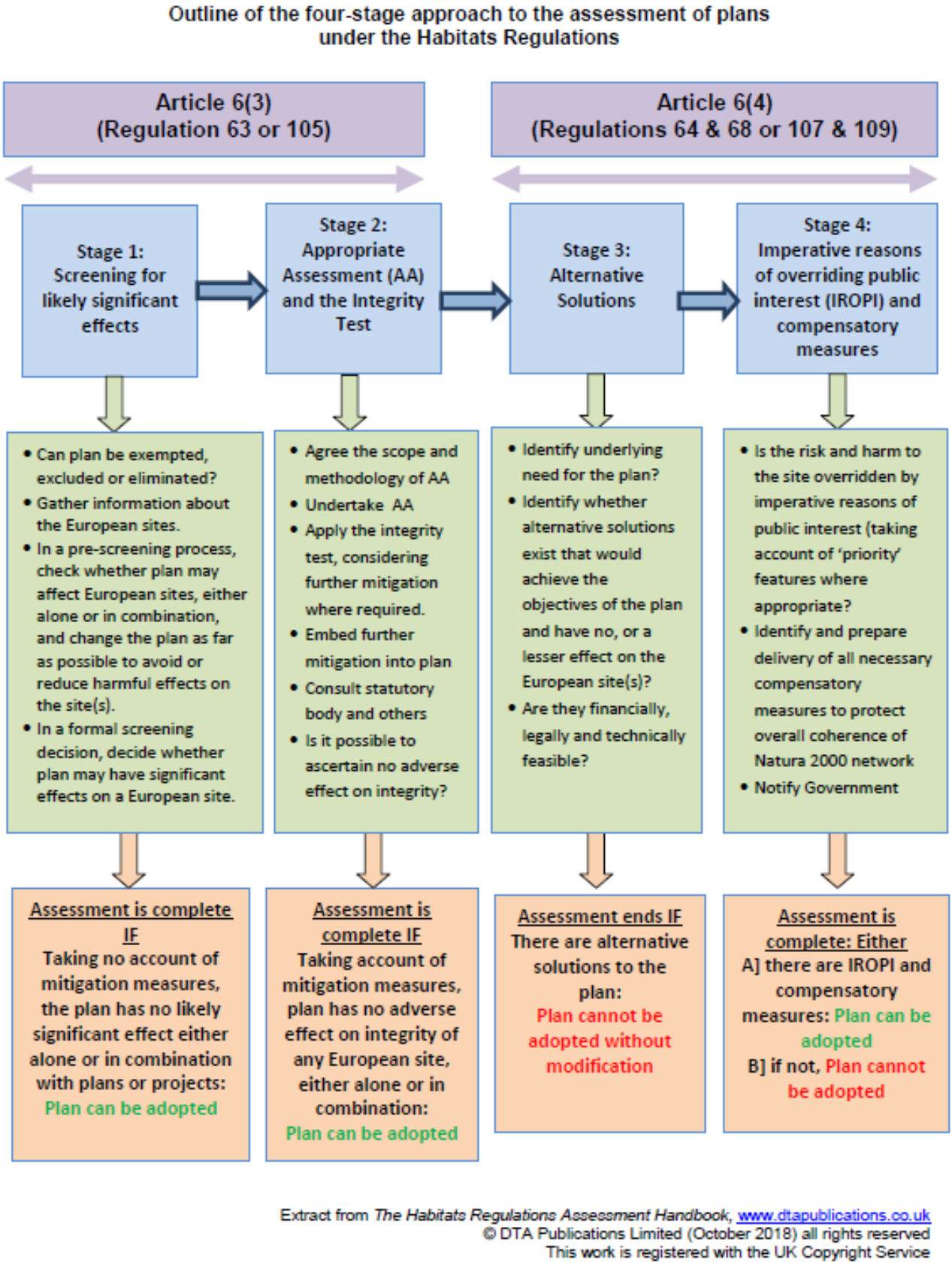


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**Figure 1: Outline of the assessment of plans under the Habitat Regulations**

1.18 Throughout all stages, there is a continual consideration of the options available to avoid and mitigate any identified potential impacts. A competent authority may consider that there is a need to undertake further levels of evidence gathering and assessment in order to have certainty, and this is the Appropriate Assessment stage. At this point the competent authority may identify the need to add to or modify the project in order to adequately protect the European site, and these mitigation measures may be added through the imposition of particular restrictions and conditions.

1.19 For plans, the stages of HRA are often quite fluid, with the plan normally being prepared by the competent authority itself. This gives the competent authority the opportunity to repeatedly explore options to prevent impacts, refine the plan and rescreen it to demonstrate that all potential risks to European sites have been successfully dealt with.

1.20 When preparing a plan, a competent authority may therefore go through a continued assessment as the plan develops, enabling the assessment to inform the development of the plan. For example, a competent authority may choose to pursue an amended or different option where impacts can be avoided, rather than continue to assess an option that has the potential to significantly affect European site interest features.

1.21 After completing an assessment, a competent authority should only approve a project or give effect to a plan where it can be ascertained that there will not be an adverse effect on the integrity of the European site(s) in question. In order to reach this conclusion, the competent authority may have made changes to the plan, or modified the project with restrictions or conditions, in light of their Appropriate Assessment findings.

1.22 Where adverse effects cannot be ruled out, there are further exceptional tests set out in Regulation 64 for plans and projects and in Regulation 107 specifically for land use plans. Exceptionally, a plan or project could be taken forward for imperative reasons of overriding public interest where adverse effects cannot be ruled out and there are no alternative solutions. It should be noted that meeting these tests is a rare occurrence and ordinarily, competent authorities seek to ensure that a plan or project is fully mitigated for, or it does not proceed.

1.23 In such circumstances where a competent authority considers that a plan or project should proceed under Regulations 64 or 107, they must notify the relevant Secretary of State. Normally, planning decisions and competent authority duties are then transferred, becoming the responsibility of the

Secretary of State, unless on considering the information, the planning authority is directed by the Secretary of State to make their own decision on the plan or project at the local level. The decision maker, whether the Secretary of State or the planning authority, should give full consideration to any proposed 'overriding reasons' for which a plan or project should proceed despite being unable to rule out adverse effects on European site interest features, and ensure that those reasons are in the public interest and are such that they override the potential harm. The decision maker will also need to secure any necessary compensatory measures, to ensure the continued overall coherence of the European site network if such a plan or project is allowed to proceed.

### *Definitions, references to case law and guidance*

1.24 The principles of case-law, government policy and best practice in HRAs are set out in the HRA Handbook (Tyldesley, Chapman, & Machin, 2020), to which Footprint Ecology subscribes. We also follow government guidance on the use of Habitats Regulations Assessment[2].

1.25 Drawing on the Handbook, other relevant guidance and case law, we clarify the following terms used in the flow chart (Figure 1):

1.26 In Stage 1, A '**likely significant effect'** following Waddenzee[3], is a 'possible significant effect; one whose occurrence cannot be excluded on the basis of objective information'. It is a low threshold and simply means that there is a risk or doubt regarding such an effect. The screening stage is a preliminary examination, sometimes described as a coarse filter, or following Waddenzee, '*a trigger in order to determine whether an appropriate assessment must be undertaken'*. There should however be credible evidence to show that there is a real rather than a hypothetical risk of effects that could undermine a site's conservation objectives. This was amplified in the Bagmoor Wind[4] case where '*if the absence of risk… can only be demonstrated after a detailed investigation, or expert opinion,* [then] *the authority must move from preliminary examination to appropriate assessment'*.

[2] https://www.gov.uk/guidance/appropriate-assessment
[3] Waddenzee: European Courts C-127/02 Waddenzee 7th September 2004, reference for a preliminary ruling from the Raad van State.
[4] Bagmoor Wind: UK courts Bagmoor Wind v The Scottish Ministers, Court of Session [2012] CSIH 93

1.27 Following the People Over Wind judgement[5], when making screening decisions for the purposes of deciding whether an appropriate assessment is required, competent authorities cannot take into account any mitigation measures. The implications are considered in more detail in the initial screening section of this report.

1.28 Stage 2 involves the **appropriate assessment and integrity test**. Here a plan can only be adopted if the competent authority can demonstrate that it will not adversely affect the integrity of the European site. This is precautionary approach and means it is necessary to show the absence of harm.

1.29 Following Champion[6] '**appropriate'** is not a technical term but simply indicates that the assessment needs to be appropriate to the task in hand.

1.30 The **integrity** of a European site has been described as '*coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was classified*[7]*'.* An alternative definition, after Sweetman[8], is '*the lasting preservation of the constitutive characteristics of the site'*.

1.31 In terms of the burden of proof, the HRA of development plans was first made a requirement in the UK following a ruling by the European Court of Justice in EC v UK[9]. However, the judgement[10] recognised that any assessment had to reflect the actual stage in the strategic planning process and the level of evidence that might or might not be available. This was given expression in the High Court (Feeney)[11] which stated: "*Each … assessment … cannot do more than the level of detail of the strategy at that stage permits*".

1.32 The need to consider possible **in-combination** effects arises at stage 1 – the screening and also at stage 2 – the appropriate assessment and integrity test. The effects of the plan in-combination with other plans or projects are

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[5] People Over Wind: European Count Case C-323/17 People Over Wind & Peter Sweetman v Coillte Teoranta 12 April 2018
[6] Champion: UK Supreme Court [2015] UKSC 52 22nd July 2015
[7] Para 20 of the ODPM Circ. 06/2005
[8] Sweetman: European Court C – 258/11 Sweetman 11th April 2013, reference for a preliminary ruling from the Supreme Court of Ireland
[9] Commission v UK (C-6/04) [2005] ECR 1-9017
[10] Commission of the European Communities v UK Opinion of Advocate General Kokott
[11] Feeney: Feeny v Oxford City Council [2011] EWHC 2699 (Admin) . 24th October 2011

the cumulative effects which will or might arise from the addition of the effects of other relevant plans or projects alongside the plan under consideration. If during the stage 1 screening it is found the subject plan would have no likely effect alone, but might have such an effect in-combination then the appropriate assessment at stage 2 will proceed to consider cumulative effects. Where a plan is screened as having a likely significant effect alone, the appropriate assessment should initially concentrate on its effects alone.

# 2. European sites and background evidence

2.1 In assessing the implications of any plan or project, it is essential to fully understand the sites in question, their interest features, current condition, sensitivities and any other on-going matters that are influencing each of the sites. Every European site has a set of 'qualifying features,' which are the ecological features for which the site is designated or classified, and the features for which Member States should ensure the site is maintained or, where necessary restored.

2.2 Each European site has a set of high-level 'conservation objectives' that set out the objectives for the site interest, i.e. what the site should be achieving in terms of restoring or maintaining the special ecological interest of European importance. These objectives are elaborated via 'supplementary advice'. Details of the high level conservation objectives are set out in Appendix 1 and Appendix 2 has links to the relevant Natural England page with conservation objectives for the different European sites.

2.3 The site conservation objectives and supplementary advice are relevant to any HRA because they identify what should be achieved for the site, and HRA may therefore consider whether any plan or project may compromise the achievement of those objectives.

## Overview of European sites

2.4 In undertaking HRA work it is necessary to gather information on the European sites that could be potentially affected by the plan or project. Footprint Ecology takes a precautionary approach to checking the potential for European sites to be significantly affected by the content of a Local Plan, normally initially checking up to 20km buffer from the edge of the plan area. This buffer is used by Footprint Ecology for local plan HRAs as it is deemed precautionary enough to capture most potential impact pathways (i.e. the means by which a European site may be affected). This is not fixed and can be expanded if the outcome of the HRA identifies impacts further away.

2.5 The European sites within 20km of the GESP area are listed in Table 1. They are also shown in Map 2 (SACs) and Map 3 (SPAs). There is no map for the Ramsar sites as in this case the two Ramsar sites share the same border as the relevant SPA. The boundary of the East Devon Heaths SPA and the East Devon Pebblebed Heaths SAC is the same – in later parts of this document we use the precise name when referring to a particular designation, or

simply refer to the "East Devon Pebblebed Heaths SAC/SPA" when referring to both designations together.

2.6 It should be noted that these European sites encompass a wide range of habitats and vary markedly in size. Some, such as the Culm Grasslands SAC and South Hams SAC are comprised of multiple, fragmented blocks, in some cases involving separate Sites of Special Scientific Interest (SSSIs).

2.7 Appendix 2 describes and provides summary information for each European site, including a list of the qualifying features. The appendix provides links to the relevant site conservation objectives on the Natural England website.

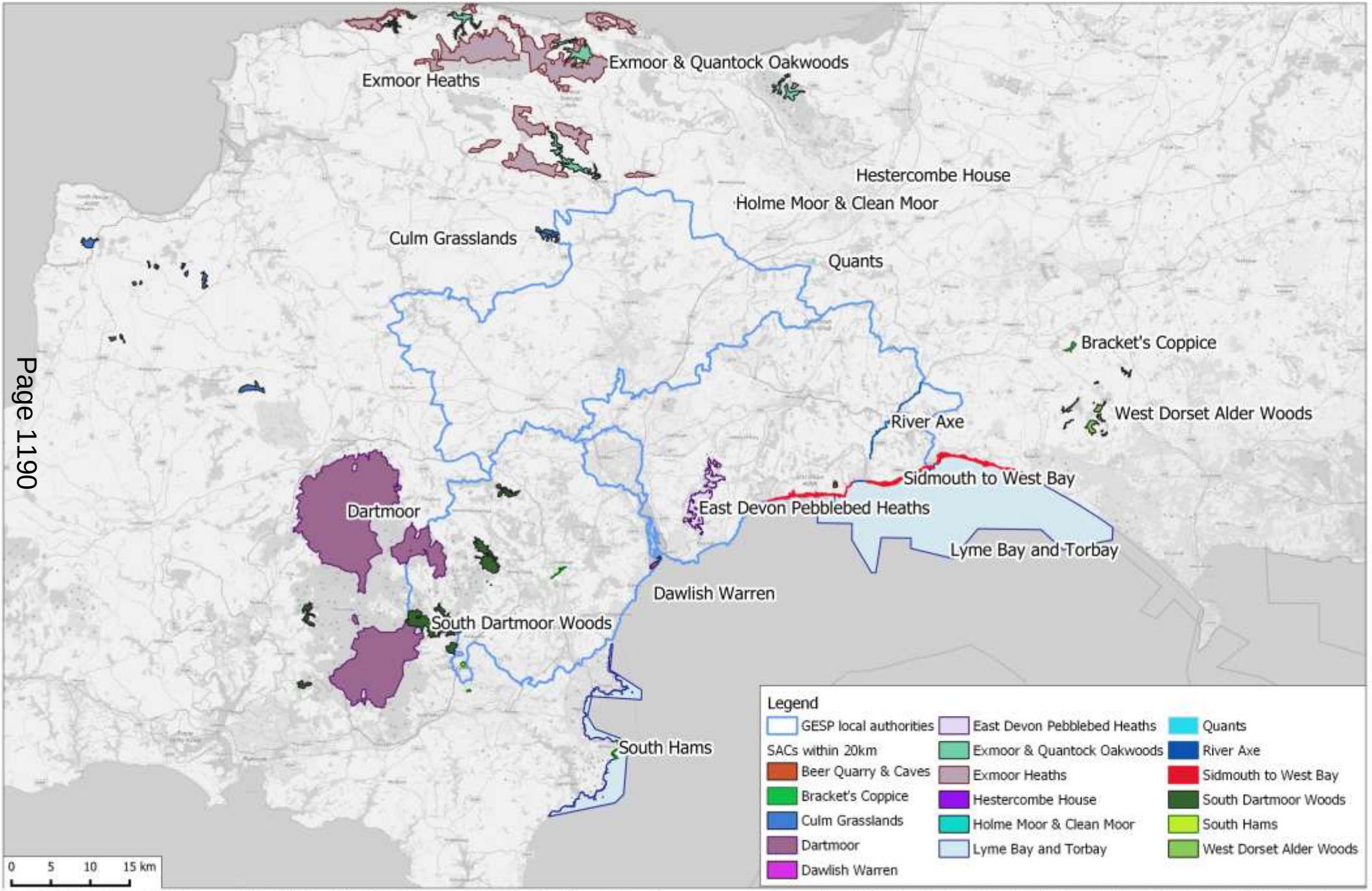
2.8 The Habitats Directive requires competent authorities to 'maintain and restore' European sites. Where sites are meeting their conservation objectives, the requirement is to maintain this position and not allow deterioration. Where a site requires restoration, competent authorities should work to bring site interest features back to a status that enables conservation objectives to be met.

2.9 In addition to conservation objectives, Natural England produces Site Improvement Plans (SIPs) for each European site in England as part of a wider programme of work under the 'Improvement Programme for England's Natura 2000 sites.' Each plan includes a set of actions for alleviating issues that are impeding the delivery of conservation objectives, with lead delivery bodies identified and indicative timescales. The SIPs can provide an additional useful reference for HRA work, identifying where there are site sensitivities. These have been reviewed to inform the appropriate assessment within this HRA report. Appendix 3 provides further context for each site, with details of the site pressures and threats listed for each site in the site improvement plans.

**Table 1: European sites within 20km of GESP area**

| SAC | SPA | Ramsar |
|---|---|---|
| Beer Quarry & Caves | East Devon Heaths | Exe Estuary |
| Bracket's Coppice | Exe Estuary | Somerset Levels & Moors |
| Culm Grasslands | Somerset Levels & Moors | |
| Dartmoor | | |
| Dawlish Warren | | |
| East Devon Pebblebed Heaths | | |
| Exmoor & Quantock Oakwoods | | |
| Exmoor Heaths | | |
| Hestercombe House | | |
| Holme Moor & Clean Moor | | |
| Lyme Bay & Torbay | | |
| Quants | | |
| River Axe | | |
| Sidmouth To West Bay | | |
| South Dartmoor Woods | | |
| South Hams | | |
| West Dorset Alder Woods | | |

**Map 2: SACs within 20km of GESP plan area**

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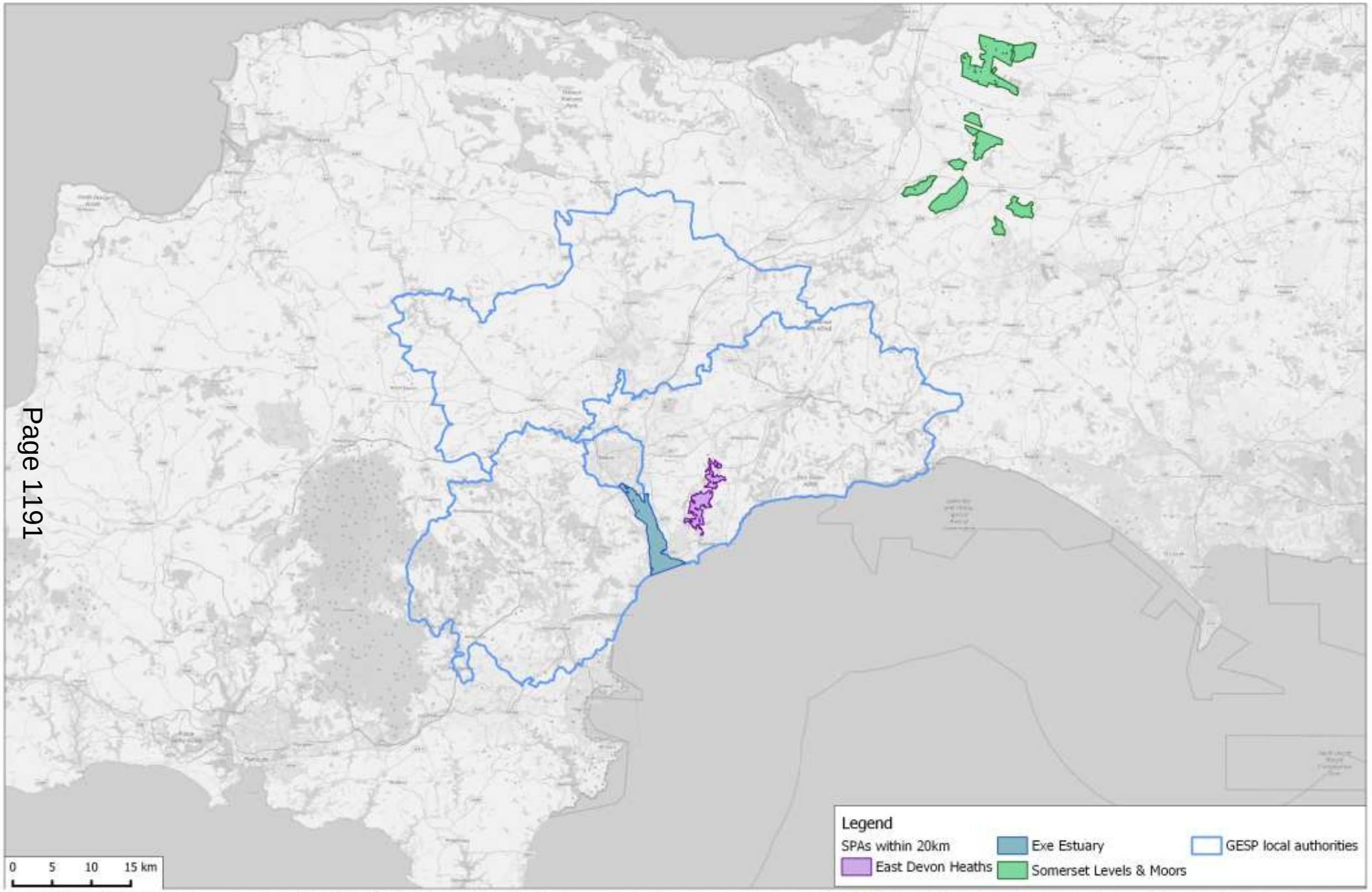
**Map 3: SPAs within 20km of GESP plan area**

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## The relevance of HRA within biodiversity aspects of national policy

2.10 The NPPF 2019 states that sustainable development is the achievement of social, economic and environmental aspirations, and these three dimensions of sustainable development are mutually dependant. For the natural environment, the NPPF advises that sustainable development should include protecting, enhancing and improving biodiversity, and moving from a net loss of biodiversity to achieving net gains. The Defra 25-year plan[12] sets out an ambitious programme for improving the natural environment, including the achievement of environmental net gains through development, of which biodiversity is an important part.

2.11 The Defra strategy follows on from the review of England's wildlife sites and ecological network, set out in the report to Defra (Lawton et al., 2010), entitled 'Making Space for Nature'. Within this report, Lawton *et al.* identified that to make our ecological networks and wildlife sites capable of future resilience, there was a need for more wildlife sites, and that existing networks need to be bigger, better and more connected. The future health of designated sites is very much dependant on the future health of wider biodiversity and the ecological networks that sustain them. In planning for the long-term sustainability of designated sites, it is therefore necessary to protect and enhance wider biodiversity through the planning system as well as the designated sites.

2.12 The NPPF 2019 sets a requirement for biodiversity net gain as part of development, and the forthcoming Environment Bill proposes to make this requirement mandatory. Draft policy GESP34 (Rebuilding Biodiversity) requires a 10% net gain for biodiversity in the Greater Exeter area, with use of Natural England's biodiversity metric to calculate net gain. It is within this wider context of a need to ensure that biodiversity is central to spatial planning, that HRA fits, securing protection and enhancement of the most important wildlife assets at an international scale.

2.13 As this HRA progresses, the importance of protecting, enhancing and restoring biodiversity as a whole, both within and outside designated wildlife

[12] https://www.gov.uk/government/publications/25-year-environment-plan

sites will be recognised within the appropriate assessment section, particularly in relation to biodiversity gains through planning.

2.14 When embarking on new HRA work, it is important to take stock and consider how well the measures recommended or put in place to protect European site interest in previous plan iterations have progressed, and what evidence there is available to support the continuation of such measures, or to indicate that they may need modification. Future iterations of this HRA will therefore check the measures that were recommended by the previous HRA and what progress has been made, if any, since those recommendations. In order to protect European sites, any changes in circumstances, evidence, statutory advice or local understanding of the issues needs to be considered. A summary of previous and other relevant HRA work is also provided in this section below.

## Previous HRA work and existing strategic mitigation

2.15 The following documents, guidance and mitigation strategies are of relevance to this HRA due to their consideration of the natural environment and resources, which includes the historic HRA work for the Local Authorities involved with GESP.

### *Existing Plan-level HRAs*

2.16 The Teignbridge Local Plan 2013-2033 was adopted in 2014. The HRA (Oxford, Liley, & Jenkins, 2013) included detailed assessment of four key impacts: urbanisation, recreational pressure, water resources and water quality, and air quality.

2.17 Urbanisation issues were primarily in relation to Greater Horseshoe Bats and South Hams SAC, arising from the proposed new development in the plan. Mitigation recommendations included a series of policy restrictions and caveats applied to specific policies. It was also recommended that the Council prepare a joint Greater Horseshoe Bat Mitigation Strategy with partner authorities across South Devon to achieve a coordinated approach and identify measures required at the landscape scale to ensure adequate connectivity across the landscape and to mitigate in-combination effects.

2.18 Air quality recommendations were precautionary, mainly relating to putting in place more comprehensive monitoring. It should be noted that the HRA

preceded the Wealden decision[13], which now highlights the need for more thorough scrutiny. Water quality and water resources recommendations were informed by the information provided in a Water Cycle Study which set out that consent of any large-scale future development would be dependent upon obtaining written confirmation from South West Water that both water supply and water treatment can be accommodated within existing infrastructure provision.

2.19 Recreation issues were identified in particular for the Exe Estuary SPA/Ramsar and for Dawlish Warren SAC. The HRA was able to rule out adverse effects on integrity due to the anticipated implementation of the South-east Devon European Site Mitigation Strategy.

2.20 The East Devon Local Plan 2013-2031 was adopted in 2016. As with the Teignbridge HRA, detailed assessment work considered urbanisation, recreational pressure, water resources, water quality and air quality. Specific recommendations were made with regard to urbanisation, highlighting concerns with development close or adjacent to the East Devon Pebblebed Heaths SAC/SPA, the Exe Estuary SPA/Ramsar and the Beer Quarry and Caves SAC. As with Teignbridge, air quality recommendations related to the need to put in place more comprehensive monitoring, to inform future HRA work. Water quality and water resources recommendations identified that further information and assurance should be obtained from the Environment Agency, and that East Devon District Council and Natural England should be closely involved in any consideration of new consents or licences to accommodate growth.

2.21 With respect to recreational pressure (East Devon Pebblebed Heaths SAC/SPA and the Exe Estuary SPA/Ramsar) it was recognised that implementation of the (then close to being finalised) mitigation and delivery strategy would ensure adequate mitigation to rule out adverse effects on integrity.

2.22 The Exeter City Core Strategy was adopted in 2012. HRA work (WSP Environmental, 2010) identified a number of potential significant negative effects mainly associated with population increase, recreation and potential development near to the Exe Estuary SPA/Ramsar, Dawlish Warren SAC and

[13] Wealden District Council v Secretary of State for Communities and Local Government, Lewes District Council and the South Downs National Park Authority and Natural England (Interested Party) [2017] EWHC 351. 20th March 2017.

the East Devon Pebblebed Heaths SAC/SPA. A number of recommendations were made in relation to avoidance and mitigation.

2.23 Mid Devon's Local Plan Review 2013-2033 was submitted to the Planning Inspectorate in 2017 and examination hearings took place in 2018 and 2019. Following the examination, a number of main modifications were prepared and were subject to consultation in early 2020. HRA work (Nicholls, Gwillym, MacLellan, & Moroney, 2015; Sydney, 2016b) identified a number of the policies that may result in likely significant effects on European sites, in relation to potential offsite damage/disturbance to habitats and nonphysical disturbance, increased air pollution and increased recreation pressure. A further HRA report (Sydney, 2016a) specifically considered an update to the Plan to include a proposed allocation (for leisure, tourism and retail) at Junction 27 of the M5 and air quality impacts for the Culm Grasslands SAC. It concluded that the allocation (in-combination with other proposals in the Local Plan Review) would increase NOx levels immediately adjacent to the A361 over the plan period; however, the effects would be very localised within the SAC. The J27 site allocation would cause a negligible increase in nutrient nitrogen and acid nitrogen deposition, although critical loads for these were already being exceeded and would continue to be so in 2022, despite expected decreases in background concentrations. Mitigation measures were discussed. A 2019 HRA report looked at the implication of the Inspector's Main Modifications, but again no change to the 2015 and 2016 HRA findings were identified (see Nicholls, 2019).

2.24 While outside the GESP plan area, HRA work for Dartmoor National Park is relevant to this HRA. The final draft Dartmoor Local Plan Review went out for consultation in 2019. The HRA work (Carroll & Jeffreys, 2019) concluded at the screening stage that adverse effects on the integrity of European sites outside of the National Park were not expected in relation to air quality changes, disturbance, changes to water quality or levels, or habitat loss/fragmentation. However, there was uncertainty with regards to the potential for likely significant effects associated with air quality, disturbance and habitat loss or fragmentation on the three SACs located within the National Park boundary (Dartmoor, South Dartmoor Woods, and South Hams SACs). These issues were considered in more detail through an Appropriate Assessment and adverse effects on integrity were ruled out in relation to air quality and habitat loss or fragmentation. In relation to recreation, while adverse effects on the integrity of European sites were ruled out in relation to effects arising from the Dartmoor National Park Local Plan Review alone, there was some uncertainty regarding the potential for

in-combination effects on the Dartmoor, South Dartmoor Woods, and South Hams SACs from increased recreation pressure resulting from the growth planned outside the National Park boundary.

### *South-east Devon European Site Mitigation Strategy*

2.25 A strategic approach to mitigation was established in 2014, developed with partnership working between East Devon, Exeter and Teignbridge local planning authorities, with input from a number of wider organisations involved in the protection and management of the three European sites. The South-east Devon European Site Mitigation Strategy (Liley, Hoskin, Lake, Underhill-Day, & Cruickshanks, 2014) set out a zone of influence (i.e. the evidence based zone within which it is deemed that mitigation measures are required) and series of mitigation measures that worked together to provide robust protection for the three European sites.

2.26 The strategic approach was designed in light of the 30,000 new dwellings anticipated within the zone of influence and planned to run over the lifetime of the relevant Local Plans, and then beyond as a continual rolling programme, but with interim reviews. Since 2014, the strategy has been progressed by the three local planning authorities and dedicated staff are in place to facilitate implementation. There has been some very positive progression of measures, including education and awareness raising, on-site ranger presence, provision of suitable alternative natural greenspace ('SANGs', e.g. Dawlish Countryside Park) and the establishment of voluntary refuges within the Exe Estuary.

2.27 The strategy provides an established and accepted mitigation approach and is in-line with similar strategies in other parts of the UK, such as the Solent, the Thames Basin Heaths, the Dorset Heaths, the North Kent coast, the Suffolk Coast and Cannock Chase. To ensure close alignment with both the GESP and Local Plans an update of the South-east Devon European Site Mitigation Strategy is being produced. This will build on the existing mitigation approach, bringing it up to date in the context of the GESP and updated housing targets, which relate to both strategic housing targets for large scale sites that will be allocated in the GESP and local level housing needs that will be met through the individual Local Plans. The strategy will continue to be a partnership led strategy, ensuring that together the relevant local authorities will implement integrated measures that avoid and mitigate for potential impacts on the relevant European sites. It is anticipated that the strategy will be finalised alongside the submission version of GESP.

### *South Hams Bats*

2.28 Guidance aimed at those preparing and validating planning applications in the South Devon area which may impact on the South Hams SAC population of greater horseshoe bats was first produced in 2010 (Sclater, 2010) and updated in 2019 (Dartmoor National Park Authority, Devon County Council, Teignbridge District Council, South Hams District Council, Torbay Council and Natural England, 2019). The guidance provides advice on which applications may have a likely significant effect on the SAC greater horseshoe bat population.

2.29 The updated guidance contains maps of roost sites, sustenance zones and connectivity zones which form the consultation area. A flow chart to help identify whether likely significant effects might be triggered by particular developments and what any HRA would need to consider within each area.

## Initial review of sites and potential impact pathways

2.30 In the early stages of GESP plan making, a review of all European sites and issues was undertaken. This step was a sensitivity analysis and ensured HRA issues could be identified in advance and used to inform potential site options.

2.31 Working with the Devon County Ecologist, Natural England and planners, we reviewed all the European sites within 20km. We identified a list of potential impact pathways - ways in which elements of the plan might impact the European sites. These impact pathways, which informed GESP site option identification and policy drafting, are summarised in Table 2.

**Table 2: Impact Pathways**

| Pathway | Explanation |
|---|---|
| **Direct loss of interest feature** | Direct, physical loss of European site habitat.<br>Mortality of fauna from collision (e.g. traffic, wind turbines) |
| **Fragmentation/ Isolation** | Development around a European site which causes site to become more isolated in the landscape. |
| **Loss of supporting habitat (functionally linked land)** | Loss, deterioration or compromise of habitat outside a European site boundary that serves a supporting role for the European site, as reservoirs of mobile species migrating in and out of a European site or providing genetic exchange, as roosting, foraging or breeding sites for species present in SAC, or as stepping stones between European sites and equivalent habitat. |
| **Recreation impacts** | Effects on a European site caused by human use of site for recreational activities and their consequences, including walking, riding, sports, organised activities etc. Effects may include direct disturbance of species by people, dogs or vehicles, trampling, erosion, fire, vandalism, fly tipping. |
| **Air Quality** | Effects on a European site from altered local air quality. |
| **Water Quality** | Effects on a European site from altered local water quality. |
| **Water Availability** | Effects on a European site from interruption, reduction or other interference of local hydrology, including groundwater, surface standing water or watercourses. |
| **General urbanisation effects** | Effects on a European site from nearby development, including light, noise, domestic cats, spread of invasive species, etc. Either adding to existing levels in urban areas or creating new issues in non-urban areas, for example affecting the ability of light sensitive species to navigate the landscape or deterring use of existing habitat/feeding/roosting sites. |

2.32 For each European site we identified which pathways were relevant, where there were likely to be particular concerns and where further information might be required. The results of this initial work are set out in a separate report (Saunders & Hoskin, 2019).

2.33 Impact pathways for each European site are summarised by site in Table 3.

**Table 3: Potential impact pathways with a tick indicating where the pathway is relevant to the site. See Saunders & Hoskin 2019 for full details and explanation. Grey shading indicates those sites where there are no plausible impact pathways.**

| Site | General urbanisation effects | Direct loss of interest feature | Fragmentation/ Isolation | Loss of supporting habitat | Recreation impacts | Water Quality | Water Availability | Air Quality |
|---|---|---|---|---|---|---|---|---|
| Beer Quarry & Caves SAC | ✓ | ✓ | ✓ | ✓ | ✓ | | | |
| Bracket's Coppice SAC | | | | | | | | |
| Culm Grasslands SAC | | ✓ | ✓ | ✓ | ✓ | | ✓ | ✓ |
| Dartmoor SAC | ✓ | | | | ✓ | ✓ | ✓ | ✓ |
| East Devon Pebblebed Heaths SAC | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| East Devon Heaths SPA | ✓ | ✓ | ✓ | ✓ | ✓ | | | |
| Dawlish Warren SAC | ✓ | ✓ | ✓ | ✓ | ✓ | | | |
| Exe Estuary Ramsar | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | |
| Exe Estuary SPA | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | |
| Exmoor & Quantock Oakwoods SAC | ✓ | | | ✓ | ✓ | ✓ | | |
| Exmoor Heaths SAC | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| Hestercombe House SAC | | | | | | | | |
| Holme Moor & Clean Moor SAC | | | | | | | | |
| Lyme Bay & Torbay SAC | | | | | ✓ | ✓ | | |
| Quants SAC | | | ✓ | ✓ | | | | ✓ |
| River Axe SAC | ✓ | ✓ | | | | ✓ | | ✓ |
| Sidmouth to West Bay SAC | | | | | ✓ | ✓ | | |
| Somerset Levels & Moors Ramsar | | | | | | | | |
| Somerset Levels & Moors SPA | | | | | | | | |
| South Dartmoor Woods SAC | ✓ | | | | ✓ | | | ✓ |
| South Hams SAC | ✓ | ✓ | ✓ | ✓ | ✓ | | | ✓ |
| West Dorset Alder Woods SAC | | | | | | | | |

2.34 Based on the initial reviews it was possible to identify a number of sites (within 20km of the GESP area) that could be screened out at an early stage as there were no potential pathways by which a likely significant effect could be triggered. These sites, with an explanation, are given in Table 4 and were checked and agreed with Natural England and the County Ecologist.

**Table 4: Sites screened out as no potential pathways by which likely significant effect might be triggered**

| Site | Site information | Explanation |
|---|---|---|
| Bracket's Coppice SAC | Annex I Habitats<br>*Molinia* meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*)<br>Annex II Species<br>Bechstein's bat *(Myotis bechsteinii)* | This site can be screened out from impacts due to the distance of the site and the site interest. It does not have visitor infrastructure, is not well publicised and not well visited for recreation. |
| Hestercombe House SAC | Annex I Habitats<br>-<br>Annex II Species<br>Lesser horseshoe bat maternity roost *Rhinolophus hipposideros* | This site can be screened out from impacts due to the distance of the site and any associated habitat from the GESP area. |
| Holme Moor & Clean Moor SAC | Annex I Habitats<br>Calcareous fens with *Cladium mariscus* and species of the *Caricion davallianae*<br>*Molinia* meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*) | This site can be screened out from impacts due to the distance of the site, and any associated habitat, from the GESP area + as no rivers in the GESP area which feed into Holme Moor. |
| Somerset Levels and Moors SPA/ Ramsar | Article 4.1<br>Wintering Bewick's Swan and Golden Plover<br>Article 4.2<br>Wintering Shoveler, Teal, Wigeon + wetland assemblage of international importance. | This site can be screened out from impacts due to the distance of the site and any associated habitat from the GESP area. |
| West Dorset Alderwoods SAC | Annex I Habitats<br>Alluvial forest with *Alnus glutinosa* and *Fraxinus excelsior*, Molinia meadows on calcareous, peaty or clay-silt-laden soils (*Molinion caeruleae*), old acidophilous oak woods with *Quercus robur* on sandy plains<br>Annex II Species<br>Marsh fritillary butterfly (*Euphydryas aurinia*) and great crested newt (*Triturus cristatus*) | Potential impact on associated Marsh Fritillary habitat. However, there is no Marsh Fritillary habitat within 10km of the SAC and within the GESP area.<br>Potential loss of species and associated impact on Marsh Fritillaries due to nitrous oxide emissions from traffic. This can be screened out due to the distance of the site from the GESP area.<br>Impacts on Great Crested Newts can be screened out due to the distance of the site from Devon. |

# 3. Initial Screening for Likely Significant Effects

3.1 HRA follows a stepwise process. GESP provides the sites necessary to deliver sustainable development in Greater Exeter, and whilst protection and enhancement of the natural environment is an integral part of sustainable development, the plan is not singularly focussed on European site management. Screening for likely significant effects will therefore be necessary.

3.2 The screening for likely significant effects is necessary on all policies within the plan. It is an initial check, made on a precautionary basis, to determine whether any part of the plan poses a risk to European sites in terms of its future implementation.

3.3 When an HRA is being undertaken on a plan or project that is initiated by the competent authority themselves, there is greater opportunity to identify potential issues arising from the plan or project in the initial stages of design or preparation. Where a competent authority is approving a project being proposed by another party, the application for permission is usually made when the proposal has already been designed and all details finalised, thus the opportunity to identify issues early on is more limited unless an applicant chooses to hold early discussions with the competent authority.

3.4 For the GESP, the local authority is both the plan proposer and the competent authority, thus allowing the HRA to influence the plan in its earlier stages, at later refining stages and up to submission for Examination. Screening at this stage in the plan making is therefore preliminary.

## What constitutes a likely significant effect?

3.5 At the screening stage of HRA, there is the opportunity to identify changes to the plan that could be made to avoid risks to European sites, and this is particularly relevant at this stage in the plan making as issues can be identified up front and resolved with later iterations of the plan. It should also be noted that the preliminary work identifying impact pathways and issues has already been running parallel to the plan making and has informed the choice of location and options included in the plan at this stage.

3.6 Where the screening identifies risks that cannot be avoided with simple clarifications, corrections or instructions for project level HRA, a more detailed assessment is undertaken to gather more information about the

likely significant effects and give the necessary scrutiny to potential mitigation measures. This is the appropriate assessment stage of HRA.

3.7 A likely significant effect could be concluded on the basis of clear evidence of risk to European site interest, or there could be a scientific and plausible justification for concluding that a risk is present, even in the absence of direct evidence. The latter is a precautionary approach, which is one of the foundations of the high-level of protection pursued by EU policy on the environment, in accordance with the EU Treaty[14]. The precautionary principle should be applied at all stages in the HRA process and follows the principles established in case law relating to the use of such a principle in applying the European Directives and domestic Habitats Regulations. In particular, the European Court in the 'Waddenzee' case[15] refers to "*no reasonable scientific doubt*" and in the 'Sweetman' case[16] the Advocate General identified that a positive conclusion on screening for likely significant effects relates to where there "*is a possibility of there being a significant effect*".

3.8 The screening in this report looks at policies and options prior to any avoidance, reduction/mitigation measures in line with People Over Wind[17]. Mitigation potential can only be considered at Appropriate Assessment stage. People Over Wind clarified the need to carefully explain actions taken at each HRA stage, particularly at the screening for likely significant effects stage. The Judgment highlights the need for clear distinction between the stages of HRA, and good practice in recognising the function of each. The screening for likely significant effects stage should function as a screening or checking stage (regardless of avoidance, reduction/mitigation measures), to determine whether further assessment is required. Assessing the nature and extent of potential impacts on European site interest features, and the robustness of mitigation options, should be done at the appropriate assessment stage.

## Initial screening conclusions

3.9 Table 5 (below) provides a record of screening of the entire plan at Draft Policies and Site Options stage. The initial screening was undertaken prior to

[14] Article 191 of the Treaty on the Functioning of the EU. Previously Article 174 of the Treaty of the EC.
[15] Waddenzee: European Court of Justice case C - 127/02
[16] Sweetman: European Court of Justice case C - 258/11
[17] People Over Wind: European Count Case C-323/17 People Over Wind & Peter Sweetman v Coillte Teoranta 12 April 2018

the finalisation of the document for public consultation. A re-screen of the plan at later stages will also be made, and this will make a record of any amendments to the plan made by the Council in response to this report and discussions between Footprint Ecology and the Planning Officers. The pre-submission version of the HRA is the point at which the appropriate assessment of all risks identified as requiring further assessment in the screening table will be prepared. The HRA will then potentially require further updates, either to inform the Examination in Public and/or on any proposed modifications which arise during the Examination of the plan, prior to adoption. This ensures that the final adopted plan has an up to date HRA report.

3.10 Table 5 records the conclusions drawn and recommendations made with a check of each draft policy and site option for likely significant effects at this early stage in the plan making. Potential risks are highlighted. In order to effectively screen the site options, within the GIS the distance from each site option to all relevant European sites was calculated. These data are included in Appendix 4.

3.11 The initial screening table identified all impact pathways as requiring further detailed consideration at the appropriate assessment stage. Likely significant effects are triggered by a range of individual draft policies and site options, and there are also risks from the overall quantum of development and air pollution, or the overall quantum of development and water availability. Policies for which likely significant effects cannot be ruled out at this stage include virtually all the site options and the following draft policies:

- GESP9: Economic Targets
- GESP10: Transformational Sectors
- GESP11: Employment Land
- GESP16: Housing Target and Distribution
- GESP14: Exeter Airport
- GESP21: Accommodation for the Gypsy and Traveller Communities
- GESP25: Long Distance Trails
- GESP29: Highway Links and Junction Improvements
- GESP31: Settlement Specific Enhancements.

3.12 The screening table (Table 5) for likely significant effects also includes a number of recommendations and minor changes relating to the wording of draft policies or supporting text, in some cases highlighting where there are opportunities to strengthen the content in relation to the HRA or where maps or diagrams that have not yet been incorporated into the plan should

highlight particular information. These minor points and checks relate to the following draft policies and changes were made to the Draft Policies and Site Options prior to consultation:

- GESP1: Sustainable Development;
- GESP4: Low Carbon Energy;
- GESP5: Heat Networks;
- GESP6: Suitable Areas for Solar PV Development;
- GESP7: Suitable Areas for Onshore Wind Development;
- GESP13: Strategic Economic Assets;
- GESP21: Accommodation for the Gypsy and Traveller Communities;
- GESP34: Rebuilding Biodiversity;
- GESP36: Exe Estuary, Dawlish Warren and East Devon Pebblebed Heaths;
- GESP37: Clyst Regional Park;
- GESP38: Great Places;
- GESP39: Garden City Principles.

**Table 5: Preliminary screening for likely significant effects – at Draft Polices and Site Options Consultation. Note that minor comments or recommendations were fed to the GESP team prior to the consultation and incorporated into the consultation draft.**

| Consultation Document Section | Initial Likely significant effect (LSE) screening | Minor comments or recommendations for text changes at Draft Policy & Site Options | Appropriate Assessment considerations |
|---|---|---|---|
| **Chapter 1: Role of the Greater Exeter Strategic Plan** | Text is for information and clarity, explaining the geographic area, how GESP fits with other plans, the timetable etc. | | |
| **Chapter 2: Consultation Process** | Text is for information and clarity on the consultation process. | | |
| **Chapter 3: List of Policies** | Text is for information and clarity on the consultation process. | | |
| **Chapter 4: Draft Vision** | No LSE – Vision very strategic, contains greater places for nature – rebuilding biodiversity. | | |
| GESP1: Sustainable Development | No LSE – no quantum of development or location set and very general. | Point C does state that sustainable development will "contribute to protecting and enhancing our natural…. environment" [own emphasis]. Wording is perhaps ambiguous given protection afforded to European sites and the need for public bodies to prevent deterioration of European sites. | |
| **Chapter 5: Climate Emergency** | Chapter overview sets out background to climate emergency status and GESP | | |

| Consultation Document Section | Initial Likely significant effect (LSE) screening | Minor comments or recommendations for text changes at Draft Policy & Site Options | Appropriate Assessment considerations |
|---|---|---|---|
| | role in transition to a net-zero carbon future. | | |
| GESP2: Climate Emergency | No LSE – policy sets target to achieve net zero carbon emissions by 2040. Environmentally positive policy, ultimately likely to benefit European sites. | | |
| GESP3: Net Zero Carbon Development | No LSE – policy requires carbon statement from development, statement will demonstrate proposals deliver net-zero carbon emissions. Environmentally positive policy, ultimately likely to benefit European sites. | | |
| GESP4: Low Carbon Energy | No LSE – policy provides in principle support for low carbon and renewable energy schemes. | Wording slightly ambiguous with respect to impacts on natural environment and should be tightened. Policy wording states that "Proposals should avoid, or where reasonable, minimise … impacts upon…the natural… environment". As written implies proposals that have some impact could proceed. | |
| GESP5: Heat Networks | No LSE – policy provides in principle support for heat networks. | Opportunities to be taken "where viable and feasible". Policy wording could clarify that project level HRA may | |

| Consultation Document Section | Initial Likely significant effect (LSE) screening | Minor comments or recommendations for text changes at Draft Policy & Site Options | Appropriate Assessment considerations |
|---|---|---|---|
| | | be required for opportunities to be feasible. | |
| GESP6: Suitable Areas for Solar PV Development | No LSE – policy provides support in principle for suitable areas for solar PV development. | Policies map should exclude any areas functionally linked to European sites (e.g. wader roost sites or foraging areas around the Exe Estuary) and be checked at next iteration. | |
| GESP7: Suitable Areas for Onshore Wind Development | No LSE – policy sets criteria for where onshore wind development will be supported. | Policies map should exclude any areas functionally linked to European sites (e.g. Greater Horseshoe Bat sustenance areas or landscape connectivity zones). Given the particular nature conservation risks, policy could in addition be tightened by adding qualification that project-level HRA should be able to conclude no likely significant effect. | |
| GESP8: Energy Storage | No LSE. Policy sets out in principle support for energy storage and contains specific wording relating to European sites. | | |
| **Chapter 6: Prosperity** | Chapter overview sets out targets for major growth: 35,000 extra jobs, doubling of the economy, 150ha of employment land, develop and enhancement of airport. | | |
| GESP9: Economic Targets | LSE. Policy proposes to double the size of the | | Policy sets umbrella targets that are linked to employment development, increased traffic and |

| Consultation Document Section | Initial Likely significant effect (LSE) screening | Minor comments or recommendations for text changes at Draft Policy & Site Options | Appropriate Assessment considerations |
|---|---|---|---|
| | economy, increase earnings and increase the number of jobs by 35,000. | | increased local population. Proposal for a magnitude of change that alone would be likely to have a significant effect on European sites. Issues are considered in the appropriate assessment topics through the consideration of individual site options (which see for relevant sites and impact pathways). |
| GESP10: Transformational Sectors | LSE. Policy allocates about 70ha of employment land (see also GESP11) and promotes employment in particular sectors. | | Proposal for a magnitude of change that alone would be likely to have a significant effect on European sites. Issues are considered in the appropriate assessment topics through the consideration of individual site options (which see for relevant sites and impact pathways). |
| GESP11: Employment Land | LSE. Sets target to develop about 150ha of land for B1, B2 and B8 uses. | | Proposal for a magnitude of change that alone would be likely to have a significant effect on European sites. Issues are considered in the appropriate assessment topics through the consideration of individual site options (which see for relevant sites and impact pathways). |
| GESP12: Economic Delivery | No LSE. Proposes that the Greater Exeter councils will act corporately and in partnership to establish the locational and physical requirements of new businesses and guide them accordingly. Policy is very general and encourages development. No quantum or specific locations defined however. | | |

| Consultation Document Section | Initial Likely significant effect (LSE) screening | Minor comments or recommendations for text changes at Draft Policy & Site Options | Appropriate Assessment considerations |
|---|---|---|---|
| GESP13: Strategic Economic Assets | No LSE. Protects existing strategic economic assets (sites and employers) from loss or change and proposals for enhancement also supported. Enhancements are not specific. | Supporting text could make clear that any enhancements will only be supported where no adverse effects on integrity. | |
| GESP14: Exeter Airport | LSE. Policy supports the airport and new employment development in Airport Development Zone (ADZ). | | Yes. Policy alone triggers LSE for impacts on water quality (Exe Estuary SPA/Ramsar) and air quality. |
| GESP15: Inclusive Employment and Skills | No LSE. General policy promoting wider access to jobs. | | |
| Regional Sports Hub | Potentially LSE. Text explaining a regional sports hub concept and feasibility study has been undertaken and further consideration will be given potential as GESP progresses. | | No location at present, but potential risks (e.g. from lighting and bats) that may require assessment as the plan progresses and location confirmed. |
| **Chapter 7: Homes** | Chapter overview, setting target of 53,260 homes 2020-2040. | | |
| GESP16: Housing Target and Distribution | LSE. Sets target of 2,663 homes per annum (53,260 homes 2020-2040). | | Yes, large increase in housing. Overall quantum itself has potential for impacts from direct loss of interest features, fragmentation/isolation, loss of supporting habitats, recreation, air quality, water quality and water availability. Issues are considered in the appropriate assessment topics through the consideration of |

| Consultation Document Section | Initial Likely significant effect (LSE) screening | Minor comments or recommendations for text changes at Draft Policy & Site Options | Appropriate Assessment considerations |
|---|---|---|---|
| | | | individual site options (which see for relevant sites and impact pathways). |
| GESP17: Affordable Homes | No LSE. Sets targets for affordable housing and identifies allocations and percentages of build to rent properties. LSE triggered by the allocations themselves and totals in GESP16, rather than the percentage of different dwelling types. | | |
| GESP18: Build to Rent Homes | No LSE. Sets targets for build to rent and identifies allocations and percentages of build to rent properties. LSE triggered by the allocations themselves and totals in GESP16, rather than the percentage of different dwelling types. | | |
| GESP19: Custom and Self Build Homes | No LSE. Sets targets for and criteria for custom and self build. LSE triggered by the allocations themselves and totals in GESP16, rather than the percentage of different dwelling types. | | |
| GESP20: Accessible Homes | No LSE. Sets proportions for accessible homes. LSE triggered by the allocations | | |

| Consultation Document Section | Initial Likely significant effect (LSE) screening | Minor comments or recommendations for text changes at Draft Policy & Site Options | Appropriate Assessment considerations |
|---|---|---|---|
| | themselves and totals in GESP16, rather than the percentage of different dwelling types. | | |
| GESP21: Accommodation for the Gypsy and Traveller Communities | LSE. Provides for access and appropriate accommodation for gypsy and travelling communities. Policy sets requirement for 116 pitches and 3 transit sites. | Supporting text states that the locations of additional permanent pitches, transit sites and sites for travelling show people will be chosen on the basis that they have minimal impact on the environment. Wording should be tightened so that no ambiguity on impacts on European sites. | Identifies need for pitches and travelling sites outside allocations. While specific allocations not named, adds to the overall quantum of growth and increase in population. Implications for direct loss of interest features, fragmentation/isolation, loss of supporting habitats, recreation, air quality, general urbanisation, water quality and water availability. |
| **Chapter 8: Movement and Communication** | Chapter introduction provides overview of policies which include transport strategy and digital communication. | | |
| GESP22: Transport Strategy | No LSE - Strategic overview of strategy to create sustainable transport network. | | |
| GESP23: Sustainable Travel in New Developments | No LSE – policy sets need for active travel and sustainable travel options within development. | | |
| GESP24: Travel Planning | No LSE – sets out requirements for travel plans. | | |
| GESP25: Long Distance Trails | LSE – policy sets out network of strategic long distance cycle trails. All are well away | | LSE alone in terms of recreation to Exe Estuary SPA/Ramsar. |

| Consultation Document Section | Initial Likely significant effect (LSE) screening | Minor comments or recommendations for text changes at Draft Policy & Site Options | Appropriate Assessment considerations |
|---|---|---|---|
| | from European sites with the exception of the Clyst Valley Trail, which links directly to the Exe Estuary SPA/Ramsar. | | |
| GESP26: Rail and Bus Projects | No LSE – policy sets out transport infrastructure requirements. All are well away from European sites. | | |
| GESP27: Park and Ride Around Exeter | No LSE - Identifies need for 6 park and ride facilities. All are well away from European sites. | | |
| GESP28: Electric Vehicles | No LSE - Outlines requirements for provision of charging points, ducting etc. | | |
| GESP29: Highway Links and Junction Improvements | LSE Identifies a series of improvements and changes to highway links and junctions. | | All are outside European sites but the A382 works are within Greater Horseshoe Bat landscape connectivity zone and the Peamore A379 – A38 junction which just borders the Greater Horseshoe Bat landscape connectivity zone. LSE for policy alone with respect to South Hams SAC and loss of supporting habitat, fragmentation and collision risk. |
| GESP30: Movement in Exeter | No LSE – environmentally positive policy to reduce dominance of car-use in Exeter. | | |
| GESP31: Settlement Specific Enhancements | LSE. Transport improvements identified for selected settlements. Improvements include | | LSE for policy alone with respect to recreation on the Exe Estuary SPA/Ramsar, East Devon Pebblebed Heaths SPA/SAC and Dawlish Warren SAC. |

| Consultation Document Section | Initial Likely significant effect (LSE) screening | Minor comments or recommendations for text changes at Draft Policy & Site Options | Appropriate Assessment considerations |
|---|---|---|---|
| | comprehensive pedestrian and cycle networks and settlements include Exmouth. | | |
| GESP32: Gigabit Ready Developments | No LSE. Policy ensures that residents and businesses in new buildings have access to a choice of fixed and mobile internet services. | | |
| GESP33: Digital Spine | No LSE – Policy provides for digital fibre spine providing high speed fibre connectivity between set locations. Locations shown in transport diagram and will not require works on European sites. | | |
| **Chapter 9: Nature** | Chapter introduction setting out proposed environmental approach including overall gain in biodiversity. | | |
| GESP34: Rebuilding Biodiversity | No LSE. Positive policy setting out net gain in biodiversity. Policy is not intended to relate to European sites and any potential for harm to such sites (see column to right) | Supporting text identifies that where there is potential for a proposed development to cause harm to internationally designated sites, applicants would still need to undertake appropriate surveys and assessment to a nationally recognised standard prior to the submission of a planning proposal. This wording potentially ambiguous in identifying potential for harm to European sites. | |

| Consultation Document Section | Initial Likely significant effect (LSE) screening | Minor comments or recommendations for text changes at Draft Policy & Site Options | Appropriate Assessment considerations |
|---|---|---|---|
| | | Ultimately it is the responsibility of local authority as competent authority to ensure compliance to Habitats Regulations. | |
| GESP35: Woodland Creation | No LSE. Environmentally positive if planting involves suitable tree species in suitable locations. Priority Areas map has been checked and does not promote planting within European sites. | | |
| GESP36: Exe Estuary, Dawlish Warren and East Devon Pebblebed Heaths | Sets out the requirement for mitigation and cross references to the strategic mitigation scheme | Supporting text contains reference to cat predation as the need for the 400m development exclusion around the East Devon Pebblebed Heaths. This could be strengthened as the 400m will provide protection with respect to general urban effects, recreation and fragmentation/isolation and would be best applied to the SAC and SPA (the boundaries are the same). | Will be excluded from consideration in formal screening. Appropriate assessment section will need to check the mitigation is sufficiently secured and fit for purpose. The mitigation strategy will need to be finalised alongside the plan and later versions of the HRA. |
| GESP37: Clyst Regional Park | No LSE – policy provides for SANG and also large areas of land where nature and recreation will be promoted. Proximity to the East Devon Pebblebed Heaths and the Exe Estuary SPA/Ramsar means likely benefits for | Policy proposes park to provide SANG. Draft GESP needs to ensure any SANG can be secured and effective, and achieve commitment to "Where irreconcilable conflicts exist between the conservation of priority habitats or species and public enjoyment, then conservation interest will take priority". | Will be excluded from consideration in formal screening. Appropriate assessment section will need to check the mitigation is sufficiently secured and fit for purpose. The mitigation strategy will need to be finalised alongside the plan and later versions of the HRA. |

| Consultation Document Section | Initial Likely significant effect (LSE) screening | Minor comments or recommendations for text changes at Draft Policy & Site Options | Appropriate Assessment considerations |
|---|---|---|---|
| | these sites in terms of absorbing recreation use and nature conservation. | | |
| **Chapter 10: Quality Places and Infrastructure** | Chapter introduction, purpose to include policies which seek to direct the delivery of great places in the Greater Exeter area | | |
| GESP38: Great Places | No LSE - policy sets out how strategic allocations will be planned to ensure they deliver high quality development with coordinated infrastructure | There could be opportunities within the concept and master plans to ensure SANGs are incorporated effectively and delivery phased as necessary. | |
| GESP39: Delivering Homes and Communities | No LSE – policy sets out how delivery might be helped and secured. | | |
| GESP40: Garden City Principles | No LSE – policy applies garden city principles to certain allocations. | Potential opportunity for benefit to European sites through the application of the principles to help ensure resident's recreation use is focussed within the allocation. | |
| GESP41: Infrastructure Classification | No LSE – policy simply identifies how infrastructure will be classified. | | |
| GESP42: Strategic Infrastructure | To be confirmed. Policy still to be updated to include list of infrastructure projects which will need checking for LSE. | | Possibly, to be confirmed as the plan progresses and more detail provided. |

| Consultation Document Section | Initial Likely significant effect (LSE) screening | Minor comments or recommendations for text changes at Draft Policy & Site Options | Appropriate Assessment considerations |
|---|---|---|---|
| GESP43: Viability | No LSE. Policy simply sets out criteria for when deviations from policy due to viability issues will be considered. | | |
| **Chapter 11: Spatial Development Strategy** | Chapter discusses the level of growth and sets out the different options for growth. | | Overall level of growth and spatial distribution will result in risks for all impact pathways. No specific policy included in this chapter however. |
| **Central Strategic Growth Area Site Options** | | | |
| SA-ED-1 (Attwells Farm) | Potentially 400 new dwellings, LSE triggered for range of sites and issues. | | 5.4km from Exe Estuary SPA/Ramsar and LSE for policy alone with respect to recreation and Exe Estuary SPA/Ramsar. Risks in-combination with other site options (and other plans/projects) to multiple European sites with respect to air quality and in-combination for water-related issues and the Exe Estuary SPA/Ramsar. |
| SA-ED-26 (Cowley) | Potentially 500 new dwellings, LSE triggered for range of sites and issues. | | 6.6km from Exe Estuary SPA/Ramsar and LSE for policy alone with respect to recreation and Exe Estuary SPA/Ramsar. Risks in-combination with other site options (and other plans/projects) to multiple European sites with respect to air quality and in-combination for water-related issues and the Exe Estuary SPA/Ramsar. |
| SA-MD-3 (Crediton South) | Potentially 750 new dwellings, LSE triggered for range of sites and issues. | | Risks in-combination with other site options (and other plans/projects) to multiple European sites with respect to air quality and in-combination for water-related issues (Culm Grassland SAC). |
| SA-EX-19 (East Gate) | Potentially 1160 new dwellings, LSE triggered for range of sites and issues. | | 3.2km from Exe Estuary SPA/Ramsar and LSE for policy alone with respect to recreation and Exe Estuary SPA/Ramsar. Risks in-combination with other site options (and other plans/projects) to multiple European |

| Consultation Document Section | Initial Likely significant effect (LSE) screening | Minor comments or recommendations for text changes at Draft Policy & Site Options | Appropriate Assessment considerations |
|---|---|---|---|
| | | | sites with respect to air quality and in-combination for water-related issues and the Exe Estuary SPA/Ramsar. |
| SA-EX-5 (Exeter St David's Station) | Potentially 660 new dwellings, LSE triggered for range of sites and issues. | | 4.7km from Exe Estuary SPA/Ramsar and LSE for policy alone with respect to recreation and Exe Estuary SPA/Ramsar. Risks in-combination with other site options (and other plans/projects) to multiple European sites with respect to air quality and in-combination for water-related issues and the Exe Estuary SPA/Ramsar. |
| SA-T-6 (Exminster West) | Potentially 200 new dwellings, LSE triggered for range of sites and issues. | | 0.8km from Exe Estuary SPA/Ramsar and LSE for policy alone with respect to recreation and loss/impacts to supporting habitat for the Exe Estuary SPA/Ramsar. Risks in-combination with other site options (and other plans/projects) with respect to water-related issues and the Exe Estuary SPA/Ramsar. 8.9km from Dawlish Warren and LSE for policy alone with respect to recreation. Risks in-combination with other site options (and other plans/projects) to multiple European sites with respect to air quality. |
| SA-ED-7 (Higher Greendale) | Potentially 1300 new dwellings, LSE triggered for range of sites and issues. | | 2.1km from East Devon Pebblebed Heaths SAC/SPA and LSE for policy alone with respect to risks from recreation and from loss/impacts to supporting habitat. 3.1km from Exe Estuary SPA/Ramsar and LSE for policy alone with respect to risks from recreation. Risks in-combination with other site options (and other plans/projects) to multiple European sites with respect to air quality and in-combination for water-related issues and the Exe Estuary SPA/Ramsar. |
| SA-ED-3 (Hill Barton) | Potentially 10000 new dwellings, LSE triggered for range of sites and issues. | | 2.9km from Exe Estuary SPA/Ramsar and LSE for policy alone with respect to risks from recreation. 2.6km from East Devon Pebblebed Heaths SAC/SPA and LSE for |

| Consultation Document Section | Initial Likely significant effect (LSE) screening | Minor comments or recommendations for text changes at Draft Policy & Site Options | Appropriate Assessment considerations |
|---|---|---|---|
| | | | policy alone with respect to risks from recreation and from loss/impacts to supporting habitat. Risks in-combination with other site options (and other plans/projects) to multiple European sites with respect to air quality and in-combination for water-related issues and the Exe Estuary SPA/Ramsar. |
| SA-EX-9 (Howell Road Car Park) | Potentially 106 new dwellings, LSE triggered for range of sites and issues. | | 4.0km from Exe Estuary SPA/Ramsar and LSE for policy alone with respect to recreation and Exe Estuary SPA/Ramsar. Risks in-combination with other site options (and other plans/projects) to multiple European sites with respect to air quality and in-combination for water-related issues and the Exe Estuary SPA/Ramsar. |
| SA-EX-7 (Markham Lane) | Potentially 1100 new dwellings, LSE triggered for range of sites and issues. | | 2.5km from Exe Estuary SPA/Ramsar and LSE for policy alone with respect to recreation and Exe Estuary SPA/Ramsar. Risks in-combination with other site options (and other plans/projects) to multiple European sites with respect to air quality and in-combination for water-related issues and the Exe Estuary SPA/Ramsar. |
| SA-EX-10 (Marsh Barton) | Potentially 5544 new dwellings, LSE triggered for range of sites and issues. | | 1.4km from Exe Estuary SPA/Ramsar and LSE for policy alone with respect to recreation and Exe Estuary SPA/Ramsar. Risks in-combination with other site options (and other plans/projects) to multiple European sites with respect to air quality and in-combination for water-related issues and the Exe Estuary SPA/Ramsar. |
| SA-MD-4 (Newton St Cyres and Sweetham) | Potentially 1200 new dwellings, LSE triggered for range of sites and issues. | | 9.7km from Exe Estuary SPA/Ramsar and LSE for policy alone with respect to recreation and Exe Estuary SPA/Ramsar. Risks in-combination with other site options (and other plans/projects) to multiple European sites with respect to air quality and in-combination for water-related issues and the Exe Estuary SPA/Ramsar. |

| Consultation Document Section | Initial Likely significant effect (LSE) screening | Minor comments or recommendations for text changes at Draft Policy & Site Options | Appropriate Assessment considerations |
|---|---|---|---|
| SA-EX-7 (North Gate) | Potentially 310 new dwellings, LSE triggered for range of sites and issues. | | 3.8km from Exe Estuary SPA/Ramsar and LSE for policy alone with respect to recreation and Exe Estuary SPA/Ramsar. Risks in-combination with other site options (and other plans/projects) to multiple European sites with respect to air quality and in-combination for water-related issues and the Exe Estuary SPA/Ramsar. |
| SA-ED-2 (Oil Mill Lane) | Potentially 4000 new dwellings, LSE triggered for range of sites and issues. | | 1.2km from Exe Estuary SPA/Ramsar and LSE for policy alone with respect to recreation and Exe Estuary SPA/Ramsar. 3.0km from East Devon Pebblebed Heaths SAC/SPA and LSE for policy alone with respect to risks from recreation and from loss/impacts to supporting habitat. Risks in-combination with other site options (and other plans/projects) to multiple European sites with respect to air quality and in-combination for water-related issues and the Exe Estuary SPA/Ramsar. |
| SA-T-18 (Peamore) | Potentially 1500 new dwellings, LSE triggered for range of sites and issues. | | 0.8km from Exe Estuary SPA/Ramsar and LSE for policy alone with respect to recreation and loss of supporting habitat for the Exe Estuary SPA/Ramsar. 9.8km from Dawlish Warren and LSE for policy alone with respect to recreation and Dawlish Warren SAC. Risks in-combination with other site options (and other plans/projects) to multiple European sites with respect to air quality and in-combination for water-related issues and the Exe Estuary SPA/Ramsar. Site boundary just clips South Hams SAC landscape connectivity zone and therefore in-combination loss of supporting habitat for South Hams SAC. |
| SA-EX-18 (Pinhoe Trading Estate) | Potentially 278 new dwellings, LSE triggered for range of sites and issues. | | 4.4km from Exe Estuary SPA/Ramsar and LSE for policy alone with respect to recreation and Exe Estuary SPA/Ramsar. 9.4km from East Devon Pebblebed Heaths |

| Consultation Document Section | Initial Likely significant effect (LSE) screening | Minor comments or recommendations for text changes at Draft Policy & Site Options | Appropriate Assessment considerations |
|---|---|---|---|
| | | | SAC/SPA and LSE for policy alone with respect to risks from recreation. Risks in-combination with other site options (and other plans/projects) to multiple European sites with respect to air quality and in-combination for water-related issues and the Exe Estuary SPA/Ramsar. |
| SA-ED-27 (Poltimore East) | LSE. Motorway services Area well away from European sites. | | LSE for policy alone from recreation to Exe Estuary SPA/Ramsar, Dawlish Warren SAC and East Devon Pebblebed Heaths SAC/SPA if option includes hotel. |
| SA-ED-26 (Sandy Gate) | Potentially 1050 new dwellings, LSE triggered for range of sites and issues. | | 1.8km from Exe Estuary SPA/Ramsar and LSE for policy alone with respect to recreation and Exe Estuary SPA/Ramsar. 7.3km from East Devon Pebblebed Heaths SAC/SPA and LSE for policy alone with respect to risks from recreation. Risks in-combination with other site options (and other plans/projects) to multiple European sites with respect to air quality and in-combination for water-related issues and the Exe Estuary SPA/Ramsar. |
| SA-EX-8 (South Gate) | Potentially 300 new dwellings, LSE triggered for range of sites and issues. | | 3.2km from Exe Estuary SPA/Ramsar and LSE for policy alone with respect to recreation and Exe Estuary SPA/Ramsar. Risks in-combination with other site options (and other plans/projects) to multiple European sites with respect to air quality and in-combination for water-related issues and the Exe Estuary SPA/Ramsar. |
| SA-EX-23 (South Street, Fore Street, Market Street) | Potentially 175 new dwellings, LSE triggered for range of sites and issues. | | 3.5km from Exe Estuary SPA/Ramsar and LSE for policy alone with respect to recreation and Exe Estuary SPA/Ramsar. Risks in-combination with other site options (and other plans/projects) to multiple European sites with respect to air quality and in-combination for water-related issues and the Exe Estuary SPA/Ramsar. |
| SA-ED-1 (Sowton) | LSE. Employment development. | | Risks in-combination with other site options (and other plans/projects) to various sites due to traffic. |

| Consultation Document Section | Initial Likely significant effect (LSE) screening | Minor comments or recommendations for text changes at Draft Policy & Site Options | Appropriate Assessment considerations |
|---|---|---|---|
| SA-EX-4 (Stoke Hill) | Potentially 768 new dwellings, LSE triggered for range of sites and issues. | | 5.0km from Exe Estuary SPA/Ramsar and LSE for policy alone with respect to recreation and Exe Estuary SPA/Ramsar. Risks in-combination with other site options (and other plans/projects) to multiple European sites with respect to air quality and f in-combination or water-related issues and the Exe Estuary SPA/Ramsar. |
| SA-EX-3 (Topsham and M5) | Potentially 1500 new dwellings, LSE triggered for range of sites and issues. | | 0.2km from Exe Estuary SPA/Ramsar and LSE for policy alone with respect to recreation and loss of supporting habitat for the Exe Estuary SPA/Ramsar. 6.4km from East Devon Pebblebed Heaths SAC/SPA and LSE for policy alone with respect to recreation and East Devon Pebblebed Heaths SAC/SPA. Risks in-combination with other site options (and other plans/projects) to multiple European sites with respect to air quality and in-combination for water-related issues and the Exe Estuary SPA/Ramsar. |
| SA-EX-6 (Water Lane) | Potentially 1570 new dwellings. LSE triggered for range of sites and issues. | | 1.4km from Exe Estuary SPA/Ramsar and LSE for policy alone with respect to recreation and Exe Estuary SPA/Ramsar. Risks in-combination with other site options (and other plans/projects) to multiple European sites with respect to air quality and in-combination for water-related issues and the Exe Estuary SPA/Ramsar. |
| SA-EX-22 (West Gate) | Potentially 620 new dwellings, LSE triggered for range of sites and issues. | | 3.4km from Exe Estuary SPA/Ramsar and LSE for policy alone with respect to recreation and Exe Estuary SPA/Ramsar. Risks in-combination with other site options (and other plans/projects) to multiple European sites with respect to air quality and in-combination for water-related issues and the Exe Estuary SPA/Ramsar. |

| Consultation Document Section | Initial Likely significant effect (LSE) screening | Minor comments or recommendations for text changes at Draft Policy & Site Options | Appropriate Assessment considerations |
|---|---|---|---|
| SA-ED-25 (Westclyst and Mosshayne) | Potentially 1600 new dwellings, LSE triggered for range of sites and issues. | | 5.0km from Exe Estuary SPA/Ramsar and LSE for policy alone with respect to recreation and Exe Estuary SPA/Ramsar. 7.1km from East Devon Pebblebed Heaths SAC/SPA and LSE for policy alone with respect to recreation and East Devon Pebblebed Heaths SAC/SPA. Risks in-combination with other site options (and other plans/projects) to multiple European sites with respect to air quality and in-combination for water-related issues and the Exe Estuary SPA/Ramsar. |
| **North Strategic Growth Area Site Options** | | | |
| SA-[illegible]-9 (Culm Garden Village) | Potentially 5000 new dwellings, LSE triggered for range of sites and issues. | | 15.9km from the Quants SAC and LSE for policy alone with respect to loss/impacts to supporting habitat. Risks in-combination with other site options (and other plans/projects) to multiple European sites with respect to air quality and in-combination for water-related issues and the Culm Grasslands SAC. |
| SA-MD-10 (Hartnoll Farm) | Potentially 950 new dwellings, LSE triggered for range of sites and issues. | | 19.1km from the Quants SAC and LSE for policy alone with respect to loss/impacts to supporting habitat. 14.6km from the Culm Grasslands SAC and LSE for policy alone with respect to loss/impacts to supporting habitat. Risks in-combination with other site options (and other plans/projects) to multiple European sites with respect to air quality and in-combination for water-related issues and the Culm Grasslands SAC. |
| SA-MD-12 (Sampford Peverell South) | Potentially 2200 new dwellings, LSE triggered for range of sites and issues. | | 14.4km from the Quants SAC and LSE for policy alone with respect to loss/impacts to supporting habitat. 17.4km from the Culm Grasslands SAC and LSE for policy alone with respect to loss/impacts to supporting habitat. Risks in-combination with other site options |

| Consultation Document Section | Initial Likely significant effect (LSE) screening | Minor comments or recommendations for text changes at Draft Policy & Site Options | Appropriate Assessment considerations |
|---|---|---|---|
| | | | (and other plans/projects) to multiple European sites with respect to air quality and in-combination for water-related issues and the Culm Grasslands SAC. |
| **South Strategic Growth Area Site Options** | | | |
| SA-T-8 (Land north of Forches Cross) | LSE. Employment development. | | Within South Hams SAC Landscape Connectivity Zone, and LSE for policy alone with respect to loss/impacts to supporting habitat. Risks in-combination with other site options (and other plans/projects) to multiple European sites with respect to air quality, in-combination for recreation and Dartmoor SAC (site option is 12.1km from SAC), in-combination for recreation and South Dartmoor Woods SAC (site option is 6.6km from the SAC) and in-combination for water-related issues and Dartmoor SAC. |
| SA-T-3 (Houghton Barton West) | Potentially 1750 new dwellings, LSE triggered for range of sites and issues. | | Within South Hams SAC Landscape Connectivity Zone, and LSE for policy alone with respect to loss/impacts to supporting habitat. Within 5.8km of South Dartmoor Woods and in-combination risks from recreation. Risks in-combination with other site options (and other plans/projects) to multiple European sites with respect to air quality, in-combination for recreation and Dartmoor SAC (site option is 10.9km from SAC), in-combination for recreation and South Dartmoor Woods SAC (site option is 5.8km from the SAC) and in-combination for water-related issues and Dartmoor SAC. |
| SA-T-22 (Ilford Park) | LSE. Employment development. | | Within South Hams SAC Landscape Connectivity Zone, and LSE for policy alone with respect to loss/impacts to supporting habitat. Risks in-combination with other site |

| Consultation Document Section | Initial Likely significant effect (LSE) screening | Minor comments or recommendations for text changes at Draft Policy & Site Options | Appropriate Assessment considerations |
|---|---|---|---|
| | | | options (and other plans/projects) to multiple European sites with respect to air quality, in-combination for recreation and Dartmoor SAC (site option is 10.8km from SAC), in-combination for recreation and South Dartmoor Woods SAC (site option is 5.2km from the SAC) and in-combination for water-related issues and Dartmoor SAC. |
| SA-[illegible] (South of Priory Road) | Potentially 500 new dwellings, LSE triggered for range of sites and issues. | | Within South Hams SAC Landscape Connectivity Zone, and LSE for policy alone with respect to loss/impacts to supporting habitat. Risks in-combination with other site options (and other plans/projects) to multiple European sites with respect to air quality, in-combination for recreation and Dartmoor SAC (site option is 16.6km from SAC), in-combination for recreation and South Dartmoor Woods SAC (site option is 11.9km from the SAC) and in-combination for water-related issues and Dartmoor SAC. |
| **East Strategic Growth Area Site Options** | | | |
| SA-ED-8 (Airport Business Park) | LSE. Employment development. | | Within 3.5km of East Devon Pebblebed Heaths SAC/SPA and LSE for policy alone with respect to loss/impacts to supporting habitat. Risks in-combination with other site options (and other plans/projects) to multiple European sites with respect to air quality and in-combination for water-related issues and the Exe Estuary SPA/Ramsar. |
| SA-ED-5 (Airport North) | LSE. Employment development. | | Within 4.9km of East Devon Pebblebed Heaths SAC/SPA and LSE for policy alone with respect to loss/impacts to supporting habitat. Risks in-combination with other site options (and other plans/projects) to multiple European |

| Consultation Document Section | Initial Likely significant effect (LSE) screening | Minor comments or recommendations for text changes at Draft Policy & Site Options | Appropriate Assessment considerations |
|---|---|---|---|
| | | | sites with respect to air quality and in-combination for water-related issues and the Exe Estuary SPA/Ramsar. |
| SA-ED-19 (Axminster South) | Potentially 540 new dwellings, LSE triggered for range of sites and issues. | | 0.4km from River Axe SAC Risks in relation to water quality and LSE for policy alone with respect to water-related impacts. Risks in-combination with other site options (and other plans/projects) to multiple European sites with respect to air quality. |
| SA-ED-15 (Feniton) | Potentially 2800 new dwellings, LSE triggered for range of sites and issues. | | 6.3km from the East Devon Pebblebed Heaths SAC/SPA and LSE for policy alone with respect to recreation. Risks in-combination with other site options (and other plans/projects) to multiple European sites with respect to air quality. |
| SA-ED-18 (Honiton East) | Potentially 1100 new dwellings, LSE triggered for range of sites and issues. | | Risks in-combination with other site options (and other plans/projects) to multiple European sites with respect to air quality. |
| SA-ED-12 (Whimple) | Potentially 2500 new dwellings, LSE triggered for range of sites and issues. | | 3.9km from the East Devon Pebblebed Heaths SAC/SPA and LSE for policy alone with respect to recreation and from loss/impacts to supporting habitat. Risks in-combination with other site options (and other plans/projects) to multiple European sites with respect to air quality. |

# 4. Appropriate Assessment of Impact Pathways: Overview

4.1 The screening for likely significant effects (Table 5) has identified a number of recommended text changes that can strengthen policy or completely avoid risks with the removal of potentially harmful aspects. These are clarifications, corrections or instructions for the development project HRA, that do not require further scrutiny at the appropriate assessment stage.

4.2 Additionally, the screening table has flagged key topics for more in-depth consideration within an appropriate assessment. The appropriate assessment topics are highlighted in this HRA report at the Draft Policies and Site Options stage to advise on the scope of the appropriate assessment and inform the evidence that will need to be gathered as the plan progresses. These impact pathways will to be assessed in detail within the appropriate assessment prepared at the next plan version: the Draft Plan stage.

4.3 Once a likely significant effect has been identified, the purpose of the appropriate assessment is to examine evidence and information in more detail to establish the nature and extent of the predicted impacts, in order to answer the question as to whether such impacts could lead to adverse effects on European site integrity.

4.4 Appropriate assessments at the plan stage are often undertaken with enough evidence to give confidence in potential mitigation options, and then project level HRAs remain critical in determining the detail of such mitigation.

4.5 The ‘precautionary principle’ is described in the screening section. It is an accepted principle that is embedded within the wording of the legislation, and latterly within case decisions, both European and domestic. Essentially, the appropriate assessment stage, in accordance with the Habitats Regulations, is an assessment that enables a competent authority to only give effect to a plan or authorise/undertake a project after having ascertained that it will not adversely affect the integrity of the European site. Fundamentally this therefore means that in the absence of certainty, the plan or project should not normally proceed.

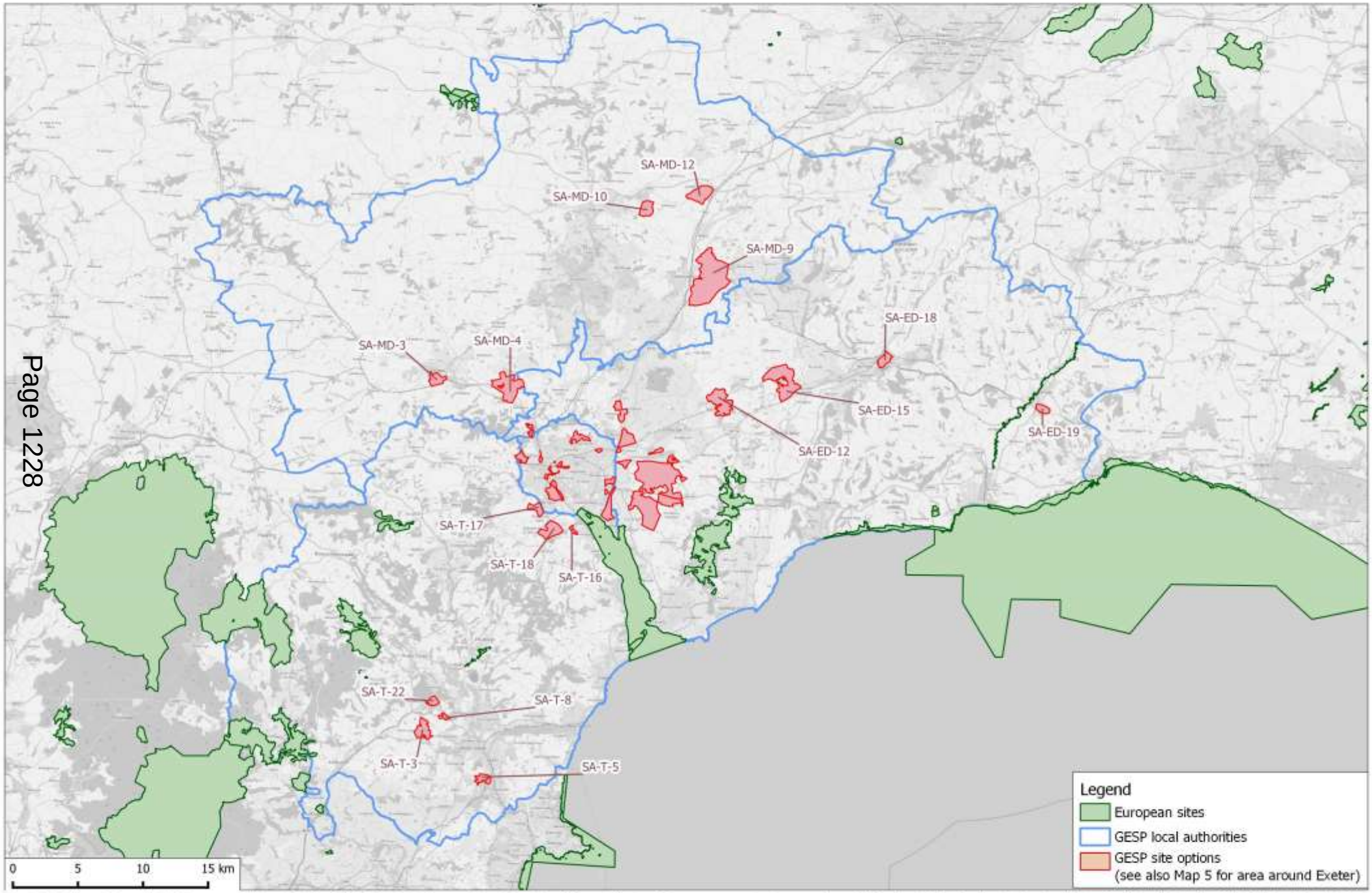
4.6 Later stages of this assessment are structured to address the different issues that have emerged from the screening. We broadly address the impact pathways set out in the earlier parts (see Table 3), however we structure the

sections slightly differently, to allow us to focus on the relevant issues. We use the following key headings for the appropriate assessment sections:

- General urbanisation effects
- Bat SACs: Loss of supporting habitat, fragmentation and collision risk
- Loss/impacts to supporting habitat around European sites (non-bat sites)
- Recreation
- Water-related issues
- Air Quality

4.7 Individual site options are shown in Maps 4-6 which provide an overview of the potential quantum of development and the locations of the sites in relation to European sites. Maps 4 and 5 are the same but different scales: labels on Map 4 show the site options away from Exeter and Map 5 labels site options in the vicinity of Exeter. Map 6 shows all site options and the symbols indicate the scale of potential development at each site.

**Map 4: GESP site options and European sites**

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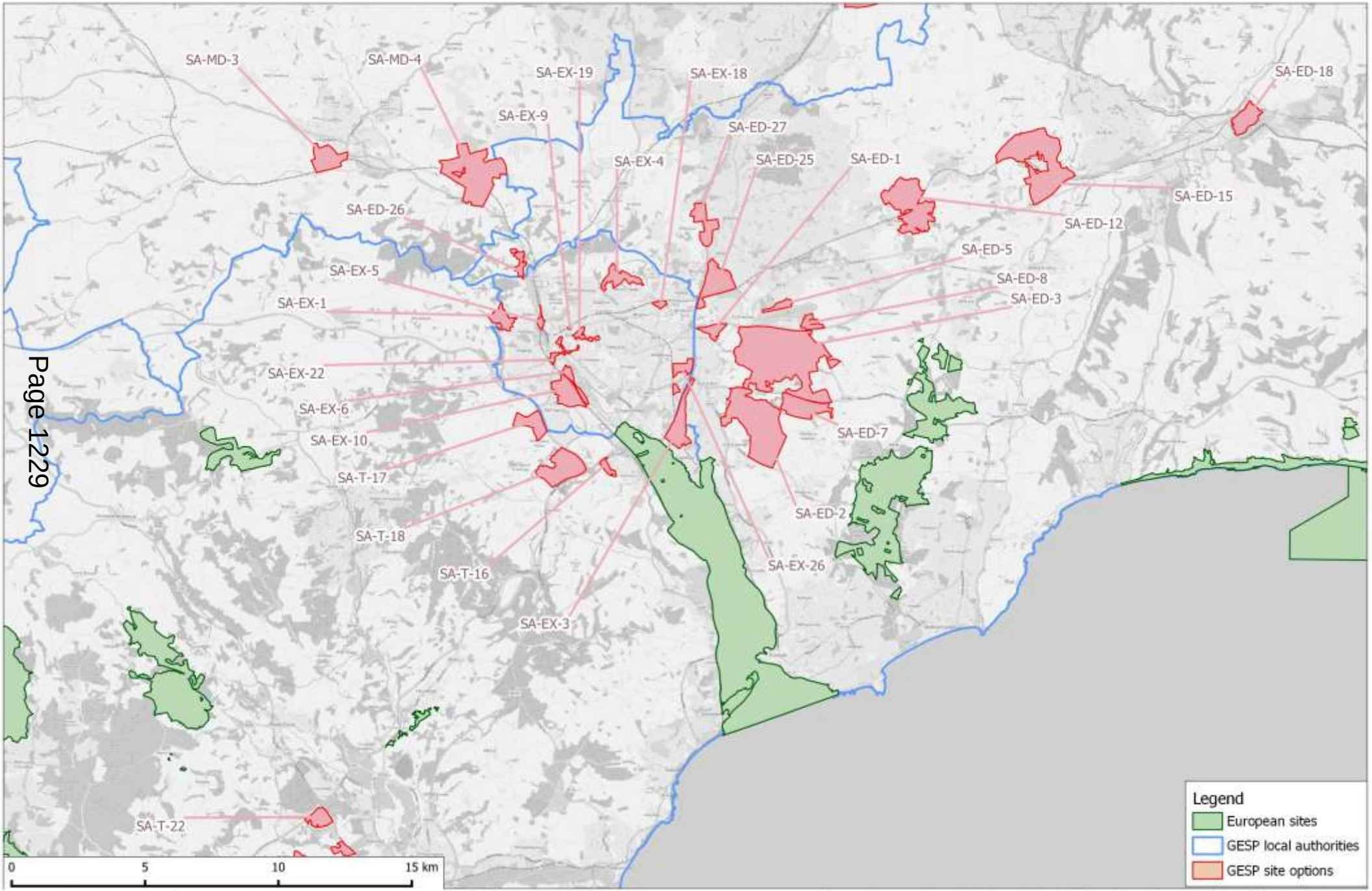
**Map 5: GESP site options and European sites - Exeter area only**

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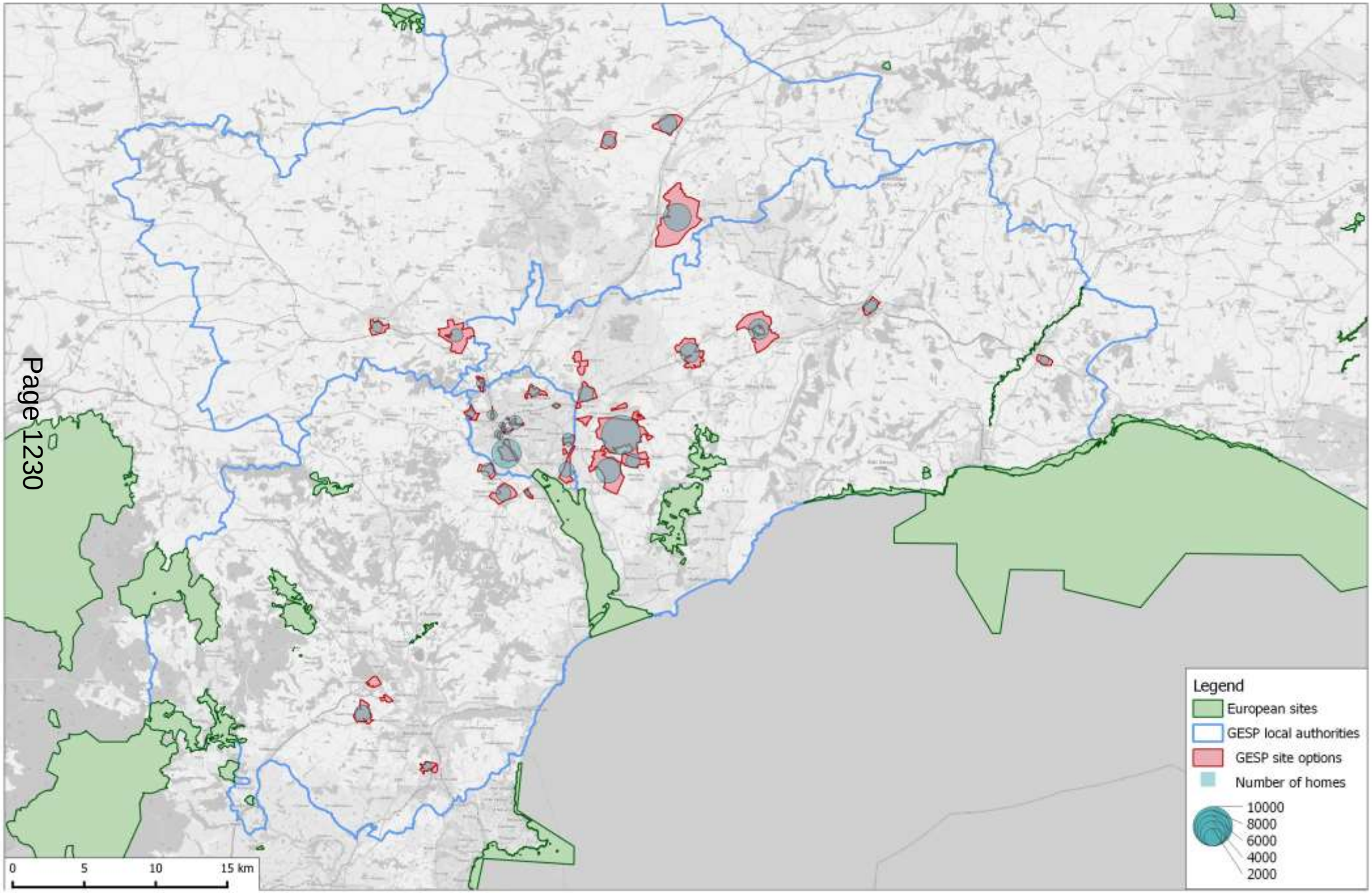
**Map 6: Site options, potential housing numbers and European sites**

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# 5. Appropriate assessment topic: general urbanisation effects

## Introduction

5.1 Urbanisation effects relate to issues where development is close to the European site boundary and is an umbrella term relating to impacts such as light, noise, cat predation, fly tipping, increased fire risk, spread of invasive species (e.g. from gardens and garden waste) and vandalism. Note that the impacts on lighting for bats foraging in the wider landscape is considered in the topic relating to Bat SACs: Loss of supporting habitat, fragmentation and collision risk.

5.2 Studies of fire incidence have shown that heathland sites with high levels of housing within 500m of the site boundary have a higher fire incidence (Kirby & Tantram, 1999). Fires can start in a range of ways, including deliberate arson, children playing, campfires, barbeques, sparks from vehicles, discarded cigarettes etc.

5.3 Where housing is directly adjacent to sites, access can occur directly from gardens and informal access points. Use will spill over from adjacent gardens and adjacent green space next to urban areas is often subject to a range of activities that are not necessarily compatible with nature conservation. Fly-tipping and dumping of garden waste can be more common. As such, managing and looking after such sites can be more challenging.

5.4 Of the sites at risk in GESP, urban issues are perhaps most relevant to heathland sites, which are vulnerable to fire, nutrient enrichment and heathland SPA sites hold sensitive ground-nesting birds. The issues are not restricted to heathlands however and can be relevant for a range of sites. For example, cats are known to predate bats (Ancillotto, Serangeli, & Russo, 2013), invasive species are a risk for a range of habitats including riparian ones.

5.5 A development exclusion zone has been established around many other European sites to reflect the particular risks with development directly adjacent to the boundary. Local plans and strategic mitigation schemes

include a presumption against development within these areas and such zones have become an established policy approach.

5.6 Examples of areas where a zone is in place include:

- Across the Thames Basin Heaths (11 local planning authorities)
- Around the Dorset Heaths (five local planning authorities)
- In the Brecks (e.g. Breckland District)
- Around the East Devon Pebblebed Heaths (East Devon District Council)
- Around Cannock Chase SAC (e.g. Cannock Chase Council Local Plan)
- At Ashdown Forest SPA/SAC (e.g. Wealden District's Core Strategy Local Plan)

5.7 All the above examples are heathland sites and a 400m zone is used. The approach is widely accepted and reduces the risks from increasing urbanisation. It provides greater certainty that mitigation measures (such as access management) for cumulative levels of urban growth will be successful as such measures can be targeted to those travelling some distance.

5.8 The choice of 400m is based on the literature (summarised in Underhill-Day, 2005) and to some extent is a pragmatic choice. For example, 400m reflects distances at which sites will be 'local' and easily accessible from nearby housing and fits with the fire research outlined above. Studies of cat roaming behaviour have shown 400m to be an appropriate buffer width to limit cats in very urban environments (Thomas, Baker, & Fellowes, 2014), however in more rural areas cats can roam considerably further and some studies have suggested ranges over 2km for more rural situations (Hall et al., 2016; Metsers, Seddon, & van Heezik, 2010).

## Relevant sites

5.9 Urban effects are potentially relevant to the following sites:

- East Devon Pebblebed Heaths SAC
- East Devon Heaths SPA
- Exe Estuary Ramsar
- Exe Estuary SPA
- River Axe SAC

5.10 These are sites where there is potential for urban effects to undermine the conservation objectives, for example affecting the structure and function of the habitats of the qualifying features, the supporting processes on which

the habitats of the qualifying features rely and the distribution of qualifying features. For these sites there are also site options relatively close. For all other European sites GESP site options are at least 3km away (South Hams SAC) and for most well over 5km.

## Draft policy GESP36 (Exe Estuary, Dawlish Warren and East Devon Pebblebed Heaths)

5.11 Draft policy GESP36 (Exe Estuary, Dawlish Warren and East Devon Pebblebed Heaths) states that additional residential development will not be permitted within 400m of the East Devon Heaths SPA and development will only be permitted within 400m of the Exe Estuary Special Protection Area and Dawlish Warren Special Area of Conservation where an Appropriate Assessment can show there will be no adverse effects to those sites, including effects arising from urbanisation impacts.

## Individual site options

5.12 There is one site option, SA-EX-3 (Land between M5 and Topsham) where the boundary comes to within 200m of the Exe Estuary SPA/Ramsar. This site could be for 1,500 homes, after factoring in the various requirements being considered for the GESP. The consultation document identifies that there are multiple applications for piecemeal residential development within the site at various stages, from submitted to approval granted at appeal. Permissions have been granted for 286 dwellings (54 under construction); two care homes and 47 assisted living apartments.

5.13 The location is screened from the estuary by existing residential areas, with various rows of houses and large gardens between the foreshore and the edge of the site option. As such issues from lighting and garden waste are unlikely to be an issue. The location is such that tall buildings (which could interrupt flight lines or deter birds due to the potential for them to act as perches for predators such as Peregrines) are unlikely to be an issue. Fire risk is not a threat for the estuary. Cat predation could be a problem, however the nearest parts of the estuary do not hold major concentrations of roosting birds and the intertidal areas are unlikely to be areas that cats will hunt. As such it is likely to be possible to rule out adverse effects on integrity for SA-EX-3 in relation to general urban effects and the Exe Estuary SPA/Ramsar, alone or in-combination. If this site option is included within the GESP, given the proximity of the site option to the Estuary and the scale

of the development, it will be important that any master planning or site plans take into account the risk to the Estuary and further checks should be undertaken when further details are available to ensure the site can be delivered without adverse effects on integrity. At project-level HRA it will then be necessary to ensure any necessary design features and mitigation are in place, in-line with draft Policy GESP36 (Exe Estuary, Dawlish Warren and East Devon Pebblebed Heaths).

5.14 Aside from SA-EX-3 the next closest development to the Exe Estuary SPA/Ramsar is SA-T-16 (West of Exminster), which at its closest is 800m from the European site boundary. This site option is separated from the SPA/Ramsar by the whole of Exminster and as such urban effects can clearly be ruled out.

5.15 Aside from the Exe Estuary SPA/Ramsar the only other site option to flag with respect to urban effects is SA-ED-19 (Axminster South). This is the only other site option within 1km of a European site and at its closest it is 400m from the River Axe SAC. The site option is separated from the SAC by the A358 (which runs in a cutting) and by a field, there is some hydrological connectivity with the SAC via a ditch. Urban effects that could impact the SAC include the spread of invasive species (which are identified in the conservation objectives). Water quality (e.g. from run-off) is also relevant and is considered in the water quality section of the HRA.

5.16 The main invasive plant species within the Axe catchment include Himalayan Balsam, Japanese Knotweed and Giant Hogweed. The most notable of these is Himalayan balsam which is almost ubiquitous throughout the catchment. The balsam out-competes native flora and covers riverbanks during the summer months. At the start of the winter it dies back leaving the banks exposed, which leads to increased rates of erosion. This accelerates the deposition of sediment into the river channel. Risks from development would relate to soil disturbance and dumped soil during construction and then spread from gardens, garden waste, recreational use etc.

5.17 Given the physical separation of the site option from the riparian zone and the cutting on the A358, risks are potentially relatively low. Adverse effects on integrity to the River Axe SAC could be avoided through survey work to inform the layout and design, vegetation management (ensuring species of concern are not present within the site and around the site), site design (to ensure no risk of invasive species spreading along the ditch running from the application site) and carefully planned construction, with necessary site

checks and controls in place. Some of these will issues can safely be deferred to project level HRA, however if this site is progressed within GESP it will be necessary to have confidence that the issues can be addressed and there is no uncertainty.

**Key findings: general urbanisation effects**

Urbanisation effects relate to issues where development is close to the European site boundary and is an umbrella term relating to impacts such as light, noise, cat predation, fly tipping, increased fire risk, spread of invasive species (e.g. from gardens and garden waste) and vandalism.

There are two site options with potential risks relating to urbanisation effects:
SA-EX-3 Land between M5 and Topsham lies within 200m of the Exe Estuary SPA/Ramsar. Risks from the general urban effects at this site seem low. If this site option is included within the GESP, given the proximity of the site option to the Estuary and the scale of the development, it will be important that any master planning or site plans take into account the risk to the Estuary and further checks should be undertaken when further details are available to ensure the site can be delivered without adverse effects on integrity from urban effects. At project-level HRA it will then be necessary to ensure any necessary design features and mitigation are in place, in-line with draft Policy GESP36 (Exe Estuary, Dawlish Warren and East Devon Pebblebed Heaths).

SA-ED-19 Axminster South is around 400m from the River Axe SAC. Risks here relate to the possibility of invasive species being spread through construction and the urbanisation. Adverse effects on integrity to the River Axe SAC could be avoided through survey work to inform the layout and design, vegetation management (ensuring species of concern are not present within the site and around the site), site design (to ensure no risk of invasive species spreading along the ditch running from the application site) and carefully planned construction, with necessary site checks and controls in place. Some of these issues can safely be deferred to project level HRA, however if this site is progressed within GESP it will be necessary to have confidence that the issues can be addressed and there is no uncertainty.

# 6. Appropriate assessment topic: Bat SACs and loss of supporting habitat, fragmentation and collision risk

## Introduction

6.1 Three different European sites (among those included in the screening, see Table 3) support bats. These are:

- Beer Quarry & Caves SAC (Greater Horseshoe Bat, Lesser Horseshoe Bat, Bechstein's Bat)
- Exmoor & Quantocks Oakwoods SAC (Bechstein's Bat and Barbastelle)
- South Hams (Greater Horseshoe Bat)

6.2 These bats use networks of roost sites, foraging habitats and commuting routes which connect roosts to other roosts and roosts to foraging areas. Different roost sites are used through the year, for example different sites are used during the winter for hibernation to those used for raising young ('maternity roosts'). While some roosts will hold very large concentrations of bats others can be small and be used for only short time windows. Bats are however faithful to roost sites and return each year. For the two Horseshoe Bat species, hibernacula tend to be in caves while maternity and summer roosts can be in caves and/or buildings. Bechstein's Bats roost in woodlands during the summer, typically in old oak woods. Females tend to roost in old woodpecker holes and regularly move between different trees. The species then over-winters in caves and mines. Barbastelles are another woodland species and roosts in trees all year round, with hibernation sites tending to be in cavities deep within trees.

6.3 For Greater Horseshoe Bats colony size is positively related to landscape features surrounding the roost such as the amount of broadleaf woodland and grassland, and density of linear features, while the amount of artificial light at night has a significant negative effect (Froidevaux, Boughey, Barlow, & Jones, 2017).

6.4 Greater Horseshoe Bats feed in areas with mixed deciduous woodland and grazing pastures on steep south-facing slopes. Preferred habitats are pastures with cattle (either single/mixed stock) followed by ancient semi-woodland and pastures with non-cattle stock (Duvergé & Jones, 1994). Woodlands and pasture close to woodland are used to a greater extent in

spring and early summer while pasture tend to be predominantly used in summer. Radio-tracking of Lesser Horseshoe Bats has shown them to forage in woodland habitats (particularly broadleaf) and to prefer to forage in areas with a high habitat diversity (Bontadina, Schofield, & Naef-Daenzer, 2002). Barbastelles feed on moths and range widely in the landscape, even ranging up to 20km from the roost (Zeale, Davidson-Watts, & Jones, 2012)

6.5 Connectivity is important. Bats will range widely over the landscape to visit suitable feeding locations. Adult Greater Horseshoe Bats for example will tend to range within 4km of maternity roosts (Dartmoor National Park Authority, Devon County Council, Teignbridge District Council, South Hams District Council, Torbay Council and Natural England, 2019). Rides, footpaths, hedges and treelines are used by greater horseshoe bats when flying in feeding areas, and the bats are rarely less than 2m away from these structures (Duvergé & Jones, 1994). Pinaud *et al.* (2018) found that a distance of 38m (maximum of 50m) between landscape features ensures an effective connection for Greater Horseshoe Bats.

6.6 Loss of suitable foraging habitat, roost sites or connectivity are risks for these species. Development which results in a loss of potential feeding habitat, potential roost sites or results in a break in landscape features such as hedgerows or woodland strips is likely to impact on the species. Further risks can result in issues from disturbance such as from lighting (e.g. Stone, Jones, & Harris, 2009). Roads are a particular issue as bats tend to avoid crossing roads (Bennett & Zurcher, 2013) and there are also risks from collision with road traffic and therefore direct mortality, low-flying species such as Greater Horseshoe Bats are particularly vulnerable (Fensome & Mathews, 2016). There are therefore clear risks from urban development in landscapes that are important to bats (Jung & Threlfall, 2016).

6.7 The issues are clearly set out in the conservation objectives (supplementary advice) and loss or deterioration of foraging habitat and flight lines clearly have the potential to undermine the conservation objectives (Table 6).

**Table 6: Supplementary Conservation Objectives relating to supporting habitat: structure and function. See Natural England website for full details.**

| Attribute | Target | Supporting & explanatory notes |
|---|---|---|
| Supporting off-site habitat (foraging areas) | Restore any core areas of feeding habitat outside of the SAC boundary that are critical to Greater Horseshoe bats during their breeding and hibernation period. | Roost choice, and the presence of bats within the SAC, is likely to be influenced by the site's ability to provide bats with food and shelter. Key feeding areas around a roost, and the commuting routes (or flight-lines) between them, will be an important element of sustaining the SAC population. Feeding areas used by SAC bats may be outside of the SAC boundary but be critical to successful hibernation (these undesignated areas are sometimes referred to as 'sustenance zones' or 'functionally-linked land'). Target set to Restore because the wider agricultural landscape beyond the SAC boundary, on which the bats rely for foraging, is, to some extent, degraded by agricultural intensification so that the habitat supports fewer invertebrate food sources and offers less shelter. |
| Supporting off-site habitat (flightlines) | Maintain and Restore the presence, structure and quality of any linear landscape features which function as flightlines. Flightlines should remain unlit, functioning as dark corridors. | Non-breeding greater horseshoe adults can forage at least 4km from roost sites. For breeding females and juveniles, the average distance tends to be roughly half this i.e. 2km (English Nature, 2003). Greater horseshoes commute and forage along linear features, over grazed pasture and in woodland. Permanent pasture and ancient woodland linked with an abundance of tall bushy hedgerows is ideal supporting habitat for this species. (English Nature, 2003). Flightlines will extend beyond the designated site boundary into the wider local landscape. In general, low intensity management (e.g. cutting hedgerows on long rotations) is required to maintain the structure and quality of linear landscape features. Target includes Restore because some flightlines have been fragmented and disrupted, for example by light pollution. NATURAL ENGLAND. 2010. South Hams SAC – Greater horseshoe bat consultation zone planning guidance. Natural England. Available from Natural England on request Page 59 of 64 Attributes Targets Supporting and Explanatory Notes Sources of site-based evidence (where available) Local Planning Authorities are taking account of greater horseshoe bats in decision-making following principles outlined in Natural England (2010) (as amended). Occasional vegetation management is required to maintain suitable vegetation cover around roost entrances. |

## Site options

6.8 The consultation document contains no site options within 10km of the Beer Quarry & Caves SAC and no site options within 15km of the Exmoor & Quantocks Oakwoods SAC. Adverse effects on integrity in relation to the bat interest and loss of supporting habitat, fragmentation and collision risk can therefore be ruled out for these sites, as the distances are too great.

6.9 There are however a number of site options in the area around the South Hams SAC. For this SAC detailed guidance (Dartmoor National Park Authority, Devon County Council, Teignbridge District Council, South Hams District Council, Torbay Council and Natural England, 2019) sets out the extent of the sustenance zones (i.e. foraging areas around the key roosts) and landscape connectivity zones (i.e. the area that includes a complex network of Commuting Routes used by the SAC population of greater horseshoe bats and providing connectivity between the Designated Roosts). These zones are shown in Figure 1 of the guidance.

6.10 There are no site options within the sustenance zones, but the following site options are within the landscape connectivity zone:

- **SA-T-3 Land West of Houghton Barton**, 126ha, potentially 1750 dwellings. Site adjacent to Seale Hayne, comprised of rolling countryside, rising up Ingsdon Hill and Seale Hayne ridgeline to the north;
- **SA-T-5 Priory Road,** 63ha, potentially 500 dwellings. 3km south of Newton Abbot, adjacent to the A380 and close to existing allocation NA3, the area is primarily in agricultural use.
- **SA-T-8 Land North of Forches Cross**, 24ha, Employment use only. gently undulating fields west of the A382, approximately 2.5 km north of Newton Abbot and 1.5 km south of Drumbridges (A38).
- **SA-T-22 Ilford Park**, 46ha, Employment use only. The site is adjacent to the A38 Drumbridges junction and Trago Mills and comprised of flat land currently in use as forestry, with some commercial and residential (C2) uses.

6.11 In addition, the following site is virtually entirely outside the Landscape Connectivity Zone but clips the edge:

- **SA-T-18 Peamore**, 146ha, potentially 1500 dwellings. Site is to the west of Exeter and comprised of undulating land with some steep slopes.

6.12 Within the landscape connectivity zone, Greater Horseshoe Bats are expected to occur in lower numbers and be more widely dispersed. The guidance therefore considers that only proposals that could severely restrict the movements of bats at a landscape scale may have a likely significant effect. However, there may be exceptions as the guidance highlights the potential for pinch points – locations where commuting routes are restricted (e.g. by the sea/estuaries or urban encroachment).

6.13 The individual site options are large and together the 4 sites comprise 259ha, potentially some 2,250 dwellings and employment land. Depending on the site options progressed into the draft GESP there is clearly potential for bat movements at a landscape scale to be restricted.

6.14 Checks on the Devon County Council web mapping system, that provides access to the data on known pinch points and other relevant features shows that there are no known pinch points within any of the sites. However, at both SA-T-8 and SA-T-22 there are Greater Horseshoe Bat mitigation features – i.e. dedicated features already established as mitigation for other development. These comprise a culvert at the south-eastern corner of SA-T-8 that allows bats to cross the A382 and at the south-eastern corner of SA-T-22 there is the Stover Bridge that again provides a crossing point over the A382. As such, both these site options are clearly close to, or adjacent to, strategic crossing points for Greater Horseshoe Bats.

6.15 At the GESP level of plan-making, it will be necessary for the final HRA to be able to show that the selected site options are deliverable. For all the site options, checks and survey work will therefore be required for the presence and use of the areas by Greater Horseshoe Bats. The HRA work may need to consider the potential impacts of the site options in-combination and it is recommended that the survey work and information gathering are co-ordinated across various sites. Survey work and the information collected will need to conform to the relevant guidance (see Dartmoor National Park Authority, Devon County Council, Teignbridge District Council, South Hams District Council, Torbay Council and Natural England, 2019).The results from the survey work will need to feed into the master planning and the boundary or scale of the site may need to be revised. For SA-T-8 and SA-T-22 it will be necessary for the survey work to check the use of the mitigation features and ensure they can continue to function in the long-term.

6.16 If any of the 5 site options is progressed, project-level HRA will be necessary to ensure the necessary detail is in place; a tailored bat mitigation plan is likely to be required.

6.17 Alongside the site options, increased traffic flows along some roads may pose problems for bats in terms of collision risk and increased avoidance of roads due to more traffic on them. When there is greater clarity on the options to be included within GESP, checks will be required of traffic changes, based on traffic flow modelling, alongside information on key areas

for bats, to ensure that there are no issues in this respect and to allow adverse effects on integrity to be ruled out.

6.18 Draft Policy GESP29 (Highway Links and Junction Improvements) contains road improvements that are within the landscape connectivity zone and may serve to further disrupt flyways and connectivity for Greater Horseshoe Bats. Two elements of the policy pose risks:

- A382 (Newton Abbot to Drumbridges) – widening of highway from Jetty Marsh Road with addition of cycle routes and improved junctions including new roundabout at Forches Cross and link road to A383;
- Junction of A379 at Peamore with A38 to create north bound onslip.

6.19 The A382 works commenced in 2020 and a suite of bat mitigation measures were secured.

6.20 Further details of the improvements at the junction of the A379 at Peamore with the A38 will be required before the next iteration of the HRA. It will be necessary to determine that the road improvements (including any lighting infrastructure) can be put in place without disruption to bats, and then detailed project level assessment will be necessary, incorporating field data on bat use of the relevant areas to ensure the detailed design is sufficient to rule out adverse effects on integrity. Survey work and the information collected will need to conform to the relevant guidance (see Dartmoor National Park Authority, Devon County Council, Teignbridge District Council, South Hams District Council, Torbay Council and Natural England, 2019).

**Key findings: Bat SACs and loss of supporting habitat, fragmentation and collision risk**

Bats can roam widely in the landscape, utilising different locations for roosting through the year and around the roost sites they fly out in darkness to feed, often ranging considerable distances from the roost. Loss of feeding areas, loss of connectivity within the landscape and risks of collision from roads and other structures pose particular risks.

The following site options and draft policy pose risks for the South Hams SAC:

- SA-T-3 Land West of Houghton Barton;
- SA-T-5 Priory Road;
- SA-T-8 Land North of Forches Cross;
- SA-T-18 Peamore;
- SA-T-22 Ilford Park;
- GESP 29 Highway Links and Junction Improvements.

All lie within or very close to the landscape connectivity zone - within which the bat interest is expected to occur in low numbers and be more widely dispersed. Nonetheless, the site options could all have the potential to severely restrict the movements of bats at a landscape scale.

For all site options, survey work will be required to check for the presence and use of the area by Greater Horseshoe Bats. The results from the survey work will need to feed into the master planning and the boundary or scale of the site option may need to be revised. For SA-T-8 and SA-T-22 it will be necessary for the survey work to check the use of the mitigation features and ensure they can continue to function in the long-term. For all 5 housing site options, if progressed into the plan, a tailored bat mitigation plan is likely to be required to ensure adverse effects on integrity can be ruled out, for the sites alone or in-combination. It may be necessary to consider the potential impacts of the site options together and it is recommended that the survey work is co-ordinated across the various sites. Survey work and the information collected will need to conform to the relevant guidance. For the relevant road junctions, further details of the improvements for these locations are required before adverse effects on integrity can be ruled out.

# 7. Appropriate assessment topic: loss/impacts to supporting habitat around European sites (non-bat sites).

## Introduction

7.1 For a number of sites and species there are areas outside the boundary of the European site that are likely to be important and at risk from development. There are therefore risks to sites through the loss, deterioration or compromise of habitat outside a European site boundary that serves a supporting role for the European site, as reservoirs of mobile species migrating in and out of a European site or providing genetic exchange, as roosting, foraging or breeding sites for species as stepping stones between European sites and equivalent habitat. Where European sites are isolated in the landscape there is greater risk of species extinctions and little chance of recolonisation.

7.2 The following sites and issues are potentially relevant:

- **Exe Estuary SPA/Ramsar**: land outside the SPA may support high tide roosts for waterbirds or provide foraging sites for waterfowl such as Dark-bellied Brent Geese.
- **East Devon Heaths SPA**: Nightjar are known to roam widely from breeding sites and feed in a range of habitats away from heaths.
- **Culm Grasslands and Quants SAC**: Marsh Fritillary butterflies can range widely and numbers fluctuate between years. There is evidence that metapopulations are formed across multiple sites and 'clusters' of sites and adjacent habitat are important to maintain populations.

## Exe Estuary SPA/Ramsar

7.3 Around the Exe Estuary key areas will be grazing marsh and other wetland habitats and also areas of grassland where geese might feed. In the long-term, coastal squeeze and sea-level rise will result in the loss of roost sites within the estuary and sites outside the SPA boundary are likely to become more important. A selection of locations are mapped by Liley *et al.* (2014). More recent evidence comes from ringing studies around the estuary and other monitoring. For example, following recent declines of Oystercatchers on the Estuary, birds have been colour-ringed and tracked to help

understand how individual birds use the SPA and surrounds. While the project continues, preliminary results indicate that some areas outside the SPA such as the Golf Course at Cockwood may be important[18].

7.4 The following site options are relatively close to the estuary and contain habitats that could be used by geese or waders:

- SA-T-16 West of Exminster
- SA-ED-2 Oil Mill Lane

7.5 Risks with both sites are low as they are on high ground and set back from the estuary. As such their location is likely to mean it will be possible to rule out adverse effects on integrity, for the two sites alone or in-combination. If the sites progress into the draft GESP, checks will be necessary for both sites at the master planning stage to ensure there are no known roosts or records of waterbirds using the relevant areas. Should records show any use, then mitigation will be possible, either by securing the relevant part of the site for nature conservation or ensuring suitable land nearby is managed to provide better roosting/feeding habitat.

## East Devon Heaths SPA

7.6 Nightjar are an interest feature of the East Devon Heaths SPA and studies of Nightjar in Dorset have shown that birds will fly a considerable distance away from the breeding sites to feed at night (Alexander & Cresswell 1990; Cresswell 1996). These studies radio-tracked birds and showed that they were leaving forest clearings (most of the tracking was conducted in conifer plantations) to feed in deciduous woodland, orchards, village gardens and they also used wetland sites such as streams, small ponds and water meadows. Cresswell (1996) also notes that radio-tracking from an open heathland site (Hartland Moor) found birds were using nearby saltmarsh.

7.7 Nightjar feed on insects and predominantly catch them in flight, either in sustained flight or 'fly-catching' from a perch or the ground (see Cresswell 1996 for details). Cresswell (1996) argues that habitats used on foraging trips - deciduous woodland and wet grassland in particular - may be of considerable importance to Nightjar: "when it comes to Nightjar

[18] Preliminary results have been presented by Natural England; see also page of the local wader ringing group

conservation, we believe that there may be a need to consider both breeding and feeding habitats".

7.8 Significant urban growth around the East Devon Heaths SPA may therefore impact on Nightjar. The concerns would relate to:

- The direct loss of foraging habitat that is functionally linked to the SPA;
- Flight paths and access to foraging habitat being blocked or restricted by the presence of built development.

7.9 Nightjar are summer migrants and on territory from May through to August. During this time, it is likely that different areas and habitats will be important for foraging. Different areas are likely to be important depending on the weather (for example some areas will be more sheltered than others), depending on prey abundance (different insects will peak at different times and in different habitats) and for individual Nightjar (for example requirements may be different just after migration or when feeding chicks), as such it is expected that a range of habitats are likely to be important.

7.10 Off-site foraging for Nightjar has been a focus in the area around Poole in recent years, where there has been growing pressure to develop sites around Canford Heath. HRA work undertaken for the Borough of Poole Local Plan in 2018 (see Hoskin, Liley, & Underhill-Day, 2018) drew on GPS tracking, commissioned by developers (Souter, 2017). The use of GPS tags allows the locations of birds to be recorded at very regular intervals – for example every 2 minutes. Results highlighted that Nightjar were using areas outside the heaths, often for extended periods. Multiple birds were using some locations and there appeared to be limited use of urban areas. The tagging surveys have been continuing and a ringing group has also been undertaking GPS tracking at other Dorset heathland sites. The complete results from these studies are likely to be available soon and should provide useful context for the East Devon Heaths SPA. The results should help clarify the ranges that Nightjar will roam and the risks from development in the wider area.

7.11 The East Devon Heaths SPA supported 83 churring males in 1992, representing 2.4% of the then British population. The last national survey in 2004 recorded 80 churring males and in 2017 there were 113 churring males recorded (figures from the supplementary conservation objectives and also from Panter, Lake, & Liley, 2019). There have been no studies of off-site foraging by Nightjars around the SPA, the conservation objectives

(supplementary advice) for the SPA are however clear on the importance of the issue and set a number of targets that relate to off-site foraging (see Table 7).

**Table 7: Supplementary Conservation Objectives relating to supporting habitat (outside of the SPA): extent and distribution. See Natural England website for full details.**

| Attribute | Target | Supporting & explanatory notes |
|---|---|---|
| Connectivity with supporting habitats | Maintain the safe passage of breeding Nightjar moving between their nesting and feeding areas | The ability of the feature to safely and successfully move between feeding and nesting areas using flight-lines and movement routes is critical to their breeding success and to adult fitness and survival. This target will apply within the site boundary and where birds regularly move to and from off-site habitat where this is relevant. The foraging range of nightjar is known to extend up to several kilometres from their nest sites. |
| Conservation measures | Maintain management or other measures (whether within and/or outside the site boundary as appropriate) necessary to maintain the structure, function and/or the supporting processes associated with breeding Nightjar and its supporting habitats. | Active and ongoing conservation management is often needed to protect, maintain or restore this feature at this site. Other measures may also be required, and in some cases, these measures may apply to areas outside of the designated site boundary in order to achieve this target. Further details about the necessary conservation measures for this site can be provided by Natural England. This information will typically be found within, where applicable, supporting documents such as Natura 2000 Site Improvement Plan, Site Management Strategies or Plans, the Views about Management Statement for the underpinning SSSI and/or management agreements. Management measures for desired conservation outcomes would include: Habitat management to maintain predominantly low heath or grassland with small patches (>2m square) of dry, bare ground Avoid mechanised bracken control wherever nightjars might be nesting, and Avoid all other mechanised management operations between May and September when they may destroy nests. Management of regular recreational access |
| Food availability within supporting habitat | Maintain a high abundance and availability of key prey items (e.g. moths, beetles) at prey sizes preferred by Nightjar. | The availability of an abundant food supply is critically important for successful breeding, adult fitness and survival and the overall sustainability of the population. As a result, inappropriate management and direct or indirect impacts which may affect the distribution, abundance and availability of prey may adversely affect the population. |
| Landscape | Maintain the amount of open and unobstructed patches within nesting and foraging areas used by Nightjar, including areas of clear-fell, windfall, wide tracks, open forest and heath. | This feature is known to favour large areas of open terrain, largely free of obstructions, in and around its nesting, roosting and feeding areas. Often there is a need to maintain an unobstructed line of sight within nesting, feeding or roosting habitat to detect approaching predators, or to ensure visibility of displaying behaviour. An open landscape may also be required to facilitate movement of birds between the SPA and any off-site supporting habitat. |
| Extent and distribution of supporting habitat | Maintain the extent, distribution and availability of off-site habitat known to support the SPA's breeding Nightjar population during its breeding cycle (for feeding, foraging, roosting) | Conserving or restoring the extent of supporting habitats and their range will be key to maintaining the site's ability and capacity to support the SPA population. The information available on the extent and distribution of supporting habitat used by the feature may be approximate depending to the nature, age and accuracy of data collection. The extent and distribution of supporting habitat used by Nightjar will also vary over time in relation to habitat management, |

| | | |
|---|---|---|
| | | succession, and ad-hoc events such as heath fires. This target will apply to supporting feeding or roosting habitat outside of the SPA boundary where this is of critical importance in maintaining or restoring the SPA population ('functionally-linked land'). This has been included as Nightjars are known to forage several kilometres away from their nesting territory |

7.12 In the absence of the complete results from the recent Dorset studies using GPS trackers, the original radio-tracking studies in Dorset provide the best guide as to the range that birds will travel off-site, with birds reported travelling up to 7km (Cresswell, 1996). A 7km radius is shown in Map 7. There are 8 site options that lie within (or partly within) 7km of the SPA (Table 8).

**Table 8: Site options within 7km of the East Devon Heaths SPA.**

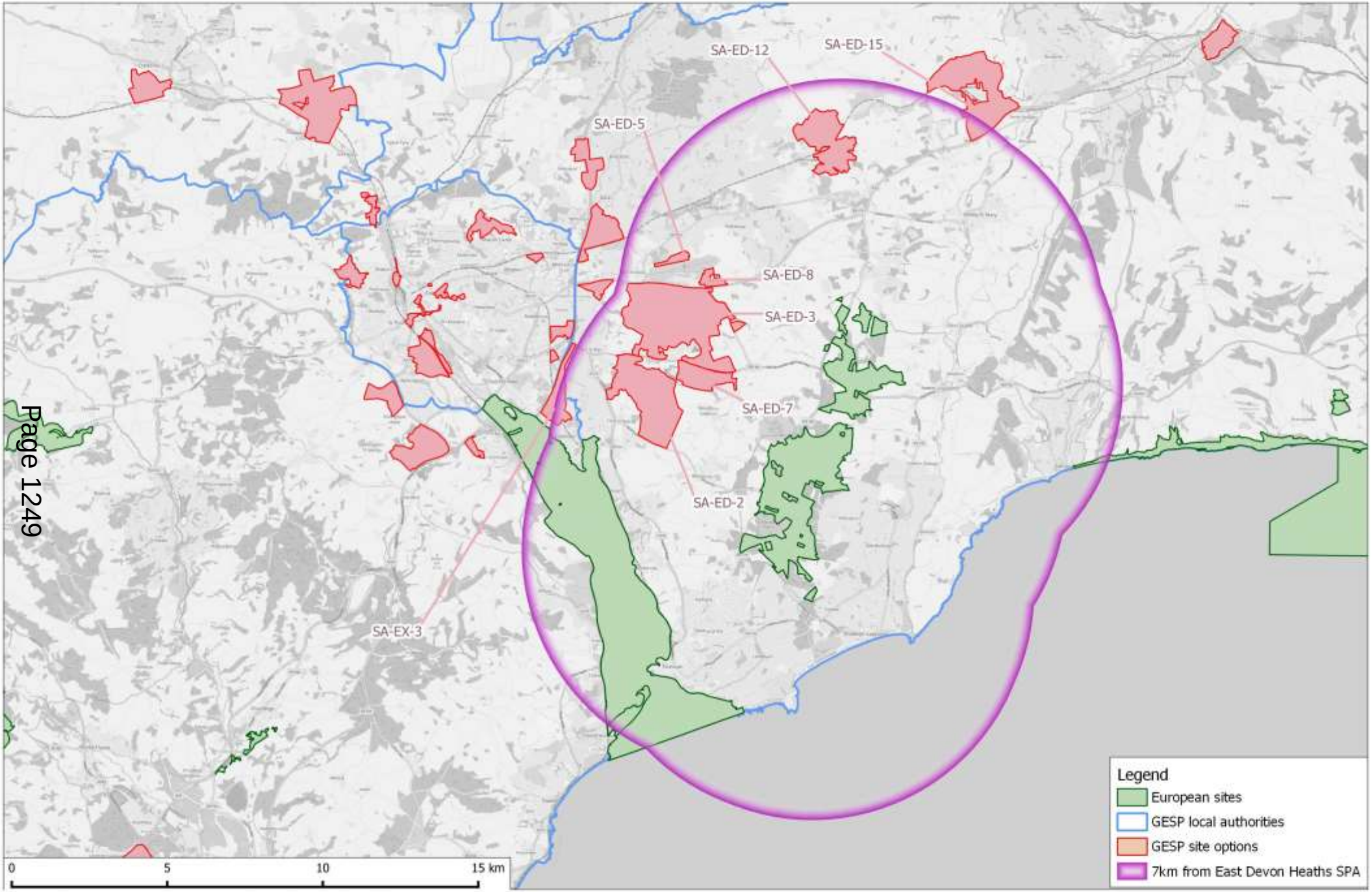
| Site Option | Site Option Name | Potential number homes | Area (ha) | Distance to East Devon Heaths SPA (km) |
|---|---|---|---|---|
| SA-ED-7 | Higher Greendale | 1300 | 107 | 2.1 |
| SA-ED-3 | Hill Barton | 10000 | 660 | 2.6 |
| SA-ED-2 | Oil Mill Lane | 4000 | 380 | 3.0 |
| SA-ED-8 | Airport Business Park | 0 | 27 | 3.5 |
| SA-ED-12 | Whimple | 2500 | 242 | 3.9 |
| SA-ED-5 | North of Exeter Airport | 0 | 22 | 4.9 |
| SA-ED-15 | Feniton | 2800 | 364 | 6.3 |
| SA-EX-3 | Land between M5 and Topsham | 1500 | 7 | 6.4 |

7.13 It can be seen from Map 7 that together the above site options cover a large proportion of the potential foraging habitat for Nightjar within 7km. Sites SA-ED-2, SA-ED-3 and SA-ED-7 are particularly large and lie in relative proximity to the SPA. While it may be possible that the flood-plain of the River Otter provides much of the foraging land, given the lack of evidence on this issue and the scale of growth, caution is necessary.

7.14 Furthermore, there is emerging evidence from the Dorset GPS studies that Nightjar switch regularly between different heaths and move between sites. As such connectivity to sites just to the east (e.g. Lambert's Castle area), to the north (Ashclyst Forest) and the West (Haldon) may be important. Sites SA-ED-6 and SA-ED-12 lie between Ashclyst and the East Devon Heaths SPA and continued development here may block linkages between the sites.

7.15 In order to rule out adverse effects on integrity in relation to off-site foraging by Nightjar it will be necessary to check the extent to which Nightjars roam from the SPA, the habitats they use and the relative importance of the land within any of the 8 site options listed above that progress into the draft GESP. Such work will also need to consider in-combination risks from other development (outside GESP) in the wider area. At this stage in the plan making process it is important that the issue is identified and surveys done prior to any master planning to ensure any areas important to foraging Nightjar or routes used can be protected and enhanced. This may reduce the amount of housing feasible in particular locations. Results from recent studies in Dorset, using GPS tags on Nightjars around Poole, may provide further insights and understanding, when available.

**Map 7: GESP site options within 7km of the East Devon Heaths SPA**

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## Culm Grasslands SAC & Quants SAC

7.16 It has long been recognised that Marsh Fritillary populations typically span networks of patches of suitable habitat, these patches are often small but interlinked (Bulman et al., 2007; Warren, 1994). The butterfly usually breeds in damp acidic grassland but also occurs on calcareous grassland. Colonies are often in very small patches and numbers fluctuate from year to year. Fluctuations relate to a parasitic wasp, as well as climate and habitat management. Certain patches appear to be transient or suboptimal and are only occupied in certain years, and as such the populations are dynamic. Maintaining the interconnected networks of suitable habitat – i.e. clusters of habitat patches - is essential to maintain the population.

7.17 The Supplementary Conservation Objectives for both the Culm Grasslands SAC and the Quants SAC recognise the importance of connectivity in the wider landscape for Marsh Fritillary. This is especially the case at the Quants SAC where Marsh Fritillaries became extinct in 2011. The nearest extant population is approximately 6km due south at Middle Barton. There is also a large population at Southey Moor.

7.18 The conservation objectives advise that Marsh Fritillaries can disperse up to 15-20km. Reviewing the site options there is only one within 15km of either SPA and only a small number within 20km (Table 9 and Table 10). Reviews of data on the NBN Atlas[19] for Marsh Fritillary indicate very scattered records in the north GESP area and none close to the site options. As such it would appear that risks are relatively low.

**Table 9: Site options within 20km of the Quants SAC.**

| Site Option | Site Option Name | Number homes | Area (ha) | Distance to the Quants SAC (km) |
|---|---|---|---|---|
| SA-MD-12 | Area south of Sampford Peverell | 2200 | 167 | 14.4 |
| SA-MD-9 | East of Cullompton | 5000 | 802 | 15.8 |
| SA-ED-18 | Honiton East | 1100 | 75 | 15.9 |
| SA-ED-15 | Feniton | 2800 | 364 | 18.9 |
| SA-MD-10 | Land at Hartnoll Farm | 950 | 101 | 19.1 |

[19] See https://records.nbnatlas.org/occurrences/search?q=lsid:NHMSYS0000516340#tab_mapView

**Table 10: Site options within 20km of the Culm Grasslands SAC.**

| Site Option | Site Option Name | Number homes | Area (ha) | Distance to the Culm Grasslands SAC (km) |
|---|---|---|---|---|
| SA-MD-12 | Area south of Sampford Peverell | 2200 | 167 | 17.4 |
| SA-MD-10 | Land at Hartnoll Farm | 950 | 101 | 14.6 |

7.19 Given the scale of the respective developments, as part of the master planning exercise for the site options listed within 20km, checks should be made by a suitably qualified ecologist for any suitable Marsh Fritillary habitat and a more detailed and thorough check made for records of the species. This will need to feed into later iterations of the HRA and will inform whether the plan will have no effect at all (ruling out adverse effects alone or in-combination) or whether the appropriate assessment will have to be extended to consider the possible cumulative effects alongside other plans or projects. Given that the site options are located well away from the relevant SACs, the risks are low and will mean the sites are likely to be deliverable without adverse effects on the integrity of the Culm Grasslands SAC and the Quants SAC, through the loss of supporting habitat. Masterplans may need to take into account the need to protect particular habitat and ensure connectivity.

**Key findings: loss/impacts to supporting habitat around European sites (non-bat sites)**

## Nightjars

There is no information on off-site foraging use by Nightjars around the East Devon Heaths SPA. The risks relate to:

- The direct loss of foraging habitat that is functionally linked to the SPA;
- Flight paths and access to foraging habitat being blocked or restricted by the presence of built development.

The following site options fall within 7km of the SPA (7km reflecting the distances Nightjar have been shown to fly in Dorset) (sites are listed in order of proximity):

- SA-ED-7 Higher Greendale;
- SA-ED-3 Hill Barton;
- SA-ED-2 Oil Mill Lane;
- SA-ED-8 Airport Business Park;
- SA-ED-12 Whimple;
- SA-ED-5 North of Exeter Airport;
- SA-ED-15 Feniton;
- SA-EX-3 Land between M5 and Topsham.

Together these site options represnt a total of 22,100 new houses and significant employment development. Furthermore, some lie between the SPA and other sites that support breeding Nightjar, potentially creating barriers to movement by the birds. In order to rule out adverse effects on integrity in relation to off-site foraging by Nightjar it will be necessary to check the extent to which Nightjars roam from the SPA, the habitats they use and the relative importance of the land within any of the 9 site options listed above if progressed into the draft GESP. Such work will also need to consider in-combination risks from other development (outside GESP) in the wider area. At this stage in the plan making process it is important that the issue is identified and surveys done prior to any master planning to ensure any areas important to foraging Nightjar or routes used can be protected and enhanced. This may reduce the amount of housing feasible in particular locations. Results from recent studies in Dorset, using GPS tags on Nightjars around Poole, may provide further insights and understanding, when available. Policy wording for these site options will need to highlight the off-site foraging issue for Nightjars.

## Marsh Fritillaries

Marsh Fritillaries can disperse 15-20km. The following site options are within 20km of either the Culm Grasslands SAC and the Quants SAC:

- SA-MD-12 Area south of Sampford Peverell;
- SA-MD-9 East of Cullompton;
- SA-MD-18 Honiton East;
- SA-MD-15 Feniton;
- SA-MD-10 Land at Hartnoll Farm.

Checks need to be made by a suitably qualified ecologist for any suitable Marsh Fritillary habitat and a more detailed and thorough check made for records of the species. This will need to feed into later iterations of the HRA and will inform whether the plan will have no effect at all (ruling out adverse effects alone or in-combination) or whether the appropriate assessment will have to be extended to consider the possible cumulative effects alongside other plans or projects. Given that the site options are located well away from the relevant SACs, the risks are low and will mean the sites are likely to be deliverable without adverse effects on the integrity of the Culm Grasslands SAC and the Quants SAC, through the loss of supporting habitat. Masterplans may need to take into account the need to protect particular habitat and ensure connectivity.

# 8. Appropriate assessment topic: Recreation

## Introduction

8.1 Postcode data from 2020 indicates that there are around 191,596 residential properties within East Devon, Exeter City, Teignbridge and Mid Devon. The GESP target of 53,260 homes (2,663 per year) between 2020-2040 therefore is equivalent to a 28% increase in the amount of housing. Such a marked increase in housing is likely to result in a marked increase in people, and therefore potential recreational use.

8.2 In the UK there is considerable overlap between nature conservation and recreation. Many of our most important nature conservation sites have legal rights of access, for example through Public Rights of Way or Open Access through the Countryside and Rights of Way Act (CRoW) 2000. People are often drawn to sites that are important for nature conservation as they are large, scenic and often few other alternatives exist. Recreation use can include a variety of activities, ranging from the daily dog walks to competitive adventure and endurance sports. There can be a difficult balancing act between providing for an increasing demand for access without compromising the integrity of protected wildlife sites.

8.3 There is now a strong body of evidence showing how increasing levels of access can have negative impacts on wildlife. Visits to the natural environment have shown a significant increase in England as a result of the increase in population and a trend to visit more (O'Neill, 2019). The issues are particularly acute in southern England, where population density is highest. Issues are varied and include disturbance, increased fire risk, contamination and damage (for general reviews see: Liley et al., 2010; Lowen, Liley, Underhill-Day, & Whitehouse, 2008; Ross et al., 2014; Underhill-Day, 2005).

8.4 The issues are not however straightforward. It is now increasingly recognised that access to the countryside is crucial to the long term success of nature conservation projects, for example through enforcing pro-environmental behaviours and a greater respect for the world around us (Richardson, Cormack, McRobert, & Underhill, 2016). Access also brings wider benefits to society that include benefits to mental/physical health (Keniger, Gaston, Irvine, & Fuller, 2013; Lee & Maheswaran, 2011; Pretty et al., 2005) and economic benefits (ICF GHK, 2013; ICRT, 2011; Keniger et al., 2013; The Land Trust, 2018). Nature conservation bodies are trying to encourage people to

spend more time outside and government policy is also promoting countryside access in general (e.g. through enhancing coastal access).

## Potential sites and risks

8.5 Recreation issues are relevant for a number of different European sites (see Table 11).

**Table 11: European sites and potential recreation impacts relevant at the appropriate assessment stage. Relevant pressures/threats from Site Improvement Plans (SIPs) are drawn from Appendix 3. Direct impact from third party can include unauthorised access and fire.**

| Site | Recreation impacts/risks | Relevant pressures/threats from SIPs | | |
|---|---|---|---|---|
| | | Direct impact from third party | Wildfire/arson | Public access/disturbance |
| Beer Quarry & Caves SAC | Disturbance to roosting bats. | ✓ | | |
| Culm Grasslands SAC | Dog fouling, trampling and fire risk. | ✓ | | |
| Dartmoor SAC | Increased fire incidence, dog fouling and trampling to habitats; Salmon (and Otter) potentially at risk from access to rivers. | | ✓ | |
| Dawlish Warren SAC | Trampling damage to dune habitats, dog fouling, fire incidence. | | | ✓ |
| East Devon Pebblebed Heaths SAC | Trampling damage, dog fouling, increased fire risk. | | ✓ | ✓ |
| East Devon Heaths SPA | Disturbance to Nightjar and Dartford Warbler; also fire risk. | | ✓ | ✓ |
| Exe Estuary Ramsar | Disturbance to waterbirds. | | | ✓ |
| Exe Estuary SPA | Disturbance to waterbirds. | | | ✓ |
| Exmoor & Quantock Oakwoods SAC | Possible risks to bat roosts from disturbance. | | | |
| Exmoor Heaths SAC | Increased fire incidence, dog fouling and trampling to habitats | ✓ | | |
| Lyme Bay & Torbay SAC | Disturbance from diving. | | | ✓ |
| River Axe SAC | Damage to riparian vegetation and potential for spread of invasive species | | | |
| Sidmouth to West Bay SAC | Trampling damage, dog fouling. | ✓ | | |
| South Hams SAC | Disturbance to roosting bats. | | | ✓ |
| South Dartmoor Woods SAC | Trampling damage, dog fouling. | | | |

## Variation around European sites in the scale of change

8.6 In order to check the scale of possible change as a result of the site options in the GESP consultation document, we calculated for each of the European sites in Table 9 the current amount of housing (in 2020) and then the potential additional housing. We summarised current and future housing within 0-5km and within 0-10km and where an site options spanned a particular band, we estimated the amount of housing within the band simply based on the relative proportion of the site options within each band. Results are summarised in Table 12.

**Table 12: Number of residential properties currently around relevant European sites, new housing within site options and the % change.**

| European site | Current | | GESP | | % change | |
|---|---|---|---|---|---|---|
| | 0-5km | 0-10km | 0-5km | 0-10km | 0-5km | 0-10km |
| Beer Quarry & Caves SAC | 6,676 | 16,583 | 0 | 0 | 0 | 0 |
| Culm Grasslands SAC | 1,521 | 10,443 | 0 | 0 | 0 | 0 |
| Dartmoor SAC | 13,931 | 58,675 | 0 | 0 | 0 | 0 |
| Dawlish Warren SAC | 26,494 | 39,628 | 0 | 5,145 | 0 | 13 |
| East Devon Pebblebed Heaths SAC/SPA | 31,895 | 70,725 | 13,124 | 26,842 | 41 | 38 |
| Exe Estuary SPA/Ramsar | 83,598 | 102,330 | 26,642 | 34,547 | 32 | 34 |
| Exmoor & Quantock Oakwoods | 4,177 | 10,645 | 0 | 0 | 0 | 0 |
| Exmoor Heaths SAC | 3,603 | 11,450 | 0 | 0 | 0 | 0 |
| Lyme Bay and Torbay SAC | 91,244 | 120,009 | 0 | 2,540 | 0 | 2 |
| River Axe SAC | 14,849 | 29,662 | 540 | 632 | 4 | 2 |
| Sidmouth to West Bay SAC | 30,390 | 46,763 | 0 | 540 | 0 | 1 |
| South Dartmoor Woods SAC | 17,235 | 90,479 | 0 | 3,400 | 0 | 4 |
| South Hams SAC | 17,255 | 85,863 | 0 | 4,356 | 0 | 5 |

8.7 The approach used to derive the data in Table 12 is relatively simplistic, using two distance bands (5km and 10km). These should however provide an indication of the potential change within the distances recreation typically originates from. The results show a very clear pattern. The East Devon Pebblebed Heaths SAC/SPA and the Exe Estuary have potentially a very large volume of new housing within the site options – representing an increase between 32% and 41% when compared to current housing levels. If all these site options therefore are to go forward, the pressure on these two European sites in particular will be very large. Alongside these two sites, there is also a reasonably marked increase – of 13% for Dawlish Warren. For the East Devon Pebblebed Heaths SAC/SPA, the Exe Estuary SPA/Ramsar and Dawlish Warren SAC the scale of potential development could trigger a need

to ensure a robust package of mitigation is in place. A initial basis for such mitigation is set out in draft Policy GESP36 (Exe Estuary, Dawlish Warren and East Devon Pebblebed Heaths) and considered in more detail below.

8.8 Looking more widely, away from the East Devon Pebblebed Heaths SAC/SPA, the Exe Estuary SPA/Ramsar and Dawlish Warren SAC, the scale of potential change is much less. Detailed sections on the two Dartmoor SACs and the River Axe are set out below. For other sites, using Table 12, adverse effects on integrity can be ruled out, as the level of change is either very low or very small. For South Hams SAC, unauthorised access to caves and roost sites is of concern, but given there is no increase in housing within 5km of the SAC boundary this is considered unlikely.

## Draft Policy GESP36 (Exe Estuary, Dawlish Warren and East Devon Pebblebed Heaths) and the South-east Devon European Site Mitigation Strategy

8.9 Our analysis of potential housing change highlights very marked pressure on the East Devon Pebblebed Heaths SAC/SPA, the Exe Estuary SPA/Ramsar and Dawlish Warren SAC. Not all the site options will progress into the draft GESP, so this illustrates the most extreme case.

8.10 The East Devon Pebblebed Heaths SAC/SPA is currently largely rural in feel and provides extensive open space with attractive views. The site draws visitors for dog walking, walking and also activities such as mountain biking and horse riding. There is an existing visitor management plan (Liley, Panter, & Underhill-Day, 2016). That plan sets out the issues with recreation, presents visitor survey data and sets out measures designed to address the issues with recreation from housing, as set out in the relevant local plans adopted at the time. The potential scale of further development in GESP, in relatively close proximity, with easy, direct road access would mean a further, very marked shift in access. Depending on the site options progressed to the draft GESP, comprehensive mitigation could be necessary.

8.11 Similarly, for the Exe Estuary, including Dawlish Warren, the scale of change from the total of the site options is large and the existing mitigation approach will need to accommodate a step change in local housing if sites were progressed.

8.12 A strategic and plan led approach to protecting European sites from the impact of recreation is now widely recognised as being more effective than

dealing with these impacts on a development by development basis. For example, educating visitors, reinforcing messages with site-based staff, and providing the right infrastructure to meet visitor needs and influence visitor behaviour cannot all be funded through an individual development. Mitigation for recreation pressure needs to be a multi measure approach, with measures working together in an integrated way (i.e. as a package of different measures) to give confidence that adverse effects can be ruled out.

8.13 Draft Policy GESP36 sets out requirements for mitigation the East Devon Pebblebed Heaths SAC/SPA, the Exe Estuary SPA/Ramsar and Dawlish Warren SAC:

- Development of residential or holiday accommodation within 10km of one or more of the protected sites will be required to pay a Strategic Access Management and Monitoring (SAMM) fee per additional dwelling or tourist bedspace, to be calculated annually based on the most up to date South East Devon Habitats Mitigation Strategy (or equivalent) and its implementation plan.
- Development of residential or holiday accommodation within 10km of one or more of the protected sites will be required to provide and maintain Suitable Alternative Natural Greenspace (SANG) in perpetuity, either:
  - In accordance with SANG provision as set out in a development plan allocation, at the expense of the development and early in the delivery of the site, or
  - Where development is without an associated SANG identified in an allocation policy, pay a financial contribution to the Local Planning Authority sufficient to provide and maintain 180 square metres of SANG per dwelling or tourist bedspace in an appropriate strategic location
- Provide any other specific measures to avoid residual impacts identified from Appropriate Assessment.

8.14 This policy is in line with the existing strategic mitigation approach that has been in place since 2014 and reflects the emerging update (see earlier paras 2.25-2.27 for context). Given the scale of the site options in GESP, likely significant effects from recreation are triggered for the sites on their own. The strategy will need to deliver mitigation for these sites as well as the many smaller sites that will be coming forward outside of GESP and for which the issues are more likely to relate to in-combination effects.

8.15 In order to be able to rule out adverse effects on integrity for the relevant European sites it will be necessary that the updated strategy is finalised alongside GESP.

8.16 The draft policy suggests a 180m$^2$ of SANG per dwelling within 10km of one of the relevant European sites. This level of SANG delivery is broadly equivalent to that used in other parts of the UK, such as the Thames Basin Heaths. In total there are nearly 40,000 homes considered in the site options that lie within 10km of the East Devon Pebblebed Heaths SAC/SPA, the Exe Estuary SPA/Ramsar or Dawlish Warren SAC (Table 13). The overall quantum of SANG, locations and design will need to be finalised in the mitigation strategy and future iterations of the GESP plan will need to ensure this is cross-referenced and the SANG requirements set out in policy.

**Table 13: Potential GESP site options that lie within 10km of either the East Devon Pebblebed Heaths SAC/SPA, the Exe Estuary SPA/Ramsar or Dawlish Warren SAC and indicative SANG requirements (using 180m² per dwelling). SANG areas rounded to nearest hectare. All site options listed lie wholly within the 10km. SA-MD-4 is omitted from the table as it just clips the 10km buffer.**

| Site Option | Site Option name | Number of homes | Indicative SANG requirement (ha) |
|---|---|---|---|
| SA-ED-3 | Hill Barton | 10000 | 180 |
| SA-EX-10 | Marsh Barton | 5544 | 100 |
| SA-ED-2 | Oil Mill Lane | 4000 | 72 |
| SA-ED-15 | Feniton | 2800 | 50 |
| SA-ED-12 | Whimple | 2500 | 45 |
| SA-ED-25 | Westclyst & Mosshayne Farms | 1600 | 29 |
| SA-EX-6 | Water Lane | 1570 | 28 |
| SA-EX-3 | Land between M5 and Topsham | 1500 | 27 |
| SA-T-18 | Peamore | 1500 | 27 |
| SA-ED-7 | Higher Greendale | 1300 | 23 |
| SA-EX-19 | East Gate | 1160 | 21 |
| SA-T-17 | Markham Lane, Ide | 1100 | 20 |
| SA-EX-26 | Sandy Gate | 1050 | 19 |
| SA-EX-4 | North of Stoke Hill | 768 | 14 |
| SA-EX-5 | Land adjacent Exeter St David's Station | 660 | 12 |
| SA-EX-22 | West Gate | 620 | 11 |
| SA-ED-26 | Cowley | 500 | 9 |
| SA-EX-1 | Attwells, North of Exwick | 400 | 7 |
| SA-EX-7 | North Gate | 310 | 6 |
| SA-EX-8 | South Gate | 300 | 5 |
| SA-EX-18 | Pinhoe Trading Estate | 278 | 5 |
| SA-T-16 | West of Exminster | 200 | 4 |
| SA-EX-23 | Land between South, Market and Fore Street | 175 | 3 |
| SA-EX-9 | Howell Road Car Park | 106 | 2 |
| **Total** | | **39,941** | **719** |

8.17 The updated mitigation strategy will set out SANGs requirements in more detail, likely including reflection on overall quantum, minimum sizes, design, parking requirements and other elements. How the SANG model works for mitigating impacts arising within Exeter city will also be reviewed. We are aware further work is being carried out by Exeter City Council looking at the role and function of the Valley Park network. Future iterations of the HRA will need to check SANG provision to ensure that it is achievable and that suitable sites are available and able to be secured. Alongside SANG delivery

the strategy will set out SAMM provision including wardening and engagement. The levels of SAMM will need to relate to the overall level of growth, both within GESP and the other relevant local plans.

8.18 In addition to the site options identified above, site option SA-ED-27 Poltimore East includes motorway services that may include accommodation. Draft policy GESP36 has potential to provide mitigation for the motorway services proposal as it considers tourist accommodation. This matter will be kept under review in the next iteration of the HRA.

8.19 Draft policy GESP 25 Long Distance Trails sets out a network of strategic long distance cycle trails and these include the Clyst Valley Trail, which links directly to the Exe Estuary SPA/Ramsar. Further information on the location, route and how this will link with the existing cycle trails around estuary will be necessary. These design elements will need to feed into the next iteration of the HRA. Similarly, Draft Policy GESP 31 Settlement Specific Enhancements includes comprehensive pedestrian and cycle networks at locations including Exmouth, with risks to the Exe Estuary SPA/Ramsar, Dawlish Warren SAC and the East Devon Pebblebed Heaths SAC/SPA. Further details of design and likely use are necessary to feed into the next iteration of the HRA.

## The River Axe SAC and site option SA-ED-19

8.20 The River Axe SAC is the only additional site with any change within 5km. The relevant development here is SA-ED-19 Axminster South. The site option (potentially 540 homes) is just 400m from the SAC and there are footpath links. Issues are specific to this site option and should be addressed through an access and visitor management plan for the area around the site option. There are public footpaths that provide access along the river banks and link to the site. Risks will relate to trampling of the riparian vegetation, disruption to the grazing and possibly damage to the banks from people and their pets trying to access the water. This has the potential to undermine the conservation objectives, for example the supplementary conservation objectives for the SAC set a target for the riparian zone to "*restore a patchy mosaic of natural woody and herbaceous (tall and short swards) riparian zone".*

8.21 As GESP progresses, if this site option is included, it will be necessary to have confidence that any risks can be addressed. Given that the issues will be likely to be restricted to the particular stretch of the River close to the site option and can potentially be resolved through fencing, vegetation management and signage, mitigation should be achievable and will allow

adverse effects on integrity to the SAC from recreation to be ruled out. The access and visitor management plan will need to be finalised and agreed with Natural England prior to submission of a planning application to allow project level HRA to rule out adverse effects on integrity.

## Dartmoor SAC and South Dartmoor Woods SAC

8.22 For the South Dartmoor Woods SAC, there is a potential change in housing of around 4% within 10km, as a result of the site options being considered for GESP alone. Not all the site options will progress into the draft GESP, so this illustrates the most extreme case. For the Dartmoor SAC there are no site options within 10km, however given the draw of Dartmoor in terms of the access opportunities and national profile, visitors will travel from a wide area. As such the Dartmoor sites warrant particular consideration in terms of recreation use.

8.23 Postal survey results (Cruickshanks & Liley, 2012), although dated, provide some information on recreation use of Dartmoor by residents living within the GESP plan area. Teignbridge District residents undertook the most visits to Dartmoor (compared to those living in Exeter or East Devon), with an average of 30.9 visits per year per household. Dartmeet, Postbridge and Steps Bridge were the most popular target locations. Widecombe-in-the-Moor and Yarner Wood were the most visited locations by residents from the Teignbridge area whereas Steps Bridge, Postbridge and Dartmeet stood out for Exeter City and East Devon residents. Due to the nature of the National Park a very high proportion of visits were made by car and travel distances were typically higher than for other sites (such as the Exe Estuary or East Devon Heaths), due to the attractiveness of the site for day trips and days out. Therefore, whilst people may travel further to reach Dartmoor, they visited the site less frequently. Walking and dog walking were the main activities, but due to the terrain, other activities such as mountain biking, remote camping, horse riding and rock climbing featured. Most dog walking visits to Dartmoor were made by residents of Teignbridge District.

8.24 More recently, work on recreation pressure for Dartmoor National Park and the impacts of growth in the wider area, have been undertaken by Exeter University (Day, Harwood, Tyler, & Zonneveld, 2018). Their modelling indicated that there are currently around 7 million day trips per year to Dartmoor from residents of the eight neighbouring local authorities. Increased populations in those authorities was predicted to result in more than 870,000 additional annual visits to Dartmoor per year, a rise of some

12%. The report considers the impacts from the additional recreation, and highlights a range of species that are considered vulnerable, based on expert review. While many of these do not relate to the SAC interest, they did include Salmon and it was suggested that recreation issues were possible or minor. The analyses also considered trampling damage to habitats and they estimated that increasing recreational pressure on Dartmoor could result in 10,854 $m^2$ of bare ground being exposed along the path network and increased gullying along 42km of path. The Park Authority have drafted wording for the Dartmoor Local Plan Review which considers recreation across the National Park and potential needs for mitigation (Strategic Policy 4.9).

8.25 Based on our understanding of the issues, concerns from recreation in terms of the European site interest relate to:

- Dartmoor SAC: dog fouling, conflicts with land management (grazing), increased fire risk, trampling damage, impacts to spawning Salmon (e.g. from canoe launching).
- South Dartmoor Woods: dog fouling, trampling, increased fire risk, trampling damage.

8.26 There is a general lack of original research for these issues, however the work by Exeter University flags the need for ongoing consideration. Dartmoor is a national park and visitor use includes a mix of day trips and visits from further afield. As such the impacts from housing growth are complex and potentially relate to a wide area. It should be noted that there are two statutory purposes for national parks in England and Wales. The first is to conserve and enhance natural beauty, wildlife and cultural heritage and the second is to promote opportunities for the understanding and enjoyment of the special qualities of national parks by the public. This second purpose includes opportunities for open air recreation. However, if it appears that there is a conflict between the two National Park purposes, the Environment Act 1995 requires greater weight to be attached to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park (this is known as the Sandford Principle[20]).

8.27 It is potentially a challenge for Dartmoor National Park to continue to manage the growing recreation use without harm to the ecological interest and where that increase is linked to growth in housing within the adjacent

[20] Named after Lord Sandford, who chaired the 1974 National Parks Policy Review Committee.

local authorities the challenges are harder. This is because such visitor use will not be staying visitors who are likely to plan their visit carefully in advance using the National Park website, go to visitor centres etc.

8.28 HRA work for the Teignbridge Local Plan (Oxford et al., 2013) was not able to rule out adverse effects arising from recreational disturbance on the integrity of either the Dartmoor SAC or the South Dartmoor SAC. Oxford *et al.* advised that ongoing monitoring of visitor pressure and possible associated biological change would be needed to provide early warning should impacts occur that could have an adverse effect of the integrity of the Dartmoor and South Dartmoor Woods SAC. As such, they advised that Teignbridge District Council should liaise with Dartmoor National Park Authority, other local planning authorities and Natural England to ensure that adequate monitoring is in place. Furthermore, given that the impacts of recreation they identified related to specific locations and areas within the SAC (such as salmon spawning areas), mitigation measures could be established if required.

8.29 The HRA for the Plymouth and South West Devon Joint Local Plan (Anon, 2017) concluded there would be no adverse effects on integrity to the two Dartmoor SACs as a result of the development proposed alone. In-combination, the HRA followed the approach of Teignbridge, recommending monitoring and close working with the National Park Authority. The HRA concluded this would be sufficient to rule out adverse effects from the development in the Plan in-combination with neighbouring authorities.

8.30 There is uncertainty around this issue at this point in the GESP. Given the scale of potential growth that could be included in the GESP, further evidence will be necessary before adverse effects on integrity can be ruled out, either from the development in GESP alone or in-combination with other plans or projects. Discussion is required with the neighbouring authorities and Dartmoor National Park to consider the monitoring currently in place and the potential for mitigation intervention. Given the National Park's role in promoting and managing recreation, it should be possible to ensure any issues can be resolved, as there is a body that can oversee and deliver mitigation. Any solution will require working with the National Park and potentially other authorities and will require some further policy wording within GESP. It should then be possible to reach a conclusion of no adverse effects on integrity at submission.

**Key findings: Recreation**

Draft Policy GESP36 (Exe Estuary, Dawlish Warren and East Devon Pebblebed Heaths) and the South-east Devon European Site Mitigation Strategy

Together, the site options involve a marked housing change around the East Devon Pebbelbed Heaths (potentially a 41% increase within 5km), the Exe Estuary (potentially a 32% increase within 5km) and Dawlish Warren SAC (13% increase within 10km). Not all the site options will progress into the draft GESP, so this illustrates the most extreme case. These site options fall within an area covered by an existing mitigation strategy and this strategy is being updated to address any potential additional growth. It will be essential that the strategy is finalised alongside GESP so that mitigation requirements are clear and suitable mechanisms for timely delivery are secured. Draft policy GESP36 is the relevant policy which sets out mitigation requirements and this cross-references to the strategy.

Depending on the size and location of the site options progressed a significant quantum of suitable alternative natural greenspace (SANG) will need to be secured. This will be set out in the updated mitigation strategy.

Draft policy GESP 25 Long Distance Trails sets out a network of strategic long distance cycle trails and these include the Clyst Valley Trail, which links directly to the Exe Estuary SPA/Ramsar. Further information on the location, route and how this will link with the existing cycle trails around estuary will be necessary. These design elements will need to feed into the next iteration of the HRA.

Draft Policy GESP 31 Settlement Specific Enhancements includes comprehensive pedestrian and cycle networks at locations including Exmouth, with risks to the Exe Estuary SPA/Ramsar, Dawlish Warren SAC and the East Devon Pebblebed Heaths SAC/SPA. Further details of design and likely use are necessary to feed into the next iteration of the HRA.

The River Axe SAC and Site Option SA-ED-19

SA-ED-19 Axminster South is an allocation for a potential of 540 houses and is just 400m from the River Axe SAC. Risks from recreation pressure for the SAC in the vicinity of the allocation will need to be resolved through an access and visitor management plan. The appropriate assessment for the GESP will need this to be progressed sufficiently to ensure adverse effects on integrity can be ruled out. Any plan will need to be finalised and agreed with Natural England prior to submission of a planning application to allow project level HRA to rule out adverse effects on integrity.

Dartmoor SAC and South Dartmoor Woods SAC

There are no GESP site options within the immediate vicinity of either of the Dartmoor SACs. However, recent research has flagged nature conservation issues with recreation use across Dartmoor National Park. Further discussion is necessary with the National Park and potentially neighbouring authorities and some further policy wording and agreed mitigation approach is likely to be necessary.

# 9. Appropriate Assessment topic: Water-related Issues

## Introduction

9.1 Run-off, outflow from sewage treatments and overflow from septic tanks can result in increased nutrient loads and contamination of water courses. This can have consequences for European sites which contain wetland or aquatic features, as the pollution will affect the ability of the site to support the given interest.

9.2 Furthermore, abstraction and land management can influence water flow and quantity, resulting in reduced water availability at certain periods or changes in the flow. This can exacerbate issues relating to water quality.

9.3 These impact pathways can be specific to particular parts of European sites or particular development locations and are also relevant to the overall quantum of development.

## Water supply

9.4 It is the role of the Environment Agency to make sure that abstraction is sustainable and does not damage the environment. Water abstraction is managed through a licensing system originally introduced by the Water Resources Act 1963.

9.5 The Environment Agency is the competent authority for the Water Framework Directive and it oversees the publication of River Basin Management Plans which are a requirement of the Directive. These plans set out how the management of water bodies will be undertaken, the roles of relevant bodies and the steps undertaken to ensure environmental targets are met.

9.6 The first River Basin Management Plans were produced in 2009 and then updated in 2015. In the more recent, second cycle river basin management plans the Environment Agency has committed to ensure abstraction licensing strategies and actions fully incorporate all environmental objectives and align with river basin management plans. The Agency will assess all licence applications and only issue licences that adequately protect and improve the environment. They will only grant replacement licences where the abstraction is environmentally sustainable and abstractors can

demonstrate they have a continued need for the water and that they will use it efficiently. In addition, for existing licences, the Agency will prioritise actions to protect and improve Natura 2000 sites and address the most seriously damaging abstractions during this plan period. All abstractors in surface water and groundwater bodies where serious damage is occurring or could occur without action should expect that their licences will be constrained over the next 6 years.

9.7 The South West Water, Water Resources Management Plan[21] predicts demand for water and issues around supply. The GESP area is supplied with domestic water from the Roadford Water Resource Zone (WRZ) and the Wimbleball WRZ. The Roadford WRZ covers north and south parts of Devon, including Plymouth, Torbay, and Barnstaple. The Wimbleball WRZ covers the area to the east, including Exeter and Tiverton. Forecasts are made based on population forecasts from the Office of National Statistics and property forecasts from local plans. The Resources Management Plan used water supply and demand forecasts, together with climate change and target headroom values to forecast baseline supply demand for a 25 year period, to 2044/5. This shows that, without any interventions:

- The Wimbleball WRZ is in surplus until the very end of the planning period with a minor deficit in 2044/45.
- The Roadford WRZ drops into deficit in 2028/9 and remains in deficit until the end of the planning period.

9.8 These predictions take into account abstraction licence changes and renewals, including information provided by the Environment Agency on actions that companies need to undertake to contribute towards meeting environmental obligations, including any required changes to abstraction licences.

9.9 Based on these forecasts, a series of interventions are set out that include, in the short-term, reducing South West Water's consumption of water at large sewage treatment works, reducing leakage and helping customers reduce water use. Also proposed is a feasibility study on a Roadford pumped storage scheme, checking the feasibility of such an option should leakage and demand management savings not materialise. With these interventions in place, the Water Resources Management Plan indicates there is sufficient surplus of water. Prior to further iterations of the HRA, checks should just be

[21] See South West Water website

made with the relevant bodies that forecasts are still appropriate given the scale of development within GESP. A further strategic point, given the reliance of the Water Resources Management Plan on interventions to reduce water consumption, is that water efficiency measures could be given greater emphasis in the Local Plan, in accordance with South West Water advice.

## Water quality

9.10 Wastewater or sewage is very damaging to water bodies as it can contain large amounts of nutrients (such as phosphorus and nitrates), ammonia, bacteria, harmful chemicals and other damaging substances. Issues arise where sewage treatment technology to remove enough of the phosphorus and harmful chemicals doesn't exist, where leakages occur from privately owned septic tanks and, in wet weather, storm overflows can discharge untreated sewage. Increases in housing increase pressure on the sewage network and the volume of wastewater.

9.11 River Basin Management Plans provide the framework for protecting and enhancing the water environment. The relevant plan for the South West[22] sets out statutory objectives for protected areas and a programme of measures to achieve those objectives. We draw on the relevant supporting data in the South West River Basin Plan in the site specific text below.

## Relevant European sites

9.12 Water-related issues are potentially relevant for the sites listed in Table 14. For all other European sites, not included in the table, the interest features are either not relevant or there are no plausible ways that the development in GESP could impact the water flow or quality.

[22] See Environment Agency website

**Table 14: European sites and water-related issues relevant at the appropriate assessment stage. Relevant pressures/threats from Site Improvement Plans (SIPs) are drawn from Appendix 3.**

| European site | Relevant threats/ pressures from SIP | | Notes |
|---|---|---|---|
| | Hydrological change | Water pollution | |
| Culm Grasslands SAC | ✓ | | Water availability critical to damp grassland habitat |
| Dartmoor SAC | ✓ | ✓ | Water quality and availability important for Salmon in particular, with impacts relevant outside the SAC given that Salmon migrate. |
| East Devon Pebblebed Heaths SAC | | ✓ | Water availability and quality important for Southern Damselfly and mire habitat |
| Exe Estuary Ramsar | | | Water quality has potential to influence algae and prey availability |
| Exe Estuary SPA | | | Water quality has potential to influence algae and prey availability |
| River Axe SAC | | ✓ | Water quality and availability relevant |
| Sidmouth to West Bay SAC | | ✓ | Sea cliff vegetation potentially vulnerable to water quality. |

## Culm Grasslands SAC

9.13 The Purple Moor Grass rush pasture and the wet heaths that are the interest features of this SAC occur on poorly drained soils and partly waterlogged soils and so ensuring water levels are high enough is therefore important for the site. The site improvement plan highlights hydrological change as a pressure/threat, however this is linked to the surrounding field drainage and not related to water abstraction. The supplementary conservation advice sets targets for water quality and also for hydrology. For example, for water quality, the targets state "*where the feature is dependent on surface water and/or ground water, restore water quality and quantity to a standard which provides the necessary conditions to support the feature".*

9.14 The site options within the GESP consultation document are all set well away from the Culm Grasslands SAC. The Mid Devon Local Plan HRA did not

identify any water issues for the Culm Grasslands and ruled out likely significant effects from water availability.

9.15 As such it should be possible to rule out adverse effects on integrity for the Culm Grasslands from GESP, alone or in-combination. Checks should be made with the Environment Agency prior to the next iteration of the HRA to ensure adequate surplus of water is in place such that all the allocations and the overall quantum of growth set out in GESP can be delivered.

## Dartmoor SAC

9.16 The Site Improvement Plan for Dartmoor SAC identifies hydrological change as a pressure/threat for blanket bogs. The issue here relates to old drainage networks and peat cuttings that have a negative impact on the conservation status of the habitat, drying out the bog. Actions to resolve this pressure/threat will involve blocking erosion gullies, drainage channels and rewetting old peat cuttings. There is therefore no link between policies in GESP and the hydrology of the blanket bog.

9.17 Atlantic Salmon are an Annex II species which are a qualifying feature for Dartmoor SAC, although not a primary reason for site selection. The salmon migrate from the sea to breed in freshwater, selecting shallow gravelly areas in clean rivers and streams where there is a swift flow of water.

9.18 New development has the potential to impact the rivers and streams used by the Atlantic Salmon. Any changes to water level, flow rate or water quality on the rivers and streams coming off Dartmoor, even changes that occur well outside the SAC, would have the potential to impact this interest feature.

9.19 As a competent authority, the Environment Agency has assessed the effects of existing abstraction licencing on water dependent European sites and has undertaken a Review of Consents. In preparing the South West Water Resources Management Plan all abstraction licences have been reviewed and reductions instigated where necessary for the European site interest. Any further licence applications will be subject to HRA by the Environment Agency. As such, there are strategic mechanisms in place to ensure adverse effects on the integrity of Dartmoor SAC and Salmon can be ruled out, both alone and in-combination. Checks should be made with the Environment Agency prior to the next iteration of the HRA to ensure adequate surplus of water is in place such that all the allocations and the overall quantum of growth set out in GESP can be delivered.

## Exe Estuary SPA/Ramsar

9.20 The Environment Agency classification for the Estuary under the Water Framework Directive in 2016 are Moderate for both Ecological and Chemical items[23]. Issues preventing waters reaching good status and the sectors identified as contributing to them include pollution from towns, cities and transport.

9.21 Checks will be necessary with Natural England and the Environment Agency to ensure water quality issues from any growth around the estuary can be accommodated.

9.22 Draft Policy GESP37 Clyst Valley Regional Park includes delivery of an improvement in the water quality of the River Clyst and tributaries, thereby achieving Water Framework Directives.

## River Axe SAC

9.23 The Lower Axe is classified by the Environment Agency in 2016 as in poor overall status[24]. Reasons include pollution from wastewater and in particular sewage discharge (Phosphate, Macrophytes and Phytobenthos). The supplementary site conservation objectives include targets for water quality, water chemistry and flow. Notably the objectives highlight that the target for maximum phosphorous concentrations is not achievable in 5 years.

9.24 A Nutrient Management Plan is in preparation (to be finalised in 2020) to establish how East Devon District Council can ensure housing development in the River Axe catchment can be delivered with no net increase in phosphate within the river. This highlights the issues with the current nutrient levels and the need for significant off-site projects to deliver mitigation, including addressing run-off from farmland in the catchment.

9.25 There is one site option with GESP that falls within the Axe catchment: SA-ED-19 Axminster South. For this option to go ahead it will be necessary to have confidence that there will be no net increase in Phosphorous and other nutrients into the Axe. In addition, the site is 400m from the SAC and, from aerial photographs, there appears to be a ditch feeding directly into the

[23] See relevant page in the Environment Agency Catchment Data Explorer
[24] See relevant page in the Environment Agency Catchment Data Explorer

River. There are therefore potential risks from pollution events during construction, from run-off and contamination from sewage overflow.

9.26 These issues will need to be addressed through detailed site design at the masterplan level to give confidence that the site is deliverable without adverse effects on integrity, if the site progresses into the draft GESP. The need to address these issues should be highlighted in the relevant policy wording.

## Sidmouth to West Bay SAC

9.27 The site improvement plan identifies that the cliff vegetation may be vulnerable to changes in water quality. The issues relate to poor water quality arising from agricultural run off or other human activity landwards of the cliffs. The plan sets out the need for further investigation to ascertain if the SAC is, or could be, affected.

9.28 Issues here are therefore local and relate to development close to the SAC and issues such as leaking septic tanks, slurry lagoons etc. Given the no site option has been identified close enough to affect these matters, adverse effects on integrity can be entirely ruled out, both alone and in-combination.

**Key findings: Water-related issues**

Run-off, outflow from sewage treatments and overflow from septic tanks can result in increased nutrient loads and contamination of water courses. This can have consequences for European sites which contain wetland or aquatic features, as the pollution will affect the ability of the site to support the given interest. Furthermore, abstraction and land management can influence water flow and quantity, resulting in reduced water availability at certain periods or changes in the flow. This can exacerbate issues relating to water quality. These impact pathways can be specific to particular parts of European sites or particular development locations and are also relevant to the overall quantum of development.

Once site options are confirmed, checks are necessary with South West Water and the Environment Agency to ensure that the forecasts in the Water Resources Management Plan do include the quantum of growth set out in GESP and that there are no issues with water supply for any European site. Given that the Water Resources Management Plan does rely on helping customers reduce their water consumption, water efficiency measures could be given greater emphasis in the GESP, in accordance with South West Water advice.

In addition, checks should be made with the Environment Agency and Natural England regarding the following sites or site specific issues related to water.

- Culm Grasslands SAC and water availability;
- Dartmoor SAC and Salmon (which migrate along rivers and therefore also occur outside the SAC), checking water flow in particular;
- Exe Estuary SPA/Ramsar and water quality;

Site option SA-ED-19 is the only site option within the Axe catchment. For this option to go ahead it will be necessary to have confidence that there will be no net increase in Phosphorous and other nutrients into the Axe. In addition, site option SA-ED-19 is 400m from the River Axe SAC and is likely to have direct hydrological surface links to the SAC. As such there are potential risks from pollution events during construction, from run-off and contamination from sewage overflow. If the site progresses into the draft GESP, it will be necessary to have confidence that these issues can be addressed and detailed site design at the masterplan level will be necessary to inform project-level HRA.

# 10. Appropriate Assessment topic: Air Quality Impacts

## Introduction

10.1 Increased growth within Local Plans is of relevance to HRAs where increased traffic volumes as a result of new growth will occur in close proximity to European sites hosting habitats that are sensitive to reduced air quality. In addition, Draft Policy GESP14 promotes Exeter Airport, with provision for an improved/enhanced/new terminal building, freight services and aviation training.

10.2 Historically, HRA consideration of air quality from traffic emissions has predominantly relied upon the advice given within the Design Manual for Roads and Bridges (DMRB)[25], a Highways England publication that provides the national standards for road and bridge design, construction and operation, including assessment of impacts.

10.3 A recent and highly relevant judgment from the domestic courts, known as 'the Wealden Judgment', together with a number of European cases and a range of new evidence, advice and guidance to inform HRA assessments in relation to air quality, provides clear reasons for ensuring that this HRA is prepared with full regard for current information, whilst still having regard for the DMRB advice.

### *Summary of atmospheric pollution*

10.4 Atmospheric pollutants of concern to sensitive habitats that are derived from vehicles include oxides of nitrogen ($NO_x$), ammonia ($NH_3$) and the consequential deposition of nitrogen (N) and acid, which can then lead to changes in species composition and mortality.

10.5 It is known that traffic emissions lead to an increase in N, and that this presents a major concern for sensitive habitats. Sites listed in Table 3 are sensitive to increased N, whereby the composition of a plant community changes to favour those that are most successful in high N environments. Critical thresholds, beyond which plant communities may change in response to pollutants, have been developed for a range of habitat types, and are available from the Air Pollution Information Service (APIS). This

[25] See LA 105 air quality, issued Nov 2019

database is funded and provided by the Centre for Ecology and Hydrology and the UK pollution and conservation agencies including Natural Resources Wales (NRW), the Environment Agency, Northern Ireland Environment Agency, Natural England, the Joint Nature Conservation Committee (JNCC), Scotland and Northern Ireland Forum for Environmental Research (SNIFFER), the Scottish Environment Protection Agency (SEPA), and Scottish Natural Heritage (SNH).

10.6 APIS holds data and threshold information specifically in relation to habitat sensitivity rather than human health. Summary information of relevance is given in Table 15.

**Table 15: Summary of key air pollutants**

| Pollutant | Source | National trend | Impact |
|---|---|---|---|
| $NO_x$ | Combustion, mainly vehicles and power stations | Decline (55% since 1986) | Mainly through N deposition, but also gaseous $NO_x$ close to source. Synergy with $SO_2$ |
| $NH_3$ | Natural and anthropogenic; main source is agriculture | Smaller decline which has now flattened | Direct toxicity and N-accumulation |

10.7 The main impacts of NOx and $NH_3$ are through N deposition and acidification. N deposition can lead to an increase in N loving species at the expense of other species; an increased risk of frost damage in spring, increased sensitivity to drought; increased incidence pest and pathogen attack and direct damage to sensitive species. The impacts of acid deposition are often indirect, resulting from a change of pH in soils and water. Chemical changes lead to nutrient deficiencies, release of toxins and changes in microbial N transformations.

10.8 The implications of the GESP in relation to air quality need to be assessed against background trends and the trajectory of vehicle emission improvements. Assessment of improvements in vehicular technology and in particular Euro6/VI standards that all vehicles are currently being manufactured to, may outweigh impacts from new development. The improvements may be retarded by additional development, but future background levels of nitrogen are expected to decline with Government clean air strategies.

## Recent case decisions and guidance

10.9 The GESP is being assessed with the benefit of a number of recent case decisions that provide an interpretation of the application of the Habitats

Regulations and its parent European Directives in relation to air pollution. These are discussed here to highlight their relevance to appropriate assessment.

### *Guidance on assessing air quality impacts for designated sites*

10.10 The Design Manual for Roads and Bridges (DMRB) has been the standard source of guidance for considering traffic generated air quality impacts. The DMRB has a specific section (LA105) on air quality, and this highlights the potential for impacts on sensitive habitats within 200m of a road, and the need for further assessment where changes to the road network or traffic volumes might increase daily traffic flows by 1,000 Average Annual Daily Traffic (AADT) or more. This is a simple measurement of change, using the total volume of traffic on a road and dividing it by 365 days to give a daily average.

10.11 Natural England and its partner UK statutory nature conservation bodies have a specialist air quality technical group known as the Air Quality Technical Advisory Group (AQTAG). This group regularly meets to discuss key issues in relation to air quality concerns for designated sites and will occasionally issue formal advice notes on key topics. AQTAG21 is an advice note that includes reference to a 1% threshold to be used in air quality assessments. This threshold has been consistently used by the statutory nature conservation bodies over a number of years to indicate where an increase in atmospheric pollutant might be deemed significant. The AQTAG21 refers to a 1% threshold in terms of the relevant critical load for the habitat type. Where the pollutant contribution is less than 1% of the critical load, it is deemed to be inconsequential (*de minimis*) and does not warrant further consideration for likely significant effects.

10.12 The Institute of Air Quality Management published guidance in June 2019 entitled 'A Guide to the Assessment of Air Quality Impacts on Designated Nature Conservation Sites'.

10.13 This guidance contains detailed and relevant advice in relation to the assessment of traffic generated air quality impacts and highlights the 1% threshold as a widely used threshold, below which fluctuations are not likely to be discernible from background fluctuations/measurements, and above which a need for further assessment is identified but does not automatically imply damage will occur.

### *The Wealden Judgment*

10.14 Use of the DMRB and AQTAG21 for the purposes of assessing air quality within a plan level HRA was scrutinised through a High Court Judgment[26] whereby Wealden District Council challenged the HRA conclusions of the Joint Core Strategy (JCS) for Lewes District and South Downs National Park. Whilst the HRA had made conclusions of no likely significant effect on the basis of growth within the JCS alone, the High Court found that the HRA had failed to consider the combined effect of growth within multiple Local Plans in the vicinity of Ashdown Forest, thus necessitating an appropriate assessment. Natural England's advice given at the time deemed both the DMRB 1000AADT and the 1% of the critical load to be thresholds below which further assessment was not required. The Judgment relies on the caveat set out within AQTAG21, which advises that if there was to be a concentration of plans or projects in the same area, at the same time, then there may be cause for case specific assessment and the 1% threshold may not automatically apply.

10.15 In light of this case it is important therefore for any HRA to refer to a range of evidence and advice when considering air quality impacts and the DMRB thresholds, the AQTAG21 advice and the findings of the High Court in the Wealden case should be considered together, alongside any other relevant research and evidence.

### *European Court - Joined Cases C-293/17 and C-294/17*

10.16 Coöperatie Mobilisation (Joined Cases C-293/17 and C-294/17) are now being generally referred to as "the Dutch Case" for nitrogen deposition. This Netherlands co-joined case brought before the European Court is an important recent case in the interpretation of the European Directives for plans and projects with potential air pollution impacts. The case focusses on agricultural derived nitrogen deposition, and essentially questions whether it is appropriate to rely on strategic measures to alleviate air pollution that may create capacity for individual projects to be approved despite their individual contribution of additional pollutants.

10.17 The European Court Judgment focusses on the fact that where a European site is already deteriorating, projects that then worsen the situation should not be approved, unless there are clear and definitive measures underway to restore the situation and maintain favourable conservation status. The

[26] [26] *Wealden v SSCLG (2017)*

Netherlands Government has an approach that relies upon a programme of nitrogen reduction measures. What is key to the assessment of traffic increases relating to Local Plans, and indeed the assessment of any other potential impacts at the plan level, is that the European Court was clear that measures should not be relied upon if they are uncertain, have not yet been carried out, are not certain to take place, or have poor scientific basis.

10.18 The case therefore highlights the need to have certainty in any measures being relied upon to allow a conclusion of no adverse effects where they are expected but not yet completed. Importantly, any such measures need to be scientifically certain and secured (in terms of responsibility, finances, practical delivery etc.), rather than just forecasts.

### *Natural England Guidance*

10.19 With growing interest from competent authorities in the correct approach to assessing air quality impacts following recent court cases, Natural England has been assisting local planning authorities across the country with advice on what should be considered within an HRA. Natural England has a number of research reports available within its publications webpage.

10.20 Caporn et al (2016) highlights that the majority of designated sites in the UK are currently exceeding their critical loads for N deposition, and this is leading to significant changes in these sensitive habitats as a consequence. There are particular concerns in relation to lower plants, which are highly sensitive to N deposition.

10.21 Although habitat responses to N deposition are not fully understood, it is apparent that the relationship between increased pollutants and habitat deterioration (declines in species richness and species composition) is not linear. Critical loads identify a point at which significant vegetation change is likely to occur, but changes do not continue on a linear basis beyond the critical threshold.

10.22 Natural England's (2018) guidance on their approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations makes it clear that it is for the competent authority, not Natural England, to acquire enough evidence to support its HRA conclusions. Helpfully, the document highlights that the 1% threshold can be used to establish whether further assessment is necessary, but should not be used to determine whether an adverse effect can or cannot be ruled out.

10.23 Importantly, this document indicates that traffic management measures and habitat management measures or interventions that limit the dispersal of traffic emissions might constitute mitigation measures.

10.24 It is concluded that whilst these measures alone do not enable a conclusion of no adverse effect as the extent of their effectiveness is not yet quantified, they can be considered as additional measures that positively support such a conclusion.

## Impacts

10.25 In Appendix 5 we summarise features of relevant sites where there are potential risks from air pollution derived from traffic. In Appendix 6 we summarise impacts from air pollution on the interest features, listing impacts for relevant species and habitats.

## Relevant sites

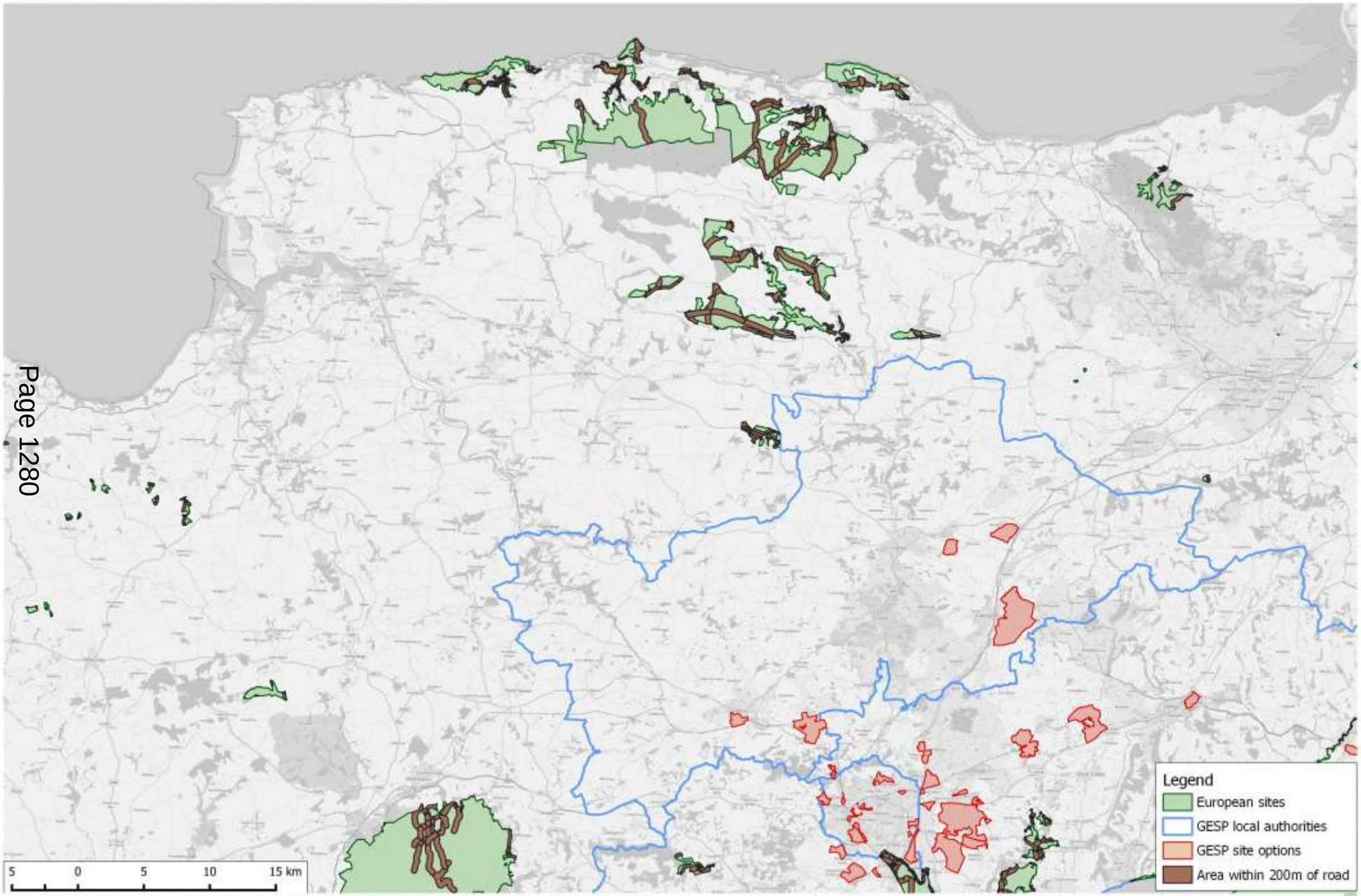
10.26 All site options and the overall quantum of growth will potentially result in increased traffic, and therefore air quality issues will be triggered by all growth. Given the distribution of the options and their scale, there will be differences in the scale of impact and this can only be ascertained through traffic modelling work. Further consideration is necessary to consider the overall cumulative effects of traffic increases associated with GESP in context with the traffic forecasts and traffic increases associated with growth in local plans.

10.27 For each European site for which air pollution has been identified as a possible impact pathway, Map 8 and Map 9 show the area of each site that falls with 200m of an A or B road or motorway. These are the Culm Grasslands SAC, Exe Estuary SPA/Ramsar, East Devon Pebblebed Heaths SPA/SAC, Dartmoor SAC, Exmoor Heaths SAC, Exmoor and Quantock Oakwoods SAC, River Axe SAC, South Dartmoor Woods SAC and South Hams SAC. Further checks are required involving modelling to predict changes in traffic and, based on the results of the traffic modelling, air quality modelling may also be required to inform later iterations of the HRA.

10.28 While, at this stage, it is important not to pre-empt the results of any such modelling work, it should be noted that Dartmoor SAC Exmoor Heaths SAC and the Exmoor and Quantock Oakwoods SAC lie well away from any of the GESP site options and implications for these sites may therefore be relatively low – from road traffic at least.

10.29 Further checks are necessary with respect to the Airport and the implications for air quality.

## Map 8: European sites within 200m of roads (north)

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## Map 9: European sites within 200m of roads (south)

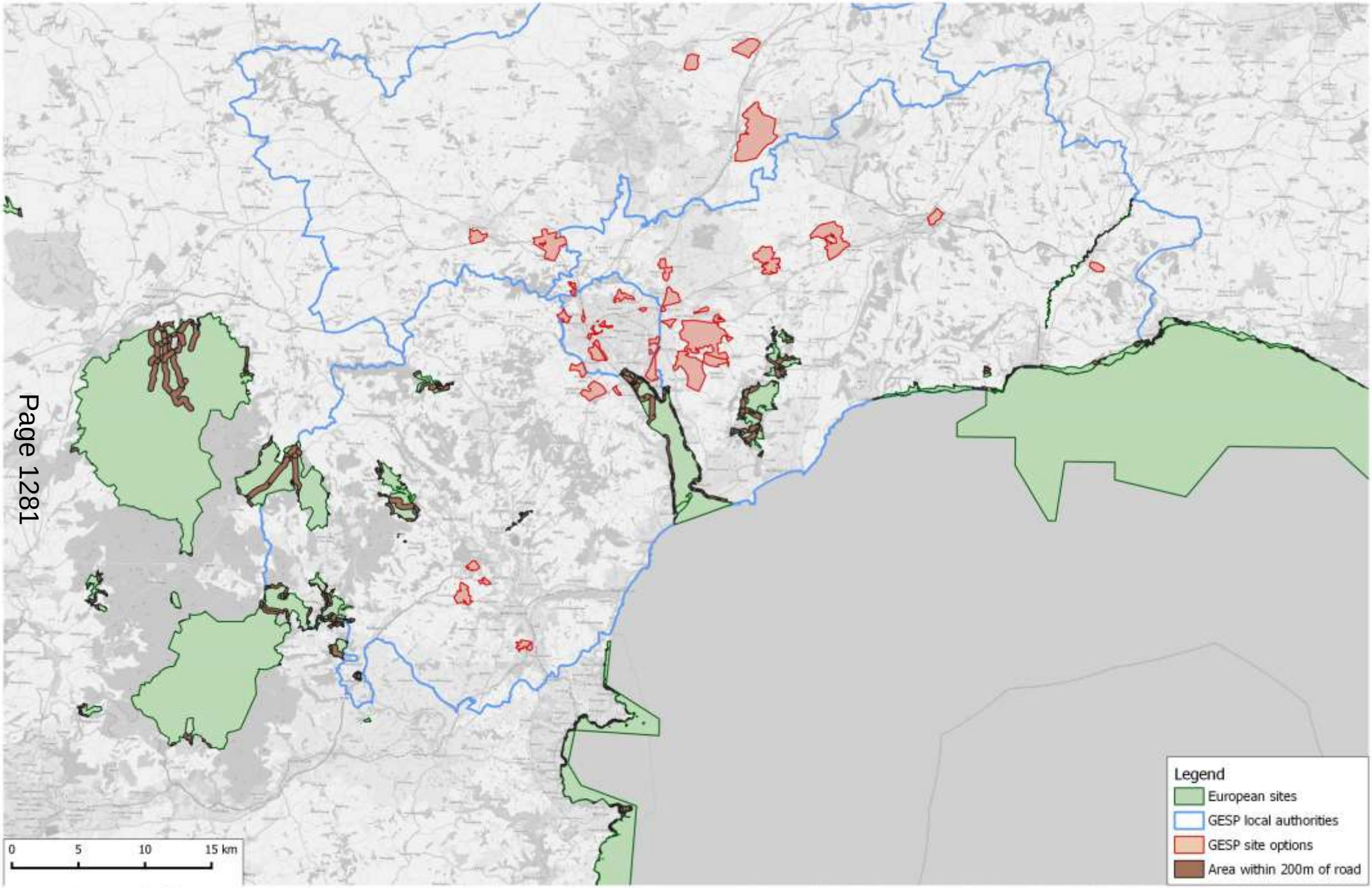


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**Table 16: The area of each European site that falls within 200m of different classes of road (minor and unclassified roads are excluded). The area figures take into account overlaps between roads (e.g. at junctions) – so for example the value for B roads at a particular European site is for B roads only and excludes any area that is within 200m of an A road and a B road. Note that the figures for the Culm Grassland SAC relate to Hare's Down, Knowstone and Rackenford Moors SSSI only. Red shading reflects A roads and blue shading the Motorway**

| European site | Class | Area (ha) within 200m | % of European site |
|---|---|---|---|
| Culm Grasslands SAC (Hare's Down, Knowstone and R'ford Moors SSSI only) | A Road | 87.28 | 39 |
| Dartmoor SAC | B Road | 227.98 | 1 |
| East Devon Pebblebed Heaths SAC/SPA | A Road | 44.8 | 4 |
| | B Road | 156.94 | 14 |
| Exe Estuary SPA/Ramsar | Motorway | 38.65 | 2 |
| | A Road | 60.88 | 3 |
| Exmoor & Quantock Oakwoods SAC | A Road | 253.04 | 13 |
| | B Road | 200.28 | 11 |
| Exmoor Heaths SAC | A Road | 56.86 | 1 |
| | B Road | 244.37 | 2 |
| River Axe SAC | A Road | 2.38 | 10 |
| | B Road | 1.19 | 5 |
| South Dartmoor Woods SAC | B Road | 65.52 | 3 |
| South Hams SAC | A Road | 8.49 | 7 |
| | B Road | 8.239 | 6 |

## Key Findings: Air Quality

Nine of the European sites that are within 20km of the GESP area have roads within 200m of the site boundary. These are the Culm Grasslands SAC, Exe Estuary SPA/Ramsar, East Devon Pebblebed Heaths SPA/SAC, Dartmoor SAC, Exmoor Heaths SAC, Exmoor and Quantock Oakwoods SAC, River Axe SAC, South Dartmoor Woods SAC and South Hams SAC. For these sites it will be necessary to understand the potential increase in traffic as a result of GESP and in addition the in-combination increase with other relevant plans, in context with any background traffic growth forecasts. If, in-combination, traffic volumes increase by more than 1000 AADT on roads within 200m of a European site, air quality modelling will be required. Issues will be particularly important where existing critical loads for N deposition are already exceeded or approaching exceedance. Without this traffic modelling it will not be possible to rule out adverse effects on integrity.

Further understanding of the impacts of the airport growth on air quality are necessary and it may be that any modelling work needs to also consider the implications of draft policy GESP14 Exeter Airport.

Modelling results should be checked with Natural England and in addition advice will be sought from Natural England regarding the progress with the Site Nitrogen Action Plans referred to in the relevant Site Improvement Plans and also to clarify how to interpret any modelling results with respect to those species and habitats for which there are not critical loads, including water courses, Barbestelle and Bechstein's bats.

# 11. Conclusions and Next Steps

11.1 This initial HRA report has been produced at the Draft Policies and Site Options consultation stage of the GESP. In carrying out this initial review of HRA matters we have been able to provide recommendations from the screening assessment for policy wording changes (which have been incorporated into the consultation document), and also identified key topic areas for consideration at appropriate assessment. For several these topic areas we have identified where further evidence gathering and information will be required, these are summarised in Table 17. The evidence required will be informed by which site options progress into the draft GESP.

11.2 This report will continue to be updated and reviewed at each plan making stage. Comments on this report will be invited alongside the GESP Draft Policies and Site Options consultation, and feedback will be considered as the HRA is updated. The next stage is the public consultation on the Draft Policies and Site Options, which may yield consultation responses that specifically relate to the HRA work undertaken to date and the scope of the appropriate assessment. Any such responses will be considered as the HRA is updated. The next stage of GESP is the Draft Plan when the options will be finalised. At that stage the HRA report will include detailed appropriate assessment.

11.3 It is currently too early to give a conclusion that the plan will not lead to any adverse effects on European sites and a number of key issues have been identified that require significant further work. This work will inform the next iteration of the HRA when it will be clear which site options are included, there will be more evidence on some of the issues and there will be greater clarity on mitigation. This will allow the appropriate assessment stage of the next iteration to consider whether adverse effects on integrity can be ruled out, alone or in-combination.

**Table 17: Summary of impact pathways, relevant policies and site options, European sites and further evidence gathering required.**

| Impact Pathway | Report Section | Draft Policies | Site Options | Risk to European Site | Key evidence and information required for appropriate assessment |
|---|---|---|---|---|---|
| General Urbanisation Effects | 5 | None | **SA-EX-3** Land between M5 and Topsham | Exe Estuary SPA/Ramsar | Master planning or site plans need to take into account the risk to the Estuary and further checks should be undertaken when further details are available to ensure the site can be delivered without adverse effects on integrity from urban effects. |
| | | None | **SA-ED-19** Axminster South | River Axe SAC | Survey work to inform the layout and design of the site to ensure risks from invasive species can be addressed. |
| Bat SACs and Loss of Supporting Habitat, Fragmentation and Collision Risk | 6 | **GESP29** – Highway Links and Junction Improvements | **SA-T-3** Land West of Houghton Barton; **SA-T-5** Priory Road; **SA-T-8** Land North of Forches Cross; **SA-T-18** Peamore; **SA-T-22** Ilford Park; | South Hams SAC | Survey work to check for the presence and use of the area by Greater Horseshoe Bats. The results from the survey work will need to feed into the master planning and the boundary or scale of the site option may need to be revised. For SA-T-8 and SA-T-22 it will be necessary for the survey work to check the use of the mitigation features and ensure they can continue to function in the long-term. For all 5 housing site options, if progressed into the plan, a tailored bat mitigation plan is likely to be required to ensure adverse effects on integrity can be ruled out. |
| Loss/impacts to supporting habitat around European sites (non-bat sites) | 7 | None | **SA-ED-7** Higher Greendale **SA-ED-3** Hill Barton **SA-ED-2** Oil Mill Lane **SA-ED-8** Airport Business Park **SA-ED-12** Whimple **SA-ED-5** North of Exeter Airport **SA-ED-15** Feniton SA-EX-3 Land between M5 and Topsham | East Devon Heaths SPA | Surveys done prior to any master planning to ensure any areas important to foraging Nightjar or routes used can be protected and enhanced. Such survey work will be complex and potentially involve tagging Nightjars. Results may have implications for the amount of housing feasible in particular locations. |

| Impact Pathway | Report Section | Draft Policies | Site Options | Risk to European Site | Key evidence and information required for appropriate assessment |
|---|---|---|---|---|---|
| | | None | **SA-MD-12** Area south of Sampford Peverell; **SA-MD-9** East of Cullompton; **SA-MD-18** Honiton East; **SA-MD-15** Feniton; **SA-MD-10** Land at Hartnoll Farm. | Quants SAC | Checks by a suitably qualified ecologist for any suitable Marsh Fritillary habitat and a detailed and thorough check made for records of the species. Masterplans or dedicated mitigation plans will then need to ensure any suitable habitat and connectivity are maintained and enhanced. |
| | | None | **SA-MD-12** Area south of Sampford Peverell; SA-MD-10 Land at Hartnoll Farm. | Culm Grasslands SAC | Checks by a suitably qualified ecologist for any suitable Marsh Fritillary habitat and a detailed and thorough check made for records of the species. Masterplans or dedicated mitigation plans will then need to ensure any suitable habitat and connectivity are maintained and enhanced. |
| Recreation | 8 | **GESP36** (Exe Estuary, Dawlish Warren and East Devon Pebblebed Heaths) and the South-east Devon European Site Mitigation Strategy; GESP 16 Housing Target and distribution | **SA-ED-3** Hill Barton **SA-EX-10** Marsh Barton **SA-ED-2** Oil Mill Lane **SA-ED-15** Feniton **SA-ED-12** Whimple **SA-ED-25** Westclyst & Mosshayne Farms **SA-EX-6** Water Lane **SA-EX-3** Land between M5 and Topsham **SA-T-18** Peamore **SA-ED-7** Higher Greendale **SA-EX-19** East Gate | Exe Estuary SPA/Ramsar; Dawlish Warren SAC; East Devon Pebblebed Heaths SAC/SPA | Listed site options fall within the area covered by the existing mitigation strategy. The strategy needs to be updated and finalised alongside GESP so that mitigation requirements are clear and suitable mechanisms for timely delivery are secured. GESP36 is the relevant policy setting out mitigation requirements and this cross-references to the strategy. The size of the allocations and their locations will mean a significant quantum of alternative greenspace (SANG) will need to be secured. |

| Impact Pathway | Report Section | Draft Policies | Site Options | Risk to European Site | Key evidence and information required for appropriate assessment |
|---|---|---|---|---|---|
| | | | **SA-T-17** Markham Lane, Ide<br>**SA-EX-26** Sandy Gate<br>**SA-EX-4** North of Stoke Hill<br>**SA-EX-5** Land adjacent Exeter St David's Station<br>**SA-EX-22** West Gate<br>**SA-ED-26** Cowley<br>**SA-EX-1** Attwells, North of Exwick<br>**SA-EX-7** North Gate<br>**SA-EX-8** South Gate<br>**SA-EX-18** Pinhoe Trading Estate<br>**SA-T-16** West of Exminster<br>**SA-EX-23** Land between South, Market and Fore Street<br>**SA-EX-9** Howell Road Car Park | | |
| | | None | **SA-ED-19** Axminster South | River Axe SAC | Risks from recreation pressure for the SAC in the vicinity of the allocation will need to be resolved through an access and visitor management plan. |
| | | GESP 16 Housing Target and distribution | Further checks required | Dartmoor SAC and S. Dartmoor Woods SAC | Further discussions with the National Park Authority and neighbouring local authorities to review risks to the SACs, monitoring and potential mitigation measures. |

| Impact Pathway | Report Section | Draft Policies | Site Options | Risk to European Site | Key evidence and information required for appropriate assessment |
|---|---|---|---|---|---|
| | | GESP 25 Long Distance Trails | None | Exe Estuary SPA/Ramsar | Further information on the location, route and how this will link with the existing cycle trails around estuary will be necessary. These design elements will need to feed into the next iteration of the HRA. |
| | | GESP 31 Settlement Specific Enhancements | None | Exe Estuary SPA/Ramsar; Dawlish Warren SAC; East Devon Pebblebed Heaths SAC/SPA | Further details of design and likely use are necessary to feed into the next iteration of the HRA. |
| Water-related issues | 9 | None | All | Culm Grasslands SAC<br>Dartmoor SAC<br>East Devon Pebblebed Heaths SAC<br>River Axe SAC | Once site options are confirmed, checks with South West Water and the Environment Agency to ensure that the forecasts in the WRMP do include the quantum of growth set out in GESP and that there are no issues with water supply for any European site. Given that the WRMP does rely on helping customers reduce their water consumption, water efficiency measures could be given greater emphasis in the GESP, in accordance with South West Water advice. |
| | | None | Further checks required | Dartmoor SAC | Further information gathering required on Salmon and impacts of water quality and flow for rivers feeding from Dartmoor SAC. |
| | | None | Further checks required | Exe Estuary SPA/Ramsar | As site options finalised, confirmation required that adequate capacity exists within Waste Water Treatment Works and to ensure water quality issues from any growth around the estuary can be accommodated |
| | | None | **SA-ED-19** Axminster South | | For this option to go ahead it will be necessary to have confidence that there will be no net increase in Phosphorous and other nutrients into the Axe. In addition, there are potential risks from pollution events during construction and from run-off and contamination from sewage overflow. If the site progresses into the draft GESP, it will be necessary to have confidence that these issues can be addressed and |

| Impact Pathway | Report Section | Draft Policies | Site Options | Risk to European Site | Key evidence and information required for appropriate assessment |
|---|---|---|---|---|---|
| | | | | | detailed site design at the masterplan level will be necessary to inform project-level HRA. |
| Air Quality | 10 | GESP 9 Economic targets; GESP 10 Transformational sectors, GESP 11 Employment land; GESP 14 Exeter Airport; GESP 116 Housing target and distribution | All | Culm Grasslands SAC, Exe Estuary SPA/Ramsar, East Devon Pebblebed Heaths SPA/SAC, Dartmoor SAC, Exmoor Heaths SAC, Exmoor and Quantock Oakwoods SAC, River Axe SAC, South Dartmoor Woods SAC South Hams SAC | Traffic modelling required to identify scale of change in traffic as a result of GESP. Air quality modelling work likely to also be required to identify impacts from changes in traffic flow. |

# 12. References

Ancillotto, L., Serangeli, M. T., & Russo, D. (2013). Curiosity killed the bat: Domestic cats as bat predators. *Mammalian Biology - Zeitschrift Für Säugetierkunde*. doi: 10.1016/j.mambio.2013.01.003

Anon. (2017). *Plymouth and South West Devon Joint Local Plan Habitats Regulations Assessment*.

Bennett, V. J., & Zurcher, A. A. (2013). When corridors collide: Road-related disturbance in commuting bats. *The Journal of Wildlife Management*, *77*(1), 93–101. doi: 10.1002/jwmg.467

Bontadina, F., Schofield, H., & Naef-Daenzer, B. (2002). Radio-tracking reveals that lesser horseshoe bats (Rhinolophus hipposideros) forage in woodland. *Journal of Zoology*, *258*(3), 281–290. doi: 10.1017/S0952836902001401

Bulman, C., Wilson, R. J., Holt, A. R., Galvez Bravo, L., Early, R. I., Warren, M. S., & Thomas, C. D. (2007). Minimum viable metapopulation size, extinction debt and the conservation of a declining species. *Ecological Applications*, *17*(5).

Caporn, S., Field, C., Payne, R., Dise, N., Britton, A., Emmett, B., … Stevens, C. (2016). *Assessing the effects of small increments of atmospheric nitrogen deposition (above the critical load) on seminatural habitats of conservation importance.* (No. NECR210).

Carroll, B., & Jeffreys, O. (2019). *Dartmoor National Park Authority Local Plan Review 2020-2036*. Report by enfusion for the Dartmoor National Park.

Cresswell, B. (1996). Nightjars - some aspects of their behaviour and conservation. *British Wildlife*, *7*, 297–304.

Cruickshanks, K., & Liley, D. (2012). *East Devon, Exeter and Teignbridge household survey and predictions of visitor use of greenspaces*. Footprint Ecology.

Dartmoor National Park Authority, Devon County Council, Teignbridge District Council, South Hams District Council, Torbay Council and Natural England. (2019). *South Hams Special Area of Conservation (SAC) Greater Horseshoe Bats. Habitats Regulatsions Assessment Guidance. October 2019*. Dartmoor National Park Authority, Devon County Council, Teignbridge District Council, South Hams District Council, Torbay Council and Natural England.

Day, B., Harwood, A., Tyler, C., & Zonneveld, S. (2018). *Population futures and Dartmoor National Park: Implications of developments around the outskirts of Dartmoor for recreational use and management of access*. Report by SWEEP for the Dartmoor National Park.

Duvergé, P., & Jones, G. (1994). Greater horseshoe bats—activity, foraging behaviour and habitat use. *British Wildlife*, *6*, 69–77.

Fensome, A. G., & Mathews, F. (2016). Roads and bats: a meta-analysis and review of the evidence on vehicle collisions and barrier effects. *Mammal Review*, *46*(4), 311–323. doi: 10.1111/mam.12072

Froidevaux, J. S. P., Boughey, K. L., Barlow, K. E., & Jones, G. (2017). Factors driving population recovery of the greater horseshoe bat (Rhinolophus ferrumequinum) in the UK: implications for conservation. *Biodiversity and Conservation*, *26*(7), 1601–1621. doi: 10.1007/s10531-017-1320-1

Hall, C. M., Bryant, K. A., Haskard, K., Major, T., Bruce, S., & Calver, M. C. (2016). Factors determining the home ranges of pet cats: A meta-analysis. *Biological Conservation*, *203*, 313–320. doi: 10.1016/j.biocon.2016.09.029

Hoskin, R., Liley, D., & Underhill-Day J. (2018). *Poole Local Plan Habitats Regulations Assessment of the Modifications to the Pre-submission Draft* (No. 488). Footprint Ecology / Borough of Poole.

ICF GHK. (2013). *The economic impact of Natural England's National Nature Reserves* (Natural England Commissioned Report No. NECR131).

ICRT. (2011). *The Economic Potential of Nature Tourism in Eastern Yorkshire* (p. 61). Retrieved from http://mediafiles.thedms.co.uk/Publication/YS-EY/cms/pdf/YNT%20ICRT%20Report,%20Nature%20Tourism%20in%20Eastern%20Yorkshire.pdf

Jung, K., & Threlfall, C. G. (2016). Urbanisation and Its Effects on Bats—A Global Meta-Analysis. In *Bats in the Anthropocene: Conservation of Bats in a Changing World* (pp. 13–33). doi: 10.1007/978-3-319-25220-9_2

Keniger, L. E., Gaston, K. J., Irvine, K. N., & Fuller, R. A. (2013). What are the Benefits of Interacting with Nature? *International Journal of Environmental Research and Public Health*, *10*(3), 913–935. doi: 10.3390/ijerph10030913

Kirby, J. S., & Tantram, D. A. S. (1999). *Monitoring heathland fires in Dorset: Phase 1*.

Lawton, J. H., Brotherton, P. N. M., Brown, V. K., Elphick, C., Fitter, A. H., Forshaw, J., … Wynne, G. (2010). *Making Space for Nature: a review of England's wildlife sites and ecological network*. Defra.

Lee, A. C. K., & Maheswaran, R. (2011). The health benefits of urban green spaces: a review of the evidence. *Journal of Public Health*, *33*(2), 212–222. doi: 10.1093/pubmed/fdq068

Liley, D., Hoskin, R., Lake, S., Underhill-Day, J., & Cruickshanks, K. (2014). *South-east Devon European Site Mitigation Strategy*. Footprint Ecology.

Liley, D., Lake, S., Underhill-Day, J., Sharp, J., White, J., Hoskin, R., … Fearnley, H. (2010). *Welsh Seasonal Habitat Vulnerability Review*. Footprint Ecology / CCW.

Liley, D., Panter, C., & Underhill-Day, J. (2016). *East Devon Pebblebed Heaths Visitor Management Plan* [Unpublished report for East Devon District Council].

Lowen, J., Liley, D., Underhill-Day, J., & Whitehouse, A. T. (2008). *Access and Nature Conservation Reconciliation: supplementary guidance for England.* Retrieved from internal-pdf://NECR013 Access and N C Reconciliation - Supp Guidance-2802587904/NECR013 Access and N C Reconciliation - Supp Guidance.pdf

Metsers, E. M., Seddon, P. J., & van Heezik, Y. M. (2010). Cat-exclusion zones in rural and urban-fringe landscapes: how large would they have to be? *Wildlife Research*, *37*(1), 47–56.

Natural England. (2018). *Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations* (NEA No. 001). Retrieved from Natural England website: http://publications.naturalengland.org.uk/file/5431868963160064

Nicholls, K. (2019). *Mid Devon Local Plan Review: Proposed Main Modifications Habitats Regulations Assessment Addendum*. Retrieved from Report by LUC for Mid Devon Council website: https://www.middevon.gov.uk/media/349006/ed26-addendum-to-habitat-regulations-assessment.pdf

Nicholls, K., Gwillym, I., MacLellan, R., & Moroney, K. (2015). *Habitats Regulations Assessment of Mid Devon's Local Plan Review*. Retrieved from Report by LUC for Mid Devon Council website:

https://www.middevon.gov.uk/media/343218/6026_habitatsregulationsassessmentreport_20150310_v6.pdf

O'Neill, R. (2019). *Monitor of Engagement with the Natural Environment – The national survey on people and the natural environment. Headline report 2019* (NECR No. 275). Retrieved from Natural England and the Office for National Statistics website: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/828552/Monitor_Engagement_Natural_Environment_2018_2019_v2.pdf

Oxford, M., Liley, D., & Jenkins, J. (2013). *Habitats Regulations Assessment of the Teignbridge Local Plan 2013-2033 Proposed Submission*. Retrieved from http://www.teignbridge.gov.uk/CHttpHandler.ashx?id=37947&p=0

Panter, C., Lake, S., & Liley, D. (2019). *New Forest heathland bird densities, desk study. A comparison of the New Forest with other lowland heathland sites* (Unpublished No. 512). Footprint Ecology / Natural England.

Pinaud, D., Claireau, F., Leuchtmann, M., & Kerbiriou, C. (2018). Modelling landscape connectivity for greater horseshoe bat using an empirical quantification of resistance. *Journal of Applied Ecology*, *55*(6), 2600–2611. doi: 10.1111/1365-2664.13228

Pretty, J., Griffin, M., Peacock, J., Hine, R., Selens, M., & South, N. (2005). A countryside for health and well-being: the physical and mental health benefits of green exercise. *Countryside Recreation*, *13*(1), 2–7.

Richardson, M., Cormack, A., McRobert, L., & Underhill, R. (2016). 30 Days Wild: Development and Evaluation of a Large-Scale Nature Engagement Campaign to Improve Well-Being. *PLOS ONE*, *11*(2), e0149777. doi: 10.1371/journal.pone.0149777

Ross, K., Liley, D., Austin, G., Clarke, R. T., Burton, N. H., Stillman, R. A., … Underhill-Day, J. (2014). *Housing development and estuaries in England: developing methodologies for assessing the impacts of disturbance to non-breeding waterfowl*. Footprint Ecology, unpublished report for Natural England.

Saunders, G., & Hoskin, R. (2019). *Habitats Regulations Assessment and mitigation strategy for the Greater Exeter Strategic Plan – European site sensitivity analysis.* Footprint Ecology/Greater Exeter Strategic Plan authorities.

Sclater, J. (2010). *South Hams SAC - Greater Horseshoe Bat Consultation Guidance*. Natural England.

Souter, R. (2017). *Canford Heath, Poole Nightjar Resource Use Study*. Unpublished report by EPR for W.H. White Ltd.

Stone, E. L., Jones, G., & Harris, S. (2009). Street Lighting Disturbs Commuting Bats. *Current Biology*, *19*(13), 1123–1127. doi: 10.1016/j.cub.2009.05.058

Sydney, K. (2016a). *Mid Devon Local Plan - J27 Proposals Habitats Regulations Assessment: Appropriate Assessment Report*. Report by LUC for Mid Devon Council.

Sydney, K. (2016b). *Mid Devon Local Plan: Submission Draft Habitats Regulations Assessment Addendum*. Retrieved from Report by LUC for Mid Devon Council website: https://www.middevon.gov.uk/media/343217/mid-devon-local-plan-submission-hra-addendum.pdf

The Land Trust. (2018). *The Economic Value of Greenspaces*. The Land Trust.

Thomas, R., Baker, P., & Fellowes, M. D. E. (2014). Ranging characteristics of the domestic cat (Felis catus) in an urban environment. *Urban Ecosystems*, *17*(4), 911–921. doi: 10.1007/s11252-014-0360-5

Tyldesley, D., Chapman, C., & Machin, G. (2020). *The Habitats Regulations Handbook*. Retrieved from https://www.dtapublications.co.uk/handbook/

Underhill-Day, J. C. (2005). *A literature review of urban effects on lowland heaths and their wildlife*. Retrieved from English Nature website: internal-pdf://EN RR 623, John Day literature review of urban effects-3794804480/EN RR 623, John Day literature review of urban effects.pdf

Warren, M. S. (1994). The UK status and suspected metapopulation structure of a threatened European butterfly, the marsh fritillary Eurodryas aurinia. *Biological Conservation*, *67*, 239–249.

WSP Environmental. (2010). *Exeter Core Strategy HRA*. Exeter City Council.

Zeale, M. R. K., Davidson-Watts, I., & Jones, G. (2012). Home range use and habitat selection by barbastelle bats (Barbastella barbastellus): implications for conservation. *Journal of Mammalogy*, *93*(4), 1110–1118. doi: 10.1644/11-MAMM-A-366.1

# Appendix 1: Conservation Objectives

12.1 As required by the Directives, 'Conservation Objectives' have been established by Natural England, which should define the required ecologically robust state for each European site interest feature. All sites should be meeting their conservation objectives. When being fully met, each site will be adequately contributing to the overall favourable conservation status of the species or habitat interest feature across its natural range. Where conservation objectives are not being met at a site level, and the interest feature is therefore not contributing to overall favourable conservation status of the species or habitat, plans should be in place for adequate restoration.

12.2 Natural England has embarked on a project to renew all European site Conservation Objectives, in order to ensure that they are up to date, comprehensive and easier for developers and consultants to use to inform project level HRAs in a consistent way. In 2012, Natural England issued a set of generic European site Conservation Objectives, which should be applied to each interest feature of each European site. These generic objectives were the first stage in the project to renew conservation objectives, and the second stage, which is to provide more detailed and site-specific information for each site to support the generic objectives, has also been completed.

12.3 The list of generic Conservation Objectives for each European site includes an overarching objective, followed by a list of attributes that are essential for the achievement of the overarching objective. Whilst the generic objectives currently issued are standardised, they are to be applied to each interest feature of each European site, and the application and achievement of those objectives will therefore be site specific and dependant on the nature and characteristics of the site. The second stage, provision of the more supplementary information to underpin these generic objectives, is nearing completion and is now providing much more site-specific information, and this detail will play a fundamental role in informing HRAs, and importantly will give greater clarity to what might constitute an adverse effect on a site interest feature. Natural England advises that HRAs should be supported by comprehensive and up to date background information that is locally relevant.

12.4 For SPAs, the overarching objective is to:

*'Avoid the deterioration of the habitats of qualifying features, and the significant disturbance of the qualifying features, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving the aims of the Birds Directive.'*

12.5 This is achieved by, subject to natural change, maintaining and restoring:

- The extent and distribution of the habitats of the qualifying features.
- The structure and function of the habitats of the qualifying features.
- The supporting processes on which the habitats of the qualifying features rely.
- The populations of the qualifying features.
- The distribution of the qualifying features within the site.

12.6 For SACs, the overarching objective is to:

'*Avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving Favourable Conservation Status of each of the qualifying features.'*

12.7 This is achieved by, subject to natural change, maintaining and restoring:

- The extent and distribution of the qualifying natural habitats and habitats of qualifying species.
- The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species.
- The supporting processes on which qualifying natural habitats and habitats of qualifying species rely.
- The populations of qualifying species.
- The distribution of qualifying species within the site.

12.8 Conservation objectives inform any HRA of a plan or project, by identifying what the interest features for the site should be achieving, and what impacts may be significant for the site in terms of undermining the site's ability to meet its conservation objectives. Site specific supplementary advice highlights the importance of typical species, processes or ecological characteristics that are critical to the interest features of the site. Within the supplementary advice these are normally referred to as 'attributes' and can refer to a range of ecological characteristics such as population number, extent of habitat or a supporting process such as hydrology. Each attribute has a 'target' for the required condition of the attribute.

12.9 In Appendix 2 the hyper-links cross reference to the relevant conservation objectives page (on the Natural England website) for all the relevant European sites.

# Appendix 2: Summary of European Sites

**Summary of European sites and their interest features. Links in the site column relate to the conservation objectives for each site or (in the case of the Ramsar sites) the relevant page with the information sheet on the Natural England website. # in the interest features column denotes an interest feature for which the UK has a special responsibility. Descriptions are drawn from the description in the relevant site improvement plans.**

| Site | Interest features | Description |
|---|---|---|
| Beer Quarry & Caves SAC | S1303 *Rhinolophus hipposideros*: Lesser horseshoe bat<br>S1304 *Rhinolophus ferrumequinum*: Greater horseshoe bat<br>S1323 *Myotis bechsteinii*: Bechstein`s bat | This complex of abandoned mines in south-west England is divided in two by a road, with a working quarry to the north and a disused quarry and cave system to the south. This site supports important populations of hibernating bats. Its use as a hibernation site by the Bechstein's Bat is the primary reason for its designation as a SAC. The area also supports a significant presence of both the Lesser Horseshoe Bat and the Greater Horseshoe Bat which are both qualifying features but are not primary reasons for the site's selection. |
| Bracket's Coppice SAC | S1323 *Myotis bechsteinii*: Bechstein`s bat<br>H6410 Molinia meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*) | Bracket's Coppice lies close to Corscombe in the vales of West Dorset. The site comprises oak and ash woodland, wooded stream valleys, and a mosaic of herb rich grassland and fen-meadow contained within small fields bounded by tall native hedges. The site is designated for Bechstein's bat and Purple moor-grass *Molinia* meadow. One of the first maternity colonies of Bechstein's bat was discovered using bat-boxes in this small woodland. |
| Culm Grasslands SAC | H4010 Northern Atlantic wet heaths with *Erica tetralix*<br>H6410 Molinia meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*) | Culm Grasslands represents Molinia meadows in south-west England. This site contains extremely diverse examples of the heathy type of M24 |

| Site | Interest features | Description |
|---|---|---|
| | S1065 *Euphydryas (Eurodryas, Hypodryas) aurinia*: Marsh Fritillary butterfly | *Molinia caerulea – Cirsium dissectum*; fen-meadow, ranging from short, grazed swards through to stands that are transitional to scrub. Structural diversity accounts for the conservation of a wide range of flora and fauna, particularly of species characteristic of south-western Europe, such as meadow thistle *Cirsium dissectum* and whorled caraway *Carum verticillatum*. Culm Grasslands contains the largest cluster of sites for Marsh fritillary *Euphydryas aurinia* in the south-west peninsula. It is judged to be the most important location for the species in its major south-west stronghold. |
| Dartmoor SAC | H4010 Northern Atlantic wet heaths with *Erica tetralix*<br>H4030 European dry heaths<br>H7130# Blanket bogs<br>H91A0 Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles<br>S1044 *Coenagrion mercuriale*: Southern damselfly<br>S1106 *Salmo salar*: Atlantic salmon<br>S1355 *Lutra lutra*: Otter | Dartmoor SAC consists of three separate blocks of upland within the Dartmoor National Park. These three constituent upland blocks contain a diverse range of habitats including large scale mosaics of wet and dry heaths and the most southerly upland peat masses in the UK. These habitats support a range of bird and invertebrate species including Southern damselfly. There are small areas of upland oak woods which support rare bryophyte species. |
| East Devon Pebblebed Heaths SAC | H4030 European dry heaths<br>S1044 *Coenagrion mercuriale*: Southern damselfly<br>H4010 Northern Atlantic wet heaths with *Erica tetralix* | The East Devon Pebblebed Heaths is the largest block of lowland heath in Devon, and it is internationally important for its Northern Atlantic wet heaths and extensive areas of lowland European dry heaths. The diversity of heathland reflects the varied topography, geology, hydrology and water chemistry of the area, and supports associated plant and animal communities. Among the 21 breeding dragonfly |

| Site | Interest features | Description |
|---|---|---|
| | | species recorded at the site is the southern damselfly, an Annex II species. |
| East Devon Heaths SPA | A302(B) *Sylvia undata*: Dartford warbler<br>A224(B) *Caprimulgus europaeus*: European nightjar | The East Devon Pebblebed Heaths is the largest block of lowland heath in Devon. There is an important assemblage of birds, and breeding European nightjar and Dartford warbler afford the site SPA status. |
| Dawlish Warren SAC | H2190 Humid dune slacks<br>S1395 *Petalophyllum ralfsii*: Petalwort<br>H2120 Shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes")<br>H2130# Fixed dunes with herbaceous vegetation ("grey dunes") | Dawlish Warren is a geomorphologically important sand spit which protects the mouth of the Exe estuary. Herb-rich neutral grassland hosts the only mainland population of the Warren sand crocus. A mosaic of reed bed, marsh, scrub and open water support several nationally rare plants. |
| Exe Estuary SPA | A141(NB) *Pluvialis squatarola*: Grey plover<br>A046a(NB) *Branta bernicla bernicla*: Dark-bellied brent goose<br>A132(NB) *Recurvirostra avosetta*: Pied avocet<br>A156(NB) *Limosa limosa islandica*: Black-tailed godwit<br>Waterbird assemblage<br>A149(NB) *Calidris alpina alpina*: Dunlin<br>A007(NB) *Podiceps auritus* Slavonian grebe<br>A130(NB) *Haematopus ostralegus*: Eurasian oystercatcher | The Exe estuary is of international importance for wintering and migratory wetland birds. It is also of national importance for its marine life, especially that associated with intertidal sand and mud flats. Dawlish Warren is a geomorphologically important sand spit which protects the mouth of the Exe estuary. Salt marsh in the lee of the spit is an important habitat and provides a winter roost for wildfowl and waders, particularly dark-bellied Brent geese and oystercatcher. |
| Exe Estuary Ramsar | Waterfowl assemblage of international importance (under criterion 5)<br>Species/populations occurring at levels of international importance (under criterion 6):<br>*Branta bernicla bernicla*: Dark-bellied brent goose | As above. |
| Exmoor & Quantock Oakwoods SAC | H91A0 Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles<br>H91E0# Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion*, *Alnion incanae, Salicion albae*) | The SAC is nearly 1900 ha and has some of the largest woodlands in lowland England, including Horner Woods and Watersmeet, in seven blocks |

| Site | Interest features | Description |
|---|---|---|
| | S1308 *Barbastella barbastellus*: Barbastelle bat<br>S1323 *Myotis bechsteinii*: Bechstein`s bat<br>S1355 *Lutra lutra*: Otter | separated by semi-natural habits or farmland and in the case of The Quantocks by Taunton Vale. The woodland is mainly ancient, semi-natural sessile oak woodland with rich lichen and bryophyte communities, occupying steep sided valleys. In some places, there are long transitions to other semi-natural habitats; small areas of heaths/scrub, grassland/bracken and small areas of sea cliffs, conifer or mixed woodland are included in the SAC. The European interest features represented include: Old sessile oak woods with holly and hard fern, Alluvial forests with alder and ash, Barbastelle and Bechstein's bat, otter. |
| Exmoor Heaths SAC | H4030 European dry heaths<br>H91A0 Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles<br>H7130# Blanket bogs<br>H7230 Alkaline fens<br>H1230 Vegetated sea cliffs of the Atlantic and Baltic coasts<br>H4010 Northern Atlantic wet heaths with *Erica tetralix* | Exmoor Heaths SAC is primarily designated for its European dry heaths, Northern Atlantic wet heaths, Blanket bogs and Vegetated sea cliffs. It also has some Old sessile oak woodland and very small areas of Alkaline fen. The wet heath is extremely variable in nature and has in places been modified by management, particularly burning. The Exmoor heaths are also important as the largest stronghold for the heath fritillary butterfly *Mellicta athalia*, associated with sheltered slopes in the transition to woodland. |
| Hestercombe House SAC | S1303 *Rhinolophus hipposideros*: Lesser horseshoe bat | Hestercombe House SAC is a Lesser horseshoe bat summer maternity roost and winter hibernacula of national importance in the vale of Taunton Deane. It consists of two roof voids within the former stable block and main house of Hestercombe House - a former country house and estate consisting of mixed woodland, |

| Site | Interest features | Description |
|---|---|---|
| | | pasture, lakes and landscaped garden. This site holds a significant number of bats, and has been included as representative of the species in south-west England. The UK holds one of the largest populations of this species in western Europe. |
| Holme Moor & Clean Moor SAC | H6410 *Molinia* meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*)<br>H7210# Calcareous fens with Cladium mariscus and species of the *Caricion davallianae*<br>H7230 Alkaline fens | Holme Moor and Clean Moor SAC is important as alkaline/calcareous fen, with *Cladium mariscus* and species of the *Caricion davallianae*, and is highly species rich, with transitions from *Cladium* fen to mire with Black Bog-Rush and Blunt-Flowered Rush. It consists of fen, marsh and swamp habitats associated with high water tables fed by base rich, nutrient poor ground water, and has Molinia meadows on calcareous, peaty or clayey-silt-laden soils. Clean Moor supports the only Black bog-rush - Blunt-flowered rush calcareous flush community in Somerset, and Holme Moor supports a rare swamp community dominated by Great Fen-Sedge. Both sites are the only Somerset sites for Broad-leaved Cotton Grass. |
| Lyme Bay & Torbay SAC | H1170 Reefs H8330 Submerged or partially submerged sea caves | The two sections of the Lyme Bay and Torbay SAC off the Devon coast of England contain a greater diversity of habitats than found in other existing SACs in the Western English Channel and Celtic Sea. Within the Lyme Bay Reefs portion, bedrock and stony reef, boulders and cobble and sediments comprise a type of reef uncommon in the region. This complex and diverse reef habitat supports particularly high species richness. Hydroids, anemones, sea squirts, sponges and |

| Site | Interest features | Description |
|---|---|---|
| Page 1304 | | corals populate the area to the extent the area has been identified as a marine biodiversity 'hotspot.' The pink sea fan and the nationally rare southern cup coral is found throughout the site. The diverse geology of the 'Mackerel Cove to Dartmouth Reefs' in Torbay, limestone reefs and outcrops, sandstone, slate reef, granite outcrops, and stony reef, supports a similarly rich assemblage of animal communities, including an extensive coverage of kelp and blue mussel communities on shallower reefs, and species of sponge, anemone, soft corals and crustaceans on the deeper reefs. The area also contains a diversity of wave-eroded sea caves at Babbacombe to Hopes Nose and Broad Sands to Berry Head. The freshwater and saltwater mix in these caves makes them some of the best examples of coastal solution caves in the UK. The caves also support a richness of animal life including many nationally significant species such as sponges, pink sea fingers, burrowing anemones and southern cup coral. |
| Quants SAC | S1065 *Euphydryas (Eurodryas, Hypodryas) aurinia*: Marsh fritillary butterfly | This damp and sheltered site supports a medium-sized but strong marsh fritillary population in a neutral grassland/fen mosaic. It is strategically placed close to other smaller sub-populations, with which it forms a metapopulation, and may exchange individuals with the large population at Southey Moor (outside the SAC series). |
| River Axe SAC | S1095 *Petromyzon marinus*: Sea Lamprey | The lower reaches of the River Axe feature a mixed catchment geology of sandstones and |

| Site | Interest features | Description |
|---|---|---|
| | H3260 Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitricho-Batrachion* vegetation<br>S1096 *Lampetra planeri*: Brook Lamprey<br>S1163 *Cottus gobio*: Bullhead | limestones giving rise to calcareous waters and associated Water-Crowfoots *Ranunculion fluitantis* and Water-Starworts *Callitricho batrachion*. The river also supports the significant presence of Sea Lamprey, Brook Lamprey and Bullhead |
| Sidmouth to West Bay SAC | H1210 Annual vegetation of drift lines<br>H1230 Vegetated sea cliffs of the Atlantic and Baltic coasts<br>H9180# *Tilio-Acerion* forests of slopes, screes and ravines | Sidmouth to West Bay is an example of a highly unstable soft cliff coastline subject to mudslides and landslips. The principal rock types are soft mudstones, clays and silty limestones, with a small chalk outlier in the west. Vegetation is very varied and includes pioneer communities on recent slips, calcareous grassland and scrub on detached chalk blocks, and extensive self-sown woodland dominated by ash Fraxinus excelsior or sycamore *Acer pseudoplatanus*. This mosaic of habitats makes this site rich in invertebrates, especially bees and wasps. The Red Data Book lichen *Parmelia quercina* occurs on ash Fraxinus excelsior trees. |
| Somerset Levels & Moors SPA | A142(NB) *Vanellus vanellus*: Northern Lapwing<br>A037(NB) *Cygnus columbianus* bewickii: Bewick Swan<br>A140(NB) *Pluvialis apricaria* : European Golden Plover<br>A052(NB) *Anas crecca*: Eurasian Teal<br>Waterbird assemblage | The Somerset Levels and Moors are located in south-west England and are one of the largest and richest areas of traditionally managed wet grassland and fen habitats in lowland UK. The SPA is within this area, and covers about 35,000 ha in the floodplains of the Rivers Brue, Parrett, Tone and their tributaries. The majority of the site is only a few metres above mean sea level and drains through a large network of ditches, rhynes, drains and rivers. Flooding may affect large areas in winter depending on rainfall and tidal conditions. Parts of the site in the Brue Valley include areas of former raised peatbog |

| Site | Interest features | Description |
|---|---|---|
| | | that have now been substantially modified by agricultural intensification and peat extraction. This has created areas of open water, fen and reedbed. The site attracts important numbers of waterbirds (swans, ducks and waders) in winter. |
| Somerset Levels & Moors Ramsar | 17 species of red-listed invertebrate (under criterion 2)<br>Waterfowl assemblage of international importance (under criterion 5)<br>Species/populations occurring at levels of international importance (under criterion 6):<br>*Cygnus columbianus* bewickii: Bewick Swan<br>*Anas crecca*: Eurasian Teal<br>*Vanellus vanellus*: Northern Lapwing | See above |
| South Dartmoor Woods SAC | H4030 European dry heaths<br>H91A0 Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles | The SAC consists of fine examples of old sessile oak woods, some of the best remaining in South Devon. The SAC forms a complex mosaic of woodland, grassland and heathland, with rare lichen species and nationally rare species of Pearl Border Fritillary and High Brown Fritillary. |
| South Hams SAC | H8310 Caves not open to the public<br>H6210# Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco-Brometalia*)<br>H4030 European dry heaths<br>H1230 Vegetated sea cliffs of the Atlantic and Baltic coasts<br>H9180# *Tilio-Acerion* forests of slopes, screes and ravines<br>S1304 *Rhinolophus ferrumequinum*: Greater Horseshoe Bat | The South Hams SAC is comprised of several but separate component SSSIs. The SAC is thought to hold the largest population of Greater horseshoe bat in the UK, and is the only one containing more than 1,000 adult bats. It contains the largest known maternity roost in the UK and possibly Europe. The site contains both maternity and hibernation sites. Many of the roosts are within caves not open to the public. The SAC is important for its extensive limestone grassland, some areas on the plateau support European dry heath characteristic of acid soil. The limestone headland cliffs of Torbay support calcareous grassland and scrubland facies . The site is |

| Site | Interest features | Description |
|---|---|---|
| | | exceptional in that it supports a number of rare and scarce vascular plants typical of the oceanic southern temperate and Mediterranean-Atlantic elements of the British flora. The SAC also supports areas of *Tilio-Acerion* ravine forest which is woodland containing ash, wych elm and small leaved lime and field maple. |
| West Dorset Alder Woods SAC | H6410 *Molinia* meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*)<br>H9190 Old acidophilous oak woods with *Quercus robur* on sandy plains<br>H91E0# Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion, Alnion incanae, Salicion albae*)<br>S1065 *Euphydryas* (*Eurodryas, Hypodryas) aurinia*: Marsh Fritillary butterfly<br>S1166 *Triturus cristatus*: Great Crested Newt | The SAC comprises mixed ash-alder woods found along the sinuous valleys in West Dorset. They have developed along the headwaters of alkaline streams and seepages having their origin in the chalk downland and issuing from the underlying Upper Greensand at its junction with the Gault Clay. The wetter woods or carr form transitions to drier oak-ash woodland as well as associated further transitions to base-rich fens, reedswamp, fen meadow and acid grassland. |

# Appendix 3: Site pressures and threats for relevant European sites

The table lists the threats and pressures identified for each European site in the relevant site improvement plan. The links are for the relevant plan and the threats/pressures are listed in prioritised order.

| Site | Site pressures and threats |
|---|---|
| Beer Quarry & Caves SAC | 1 Direct impact from third party<br>2 Planning permission: general<br>3 Habitat vulnerability<br>4 Inappropriate scrub control<br>5 Habitat connectivity |
| Bracket's Coppice SAC | 1 Undergrazing<br>2 Deer<br>3 Air pollution: impact of atmospheric nitrogen deposition |
| Culm Grasslands SAC | 1 Air pollution: impact of atmospheric nitrogen deposition<br>2 Agricultural management practices<br>3 Hydrological changes<br>4 Change in land management<br>5 Changes in species distributions<br>6 Invasive species<br>7 Inappropriate scrub control<br>8 Agricultural management practices<br>9 Direct impact from 3rd party |
| Dartmoor SAC | 1 Hydrological changes<br>2 Wildfire/arson<br>3 Air pollution: impact of atmospheric nitrogen deposition<br>4 Water pollution<br>5 Overgrazing<br>6 Undergrazing<br>7 & 8 Invasive species<br>9 Change in land management |

| Site | Site pressures and threats |
|---|---|
| | 10 Disease |
| East Devon Pebblebed Heaths SAC/SPA | 1 Inappropriate scrub control<br>2 Undergrazing<br>3 Change in land management<br>4 Public access/disturbance<br>5 Air pollution: impact of atmospheric nitrogen deposition<br>6 Water pollution<br>7 Hydrological changes |
| Exe Estuary SPA and Dawlish Warren SAC | 1 Public access/disturbance (affecting birds)<br>2 Changes in species distributions<br>3 Coastal squeeze<br>4 Change in land management<br>5 Public access/disturbance (visitor pressure at Dawlish Warren)<br>6 Fisheries: Commercial marine and estuarine |
| Exmoor & Quantock Oakwoods SAC | 1 Invasive species<br>2 Forestry and woodland management<br>3 Disease<br>4 Air pollution: impact of atmospheric nitrogen deposition<br>5 Change in land management<br>6 Deer |
| Exmoor Heaths SAC | 1 Air pollution: impact of atmospheric nitrogen deposition<br>2 Drainage<br>3 Inappropriate pest control<br>4 Agricultural management practices<br>5 Invasive species<br>6 Managed rotational burning<br>7 Change in land management<br>8 Direct impact from 3rd party |
| Hestercombe House SAC | 1 Changes in species distributions<br>2 Inappropriate scrub control<br>3 Public access/disturbance |

| Site | Site pressures and threats |
|---|---|
| | 4 Physical modification<br>5 Planning permission: general |
| Holme Moor & Clean Moor SAC | 1 Change in land management<br>2 Water pollution<br>3 Air pollution: impact of atmospheric nitrogen deposition |
| Lyme Bay & Torbay SAC | 1 & 2 Fisheries: commercial marine and estuarine<br>3 Public access/disturbance |
| Quants SAC | 1 Changes in species distributions<br>2 Air pollution: impact of atmospheric nitrogen deposition |
| River Axe SAC | 1 Water pollution<br>2 Siltation<br>3 Invasive species<br>4 Inappropriate weirs, dams and other structures |
| Sidmouth to West Bay SAC | 1 Invasive species<br>2 Disease<br>3 Direct impact from third party<br>4 Planning permission: general<br>5 Water pollution<br>6 Vehicles<br>7 Habitat fragmentation<br>8 Inappropriate coastal management<br>9 Air pollution: risk of atmospheric nitrogen deposition |
| Somerset Levels & Moors SPA | 1 Drainage<br>2 Inappropriate water levels<br>3 Maintain and upgrade water management structures<br>4 Change in land management<br>5 Agricultural management practices<br>6 Peat extraction<br>7 Public access/disturbance<br>8 Offsite habitat availability/management |
| South Dartmoor Woods SAC | 1 Air pollution: impact of atmospheric nitrogen deposition |

| Site | Site pressures and threats |
|---|---|
| South Hams SAC | 1 Change in land management<br>2 Planning permission: general<br>3 Physical modification<br>4 Inappropriate vegetation management<br>5 & 7 Public access/disturbance<br>6 Forestry and woodland management<br>8 Inappropriate scrub control<br>9 Air pollution: impact of atmospheric nitrogen deposition |
| West Dorset Alder Woods SAC | 1 Deer<br>2 Water Pollution<br>3 Forestry and woodland management<br>4 Undergrazing<br>5 Invasive species<br>6 Disease<br>7 Water abstraction<br>8 Air pollution: impact of atmospheric nitrogen deposition<br>9 Habitat fragmentationl |

# Appendix 4: Individual site options and distance to European sites

This appendix gives the distance (km) from each site option to each European site. Distances are the distance from the nearest part of each respective boundary. Shading (red to green) reflects the distances (closer distances shaded red).

| Site Ref | Site Name | Potential number of dwellings | Site area (ha) | Culm Grasslands SAC | Dawlish Warren SAC | East Devon P' bed Heaths SAC/SPA | Lyme Bay and Torbay SAC | River Axe SAC | Sidmouth to West Bay SAC | South Dartmoor Woods SAC | South Hams SAC | Beer Quarry & Caves SAC | Quants SAC | Dartmoor SAC | Exmoor Heaths SAC | Exmoor & Q' tock Oakwoods SAC | Exe Estuary SPA/Ramsar |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SA-ED-1 | Venns Farm, Sowton | 0 | 31 | 29.1 | 12.5 | 7.1 | 22.4 | 27.7 | 15.9 | 16.2 | 17.2 | 23.4 | 31.7 | 27.9 | 35.1 | 35.4 | 4.3 |
| SA-ED-12 | Whimple | 2500 | 242 | 28.2 | 17.3 | 3.9 | 17.6 | 20.2 | 11.9 | 24.4 | 24.8 | 17.0 | 23.0 | 36.2 | 30.4 | 32.3 | 11.0 |
| SA-ED-15 | Feniton | 2800 | 364 | 30.0 | 20.4 | 6.3 | 14.9 | 15.4 | 10.9 | 28.9 | 29.2 | 13.6 | 18.9 | 40.7 | 30.1 | 32.9 | 15.3 |
| SA-ED-18 | Honiton East | 1100 | 75 | 36.3 | 27.0 | 13.3 | 12.5 | 9.8 | 11.8 | 37.6 | 36.7 | 11.3 | 15.9 | 49.2 | 33.1 | 36.6 | 23.0 |
| SA-ED-19 | Axminster South | 540 | 54 | 48.5 | 34.4 | 22.8 | 6.2 | 0.4 | 5.6 | 48.5 | 45.6 | 10.7 | 22.5 | 59.5 | 43.6 | 42.6 | 32.2 |
| SA-ED-2 | Oil Mill Lane | 4000 | 381 | 31.7 | 7.6 | 3.0 | 19.1 | 25.7 | 12.6 | 16.5 | 14.9 | 20.8 | 33.0 | 27.4 | 37.5 | 37.9 | 1.2 |
| SA-ED-25 | Westclyst & Mosshayne Farms | 1600 | 117 | 26.9 | 13.8 | 7.1 | 22.6 | 27.4 | 16.2 | 16.4 | 17.8 | 23.3 | 30.1 | 28.2 | 32.7 | 33.0 | 5.0 |
| SA-ED-26 | Cowley | 500 | 27 | 24.3 | 17.1 | 14.4 | 26.0 | 35.3 | 23.6 | 11.0 | 16.4 | 31.1 | 35.3 | 23.1 | 32.4 | 32.0 | 6.6 |
| SA-ED-27 | Between Jarvishayes and the M5 | 0 | 77 | 24.8 | 16.0 | 8.6 | 24.2 | 28.2 | 17.8 | 17.6 | 20.0 | 24.5 | 28.9 | 29.5 | 30.6 | 30.8 | 7.2 |
| SA-ED-3 | Hill Barton | 10000 | 660 | 29.7 | 10.3 | 2.6 | 17.8 | 23.5 | 11.2 | 17.3 | 16.5 | 19.0 | 29.9 | 28.6 | 35.3 | 35.7 | 2.9 |

| SA Ref | Site Name | Potential number of dwellings | Site area (ha) | Culm Grasslands SAC | Dawlish Warren SAC | East Devon P' bed Heaths SAC/SPA | Lyme Bay and Torbay SAC | River Axe SAC | Sidmouth to West Bay SAC | South Dartmoor Woods SAC | South Hams SAC | Beer Quarry & Caves SAC | Quants SAC | Dartmoor SAC | Exmoor Heaths SAC | Exmoor & Q' tock Oakwoods SAC | Exe Estuary SPA/Ramsar |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SA-ED-5 | North of Exeter Airport | 0 | 22 | 29.5 | 13.5 | 4.9 | 20.4 | 25.3 | 14.0 | 18.8 | 19.1 | 21.1 | 29.5 | 30.4 | 34.3 | 35.1 | 5.8 |
| SA-ED-7 | Higher Greendale | 1300 | 107 | 32.6 | 9.7 | 2.1 | 17.6 | 23.9 | 11.1 | 18.8 | 17.0 | 19.1 | 31.9 | 29.7 | 37.8 | 38.5 | 3.1 |
| SA-ED-8 | Airport Business Park | 0 | 27 | 30.4 | 13.0 | 3.5 | 19.0 | 24.0 | 12.5 | 20.0 | 19.7 | 19.7 | 29.4 | 31.5 | 35.0 | 35.9 | 5.9 |
| SA-EX-1 | Attwells, North of Exwick | 400 | 48 | 26.3 | 15.7 | 14.0 | 24.1 | 35.6 | 23.4 | 9.3 | 14.3 | 31.2 | 37.0 | 21.3 | 34.4 | 34.0 | 5.4 |
| SA-EX-10 | Marsh Barton | 5544 | 86 | 29.2 | 11.7 | 10.5 | 21.0 | 33.0 | 20.2 | 10.4 | 12.2 | 28.3 | 37.2 | 22.0 | 37.1 | 36.6 | 1.4 |
| SA-EX-18 | Pinhoe Trading Estate | 278 | 10 | 27.6 | 14.0 | 9.4 | 24.8 | 29.9 | 18.3 | 15.0 | 17.1 | 25.7 | 32.6 | 26.8 | 34.2 | 34.3 | 4.4 |
| SA-EX-19 | East Gate | 1160 | 17 | 27.7 | 13.7 | 10.9 | 23.5 | 32.4 | 20.2 | 11.8 | 14.7 | 28.0 | 35.2 | 23.6 | 35.3 | 35.0 | 3.2 |
| SA-EX-22 | West Gate | 620 | 9 | 28.4 | 13.7 | 12.0 | 22.7 | 33.9 | 21.5 | 10.6 | 13.5 | 29.4 | 36.7 | 22.4 | 36.3 | 35.9 | 3.4 |
| SA-EX-23 | Land between South, Market and Fore Street | 175 | 1 | 28.2 | 14.0 | 11.9 | 23.2 | 33.8 | 21.4 | 11.1 | 14.2 | 29.2 | 36.5 | 23.0 | 36.0 | 35.6 | 3.5 |
| SA-EX-26 | Sandy Gate | 1050 | 37 | 30.0 | 10.8 | 7.3 | 21.7 | 29.0 | 16.6 | 14.8 | 14.6 | 24.4 | 33.5 | 26.1 | 36.4 | 36.5 | 1.8 |
| SA-EX-3 | Land between M5 and Topsham | 1500 | 97 | 30.8 | 8.8 | 6.4 | 19.7 | 28.9 | 16.2 | 14.4 | 13.2 | 24.3 | 34.0 | 25.2 | 37.1 | 37.3 | 0.2 |
| SA-EX-4 | North of Stoke Hill | 768 | 58 | 25.8 | 15.0 | 10.5 | 25.4 | 30.8 | 19.3 | 13.5 | 16.8 | 26.7 | 32.6 | 25.5 | 32.9 | 32.6 | 5.0 |
| SA-EX-5 | Land adjacent Exeter St David's Station | 660 | 9 | 26.6 | 15.1 | 13.0 | 24.0 | 34.5 | 22.4 | 10.7 | 14.7 | 30.1 | 36.1 | 22.7 | 34.6 | 34.1 | 4.7 |
| SA-EX-6 | Water Lane | 1570 | 26 | 29.0 | 11.8 | 10.4 | 21.1 | 32.9 | 20.1 | 10.9 | 12.6 | 28.2 | 36.8 | 22.6 | 36.8 | 36.4 | 1.4 |
| SA-EX-7 | North Gate | 310 | 4 | 27.9 | 14.2 | 12.1 | 23.4 | 33.8 | 21.6 | 11.1 | 14.3 | 29.4 | 36.3 | 22.9 | 35.7 | 35.3 | 3.8 |

| SA Ref | Site Name | Potential number of dwellings | Site area (ha) | Culm Grasslands SAC | Dawlish Warren SAC | East Devon P' bed Heaths SAC/SPA | Lyme Bay and Torbay SAC | River Axe SAC | Sidmouth to West Bay SAC | South Dartmoor Woods SAC | South Hams SAC | Beer Quarry & Caves SAC | Quants SAC | Dartmoor SAC | Exmoor Heaths SAC | Exmoor & Q' tock Oakwoods SAC | Exe Estuary SPA/Ramsar |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SA-EX-8 | South Gate | 300 | 4 | 28.4 | 13.7 | 11.4 | 23.0 | 33.2 | 20.9 | 11.1 | 14.0 | 28.7 | 36.0 | 22.9 | 36.0 | 35.6 | 3.2 |
| SA-EX-9 | Howell Road Car Park | 106 | 1 | 27.6 | 14.5 | 12.0 | 24.0 | 33.5 | 21.4 | 11.7 | 15.0 | 29.1 | 35.8 | 23.6 | 35.3 | 34.9 | 4.0 |
| SA-MD-10 | Land at Hartnoll Farm | 950 | 101 | 14.6 | 31.7 | 20.2 | 32.5 | 31.3 | 28.1 | 29.2 | 35.1 | 31.1 | 19.1 | 38.8 | 15.4 | 16.9 | 22.9 |
| SA-MD-12 | Area south of Sampford Peverell | 2200 | 167 | 17.4 | 33.0 | 20.3 | 30.6 | 28.4 | 27.2 | 32.5 | 37.6 | 29.1 | 14.4 | 42.6 | 15.1 | 18.2 | 25.1 |
| SA-MD-3 | South of Crediton | 750 | 91 | 20.3 | 24.4 | 22.4 | 31.5 | 42.3 | 31.4 | 10.3 | 20.5 | 38.5 | 38.8 | 18.4 | 28.4 | 29.2 | 14.2 |
| SA-MD-4 | Newton St Cyres Area | 1200 | 303 | 20.2 | 20.2 | 16.6 | 28.9 | 36.3 | 25.7 | 11.6 | 18.8 | 32.6 | 33.9 | 22.7 | 28.4 | 28.2 | 9.7 |
| SA-MD-9 | East of Cullompton | 5000 | 802 | 20.4 | 25.1 | 12.6 | 24.5 | 23.5 | 20.1 | 26.8 | 30.3 | 23.1 | 15.8 | 38.8 | 19.8 | 22.5 | 17.6 |
| SA-T-16 | West of Exminster | 200 | 17 | 32.7 | 8.9 | 8.6 | 18.5 | 32.2 | 18.9 | 11.9 | 10.8 | 27.2 | 38.4 | 22.6 | 40.1 | 39.9 | 0.8 |
| SA-T-17 | Markham Lane, Ide | 1100 | 66 | 30.4 | 11.8 | 11.7 | 19.9 | 34.6 | 21.6 | 8.8 | 10.7 | 29.8 | 38.8 | 20.1 | 38.5 | 38.1 | 2.5 |
| SA-T-18 | Peamore | 1500 | 146 | 32.0 | 9.8 | 9.8 | 18.1 | 33.3 | 20.0 | 9.5 | 9.3 | 28.3 | 39.1 | 20.2 | 39.9 | 39.4 | 1.6 |
| SA-T-22 | Ilford Park | 0 | 46 | 42.4 | 15.1 | 21.3 | 11.1 | 46.1 | 32.1 | 5.2 | 3.3 | 40.4 | 55.3 | 10.8 | 53.3 | 53.6 | 14.9 |
| SA-T-3 | Land West of Houghton Barton | 1750 | 126 | 42.9 | 16.3 | 22.7 | 10.5 | 47.5 | 33.4 | 5.8 | 5.1 | 41.7 | 57.1 | 10.9 | 54.9 | 55.3 | 16.1 |
| SA-T-5 | Priory Road | 500 | 63 | 48.9 | 14.4 | 21.5 | 5.5 | 45.2 | 31.4 | 11.9 | 8.3 | 39.3 | 57.7 | 16.6 | 59.1 | 59.1 | 13.9 |
| SA-T-8 | Land North of Forches Cross | 0 | 24 | 43.8 | 14.7 | 21.1 | 9.8 | 45.8 | 31.8 | 6.6 | 3.9 | 40.1 | 55.8 | 12.1 | 54.5 | 54.7 | 14.4 |

# Appendix 5: Features of relevant sites where there are potential risks from air pollution derived from traffic

This appendix lists those features of relevant sites where there are potential risks from air pollution derived from traffic. The majority of the SAC habitats are naturally low in nutrients and are therefore susceptible to eutrophication. Nitrogen deposition already exceeds the site-relevant critical load for ecosystem protection and hence there already is a risk of harmful effects, and these are listed in the table. Actions listed in the Site Improvement Plans for each site are to control, reduce and ameliorate atmospheric nitrogen impacts and develop site Nitrogen plans.

The table only Includes sites or component SSSIs for which a section of the site is within 200m of a road. For individual species, the impact on the habitat on which they are dependent is listed. Note that critical loads are, where known, exceeded at all sites, therefore features are likely to be impacted already. 'Action' indicates where measures are planned to ameliorate existing impacts (e.g. from Site Improvement Plans). Features that are not likely to be vulnerable have been excluded.



| European site | Sensitive interest feature | Exceedance impact |
|---|---|---|
| Culm Grassland SAC – Hare's Down Knowstone & Rackenford Moors | Northern Atlantic wet heaths with Erica tetralix (H4010) | Transition heather to grass. Ericaceous species susceptible to frost and drought, possible direct impact on lower plants |
| | Molinia meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*) (H6410) | Increase in tall graminoids, decreased diversity, decrease of bryophytes |
| | Marsh fritillary butterfly (S1065) – broad habitat Acid grassland | Increase in graminoids, decline of typical species, decrease in total species richness. Insufficient knowledge to make a judgment of the impacts on this species. Decision should be made at a site specific level |
| Dartmoor SAC | Blanket bogs (* if active bog) (H7130) | Increase in vascular plants, altered growth and species composition of bryophytes, increased N in peat and peat water. |

| European site | Sensitive interest feature | Exceedance impact |
|---|---|---|
| Action: Control, reduce and ameliorate atmospheric nitrogen impacts | Old sessile oak woods with Ilex and Blechnum in the British Isles (H91A0) | Decrease in mycorrhiza, loss of epiphytic lichens and bryophytes, changes in ground vegetation, decline in tree vitality |
| | Northern wet heath: Erica tetralix dominated wet heath | Transition heather to grass. Ericaceous species susceptible to frost and drought, possible direct impact on lower plants |
| | European dry heaths (H4030) | Transition from heather to grass dominance, decline in lichens, changes in plant biochemistry, increased sensitivity to abiotic stress |
| | Southern damselfly (S1044): Northern wet heath: *Erica tetralix* dominated wet heath | Transition heather to grass. Ericaceous species susceptible to frost and drought |
| | Southern damselfly (S1044): Rivers and streams | No Critical Load has been assigned habitat. decisions should be taken at a site specific level and consideration should also be given to other sources of N |
| | Atlantic Salmon (S1106): Rivers and Streams | No Critical Load has been assigned habitat. decisions should be taken at a site specific level and consideration should also be given to other sources of N |
| | Otter (S1355): Rivers and Streams | No Critical Load has been assigned habitat. decisions should be taken at a site specific level and consideration should also be given to other sources of N. |
| Exe Estuary SPA/Ramsar | Pied Avocet (A132): Upper, pioneer, low-mid, mid-upper saltmarshes | Potential negative impact through increase in late successional species, positive impact through an increase in productivity |
| | Black-tailed godwit (A616): Upper, pioneer, low-mid, mid-upper saltmarshes | As above |
| | Dark-bellied brent goose (A675): Upper, pioneer, low-mid, mid-upper saltmarshes | As above |
| East Devon Pebblebed Heaths SAC/SPA | Northern wet heath: *Erica tetralix* dominated wet heath | Transition heather to grass. Ericaceous species susceptible to frost and drought, possible direct impact on lower plants |

| European site | Sensitive interest feature | Exceedance impact |
|---|---|---|
| Action: Control, reduce and ameliorate atmospheric nitrogen impacts; Site Nitrogen Action Plan; Restore as necessary the concentrations and deposition of air pollutants to below the site-relevant Critical Load or Level | European dry heaths | Transition from heather to grass dominance, decline in lichens, changes in plant biochemistry, increased sensitivity to abiotic stress |
| | Southern damselfly (S1044): Dwarf shrub heath | Transition heather to grass. Ericaceous species susceptible to frost and drought |
| | Southern damselfly (S1044): Rivers and streams | No Critical Load has been assigned habitat. decisions should be taken at a site-specific level and consideration should also be given to other sources of N. Possible impact on invertebrates of freshwater acidification |
| | A224(B) European nightjar – Dwarf Shrub Heath, Coniferous woodland | See above for heathland. No expected impacts through effects on coniferous woodland |
| | A302(B) Dartford Warbler- – Dwarf Shrub Heath, | See above for heathland |
| Exmoor and Quantock Oakwoods SAC | Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles (H91A0) | Decrease in mycorrhiza, loss of epiphytic lichens and bryophytes, changes in ground vegetation, decline in tree vitality; may cause increased susceptibility to pathogens and pests. |
| | Barbastelle (S1308): Broadleaved mixed deciduous woodland | Changes in soil processes, nutrient imbalance, altered composition mycorrhiza and ground vegetation. Decision should be at site level. |
| | Bechstein's bat (S1323): Broadleaved mixed deciduous woodland | Changes in soil processes, nutrient imbalance, altered composition mycorrhiza and ground vegetation. Decision should be at site level. |
| Exmoor Heaths SAC | European dry heaths (H4030) | Transition from heather to grass dominance, decline in lichens, changes in plant biochemistry, increased sensitivity to abiotic stress |
| | Old sessile oak woods with Ilex and Blechnum in the British Isles (H91A0 | Decrease in mycorrhiza, loss of epiphytic lichens and bryophytes, changes in ground vegetation |
| | Alkaline fens (H7230) | Increase in tall graminoids, decrease in bryophytes |

| European site | Sensitive interest feature | Exceedance impact |
|---|---|---|
| | Blanket bogs (* if active bog) (H7130) | Increase in vascular plants, altered growth and species composition of bryophytes, increased N in peat and peat water. |
| River Axe SAC | Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation (H3260) | These systems are often P limited (or N/P co-limiting), therefore decisions should be taken at a site specific level. Furthermore, consideration should also be given to other sources of N |
| | Sea lamprey (S1095), Brook lamprey (S1096), Bullhead (S1163): Rivers and streams | These systems are often P limited (or N/P co-limiting), therefore decisions should be taken at a site specific level. Furthermore, consideration should also be given to other sources of N |
| South Dartmoor Woods SAC | Old sessile oak woods with Ilex and Blechnum in the British Isles (H91A0) | Decrease in mycorrhiza, loss of epiphytic lichens and bryophytes, changes in ground vegetation, decline in tree vitality; may cause increased susceptibility to pathogens and pests. |
| | European dry heaths (H4030) | Transition from heather to grass dominance, decline in lichens, changes in plant biochemistry, increased sensitivity to abiotic stress |
| South Hams SAC<br>Action: Further investigate potential atmospheric nitrogen impacts on the site based on application of guidance from Chief Scientist Group Nitrogen Task and Finish Group | Tilio-Acerion forests of slopes, screes and ravines (H9180) | Changes in ground vegetation (sensitive features are currently considered to be in favourable condition on the site) |
| | Greater horseshoe bat (S1304): Broadleaved deciduous woodland | Changes in soil processes, nutrient imbalance, altered composition mycorrhiza and ground vegetation – decision needed at site level. |

# Appendix 6: Potential impacts on interest features or relevant sites

The potential effects of an increase in N and acid deposition on the specific interest features of relevant sites are outlined below, and are based on the references listed within APIS. Critical loads have been established for pollutants and these are summarised for each habitat type. Critical loads are generally not available for species, as APIS focusses on habitats. The implications for habitats give an indication of likely changes for species that are not directly affected (i.e. for which increased deposition is not in itself toxic). It is important to note that roadsides which will attract the greatest deposition and may be part of the European site frequently support highly modified communities as a result of salt, fire, litter, road works and so on that make achievement of the conservation objectives very difficult in any event, such that deposition above 1% of the critical load very close to the road may not matter so much.

## *Impacts on heathland*

Heathlands are naturally low-nutrient systems and therefore particularly susceptible to nutrient enrichment via N deposition. Lowland heaths in the vicinity of major roads have been identified as being at particular risk. Typical heathland species are generally acid tolerant, but their roots may be sensitive to soil chemistry changes. The potential impacts of N and acid deposition may be:

- A shift in dominance from heath species, mosses (including bog-mosses) and lichens to grasses such as Wavy Hair-grass *Deschampsia flexuosa* and Purple Moor-grass *Molinia caerulea* through shading or an inability to compete for limiting resources
- Increased incidence of Heather Beetle *Lochmaea suturalis* damage
- Increased litter fall, inhibiting ground-dwelling species
- Direct damage to lichens, mosses and liverworts
- Increased susceptibility of Heather *Calluna vulgaris* to winter and summer drought

**Summary of critical loads for heathland habitats at the relevant sites.**

| Pollutant | Objective (UK) |
|---|---|
| Nutrient N deposition | 10-20 Kg N/ha/yr |
| Acidity deposition | **(keq/ha/yr):**<br>**Maximum:** CLminN:1.035 CLmaxN: 1.822 CLmaxS: .93<br>**Minimum:** CLminN: .499 CLmaxN: .842 CLmaxS: .2 |

In accordance with recommendations on APIS, the high end of the range for N should be used in locations with high precipitation, a high water table and when sod cutting has been practiced and the low end of the range with low precipitation, a low water table and low intensity management.

### *Heathland species*

Interest features on heathland include Nightjar and Dartford Warbler. Impacts on these species are indirect, associated with habitat changes. Both species require heather and would be negatively impacted by a change to grass-dominated vegetation over time.

Southern Damselfly is also associated with heathlands, however, it is more likely to be affected by the quality and vegetation of the streams and valley mire runnels vital to aquatic stages of its life cycle than by pollution-induced changes to the surrounding vegetation, although gross changes (such as an increase in scrub around the water course leading to shading and to changes to emergent vegetation) would in time lead to a reduction in population size or the loss of populations.

### *Acid grassland*

Acid grasslands are also naturally low-nutrient systems and therefore susceptible to nutrient deposition. In Purple Moor-grass rush pasture, tall grasses are likely to increase with an overall loss of diversity. Specifically:

- N deposition is likely to have the effect of fertilising acid grasslands, as these are usually N limited
- This will favour grasses which are likely to shade out forbs and lower plants, and grassland will become more grass-dominated and loose diversity (with implications of pollinators)
- Lower plants, especially mosses, at risk both from N accumulation and acid
- Vulnerability is increased by proximity to agricultural areas that provide a seed source for N loving species, particularly grasses.

Acidity may result in an increase in ions that may cause toxicity to plants and mycorrhiza and may have direct effects on lower plants. A study reported in APIS has shown that Increasing acidity is limiting the pool of species able to survive, resulting in a decline in species richness with the loss of fine-leaved species and forbs (eutrophication and other soil chemical changes are likely to be involved too).

**Summary of critical loads for moist and wet oligotrophic grasslands: *Molinia caerulea* meadow.**

| Pollutant | Objective (UK) |
|---|---|
| Nutrient N deposition | 15-25 kg N ha-1 year |
| Acidity deposition | **(keq/ha/yr):**<br>MinCLminN: 0.223 \| MaxCLminN: 0.581<br>MinCLMaxS: 0.43 \| MaxCLMaxS: 1.62<br>MinCLMaxN: 0.796 \| MaxCLMaxN: 2.058 |

### *Relevant Acid Grassland species – Marsh Fritillary*

There is insufficient knowledge to make a judgement of the impacts on this species overall and decisions are needed at a site-specific level. Marsh Fritillary has been identified as a feature affected by the impacts of atmospheric nitrogen deposition on the Culm Grasslands. Further consideration is required as to the potential change in deposition levels at the relevant site (Rackenford Moors, part of the Culm Grassland SAC), taking into account the distribution of suitable vegetation types at the site.

### *Blanket Bog*

Bogs that rely on atmospheric inputs for nutrients are highly sensitive to increases in N deposition. Negative Impacts are likely to include:

- Reductions in the cover of keystone species (bog mosses) resulting in changes in microtopography and water-holding capacity
- Loss of characteristic species
- Changes in species composition, proportions and abundance
- Expansion of nitrogen-loving species e.g. grasses and Cottongrass *Eriophorum vaginatum* at the expense of lower plants

Bogs surrounded by farmland or major roads are more vulnerable to invasion by N-tolerating species as they provide a reservoir of seed bearing grasses and ruderal plants.

**Summary of critical loads for blanket bog.**

| Pollutant | Objective (UK) |
|---|---|
| Nutrient N deposition | 5-10 **kg N/ha/yr** |
| Acidity deposition | **(keq/ha/yr):**<br>MinCLminN: 0.321 \| MaxCLminN: 0.321<br>MinCLMaxS: 0.509 \| MaxCLMaxS: 0.985<br>MinCLMaxN: 0.83 \| MaxCLMaxN: 1.306 |

### *Alkaline Fen*

Atmospheric N deposition may not be the only source of N eutrophication in alkaline fens and will not necessarily provide the most N, making it difficult to predict likely effects of N deposition. Effects may include:

- Decline in characteristic brown moss species
- Reduced numbers of bryophyte species and biomass, thinning of the moss carpet.
- Increase in vascular plant biomass, particularly grasses, sedges and rushes, with a corresponding decrease in other species.

Alkaline fens are not considered sensitive to acid deposition.

**Summary of critical loads for blanket bog.**

| Pollutant | Objective (UK) |
|---|---|
| Nutrient N deposition | 15-30 **kg N/ha/yr** |

### *Mixed deciduous woodlands*

Woodlands have a rough surface and tend to intercept larger amounts of dry depositions than, for example, grasslands, with edges adjacent to farmland or roads being most vulnerable. N deposition is not thought to have a major impact on growth directly but can have indirect effects on woodland:

- Destabilization and reduced investments in roots leading to increased risk of drought stress and increased risk of uprooting of trees
- Change in mycorrhizal flora and reduction in the numbers of fruiting bodies.
- Increased litter production
- increased sensitivity to abiotic and biotic stress
- Winter desiccation; increased defoliation by leaf feeders; increased pathogen infection
- Loss of species diversity in the ground flora and understory, with N loving grasses replacing forbs and lower plants
- Loss of sensitive lichen species and increase in epiphytic algae

With the decline in Sulphur deposition since the 1970-80s, effects of acid deposition are more difficult to attribute. However, the moss and liverwort flora of Atlantic Oakwoods (such as the South Dartmoor and Exmoor woods) are particularly vulnerable.

There is insufficient knowledge to make a general judgement about impacts on woodland species such as Bechstein's and Barbastelles bats, which should therefore be considered on a site basis.

**Summary of critical loads for acid, oak-dominated woods**

| Pollutant | Objective (UK) |
|---|---|
| Nutrient N deposition | 10-15 kg **N/ha/yr** |
| Acidity deposition | No estimate available |

### *Rivers and streams*

Critical loads for both N and acid deposition have not been assigned to rivers and streams. These systems are often P limited (or N/P co-limiting), therefore decisions should be taken at a site-specific level. Similarly, values vary according to species of interest and mineralogy of the waterbody in terms of acid deposition. Consideration should also be given to other sources of N, i.e. discharges to water, diffuse agricultural pollution etc.

Depending on the sites progressed into the draft GESP further consideration is needed as to the status of relevant valley mire streams within the East Devon Heaths SAC and the potential impacts of nitrogen and acid deposition on these with regard to Southern Damselfly populations, Dartmoor rivers and streams and impacts on Otter and Salmon, and the River Axe and Sea Lamprey, Brook Lamprey and Bull Head.

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2020

# Equality Impact Assessment – Screening Report

Greater Exeter Strategic Plan

Draft Policies and Site Options Consultation

May 2020

To request this information in an alternative format please call 01932 265177 or email gesp@devon.gov.uk

We will consider requests on an individual basis.

# Equality Impact Assessment – Screening Report

**What is the purpose of an Equality Impact Assessment (EqIA)?**

Under the Equality Act 2010 local authorities have a legal duty (Public Service Equality Duty) to eliminate discrimination and promote equality within service delivery. Local authorities are required to have 'due regard' to the need to:

- Eliminate discrimination, harassment, victimisation and any other prohibited conduct;
- Advance equality of opportunity (remove or minimise disadvantage, meet people's needs, take account of disabilities, encourage participation in public life); and
- Foster good community relations between people (tackle prejudice and promote understanding).

The equality strands protected under the Equality Act (the 'protected characteristics') are:

- Age
- Disability – including physical disability, mental health
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex/Gender
- Sexual orientation

'Due regard' to the Public Sector Equality Duty is demonstrated through undertaking an equality impact assessment. The purpose of the assessment is:

- To understand the actual or potential effect of functions, policies or decisions on different people
- To consider if there are any unintended consequences for some groups
- To consider if the policy will be fully effective for all target groups
- To help identify practical steps to tackle any negative effects or discrimination
- To advance equality and to foster good relations
- To document the results

This document sets out how the equality impact assessment of the Greater Exeter Strategic Plan – Draft Policies and Site Options has been undertaken and the findings that have arisen as a result.

**Name of the proposed strategy being assessed**

Greater Exeter Strategic Plan – Draft Policies and Site Options Consultation.

**Team responsible for completing the Equality Impact Assessment**

Officers of the Local Authorities preparing the Greater Exeter Strategic Plan (GESP).

**Who are the key people that are involved, for example decision-makers, staff implementing it, service users and equality groups?**

The GESP is being prepared in partnership between East Devon, Exeter, Mid Devon and Teignbridge Councils with assistance from Devon County Council, which has a key role in terms of transport infrastructure, education and social care. The joint strategic plan for the Greater Exeter area is considered an effective way of ensuring a collaborative and co-ordinated approach to the delivery of the housing and employment needs of the area. This is due to the scale of influence of Exeter, which has expanded to encompass the surrounding districts and sets the functional geography for the plan.

To facilitate the preparation of the GESP, the authorities have combined both financial and staff resources to set up a GESP team, tasked with preparation of the plan and background evidence. The team has engaged with officers and councillors across the councils in preparing the Draft Policies and Site Options Consultation.

In preparing evidence for the GESP a broad spectrum of stakeholders have been involved and engaged, including numerous teams within the Local Authorities, the Local Economic Partnership, Homes England, Highways England, Natural England, Environment Agency, Exeter City Futures, Exeter University, low carbon specialists and operators, various specialist consultants, large employers, developers, land agents and landowners. NHS England, the local Clinical Commissioning Groups and utilities companies are also informing the evidence base for the GESP. Dialogue with key stakeholders will continue as preparation of the GESP progresses.

A Statement of Community Involvement has also been prepared for the GESP. This sets out the general principles for consultation and involvement on the preparation of the plan (addressing equality strands). This is available on www.gesp.org.uk.

**What is the purpose of the policies and what are the intended outcomes?**

The feedback from the Draft Policies and Site Options consultation will inform the first draft of the Greater Exeter Strategic Plan. The GESP covers the planning authority areas of East Devon, Exeter, Mid Devon and Teignbridge (it does not include any of Dartmoor National Park). It will provide a long term strategy for development, infrastructure and conservation which looks at the area as a whole, rather than considering each of the different administrative areas separately. It will contain policies which need to be decided over a wider area than just one council, and will allocate the major, strategic sites which are needed to continue the area's growth in the most sustainable manner.

The reason for planning over this wide area is that it closely follows the most recent indication of the Exeter city region (the Travel to Work Area). This means that it is a closely integrated economy and a reasonably self-contained area, with commuter and other flows which tend to stay within it.

The GESP will cover the period 2020 – 2040 and will address the key strategic issues which face the area. It will:

- Set an overall vision for the Greater Exeter area
- Provide a spatial development strategy for the area, covering the overarching direction of the area considering climate emergency declarations, housing, economy, connectivity, environment and healthy and resilient communities
- Set the overall amount of growth for the period 2020 – 2040, also identifying what infrastructure is required to support that growth
- Promote the Liveable Exeter vision by allocating urban regeneration sites in the city for more than 100 homes and 1ha of employment land
- Implement the overall vision and spatial development strategy by allocating strategic sites of 500 or more homes and 5ha of employment land outside of Exeter which may include urban extensions and new settlements
- Provide district local plans with targets for non-strategic development
- Identify monitoring indicators

The Draft Policies and Site Options Consultation provides information about the level of growth required across the area and explores possible approaches to distributing this growth. A number of potential sites have been identified which are aligned with the recommended spatial development strategy for the GESP. Some of the growth identified will already be committed (through existing planning permissions and site allocations in adopted Local Plans) and the district councils will plan for delivering any residual growth in reviews of their Local Plans.

The draft GESP Vision has been prepared as a guide for the whole plan and is the result of considering the place, its strengths and weaknesses and its opportunities and threats. It also responds to national and regional requirements.

## Greater Exeter – Draft Vision

*THE PLAN*

*The Greater Exeter Strategic Plan makes the big, cross-boundary decisions about growth, infrastructure and environment in the Greater Exeter area looking many years ahead. The innovative planning and ambitious investment decisions taken together by the local authority partners aim to realise our potential by creating great places for all people to live full lives.*

*THE PLACE*

*In 2040 we are a sustainable, accessible and networked city region of linked but distinct communities. Our economy is carbon neutral and productive. We invest in our citizens, celebrate the area's beauty and continue to work together for mutual long term benefit. We fully utilise our unique south western city-town-country-coast environment and our growing academic and skills base for smart growth. We enable prosperous and healthy lives in high quality homes and increasingly self-sufficient communities with access to great greenspaces and high quality jobs linked by a reliable, sophisticated and sustainable transport system.*

*THE PRIORITIES*

- *Greater efficiency – to be carbon neutral by 2040*
- *Greater ambition – hardwiring delivery in from the start*
- *Greater innovation – fast growth in cutting edge businesses including becoming the UK centre for data analytics, environmental futures, health innovation, smart transport and other digital future businesses*
- *Greater connectivity –gigabit ready communities with majority sustainable travel*
- *Greater prosperity – local wages rise to above the national average*
- *Greater places for people – providing the homes we need in high quality neighbourhoods with the right infrastructure in the right places*
- *Greater places for nature – rebuilding biodiversity and peoples' access to it*
- *Greater education – nurturing, attracting and retaining a world class workforce*
- *Greater wellbeing – healthy active communities with a range of facilities and services*

The draft policies proposed to be included in the GESP, included in the Draft Policies and Site Options Consultation, are set within the following themes:

- **Sustainable Development**: including a commitment between the authorities to supporting sustainable development and resilience through preparation and implementation of development plan documents
- **Climate Emergency**: including a target of net-zero carbon by 2040, proposing measures for the reduction of carbon emissions in new development, enabling decentralised low carbon/renewable energy networks and the decarbonisation of existing energy networks and transportation.
- **Prosperity**: providing economic opportunities to individuals and communities, maintaining an outward-facing networked city region, with the key focus on increasing productivity
- **Homes**: setting out a target for delivering new homes with further requirements to ensure an appropriate mix of types and tenures, including provision for traveller communities, and ensuring new homes are accessible.
- **Movement and Communication**: promoting low carbon and sustainable transport measures through a sustainable transport hierarchy, alongside a major expansion in digital infrastructure.
- **Nature**: setting out an approach to rebuild biodiversity and improve access to nature through ensuring developments achieve an overall enhancement in biodiversity, woodland creation, protection of internationally important wildlife sites, and defining a new boundary for the Clyst Valley Regional Park.

- **Quality Places and Infrastructure**: providing a focus on achieving high quality development and timely provision of infrastructure to deliver great places in the Greater Exeter area through masterplanning and appropriate delivery mechanisms, application of garden city principles and how decisions on prioritising infrastructure and funding will be made.

**Spatial Development Strategy and Site Options**: The 40 site options identified in the Draft Policies and Site Options Consultation are based on a spatial development strategy that primarily concentrates the defined level of growth at public transport nodes (i.e. key bus and rail interchanges) and corridors including significant intensification and housing delivery in Exeter and the expansion of a number of other main towns with strong economic roles. Key potential growth areas are identified as: Central, North, South and East and the site options fall within these four growth areas.

**What existing sources of information will you use to help you identify the likely equality on different groups of people?**

The consultation on the issues and scope of the GESP (the 'Issues' consultation, February – April 2017) included a call for sites. Following the consultation, the councils have undertaken the work necessary to progress to the Draft Policies and Site Options Consultation. The results of the Issues consultation has enabled officers to identify the potential impacts on communities and utilise evidence to consider and address these impacts. The evidence base to inform the preparation of the GESP is available at www.gesp.org.uk

The work has included:

- Revising the GESP's Vision to focus on The Plan, The Place and The Priorities
- Undertaking an assessment of need for additional homes and jobs in the Greater Exeter area
- Considering a spatial development strategy to accord with the GESP's vision
- Preparing a detailed evidence base to inform the draft policies
- Carrying out detailed assessments of strategic sites for residential, employment or mixed uses

The Draft Policies and Site Options Consultation has been prepared in consideration of the Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA). This provides regular checks on the social, economic and environmental impacts of a plan, and determines whether or not significant negative effects are likely. Existing sources of information that provide a profile of the different equality groups within the Greater Exeter area are listed in Appendix 1.

The Greater Exeter Strategic Plan aims to improve the quality of life for everyone, regardless of age, disability, sex/gender, race, pregnancy or maternity, marital status, religion or belief, gender reassignment or sexual orientation. The GESP seeks to improve accessibility to homes, jobs and services through better transport, and proximity to services. It also seeks to improve digital networks and to create inclusive communities. New homes will have to be of the right size, type, and tenure to meet the needs of the area (see supporting GESP evidence document - Local Housing Needs Assessment).

**Having analysed the initial and additional sources of information including feedback from consultation, what impact (positive/adverse/none) is the policy going to have on any of these different groups of people and/or promote equality of opportunity?**

The purpose of this stage is to assess whether or not it is necessary to carry out a full equality impact assessment. It aims to assess if there are any likely impacts on a particular equality group/s or if there are any gaps in knowledge about the likely impact. The outcome from this initial screening will determine whether a full EqIA needs to be undertaken.

**Table 1: EqIA Screening of the Draft Policies for the Greater Exeter Strategic Plan**

| Equality Group | Type of Impact (Positive, Adverse, Neutral/ Negligible) | Reasons |
|---|---|---|
| **Age** (a person belonging to a particular age or range of ages) | Positive Impact | The draft vision and some of the draft policies relating to the themes of low carbon, prosperity, homes, movement and communication, and quality places and infrastructure, have the potential to provide a positive impact for people of all ages.<br><br>The section on homes particularly has regard to housing types and tenures to ensure suitability for all age ranges. |
| **Disability** (including a physical or mental impairment that has a substantial long term adverse effect on that person's ability to carry out normal day-to-day activities) | Positive Impact | The draft policies have the potential to provide a positive impact for disabled groups e.g. a policy requiring accessible and adaptable homes including a proportion that are wheelchair adaptable or accessible. The draft transport and connectivity policies also have the potential to provide a positive impact for people with accessibility issues.<br><br>The majority of the plan will have a neutral impact on mental health issues. The aim of the emerging plan is to provide healthy lives in great places with access to high quality green spaces. Therefore, the impact of the plan with regard to equal opportunities for people with mental health disabilities is likely to be negligible. |
| **Gender reassignment** (person proposing to undergo, is undergoing or has undergone reassigning their sex) | Neutral/ negligible Impact | There is no clear or direct impact on equal opportunities for people proposing to undergo, undergoing, or that have undergone gender reassignment from the emerging plan. |
| **Marriage and civil partnership** (a union between a man and a woman or between a same-sex couple) | Neutral/ negligible Impact | There is no clear or direct impact on equal opportunities for people who are married or within a civil partnership. |
| **Pregnancy and maternity (**the condition of being pregnant – maternity is the period after birth and is linked to maternity leave in the employment context) | Neutral/ negligible Impact | There is no clear or direct impact on equal opportunities for pregnant women/women on maternity leave from the emerging plan. |
| **Race** (a group of people defined by their race, colour and nationality, ethnic or national origins – including Gypsies and Travellers) | Positive Impact | The majority of the draft policies in the plan will have a neutral impact in terms of race issues. A draft policy is included for the provision of sufficient pitches/plots to accommodate the needs of gypsies and travellers over the plan period. |
| **Religion or belief** (any religion/belief, including a lack of religion/belief – generally a belief should affect a person's life choices or the way a person lives) | Neutral/ negligible Impact | There is no clear or direct impact on equal opportunities for different religious/faith/belief groups from the emerging plan. |

| Equality Group | Type of Impact (Positive, Adverse, Neutral/ Negligible) | Reasons |
|---|---|---|
| **Sex/Gender** (applies to men and women of any age) | Positive Impact | Some policies, including those on transport/connectivity and work skills provide potential positive impacts for women. Also, where other equality groups have been identified as benefiting from positive impacts, these have the potential to positively impact on women as well (e.g. being more common than men in having primary care responsibilities for disabled or elderly relatives as well as children). |
| **Sexual orientation** (whether a person's sexual attraction is towards their own sex, the opposite sex or both sexes) | Neutral/ negligible Impact | There is no clear or direct impact on equal opportunities for different sexual orientation groups from the emerging plan. |

The screening has indicated that equality impacts are either positive, or no impact is recorded due to neutral or negligible effects on certain equality groups. A full screening of each policy in the plan is set out in Appendix 2.

Local Plans within each of the four districts that make up the Greater Exeter area will provide further detailed policies and smaller allocations for development necessary for their area that reflect the local context. Reviews of these plans will include a range of smaller sites and sites within smaller settlements to address the needs of rural communities.

**Conclusion**

**Is a full EqIA required and/or should the Plan be amended to ensure that the Public Sector Equality Duty is met?**

A full EqIA is not required, and the Duty is met, because:

- The screening of the Draft Policies and Site Options Consultation identifies that the plan content is unlikely to result in negative equality impacts that would require justification or mitigation.
- There is unlikely to be equality impacts that generate negative public opinion or media coverage about the proposed changes.
- An opportunity has not been missed to promote equality of opportunity and further details do not need to be provided of action that can be taken to remedy this.

A review of the EqIA will take place at each key stage of the preparation of the GESP to screen for unexpected equality impacts and to ascertain whether a full EqIA is required.

# Appendix 1: Equality Profile of Greater Exeter

## Gender

No. and % males and females

The 2018 mid-year population estimates state that of a total population of 489,284 in the Greater Exeter area, 238,797 (49%) were male and 250,487 (51%) were female.

## Age

The population estimate (2018) puts the population of the four combined Greater Exeter Authorities as 489,284 – an increase of 37,000 since the 2011 census (452,200). Figure 1 shows the age profile for each Local Authority and the combined Greater Exeter area, compared against the national and regional profiles. This shows that the Greater Exeter area has a similar age profile to the wider South West Region with a noticeably higher proportion of the population aged 65 and over, than England as a whole.

*Figure 1: Age profile for GESP area Local Authorities (ONS Mid-Year Population Estimates June 2018)*

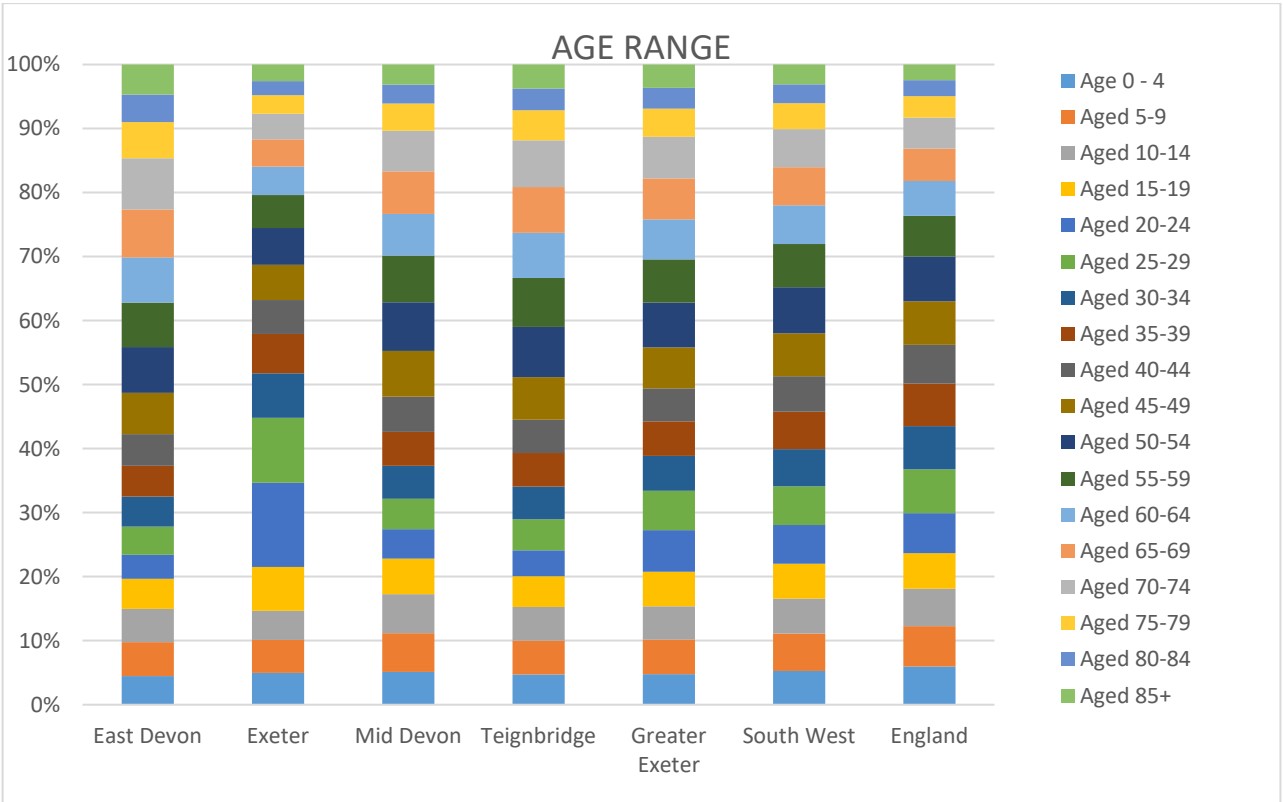



Table A1.1 2018 Mid-Term Population Estimates

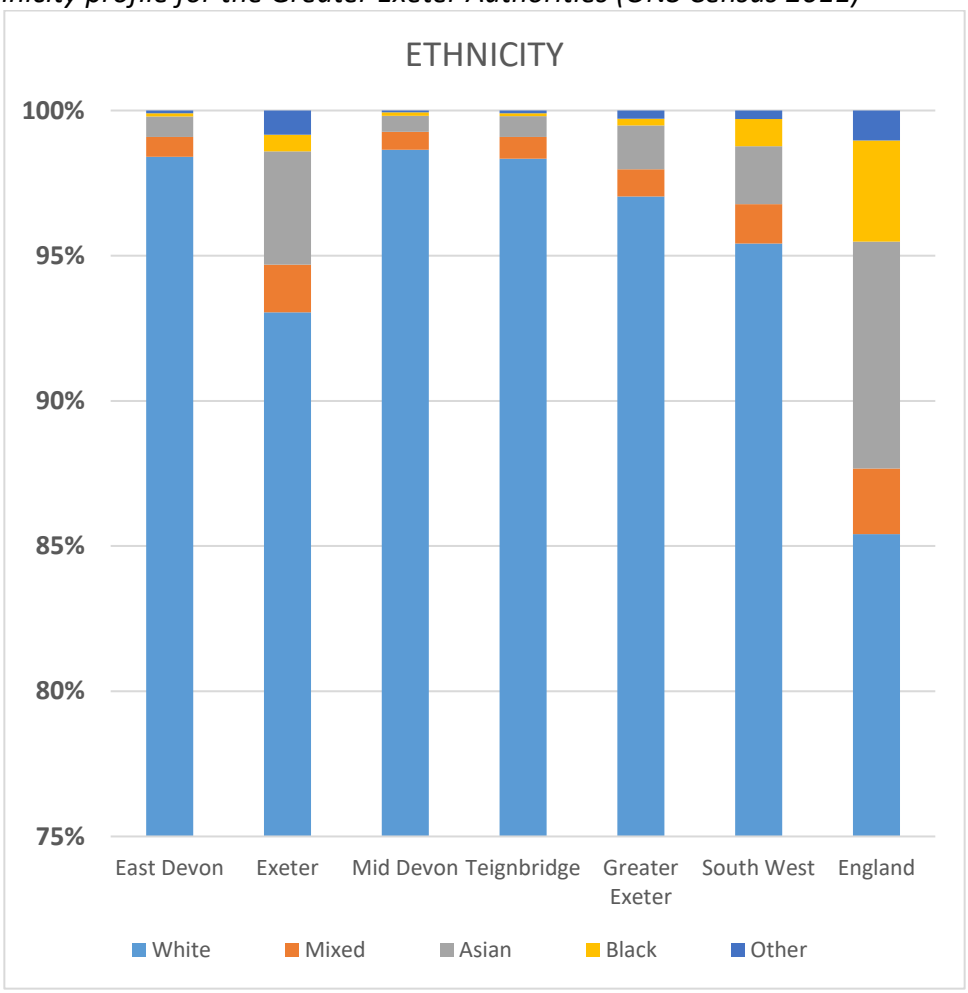
| Age Range | East Devon | Exeter | Mid Devon | Teignbridge | Greater Exeter | South West | England |
|---|---|---|---|---|---|---|---|
| **Age 0 - 4** | 4.50% | 4.98% | 5.11% | 4.70% | 4.78% | 5.29% | 5.98% |
| **Aged 10-14** | 5.21% | 4.54% | 6.11% | 5.22% | 5.18% | 5.49% | 5.85% |
| **Aged 15-19** | 4.67% | 6.84% | 5.55% | 4.82% | 5.43% | 5.43% | 5.53% |
| **Aged 20-24** | 3.75% | 13.18% | 4.61% | 4.07% | 6.49% | 6.06% | 6.28% |
| **Aged 25-29** | 4.44% | 10.13% | 4.76% | 4.85% | 6.12% | 6.02% | 6.82% |
| **Aged 30-34** | 4.65% | 6.94% | 5.13% | 5.07% | 5.46% | 5.84% | 6.77% |
| **Aged 35-39** | 4.82% | 6.17% | 5.31% | 5.27% | 5.39% | 5.85% | 6.64% |
| **Aged 40-44** | 4.94% | 5.27% | 5.49% | 5.19% | 5.19% | 5.56% | 6.06% |

| Age Range | East Devon | Exeter | Mid Devon | Teignbridge | Greater Exeter | South West | England |
|---|---|---|---|---|---|---|---|
| **Aged 45-49** | 6.44% | 5.54% | 7.13% | 6.65% | 6.37% | 6.67% | 6.79% |
| **Aged 50-54** | 7.14% | 5.71% | 7.60% | 7.82% | 7.02% | 7.19% | 6.99% |
| **Aged 55-59** | 6.99% | 5.15% | 7.32% | 7.65% | 6.74% | 6.78% | 6.38% |
| **Aged 5-9** | 5.28% | 5.15% | 6.05% | 5.33% | 5.39% | 5.81% | 6.30% |
| **Aged 60-64** | 7.03% | 4.48% | 6.49% | 7.06% | 6.27% | 6.05% | 5.44% |
| **Aged 65-69** | 7.50% | 4.21% | 6.66% | 7.14% | 6.38% | 5.94% | 5.04% |
| **Aged 70-74** | 8.01% | 4.03% | 6.33% | 7.29% | 6.47% | 5.95% | 4.87% |
| **Aged 75-79** | 5.62% | 2.90% | 4.27% | 4.72% | 4.42% | 4.03% | 3.33% |
| **Aged 80-84** | 4.30% | 2.19% | 2.96% | 3.39% | 3.27% | 2.99% | 2.51% |
| **Aged 85+** | 4.70% | 2.60% | 3.13% | 3.76% | 3.62% | 3.07% | 2.44% |

## Ethnicity

The chart and table below show the ethnicity of the resident populations of the Greater Exeter districts and Greater Exeter area as a whole, at Census 2011. This illustrates that Exeter is the most ethnically diverse local authority area of the Greater Exeter Councils and the South West as a whole.

*Figure 2: Ethnicity profile for the Greater Exeter Authorities (ONS Census 2011)*




*Note that the % axis starts from 75%

Table A1.2 Further detail of ethnicity (2011 Census):

| Ethnic Group | Greater Exeter | South West | England |
|---|---|---|---|
| **Asian/Asian British: Bangladeshi** | 0.09% | 0.16% | 0.82% |
| **Asian/Asian British: Chinese** | 0.60% | 0.42% | 0.72% |
| **Asian/Asian British: Indian** | 0.32% | 0.65% | 2.63% |
| **Asian/Asian British: Other Asian** | 0.46% | 0.55% | 1.55% |
| **Asian/Asian British: Pakistani** | 0.04% | 0.22% | 2.10% |
| **Black/African/Caribbean/Black British: African** | 0.15% | 0.46% | 1.84% |
| **Black/African/Caribbean/Black British: Caribbean** | 0.06% | 0.29% | 1.11% |
| **Black/African/Caribbean/Black British: Other Black** | 0.02% | 0.19% | 0.52% |
| **Mixed/multiple ethnic group: Other Mixed** | 0.24% | 0.31% | 0.53% |
| **Mixed/multiple ethnic group: White and Asian** | 0.36% | 0.40% | 0.63% |
| **Mixed/multiple ethnic group: White and Black African** | 0.12% | 0.16% | 0.30% |
| **Mixed/multiple ethnic group: White and Black Caribbean** | 0.23% | 0.49% | 0.78% |
| **Other ethnic group: Any other ethnic group** | 0.12% | 0.19% | 0.62% |
| **Other ethnic group: Arab** | 0.16% | 0.11% | 0.42% |
| **White: English/Welsh/Scottish/Northern Irish/British** | 94.09% | 91.81% | 79.75% |
| **White: Gypsy or Irish Traveller** | 0.09% | 0.11% | 0.10% |
| **White: Irish** | 0.44% | 0.54% | 0.98% |
| **White: Other White** | 2.41% | 2.96% | 4.58% |

## Disability

**Long term health problem or disability**

*Figure 3 – General Health (Census 2011)*

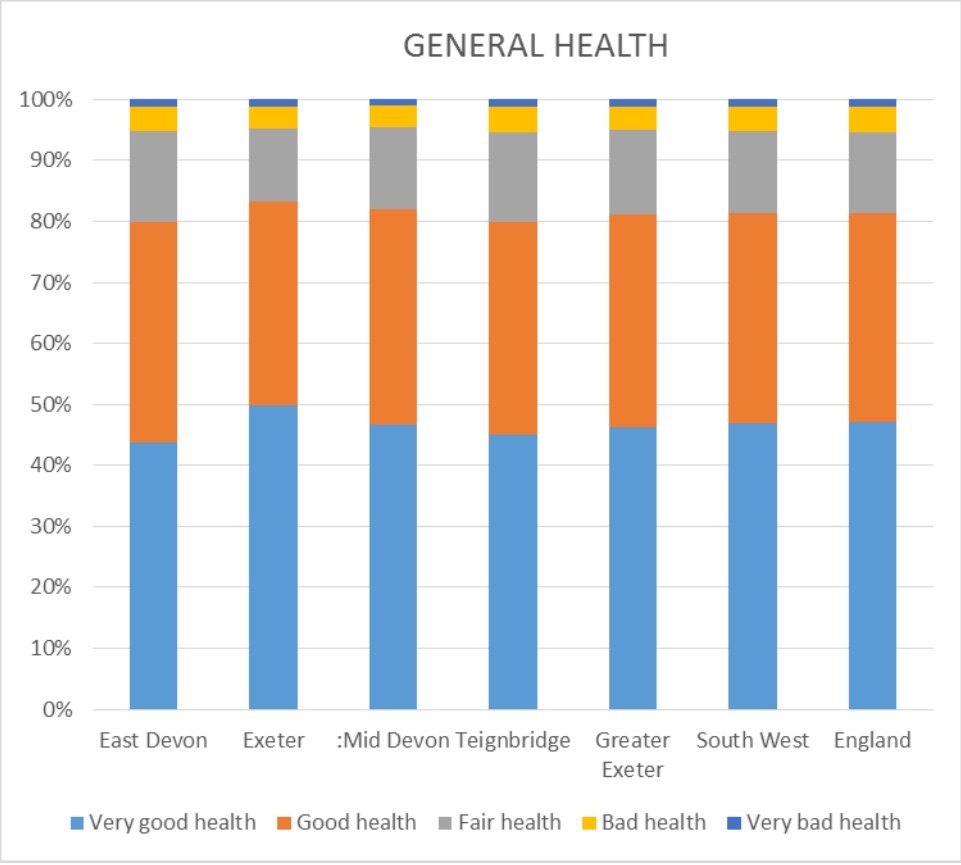


Table A1.3 2011 Census (ONS) General Health

| GENERAL HEALTH | GREATER EXETER | SOUITH WEST | ENGLAND |
|---|---|---|---|
| **Bad health** | 3.91% | 4.01% | 4.25% |
| **Fair health** | 13.86% | 13.43% | 13.12% |
| **Good health** | 34.92% | 34.56% | 34.22% |
| **Very bad health** | 1.12% | 1.14% | 1.25% |
| **Very good health** | 46.19% | 46.85% | 47.17% |

Table A1.4 2011 Census (ONS) – Day to Day Activities (Limitations)

| Day to Day Activities – Limitations | Greater Exeter | South West | England |
|---|---|---|---|
| **Day-to-day activities limited a little** | 10.72% | 10.15% | 9.33% |
| **Day-to-day activities limited a lot** | 8.44% | 8.26% | 8.31% |
| **Day-to-day activities not limited** | 80.84% | 81.59% | 82.36% |

As shown by the tables above, Greater Exeter area residents are generally in line with regional and national averages in terms of general health, and slightly higher in terms of day-to-day activities limitations.

**Disability living allowance claimants**

In November 2018 there were 12,320 Disability Living Allowance claimants within the Greater Exeter area, which equates to approximately 2.5% of the Greater Exeter population.

## Religion and Belief

The table below shoes the detailed breakdown of the Greater Exeter area's religious beliefs in 2011. This shows a higher proportion of residents with no religion (or religion not stated) compared to national statistics, but a significantly lower proportion of residents identifying Islam as their religion.

Table A1.5 2011 Census (ONS) Religion

| RELIGION | GREATER EXETER | SOUTH WEST | ENGLAND |
|---|---|---|---|
| **Buddhist** | 0.37% | 0.37% | 0.45% |
| **Christian** | 61.03% | 60.39% | 59.38% |
| **Hindu** | 0.13% | 0.31% | 1.52% |
| **Jewish** | 0.10% | 0.12% | 0.49% |
| **Muslim (Islam)** | 0.54% | 0.97% | 5.02% |
| **No religion: Total** | 29.01% | 29.29% | 24.74% |
| **Other religion: Total** | 0.54% | 0.55% | 0.43% |
| **Religion not stated** | 8.24% | 7.88% | 7.18% |
| **Sikh** | 0.04% | 0.11% | 0.79% |

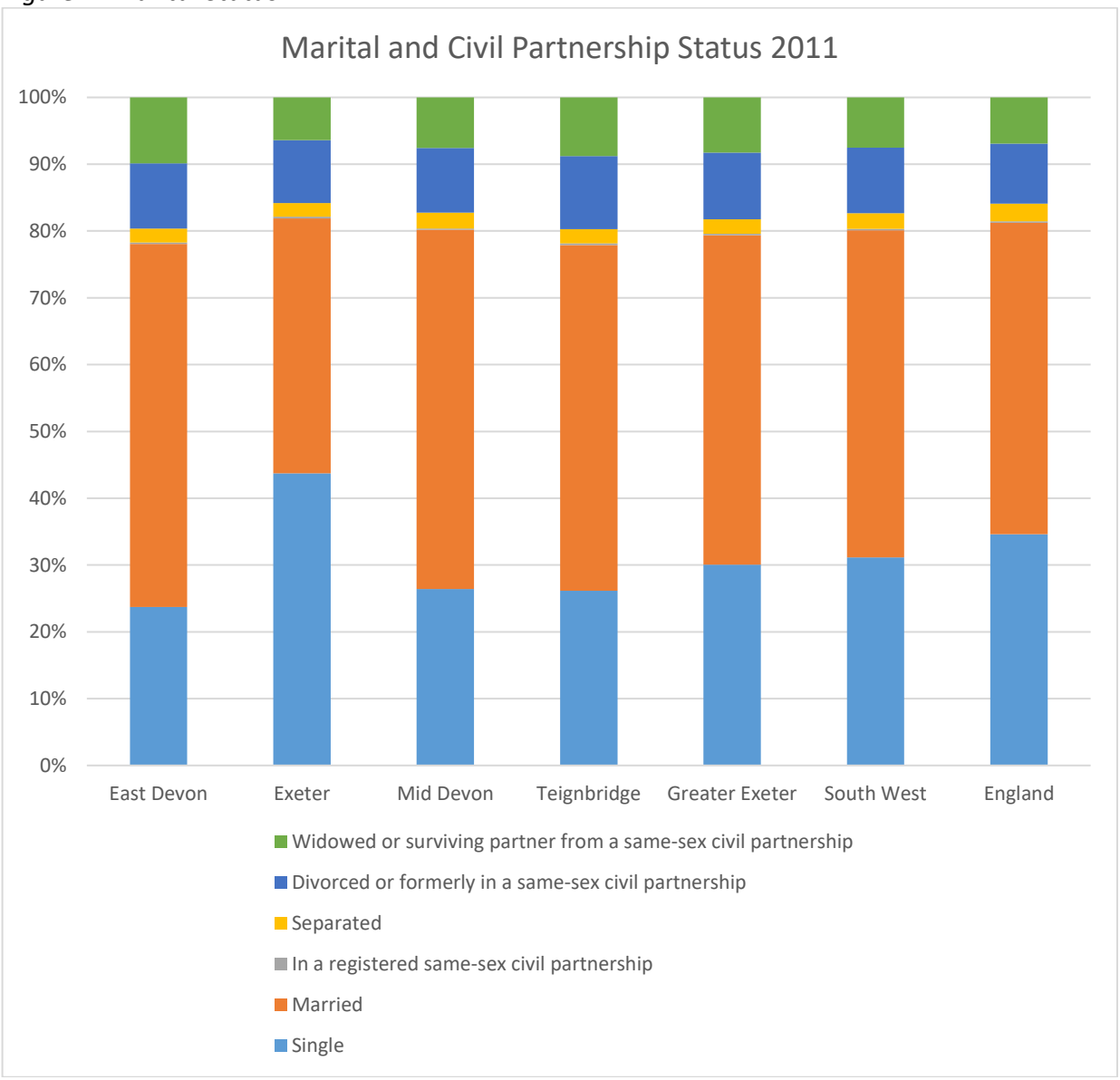
## Marital Status
## Sexual Orientation (same-sex civil partnership)

Generally the marital status of residents in the Greater Exeter area is similar to that of the South West region. There is a slightly higher proportion of residents who are married or widowed, and a lower proportion of single people compared to national figures.

Table A1.6 Census 2011 (ONS) Marital Status

| STATUS | GREATER EXETER | SOUTH WEST | ENGLAND |
|---|---|---|---|
| **Divorced or formerly in a same-sex civil partnership** | 9.99% | 9.84% | 8.97% |
| **In a registered same-sex civil partnership** | 0.22% | 0.22% | 0.23% |
| **Married** | 49.31% | 48.97% | 46.59% |
| **Separated** | 2.13% | 2.32% | 2.65% |
| **Single** | 30.07% | 31.13% | 34.64% |
| **Widowed or surviving partner from a same-sex civil partnership** | 8.27% | 7.51% | 6.91% |

*Figure 4: Marital Status*



## Pregnancy and Maternity

### Fertility rates and Conceptions

This data is from the Joint Strategic Needs Assessment produced per district by Devon County Council. Exeter has the lowest birth rate of the four Greater Exeter authorities which is consistent with a younger population and higher rate of single people.

Table A1.7

| District | Female Population aged 15-44 (2011 Census) | Live births to females aged 15-44 (2012 – 2016) | Birth rate per 1,000 female population aged 15-44 (2012-2016) |
|---|---|---|---|
| **East Devon** | 19,325 | 5,732 | 60.3 |
| **Exeter** | 27,759 | 6,791 | 46.3 |
| **Mid Devon** | 13,176 | 4,024 | 62.7 |
| **Teignbridge** | 19,699 | 5,915 | 60.9 |
| **Devon** | - | 35,986 | 62.3* |
| **South West** | - | - | 65.5* |
| **England** | - | - | 55.1 |

*Figures for 2011-2015

Note that the population figures are for 2011 rather than between 2012 and 2016

## Appendix 2: Screening Equality Impact on Groups by Policy

Each policy in the GESP Draft Policies and Site Options Consultation document has been subject to an EqIA screening assessment. The table below sets out if the policy has been screened out (because it has been assessed as having no differential impact for the identified equalities groups – see the commentary in column 3 of the table), or in (because it has been assessed as having a potential impact on the identified groups – again, see the commentary in column 3 of the table). As can be seen, of the policies that have been screened in, the screening has indicated that equality impacts are potentially positive. Findings have informed Table 1 of the main report.

| Policy | Screen In or Out | Commentary |
|---|---|---|
| GESP1 Sustainable Development | OUT | No differential impact for equality groups is envisaged. |
| GESP2 Climate Emergency | OUT | No differential impact for equality groups is envisaged. |
| GESP3 Net-Zero Carbon Development | IN | Potential effects on fuel poverty, which can be more prominent in certain groups such as the elderly. |
| GESP4 Low Carbon Energy | OUT | No differential impact for equality groups is envisaged. |
| GESP5 Heat Networks | OUT | No differential impact for equality groups is envisaged. |
| GESP6 Suitable Areas for Solar PV Development | OUT | No differential impact for equality groups is envisaged. |
| GESP7 Suitable Areas for Onshore Wind Development | OUT | No differential impact for equality groups is envisaged. |
| GESP8 Energy Storage | OUT | No differential impact for equality groups is envisaged. |
| GESP9 Economic Targets | IN | No differential impact for the equality groups envisaged. These targets should generally help to address inequalities - depending on the type and accessibility of employment secured. |
| GESP10 Transformational Sectors | OUT | No differential impact for the equality groups envisaged. |
| GESP11 Employment Land | OUT | No differential impact for the equality groups envisaged. |
| GESP12 Economic Delivery | OUT | No differential impact for the equality groups envisaged. |
| GESP13 Strategic Economic Assets | OUT | No differential impact for the equality groups envisaged. |
| GESP14 Exeter Airport | OUT | No differential impact for the equality groups envisaged. |
| GESP15 Inclusive Employment and Skills | IN | Access to jobs varies for different groups. The policy could have particular benefits for low-income groups and those with restricted academic/training and employment prospects. |
| GESP16 Housing Target and Distribution | IN | This policy sets out the provision of housing required over the plan period to 2040 and how it will be distributed between existing commitments, allocations within the GESP and allocations within Local Plan reviews, and therefore meets the needs of all people. It has positive impacts for those groups where the delivery of homes |

| Policy | Screen In or Out | Commentary |
|---|---|---|
| | | (particularly certain standards and tenures of housing) has clear benefits. |
| GESP17 Affordable Homes | IN | This policy can potentially have a positive impact on all equality groups, particularly younger families, by providing them with a good quality home that meets their needs. This particularly benefits people on low incomes unable to access open market housing. It also helps to encourage community cohesion and reinforces intergenerational cohesion. |
| GESP18 Build to Rent Homes | IN | Potential beneficial effect on the provision of housing suitable for protected characteristic groups, particularly those on lower incomes. |
| GESP19 Custom and Self Build | OUT | No differential impact for equality groups is envisaged. The policy will only have benefits for a low proportion of people that have an interest in custom and self-build developments. |
| GESP20 Accessible Homes | IN | Potential beneficial effect on the provision of housing suitable for protected characteristic groups such as the elderly and people with disabilities. Also potential additional benefit for women (intersectionality). |
| GESP21 Accommodation for the Gypsy and Traveller Communities | IN | This policy directly benefits a specific minority group by setting the framework for accommodating pitch/plot provision. Further detailed provision will be included in Local Plans of the four councils. It has potential benefits for a range age groups (with particular potential benefit for women), by providing locations accessible to jobs, schools and health facilities. This is particularly important for travellers as at present they have poor health and educational outcomes, compared to the rest of the population. |
| GESP22 Transport Strategy | OUT | This policy aims to promote an integrated transport strategy for Greater Exeter including measures to promote sustainable travel, it therefore helps all people indirectly. |
| GESP23 Sustainable Travel in New Developments | IN | Potential beneficial effects on equality groups with accessibility issues. |
| GESP24 Travel Planning | IN | Potential beneficial effects on equality groups with accessibility issues. |
| GESP25 Long Distance Strategic Trails | IN | Potential beneficial effects on equality groups with accessibility issues. |
| GESP26 Rail and Bus Projects | IN | Potential for positive effects on groups with accessibility issues due to the opportunity to improve accessibility and deliver infrastructure improvements. |
| GESP27 Park and Ride around Exeter | OUT | No differential impact for equality groups is envisaged. |
| GESP28 Electric Vehicles | OUT | No differential impact for equality groups is envisaged. |
| GESP29 Highway Links and Junction Improvements | OUT | No differential impact for equality groups envisaged as provision should not affect groups differently. |
| GESP30 Movement in Exeter | IN | Potential beneficial effects on equality groups with accessibility issues |
| GESP31 Settlement Specific Enhancements | IN | Potential beneficial effects on equality groups with accessibility issues |

| Policy | Screen In or Out | Commentary |
|---|---|---|
| GESP32 Gigabit Ready Developments | IN | This policy can potentially have a beneficial positive impact on all equality groups, but particularly on equality groups with accessibility issues, with the delivery of good digital connectivity. |
| GESP33 Digital Spine | IN | Potential for positive effects for a wide range of groups due to the opportunity to improve and deliver transformational digital infrastructure including gigabit-ready full-fibre connectivity. Particular potential for equality groups with accessibility issues, with the delivery of good digital connectivity. |
| GESP34 Rebuilding Biodiversity | OUT | No differential impact for equality groups is envisaged. |
| GESP35 Woodland Creation | OUT | No differential impact for equality groups is envisaged. |
| GESP36 Exe Estuary, Dawlish Warren and East Devon Pebblebed Heaths | OUT | No differential impact for equality groups is envisaged. |
| GESP37 Clyst Valley Regional Park | OUT | Access to green space is beneficial to all communities. This policy provides a defined area for the regional park which is likely to be beneficial to a wide range of groups. Therefore, no differential impact for equality groups is envisaged. |
| GESP38 Great Places | IN | This policy requires the strategic allocations within the GESP to be appropriated planned in detail, to ensure infrastructure and development are dovetailed. This approach is aimed to have a positive impact on equalities issues by helping to provide high quality places for healthy and safe lifestyles. |
| GESP39 Delivering Homes and Communities | OUT | This policy sets out the delivery mechanisms required to deliver the homes needed at a faster pace and higher quality to help achieve the draft vision. As an over-arching policy, improvements could be beneficial to a wide range of groups. Therefore, no differential impacts are envisaged for equality groups. |
| GESP40 Garden City Principles | IN | As an over-arching policy, these principles for achieving high quality development, based on Garden City principles are likely to be beneficial to a wide range of groups. There are specific principles to provide a variety of flexible, affordable homes and to ensure development is future proofed and resilient to change. There are potential beneficial effects on the provision of housing suitable for protected characteristic groups such as the elderly and people with disabilities. |
| GESP41 Infrastructure Classification | OUT | No differential impact for equality groups is envisaged. |
| GESP42 Strategic Infrastructure | OUT | No differential impact for equality groups is envisaged. |
| GESP43 Viability | OUT | No differential impact for equality groups is envisaged. |
| Chapter 11 – Spatial Development Strategy | OUT | The preferred approach to the distribution of strategic growth across the Greater Exeter area directs developments to Exeter and the main towns, and to locations along the strategic transport corridors radiating out from the city. This approach will improve access to homes, jobs and essential services for the strategic growth delivered through the GESP, but no differential impacts are envisaged for equality groups. |

| Policy | Screen In or Out | Commentary |
|---|---|---|
| Chapter 12 – Site Options | IN | Potential site options are presented at a range of locations across the Greater Exeter area, aligned with the spatial development strategy. These sites are generally accessible to residents by a range of transport modes and all have potential opportunities for enhancement.<br><br>There is potential for positive effects for all equality groups due to the potential opportunities to deliver affordable housing, employment, services and facilities, green infrastructure, and other infrastructure improvements.<br><br>Some sites are also within close proximity to a number of deprived communities and therefore could have enhanced benefits for some equality groups. |

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# Greater Exeter Strategic Plan – Issues Consultation: 2017

## Statement of Consultation

### May 2020

## Introduction

This Statement of Consultation has been prepared to meet the requirements of Regulation 22 (1) (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012.

This statement sets out details relating to the Greater Exeter Strategic Plan (GESP) Issues consultation in 2017, in particular:

- The Greater Exeter councils' approach to consultation (Regulation 18) including:
    - What we consulted on
    - How we consulted
    - Who we consulted
- How representations have been taken into account



## Consultation Approach (Regulation 18)

**What we consulted on**

The first stage in preparing the Greater Exeter Strategic Plan involved inviting comments on the scope and content of the Plan and key issues facing the area. The consultation was designed to stimulate debate early on in the process of preparing the Greater Exeter Strategic Plan. In accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, an 'Issues' document was published for public consultation between 27th February and 10th April 2017. The consultation documents included:

- Greater Exeter Strategic Plan - Issues (Regulation 18) Consultation Document
- Greater Exeter Strategic Plan - Sustainability Appraisal and Strategic Environmental Assessment – Draft Scoping Report

- Issues (Regulation 18) Equality Impact Assessment Screening Report
- Draft Statement of Community Involvement

The consultation also included a call for sites, inviting landowners to submit details of their land that would be available for development.

A total of 198 valid consultation responses and 784 call for sites submissions were received during the consultation. A full list of responses is available on the GESP website at: www.gesp.org.uk/consultation-phases/issues/

**How we consulted**

- **Hard copies -** The consultation papers were made available at the four Local Planning Authorities' main offices, as well as at all public libraries (including mobile libraries) across the Greater Exeter area. Hard copies of documents were also made available to parish and town councils and other local groups, upon request.
- **Dedicated website –** The consultation papers were available on the GESP website in addition to dedicated webpages on each of the local planning authority websites. The GESP website provided hyperlinks for downloading all consultation documents, details of the consultation and how to submit representations and details of exhibition events. The GESP website also provided the opportunity to respond to the consultation through a web-based form.
- **Consultation notification –** Direct notification via letter and email were sent out for the issues consultation document, SCI, SA and the call for sites process.
- **Social media –** A series of social media posts were published during the course of the consultation, under one consistent hashtag (#GESPlan).
- **Media –** A press release for the issues consultation and call for sites was publicised by each of the LPAs. This was also published within a number of local news outlets.
- **Public exhibitions –** Four consultation events were held. These also included information regarding the draft SCI, SA Scoping Report and call for sites. The consultation events were held in Honiton, Exeter, Newton Abbot and Tiverton. Events were held on weekdays and extended from normal office hours into the evening to facilitate attendance.

**Who we consulted**

Each of the Greater Exeter Local Planning Authorities maintains a database of all individual persons and organisations who have expressed an interest in being kept informed of consultations on planning policy matters. These persons were all notified by letter or email. All statutory consultees (including town and parish councils), neighbourhood plan groups and district councillors were also notified.

## How the responses received have influenced the Greater Exeter Strategic Plan – Draft Policies and Site Options.

The table below sets out how comments received during the Regulation 18 'Issues' Consultation have informed the preparation of draft policies and site options; the next stage in the preparation of the GESP. Responses to each of the previous consultation questions are set out in question order and they have also been grouped into similar topic areas.

For ease of reference, the questions asked during the 'Issues' consultation were:

1. Do you have any comments on the content of the Greater Exeter Strategic Plan and its relationship with other plans?

2. Do these reflect the issues you see facing Greater Exeter? If not, what should we add or change?

3. Is the draft vision appropriate for guiding the future of the Greater Exeter area up to 2040? If not, what changes would you like to see?

4. Have we missed anything? If yes, what additions or changes should we make? (This referenced themes for the GESP)

5. If we are to meet the area's needs for housing and employment, what forms of development do you feel best deliver our draft vision? For example, more efficient use of land in Exeter, major urban extensions in Exeter and main towns, dispersed small scale development, stand-alone new communities, or other?

6. Are there any further comments you would like to make on the Greater Exeter Strategic Plan?

The full consultation document is available on the GESP website: https://www.gesp.org.uk/consultation-phases/issues/

| You said | Organisation/Individual | We did |
|---|---|---|
| **1) Do you have any comments on the content of the Greater Exeter Strategic Plan and its relationship with other plans?** | | |
| **Support GESP** | | |
| *Generally support* | Exeter Cycling Campaign (357); Gladman Developments Limited (160); IJP (261); ); Individuals – Exeter (100); East Devon (308); Jillings Heynes Planning (332); Pegasus Group on behalf of Lightwood Land (358); Teignbridge (198); Torbay Council (275); Vail Williams for Gleeson Developments Limited (372); WYG (146). | Support noted. |
| *Supports strategic and cross-boundary approach* | | |
| Fully support the preparation of GESP. This is a much needed and positive cross boundary strategic approach to planning. | Barton Willmore c/o Barratt David Wilson Homes (367) | |
| Support spatial strategy at this scale. | Blackdown Hills AONB Partnership (208) | |
| Support four authorities working together to prepare GESP. | Cranbrook Town Council (324) | |
| Needs of sub-region can be better served through joint working. | GL Hearn Ltd (296) | |
| The HBF is fully supportive of the GESP which will provide a high level strategic planning policy framework for the constituent authorities of the sub-region | Home Builders Federation (369) | |
| Reflects the real area in which people live and work. A Strategic Plan will help to deliver a coherent vision and avoid piecemeal development. | Individual – Exeter (223) | |
| Support joint working of Local Authorities | Individual – East Devon (69); Individual (29) | |
| Overarching strategic framework being produced with more local documents being prepared alongside is welcomed. | Jillings Heynes Planning (332) | |

| You said | Organisation/Individual | We did |
|---|---|---|
| Welcomes the move towards a high level strategic planning policy framework for the region, in particular the proposed identification of strategic allocations to support the required levels of growth. | Lichfields on behalf of Mr Roger Cooke (295) | |
| Support the concept of preparing a strategic plan for the Greater Exeter area to facilitate the delivery of new homes, jobs and infrastructure as part of a single co-ordinated strategy for the area. | Lichfields on behalf of Mr Peter Lee and Tim Davey (343); WYG c/o Sibelco (215) | |
| The principle of the four local authorities combining to prepare the GESP is supported in order to plan holistically for strategic growth over the plan period to 2040. | Origin 3 for Burrington Estates (368) | |
| Essential key strategic issues are largely dealt with through the GESP which will set the key development needs and strategic priorities. | Peter Brett Associates (167) | |
| Overall welcome the strategic nature and over-arching certainty that the Greater Exeter Strategic Plan should provide. | Planning Sphere Ltd (166) | |
| Support the opportunities which this brings to deliver a spatial strategy which responds to the needs and aspirations of the entire region over the plan period. Scope reflects its role in the plan hierarchy and ensures flexibility in the content. | Savills on behalf of Bloor Homes (325) | |
| Support the decision to bring forward a strategic plan for the Greater Exeter region. The ability to plan strategically across the Greater Exeter area ensures that development is directed to the most appropriate locations, and is supported by a comprehensive and coordinated infrastructure plan. | Savills for St Modwen Developments Ltd (338) | |

| You said | Organisation/Individual | We did |
|---|---|---|
| *Supports – other reasons* | | |
| Support GESP, provides a great opportunity for flood management solutions. | Environment Agency (329) | Support noted. |
| The content of the Greater Exeter Strategic Plan at this stage is broadly consistent with the vision, aims and objectives as set out in the HotSW LEP Strategic Economic Plan (SEP) | Heart of South West Local Enterprise Partnership (176) | |
| *Conditional Support /additional recommendations* | | |
| Points made appear reasonable but more detail needed on funding, timescales etc. | Individual – Mid Devon (73) | Comments noted. The timetable for the GESP is set out in Local Development Scheme documents which were agreed by partner Council committees. |
| The principle of the GESP is broadly supported as a mechanism for planning holistically in an area. However the GESP must ensure that it reflects and honours all four authorities' development strategies. | Rapleys LLP (282) | Noted. The GESP is subject to separate decision making processes by each of the partner local planning authorities. |
| The Woodland Trust recommends the development of a Trees and Woods Strategy; would welcome the opportunity to support the development of this approach. | Woodland Trust (317) | Comments noted. |
| Relationship with other plans | | |
| *Need for greater clarity of GESP relationship to local/neighbourhood plans* | Bishops Clyst Parish Council (331); Blackdown Hills AONB Partnership (208); Blue Cedar Homes (299);<br>Brampford Speke Parish Council (257); Clyst St George Parish Council (280); Exeter Green Party (297); Gleeson Development Limited (262); Historic England (120); Home Builders Federation (369); Planning Sphere Ltd (166); Savills on behalf | The Greater Exeter Strategic Plan will be a formal statutory document providing the overall spatial strategy and level of housing and employment land needed up to 2040, beyond the timeframes of current plans (which plan up to 2026 -2033). Once adopted, it will supersede specified strategic parts of each partner LPA's local plan and provide the high level strategic planning |

| You said | Organisation/Individual | We did |
|---|---|---|
| | of Bloor Homes (325); Sidmouth Chamber of Commerce (75); Individual – East Devon (31) | policy framework for the area. More localised policies such as development management policies and locations for smaller scale development will be included in new Local Plans produced subsequently by the LPAs. Neighbourhood plans are able to support the strategic development needs set out in the Local Plan and GESP. |
| *Specific issues concerning role of local and neighbourhood plans in relation to GESP* | | |
| Unclear why this Strategic Plan is being developed; should be informed by adopted Local and Neighbourhood Plans which have been subject to robust assessments. | Campaign to Protect Rural England (268) | |
| GESP should not take precedence over Neighbourhood Plans and Local Plans | Bishopsteignton Parish Council (318); Chardstock Parish Council (187); Devon Campaign to Protect Rural England (268); Exminster Parish Council (180) | |
| Assume once in place the GESP will both inform and amend the respective Local Plans. Emerging Neighbourhood Plans will need to be in compliance with (and not over-rule) the GESP | Cranbrook Town Council (324) | |
| The GESP process should not undermine or unpick strategic policies already in Local Plans. | David Lock Associates c/o East Devon New Community Partners (314) | |
| Should reflect emerging and adopted Neighbourhood Plans across Greater Exeter | Deloitte LLP on behalf of the Church Commissioners for England (291) | |
| The relationship with other plans should be defined; particularly in relation to the extent to which the other plans will require review. | Exeter Green Party (297) | |
| Questions why GESP is needed at all. Each authority has its own Local Plan and there is likely to be a Heart of the SW LEP strategic plan. | Individual – Teignbridge (137) | |
| Point out new legislation that allows planning inspectors to take note of post examination Neighbourhood Plans | Crediton Town Council (Crediton Neighbourhood Plan) (189) | Noted. |
| Neighbourhood Plans should form a strategic part of development planning. Concern that some areas do not have the capacity to develop a neighbourhood plan. | Exeter Civic Society (356) | Comments noted. National policy stipulates that a neighbourhood plan should support the strategic development needs set out in the Local Plan and plan positively to support local |

| You said | Organisation/Individual | We did |
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| Neighbourhood Plans when approved at referendum, become an approved part of the Local Plan. They are not, as implied by the diagram on p.4 the lowest level of plan. | Exeter St James Forum, St David's Neighbourhood Partnership, and Newtown Community Association (349) | development. Neighbourhood plans have formal status once 'made' and become part of the statutory development plan. |
| Strongly object to GESP planting itself above local plans in a self-determined hierarchy which can override local plans. | Individual – East Devon & Exeter (252) | |
| Wrong approach – should be bottom up, starting with Neighbourhood Plans, then Strategic Plan as end result. | Individual – East Devon (88) | |
| Argue relationship chart on p.4 should be the other way round with Neighbourhood and District Plans over riding the GESP. | Newton Abbot Town Council (264); Individual – Teignbridge (243; 228); East Devon (77) | |
| Clarify role of neighbourhood and local plans: can they overrule plans to expand Exeter into rural areas? | Individual – Teignbridge (243); 228; East Devon (77) | |
| Questions the consideration of areas designated as 'open countryside' in Local Plans. | Farringdon Parish Council (336) | The GESP will provide the overall spatial strategy and level of housing and employment land in the period to 2040, beyond the timeframes of current plans (which plan up to 2026 – 2033). The document will provide the high level strategic planning policy framework for the area which once adopted, will supersede specified strategic parts of each partner LPA's local plan. However, given that the GESP will deal with the main large scale allocations and strategic issues, there will still be a need for a local plan for each authority. Each subsequent local plan will include non-strategic allocations and development management policies. |
| Needs to be sub-set of visions and objectives for each of the constituent local authority areas for transparency and clarity on how Local Plans should reflect GESP. | GL Hearn Ltd (296) | |
| GESP will inform future iterations of Local Plans. In preparing the GESP regard should be had to existing and emerging Local Plans. | GL Hearn Ltd (296) | |
| Teignbridge District Council has its Local Plan – will this be taken in to account? | Hennock Parish Council (133) | |
| Query if in the longer term there is the idea to move away from each authority producing their own Local Plans and to just have one plan across the four authorities. | Seaton Town Council (212) | |

| You said | Organisation/Individual | We did |
|---|---|---|
| Assume Local Plans will need to change again to conform with the proposed strategic plan. | Holcombe Rogus Parish Council (200) | |
| Would sites rejected under recent local plans be reconsidered automatically? | Individual – Mid Devon (42) | No. A new call for sites took place in 2017 which asked landowners to put forward sites for development. The call for sites process will also be relaunched as part of the Draft Policies and Site Options consultation. |
| Town Councils and Neighbourhood Plans have had no direct input into this new strategic plan. | Newton Abbot Town Council (264); Individual – Teignbridge (243) | Not agreed. Town Councils and Neighbourhood Plan Steering Groups were consulted during the 'issues' consultation in order to stimulate debate and gather views on the scope and content of the new joint plans, the key issues facing the area and to provide local knowledge. |
| Need for Local Plans to be reviewed every five years remains so they are responsive to housing needs and not wait for adoption of GESP. | Lichfields on behalf of Mr Peter Lee and Tim Davey (343) | This will still be the case, however the GESP will provide the overarching strategy for the area. As such there will still be a need for a local plan for each district which will include non-strategic allocations and development management policies. |
| Local issues should be address in the District Local Plans if these are to be prepared in addition but these will still need proper cooperation. | Peter Brett Associates (167) | |
| It is important to recognise the hierarchy of plans and that the future process of reviewing the District Local Plans will need to take account of the strategic objectives of the GESP; places a significant emphasis on the 'Duty to Cooperate'. Local Plans need to be positively prepared and effective if the objectives of the GESP are to be realised. | Savills (UK) Ltd : for Darts Farm Properties Ltd (352) | Comments noted. |
| Allocating sites within the GESP is supported as this will ensure strategic sites and infrastructure will come forward in a timely manner without relying on future local plan reviews. | Savills on behalf of Bloor Homes (325) | Support noted. |

| You said | Organisation/Individual | We did |
|---|---|---|
| Concern resources have been allocated to work on the Strategic Plan and therefore there will be fewer resources available for Neighbourhood Plan. How will you ensure that any town or parish that wishes to come forward and do a Neighbourhood Plan is accommodated? | Seaton Town Council (212) | Comments noted. The balance of resourcing strategic, local and neighbourhood planning matters is for consideration by each partner authority, depending on their individual circumstances. |
| Important to publicise and consult on potential changes that will impact on local plan policies. | Transition Exeter (206) | Agreed. The GESP will be subject to various stages of consultation in accordance with the joint Statement of Community Involvement. |
| *Risk of policy overlap/duplication between GESP and Local Plans* | | The GESP will provide the overall spatial strategy and level of housing and employment land in the period to 2040. The document will provide the high level strategic planning policy framework for the area which once adopted, will supersede specified strategic parts of each partner authority's local plans. However, given that the GESP will deal with the main large scale allocations and strategic issues, there will still be a need for a local plan for each authority. Each subsequent local plan will include non-strategic allocations and development management policies. |
| A number of the District Local Plans have recently been adopted, or are reasonably advanced in their preparation, and this raises the question of conformity with the Strategic Plan once this has been adopted. | Vail Williams for Gleeson Developments Limited (372) | |
| Local Plans and Neighbourhood Plans should not seek to add unnecessary layers of plan making leading to overlap and delay. The relative roles of each and the need for efficient plan making should be spelt out as part of the GESP process and documentation. | David Lock Associates c/o East Devon New Community Partners (314) | |
| In accordance with the HWP, there should not be any duplication of policies between the joint plan and the local and neighbourhood plans. The joint plan should set out how the other plans interact with each other and what policies each plan should include. | Lichfields on behalf of Mr Peter Lee and Tim Davey (343) | |
| Risk that Local Plans at the District level may end up duplicating the GESP approach. | Stride Treglown (283) | |
| *Clarification of local and strategic roles* | | |
| Greater clarity on definition of small scale and strategic development. | Home Builders Federation (369) | GESP will focus on outlining strategic development proposals. This equates to sites |

| You said | Organisation/Individual | We did |
|---|---|---|
| Threshold for strategic scale development should be clarified. | Genesis Town Planning (172); Gladman Developments Limited (160) | larger than 500 dwelling throughout the GESP area with the exception of Exeter where sites of 100 dwellings or more will be considered. For employment the threshold is 5ha or more (2ha+ in or next to Exeter). Smaller scale development allocations will follow in each LPA's subsequent Local Plans. |
| It would be desirable to define what the threshold is for smaller scale development to be included in New Local Plans. | Genesis Town Planning Limited (353) | |
| Important to make role of GESP/Local Plans clear in terms of scale of development catered for; GESP to identify strategic sites while Local Plans identify non-strategic sites and make provision for windfalls? | Lichfields on behalf of Mr Peter Lee and Tim Davey (343); Turley on behalf of Bloor Homes South West Ltd (339) | |
| Arbitrary threshold for defining strategic sites; should be specific to size and function of each settlement. | Lichfields on behalf of Mr Peter Lee and Tim Davey (343) | |
| GESP should only focus on the broad locational and settlement hierarchy strategy, overall housing and employment requirements and key strategic sites. Specific site allocations, development management and detailed policies should remain in the remit of individual authority plans. | Rapleys (282) | |
| Further information should be provided to clarify the distinction between 'strategic' and 'local' for the purposes of GESP so that those engaging with the GESP are able to respond effectively to the scope of the document. | Savills on behalf of Bloor Homes (325); Savills for St Modwen Developments Ltd (338). | |
| Scope of the GESP and the Local Plans need to be clearly explained, so there is no confusion between the coverage of strategic and development policies in each layer of plans. | Turley on behalf of Gallagher Estates Limited (354) | |
| *Impact of GESP on Mid Devon Local Plan Review* | | |
| Mid Devon's Local Plan Review significantly flawed in its conclusions regarding the | Individual – Mid Devon (184) | These issues are being considered as part of the Mid Devon Local Plan Review Examination. |

| You said | Organisation/Individual | We did |
|---|---|---|
| desirability and deliverability of the proposed scale of new housing provision around Cullompton. | | |
| Suggests shortcomings in the OAN for the forthcoming Mid Devon Local Plan Review which will need to be remedied. Respondent emphasises importance that the GESP deals appropriately with the supply of housing land. | LRM Planning Ltd (347) | |
| Argue progress of the Mid Devon Local Plan should be halted to allow the wider directions of growth to be established within the GESP. | Persimmon Homes South West (259) | The Mid Devon Local Plan Review is well advanced and was subject to a Proposed Main Modifications earlier this year. Until the adoption of the Mid Devon Local Plan Review, Mid Devon District Council will be working on both plans at the same time. |
| Specific reference to the Mid Devon Local Plan, representor queries that the Local Plan will continue through submission and examination stages through to adoption. Suggests this should be made clear for future documentation. | Gladman Developments Limited (160) | |
| *Concern regarding role for local communities* | | |
| Current structure of plans is top-down, does not give a sense of neighbourhoods being able to inform and contribute to plans that are good for all. | Exeter Northcott Theatre (170) | The GESP is being prepared in full consultation with local communities in accordance with the principles set out in the joint Statement of Community Involvement. An initial 'issues' consultation took place in 2017 in order to stimulate debate and gather views on the scope and content of the new joint plan, the key issues facing the area and provide local knowledge. The next stage of the plan will be 'draft policies and site options' which will provide a further opportunity for local communities to engage with the emerging GESP. |
| Clarity on how the plan will impact local communities. | Hennock Parish Council (133) | |
| Relationship between various plans is dangerously top down. Local people will have even less say when GESP is adopted. | Individuals – Teignbridge (266); East Devon, Exeter (252) | |
| Local people at parish level should have the strongest voice, not vested commercial and other interests | Individual – East Devon (27) | |
| Danger that there will be a loss of attention to local detail. | Individual (373) | |

| You said | Organisation/Individual | We did |
|---|---|---|
| Concern that requirements of smaller local communities will be lost. | Newton Abbot Town Council (264) | |
| How will local involvement be achieved? | Ogwell Neighbourhood Plan Steering Group (195) | |
| *Weight to GESP in decision making/precedence in event of conflict* | | |
| Query weight to be given to Local Plans and Neighbourhood Plans. | Farringdon Parish Council (336) | Once adopted the GESP will supersede specified strategic parts of each partner LPA's local plan and provide the high level strategic planning policy framework for the area. More localised policies such as development management policies and locations for smaller scale development will be included in new Local Plans produced subsequently by the LPAs. Neighbourhood plans are able to support the strategic development needs set out in the Local Plan and GESP and must be in 'general conformity'. In terms of the status of neighbourhood plans, once 'made' the neighbourhood plan attains the same legal status as the Local Plan. |
| If there are any policies in the GESP which conflict with an existing plans e.g. Local Plan, Core Strategy, Neighbourhood Plan it should be made clear which policy takes precedence. Suggestion that a diagram showing the relationship between plans could be beneficial. | Gleeson Developments Limited (262) | |
| Needs to be guidance on weight applied to each plan. For example if strategic sites are not acknowledged specifically within the Local or neighbourhood plan, how will planners apportion weight to one document over another? | Individual – East Devon (143) | |
| The relationship between future Plans for each Authority and the GESP itself is not explicitly stated. It will be important for each Authority to confirm the weight to be given to the GESP as it progresses through to adoption. | Jillings Heynes Planning (332) | |
| Need to set out clearly where GESP sits in plan making and decision making. It is important it sets out strategic priorities and a compliance framework. | McMurdo Land Planning and Development Ltd (271) | |
| *GESP timescales; alignment with other plans* | | |
| Risk of delays caused by joint plan making due to different agendas; concern delays to GESP will affect the delivery of Local Plans. Suggests timetable to establish deadline for future stages. | AP Planning c/o Bovis Homes (255) | The timetable for the GESP is set out in Local Development Scheme documents which were agreed by partner Council committees. |

| You said | Organisation/Individual | We did |
|---|---|---|
| The timetable determined for the GESP will result in draft policies before any final reporting from Exeter City Futures research which aim to find innovative solutions to issues which challenge the city. Investigations are due to be completed in 2018. | Exeter Civic Society (356) | |
| The relationship with other plans should be defined, particularly in relation to timings and joint agreement | Exeter Green Party (297) | |
| Clarity on alignment of plan periods for GESP and Local Plans. | Home Builders Federation (369) | |
| Greater clarity in the timescale for the preparation of GESP and the programming of adopted Local Plan Reviews. | Home Builders Federation (369) | |
| To provide certainty it will be important that links with other plans and the overall development plan timetable is made clear from the start. | IJP (261) | |
| It will be important that the GESP provides clarity in terms of how it and the new local plans will inter-relate and to ensure that the various development plan periods across the sub-region are aligned. | Lichfields on behalf of Mr Roger Cooke (295) | |
| How does GESP timetable fit in with Local Plans? | Individual – East Devon (77) | |
| Timetable of Local Plans is not set within this document, considered to be a significant omission. Argue this should be set at this early stage so evidence required and issues to be addressed at each stage are properly considered. | Peter Brett Associates (167) | |

| You said | Organisation/Individual | We did |
|---|---|---|
| Timeline should be published so that parties are aware of the indicative timelines moving forwards. | Savills on behalf of Bloor Homes (325) | |
| Wrong that that a 'call for sites' should be conducted prior to this consultation. Lack of local knowledge and input. | Individual – East Devon (41) | The call for sites process ran alongside the Issues consultation to understand what land was available for development within the GESP area. This is a technical exercise. A positive assessment of a site's development potential in the HELAA is no guarantee of a future planning permission or that the site will be selected for allocation in the GESP or other local planning policy documents. Draft policies, potential development site options and supporting information will be consulted on during the next stage of consultation. |
| Preparation of the GESP should not frustrate or delay development coming forward; work on delivering the garden village at Culm must progress in parallel to the GESP. | Lichfields on behalf of Mr Roger Cooke (295) | Agreed, Mid Devon District Council and the other GESP partner authorities are working on delivering the Culm GV in parallel. |
| Good opportunity to address the diverse housing needs of the elderly in the region at a strategic level. | McCarthy & Stone Retirement Lifestyles Ltd. c/o The Planning Bureau Ltd (345) | Comments noted. |
| Going forward as part of any review process, the authority periods should reflect the GESP plan period. | Rapleys (282) | Comments noted. The GESP plan period will be 2020 – 2040. |
| Correct alignment of GESP and Local plan periods are essential to avoid confusion, ensure a joined-up approach and a correct assessment of needs. | Turley on behalf of Bloor Homes South West Ltd (339); Turley on behalf of Gallagher Estates Limited (354) | |
| The GESP is clear that it is looking forward to 2040, but it does not appear to have a start date, which will be required to enable accurate monitoring of key deliverables, such as housing and employment delivery. This would also help | Vail Williams for Gleeson Developments Limited (372) | |

| You said | Organisation/Individual | We did |
|---|---|---|
| set the context for the District Local Plans, given the differing Plan periods. | | |
| *Relationship of GESP to other plans/other areas/ other bodies* | | |
| In the preparation of GESP it is imperative the Plan takes full account of the available planning policy and guidance. Respondent provides references to national policy and guidance to be considered. | Barton Willmore c/o Barratt David Wilson Homes (367) | Comments noted. |
| There is no mention of the Heart of the South West Local Enterprise Partnership. | Crediton Town Council (Crediton Neighbourhood Plan) (189); GL Hearn Ltd (296) | |
| Concerned about the status of the Local Enterprise Partnership's Strategic Economic Plan and other plans they have developed and how this will align with GESP. | Exeter Civic Society (356) | |
| The relationship between GESP and the work of the HotSW Local Enterprise Partnership requires definition and explanation. Argue LEP gives insufficient weight to a low carbon economy which respects environmental limits and seeks to create a socially inclusive and sustainable society. We expect the GESP to take a more balanced approach. | Exeter Green Party (297) | |
| Concern over soundness of approach if a strategy, taking account of HoSW LEP, is not first set within the GESP. | Persimmon Homes South West (259) | |
| Greater clarity in how the plan will link into the Local Enterprise Partnerships strategic plan for growth in the Heart of the South West Area. | Seaton Town Council (212) | |
| Little reference to Cullompton, despite it being identified as a major growth hub for Mid Devon. | Culm Valley in Business & Cullompton Neighbourhood Plan Steering Group (81) | The issues consultation represented the first stage in the process of preparing the GESP and was intended to stimulate debate early in the process. This did not include any fully worked out |

| You said | Organisation/Individual | We did |
|---|---|---|
| | | proposals but represented a stage of consultation at a formative stage in the development of the plan. The next stage of consultation on the draft GESP will consult on draft policies, potential site options and supporting information. |
| The potential impact of development in the GESP on the quality and character of the National Park should be identified as a key issue assessed as part of the SA, as well as impacts on the setting of heritage assets particularly Conservation Areas close to the National Park boundaries. | Dartmoor National Park Authority (175) | Comments noted. The GESP partner authorities welcome continued close working with Dartmoor National Park Authority to recognise the quality and character of the national park and to address cross-boundary impacts of development. |
| Dartmoor's status as a National Park and its statutory purposes mean that it has limited land supply and is not a suitable place for large scale development. GESP should recognise its role in relieving development pressure on the National Park, There may also be implications for minerals and waste planning across these areas. | Dartmoor National Park Authority (175) | |
| Concern over potential cumulative impact of increased in the National Park including from the Greater Exeter area e.g. recreational pressure, increased traffic. Particular concern over the damage and disturbance of wildlife sites. Should be reflected in table 3. | Dartmoor National Park Authority (175) | |
| Flood risk is a potential cross boundary issue. Could be opportunities for natural flood management upstream within the National park to reduce or mitigate flood risk in the GESP area. | Dartmoor National Park Authority (175) | |
| GESP should reference Devon County Council's Local Transport Plan 3. GESP should also have its own Local Transport Plan and delivery plan. | Exeter Civic Society (356) | Comments noted. |

| You said | Organisation/Individual | We did |
|---|---|---|
| Relationship with Devon County Council's Transport Plan needs clarification. | Individual – Exeter (250) | |
| The strategy needs to tie into policy throughout the partner authorities and extend from strategic decision to implementation e.g. transport and highways are planned and delivered in isolation from development often resulting in missed opportunities. Policies need to clearly link back to how they will help achieve the vision. | Exeter Cycling Campaign (357) | Comments noted. Conserving and enhancing the area's environment, providing transport infrastructure improvements to support sustainable growth and securing economic growth and prosperity are all key priorities for the Greater Exeter Strategic Plan. These are expressed through the vision for GESP and the emerging spatial development strategy. |
| Land use planning is only of limited use unless it is linked into other critical areas: environmental limits, transport and the economic. Other plans therefore need to be brought into the diagram on p.4 e.g. transport plans, coastal management plans etc. | Exeter Green Party (297) | |
| Integration with transport planning is particularly important. Suggestion of an integrated transport board to match the GESP area. Suggestion for greater powers over public transport. | Exeter Green Party (297) | |
| Should reflect forthcoming changes to the NPPF including greater clarity to housing need. | Holcombe Rogus Parish Council (200) | The GESP is being prepared in accordance with the NPPF, relevant legislation and associated planning guidance. |
| Relationship of plan with the wider Central Government framework. | Musbury Parish Council (242) | |
| Would like to see references to other plans such as the Devon Rights of Way Improvement Plan. | Individual – Exeter (235) | Comments noted. |
| Possibly a link to strategic plans of other more rural areas. | Individual – Exeter (310) | The GESP will provide the overall spatial strategy and level of housing and employment land in the period to 2040. The document will provide the high level strategic planning policy framework for the area which once adopted, will supersede specified strategic parts of each LPA's local plan. However, given that the GESP will deal with the |

| You said | Organisation/Individual | We did |
|---|---|---|
| | | main large scale allocations and strategic issues, there will still be a need for a local plan for each LPA. Each subsequent local plan will include non-strategic allocations and development management policies. |
| Worth showing how the Strategic Plan will draw on working groups and documents working on other areas, e.g. rail transport. | Individual – East Devon (77) | Comments noted. The draft policies and site options document describes how the Greater Exeter councils will work with strategic partners with responsibilities for other areas, e.g. rail transport. |
| There should be a clearer connection to national policy in DEFRA relating to agricultural production in the UK post-Brexit. | Individual – Exeter (100) | Comments noted. |
| Important that the GESP relates well to the North Devon plan which will include significant housing and economic growth. | John Phillips, Tarka Rail Association (109) | The GESP partner authorities are working closely with surrounding areas in accordance with the 'Duty to Cooperate'. |
| Relationship with national bodies under the different themes e.g. National Trust and English Heritage so that visions are joined up. | Musbury Parish Council (242) | Comments noted. The National Trust and Historic England were consulted as part of the 'issues' consultation and their comments are summarised and responded to in this report. The GESP partner authorities welcome continued close working with these organisations. |
| Query the provision of CIL in the GESP area. | Ogwell Neighbourhood Plan Steering Group (195) | Comments noted. |
| All plans should be integrated to ensure policy requirements in one area do not cause a displacement in another, example is provided of trucks being displaced onto unsuitable roads. | Road Haulage Association (303) | Comments noted. The GESP will help enable this by providing a joined-up vision for the area and providing transport and infrastructure improvements needed to support sustainable growth throughout the Greater Exeter area. |
| Greater clarity how the plan will link into the corporate plan and aspirations of each of the Councils involved. | Seaton Town Council (212) | The GESP will provide the overall spatial development strategy and level of housing and employment land in the period to 2040. The document will provide the high level strategic |

| You said | Organisation/Individual | We did |
|---|---|---|
| | | planning policy framework for the area which once adopted, will supersede specified strategic parts of each partner LPA's local plan. However, given that the GESP will deal with the main large scale allocations and strategic issues, there will still be a need for a local plan for each authority. Each subsequent local plan will include non-strategic allocations and development management policies.<br><br>Collaborative working between the partner authorities on a sub-regional basis will enable enhanced delivery of each Corporate Plan's priorities through a joint strategic planning approach. |
| Will economic development plans of each of the authorities be joined together and link into the plan. | Seaton Town Council (212) | Yes, please see proposed draft policies within 'Prosperity' chapter of the draft policies and site options consultation document. |
| Focus of GESP is on district matters such as housing and employment use. "County matters" will continue to be considered through statutory Minerals and Waste Plans produced by DCC. | Somerset County Council (289) | Yes, the strategic plan will sit within a framework of plans which includes the County Minerals and Waste Plans for the area. |
| Clarity on role of other bodies/stakeholders in implementation of GESP policies. | Transition Exeter (206) | The plan is being developed by the local authorities of East Devon District Council, Exeter City Council, Mid Devon District Council and Teignbridge District Council in partnership with Devon County. The GESP is subject to separate decisions by each of the Local Planning Authorities. In other words, all four councils will need to approve the plan at each relevant stage in accordance with their own constitutions/schemes of delegation. |

| You said | Organisation/Individual | We did |
|---|---|---|
| | | The strategic plan would also sit within a framework of plans which includes the County Minerals and Waste Plans and Neighbourhood Plans for the area. |
| *Cross-boundary working/duty to cooperate* | | |
| Full coordination across local authorities is essential to ensure GESP does not result in conflicting policies, or becomes unnecessary, burdensome or unclear. | Deloitte LLP on behalf of the Church Commissioners for England (291) | Comments noted. The GESP partner authorities are working closely with surrounding areas in accordance with the 'Duty to Cooperate'. |
| Duty to cooperate with neighbouring councils should be explained. | Genesis Town Planning (172) | |
| GESP should align with emerging plans in neighbouring authorities to ensure the plan does not take an insular view of potential Strategic Road Network issues particularly those occurring near the plan border. | Highways England (375) | |
| Requires co-ordination across the respective boundaries to deal comprehensively with future development. This additional strategic level must complement District Local and Neighbourhood Plans. | Individual (342; 346; 362) | |
| At the outside individual authorities should have dialogue with each other, the joined up thinking approach would be consistent with the Duty to Co-operate. | Jillings Heynes Planning (332) | |
| GESP should consider how it will engage its duty-to-cooperate partners especially the area of the National Park within the Teignbridge boundary. | Origin 3 for Burrington Estates (368) | |
| Other comments on content of GESP | | |
| *Housing and employment need.* | | |

| You said | Organisation/Individual | We did |
|---|---|---|
| Clarity on basis for future 5 year housing land supply calculations and the housing delivery test | Home Builders Federation (369) | Comments noted. A wide range of responses were received in respect of housing issues. Taking these issues into account a number of draft policies have been formulated to include:<br><br>• A housing delivery target to include affordable homes, custom and self-build homes and gypsy and traveller provision.<br>• A total provision of new homes in future local plan reviews<br>• A requirement for quality new places by ensuring that new homes are accessible.<br><br>In terms of establishing housing need across the GESP area, the government's standard method set out in national policy gives the Greater Exeter housing need at 2,663 homes per year. The calculation uses data from the Office of National Statistics (ONS) 2014-based household projections and Office for National Statistics (ONS) 2018 household affordability statistics. |
| The plan assumes an increase in human population. This is not certain and should be resisted. | Individual – (164) | |
| Concerned that GESP will give an exaggerated impression of the underlying demand for housing in Teignbridge. | Individual (373) | |
| By deciding huge increases in housing across the whole area, you will be forcing each district to take on unwarranted development. | Individual – East Devon (233) | |
| Plan should set out a housing requirement figure for the region based on an objective assessment of need; OAN figure to be calculated using government's proposed new methodology in Housing White Paper. Also identify the scale of job growth required. Streamline process to provide certainty for developers and public. | Lichfields on behalf of Mr Peter Lee and Tim Davey (343) | |
| It is recognised that the evidence base will identify the housing and economic development needs of the region and GESP will identify the most appropriate locations to meet these. Therefore there will not be a simplified objectively assessed need figure for each authority. | Savills on behalf of Bloor Homes (325) | |
| GESP should confirm the Councils' proposed approach to disaggregate housing or economic targets for the purposes of monitoring delivery and applying these tests. | Savills on behalf of Bloor Homes (325) | |
| *Other housing issues* | | |
| Proposed distribution of housing should be guided by the size and function of the | Lichfields on behalf of Mr Peter Lee and Tim Davey (343) | |

| You said | Organisation/Individual | We did |
|---|---|---|
| settlements within the region and their ability to accommodate further growth sustainably; growth should be spread proportionately across the region allowing existing settlements to thrive and prosper. | | |
| The guarantee of delivery of affordable homes should be a key consideration of this plan, prior to any acceptance of more. | Ogwell Neighbourhood Plan Steering Group (195) | |
| Consider it appropriate that the GESP identifies the quantum of housing which should be distributed into each district accordingly. Suggestion of Greenbrook site for East Devon. | RPS Group (301) | |
| *Economic issues* | | |
| Unclear if higher tourism figures reported in Teignbridge are due to the inclusion of Dartmoor. | Dartmoor National Park Authority (175) | Comments noted. A wide range of responses were received in respect of economic issues. Taking these issues into account a series of draft policies to cover economic issues are proposed. These include:<br>• A jobs target<br>• Doubling the size of the economy<br>• Measures to increase business growth<br>• Support for digital exchanges<br>• Aim to deliver employment land within Greater Exeter<br>• Strategic guidance on the review and allocation of employment sites in local plans and with planning permission<br>• Protection and support for key economic assets<br>• Proposals for Exeter Airport<br>• Support for skills, education and training |
| Recognition of tourism as a key economic activity. | Jillings Heynes Planning (332) | |
| Exeter as a hub for GESP is clear, more focus on attraction and retention of growth of people to the region. | Exeter Northcott Theatre (170) | |
| There should be reference to positive policies that allow for economic growth in rural areas and the delivery of houses to match this growth. | Jillings Heynes Planning (332) | |

| You said | Organisation/Individual | We did |
|---|---|---|
| *Environmental issues* | | |
| Concern over greater development on greenfield land. | Ogwell Neighbourhood Plan Steering Group (195) | Comments noted. |
| Disappointing that the environmental setting of Exeter is not acknowledged as explicitly as a key driver of the City's growth and attraction. | RSPB (341) | |
| *Health and wellbeing/sports* | | |
| Should consider the provision of sports facilities. | Exeter City Swimming Club (293) | Comments noted. Increasing physical activity levels to improve health and wellbeing is a key element of creating greater places for people – part of the vision for the Greater Exeter area. In addition, a regional sports hub concept is considered. As the GESP progresses we will continue to consider the potential for such facilities in the Greater Exeter area. |
| Need a centre for sports in Exeter, including a 50metre pool and other facilities. Also open up Roman Baths. Need to attract jobs and visitors to area. | Individual – Exeter (232) | |
| Little mention of sports facilities; need to cater for a range of sports from elite competition to occasional users. New swimming pool won't be able to host school, club or county swimming competitions. | Individual – East Devon, Exeter, Mid Devon & Teignbridge (198) | |
| Exeter pool development needs reconsidering on the grounds of poor location and the requirement for a larger more diverse and inclusive centre. | Individual – (305) | |
| Interested in issues surrounding Leisure Facilities. | Newton Abbot College (135) | |
| GESP should include up-to-date and robust evidence base to plan for the provision of sport both playing fields and built facilities. Sport England provide guidance. | Sport England (168) | |
| *Infrastructure/ transport* | | |
| Should consider provision for a Park and Ride Facility to serve those approaching the city from either the A377 or A369 | Coldridge Parish Council (97) | Comments noted. A wide range of responses were received in respect of transport issues. |

| You said | Organisation/Individual | We did |
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| The plan should be clear about what social and physical infrastructure is needed to support communities. | Exeter St James Forum, St David's Neighbourhood Partnership, and Newtown Community Association (349) | Taking into account the comments received, a series of draft policies are proposed, to include:<br>• A transport strategy for the wider GESP area, including a range of strategic transport and digital infrastructure investments which will mesh with growth decisions<br>• A clear sustainable transport hierarchy in major new developments<br>• The approaches to be taken for a variety of transport modes<br>• The strategy for improved digital connectivity and high speed digital communications. |
| GESP consultation document provides insufficient evidence to allow Highways England to form and opinion on its contents. We look forward to working with the relevant authorities to development the evidence base. | Highways England (375) | |
| Needs more ambitious plans to provide safe commuter cycle routes and the use of the river, waterways, canals as a commuter route. | Individual – Mid Devon (72) | |
| No reference to mobility. Connectivity is relevant but too narrow. | Individual – Exeter (250) | |
| Plan will be defeated if those making choices about funding 'road' infrastructure do not adapt to new thinking. | Individual – Exeter (174) | |
| Concerned that number of houses might not be able to cope with increased traffic. | Individual – East Devon (238) | |
| The GESP's supporting evidence base should identify the range of infrastructure required to support any strategic allocations; appropriate funding sources / mechanisms investigated as the plan is developed. | Savills for St Modwen Developments Ltd (338) | |
| GESP role in issues relating to existing infrastructure, e.g. reduce traffic congestion, improve energy efficiency of existing housing stock? | Transition Exeter (206) | |
| *Education* | | |
| Interested in the effect of the proposals on education and potential to expand existing schools | Newton Abbot College (135) | Comments noted. The draft site option information includes infrastructure requirements in relation to education. These requirements will be refined and updated as the plan progresses. |

| You said | Organisation/Individual | We did |
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| *Evidence base* | | |
| Robust and thorough evidence base required to help inform the spatial strategy for the Greater Exeter area | Vail Williams for Gleeson Developments Limited (372) | Comments noted. |
| *Consultation process* | | |
| The steps for preparing the plan do not include consultation on the priorities for draft policies. | Crediton Town Council (Crediton Neighbourhood Plan) (189) | The next stage of public consultation on the Greater Exeter Strategic Plan will consult on draft policies, potential site options and supporting information. |
| Communities should be consulted on land allocations. | Exminster Parish Council (180) | |
| Need actual proposals in order to know what concerns are. | Individual – Mid Devon (272) | |
| Cannot answer question until electorate has voted democratically at the ballot box as to whether they would wish for GESP. | Individual – East Devon (277) | The Greater Exeter Strategic Plan is being prepared in full consultation with local communities in accordance with relevant legislation and associated government guidance. |
| More must be done to publicise opportunity for comment at each stage of process. | Individual – Exeter (47) | The approach to consultation is set out in the joint Statement of Community Involvement. There is a need to balance wide involvement in the planning process with the need for effective operation of the planning system. This difficult balancing act reflects cost and time constraints, and our level of discretion on the outcome. |
| GESP will lack legitimacy as it has been decided without public consultation or consent. It is imposed rather than in response to established need. However acknowledge there needs to be a strategic approach to how future decision are taken which might be best at County level. | Sidmouth Chamber of Commerce (75) | Not agreed. The GESP is being prepared in full consultation with local communities. The first stage of consultation invited people to comment on the content of the plan, provide local knowledge and stimulate debate early on in the process. This did not include any fully worked out proposals but represented a stage of consultation at a formative stage in the development of the plan. The next stage of |

| You said | Organisation/Individual | We did |
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| | | consultation on the draft GESP will consult on draft policies, potential development locations and supporting information. |
| *Focus on specific areas/sites* | | |
| The villages of the western area of East Devon do not want to be absorbed into the city. | Bishops Clyst Parish Council (331) | Comments on specific site options are invited as part of the draft policies and site options consultation. |
| Identifies commitment to delivering proposals at Junction 27 of the M5 motorway and welcomes constructive engagement with Greater Exeter authorities to ensure emerging proposals benefit the sub-region as far as possible. | GL Hearn Ltd (296) | |
| Area of Dawlish is being overdeveloped. Concerns regarding sewage, flooding and infrastructure provision. | Individual – Teignbridge (222) | |
| Not clear how the impact on small communities is being addressed. | Individual – Teignbridge (114) | |
| What safeguards do we have that investment will not be heavily focused in Exeter city and not shared across the whole of the area? | Individual – Mid Devon (272) | |
| Title is misleading – suggests more importance given to Exeter. | Individual – East Devon (77) | Not agreed. The cross border co-ordination of issues particularly those associated with the growth of Exeter is going to be key for the city and the neighbouring authorities. The impact of Exeter is felt beyond the boundaries of the city on a regional scale in terms of economy, housing need and transportation pattern. This area of influence has expanded to encompass East Devon, Mid Devon and Teignbridge. Together with Exeter itself, this wider area can now be regarded as 'Greater Exeter'. |
| Seems too Exeter centric | Teignmouth Town Centre Management Partnership (116) | |
| Doesn't North Devon feel left out? | Individual – Exeter (92) | The scope of the plan (i.e. Greater Exeter) is considered appropriate as it reflects the |

| You said | Organisation/Individual | We did |
|---|---|---|
| | | functional geographies, the travel to work area and housing market area. |
| Any spatial portrait of the plan area in the Draft Plan should mention Cullompton/Culm Garden Village and Cranbrook as two key locations for development. | Pegasus Group on behalf of Lightwood Land (358) | Comments noted. |
| *Monitoring plan progress* | | |
| Monitoring indicators need to be developed at an early stage. | Individual – Exeter (250) | Agreed, comments noted. |
| Query what measures will be put in place to ensure that the GESP is adopted. | Seaton Town Council (212) | Local Planning Authorities have plan making responsibilities under the Planning and Compulsory Purchase Act 2004. This Act includes provisions for joint planning making. The Localism Act 2011 also introduced a legally binding duty to cooperate between authorities. Other implications in terms of governance and staffing arrangements have been put in place by each of the partner authorities in order to ensure that the GESP will be adopted. |
| *Other* | | |
| An integrated plan will only work if people put aside parochial concerns. | Individual – Teignbridge (142) | Noted. |
| **2) Do these reflect the issues you see facing Greater Exeter? If not, what should we add or change?** | | |
| Agrees that content reflects issues facing Greater Exeter | Individuals – Teignbridge (142; 266), Unknown (305) | Support noted. |
| Housing | | |
| 500+ homes not appropriate or applicable for Parish. | Bishops Clyst Parish Council (331)<br>Clyst St George Parish Council (280) | Comments noted. A wide range of responses were received in respect of housing issues. Taking these issues into account a number of draft polices have been formulated to include: |
| Support identifying the right properties to 'meet their needs'. GESP should develop an | Blue Cedar Homes (299) | |

| You said | Organisation/Individual | We did |
|---|---|---|
| unambiguous support for the delivery of age-specific housing in the GESP area. | | • A housing delivery target to include affordable homes, custom and self-build homes and gypsy and traveller provision.<br>• A total provision of new homes in future local plan reviews<br>• A requirement for quality new places by ensuring that new homes are accessible.<br><br>In terms of establishing housing need across the GESP area, the government's standard method set out in national policy gives the Greater Exeter housing need at 2,663 homes per year. The calculation uses data from the Office of National Statistics (ONS) 2014-based household projections and Office for National Statistics (ONS) 2018 household affordability statistics.<br><br>Comments on specific areas/site options are invited as part of the draft policies and site options consultation. |
| Housing should be dealt with at District level in accordance with the adopted Neighbourhood and Local Plans. Query the need for additional housing. | Bishopsteignton Parish Council (318); Individual – Teignbridge (228) | |
| Housing development within Exeter has clear constraints and therefore the greater Exeter area does need to provide the right levels of affordability and availability of good homes for local people. But this adds demands on the transport infrastructure because Exeter will remain a social and retail hub as well as providing a high proportion of employment opportunities. New and innovative transport links are therefore required. | Cranbrook Town Council (324) | |
| Flexibility allowing for a variety of housing types as supported in the Housing White Paper should be provided. | Deloitte LLP on behalf of the Church Commissioners for England (291) | |
| Policies for provision of suitable housing for the ageing population. | Exminster Parish Council (180) | |
| More explicit policy guidance on how sustainable residential development can help support existing services and facilities at smaller/medium sized settlements, it is not just about affordability. | Genesis Town Planning (172) | |
| The need for more housing should be more clearly set out. | Gleeson Developments Limited (262) | |
| Remaining land along the A3052 into East Devon should not be built on. Please do not contemplate a further new town. | Individual – East Devon & Exeter (252) | |

| You said | Organisation/Individual | We did |
|---|---|---|
| Insulation should be mentioned under housing. This would address energy efficiency and fuel poverty. | Individual – Exeter (223) | |
| Too many recent city centre developments have been for student accommodation instead of perhaps small blocks of flats or affordable housing. | Individual – Exeter (139) | |
| Housing sections reads as though owning house is goal, however most rent. | Individual - East Devon (102) | |
| Housing needs of an ageing population. | Individual – Exeter (91) | |
| Affordable housing should only be built where there are jobs. | Individual – East Devon (88) | |
| Care needs to be taken over the assumption that building lots of houses will significantly reduce house prices. Trying to empirically establish housing need is a highly unreliable process. | Individual – East Devon (41) | |
| Proliferation of second homes which damage the ability for people to live and work here. | Individual – East Devon (31) | |
| Social housing should underlie any housing development. Also more affordable homes to buy. | Individual – East Devon (31) | |
| Critical that housing development sites are in the right places to achieve true sustainability, not be selected purely because they are in the vicinity of Exeter. Sustainable, controlled growth in all communities is acceptable but small communities with limited services (e.g. Clyst St Mary) cannot sustainably absorb large scale residential expansion. | Individual (342; 346; 362) | |
| Affordability is a key issue but the delivery of an appropriate level of affordable and open market | Jillings Heynes Planning (332) | |

| You said | Organisation/Individual | We did |
|---|---|---|
| homes at all levels in the right locations to allow for choice is critical. | | |
| Need for new homes is understood, delivery on greenfield is not. | Ogwell Neighbourhood Plan Steering Group (195) | |
| Should consider development of higher density within Exeter. | Ogwell Neighbourhood Plan Steering Group (195) | |
| Redevelopment of poor housing should be a key consideration. | Ogwell Neighbourhood Plan Steering Group (195) | |
| Suggestion of option for Passive Houses to help affordability. | Ogwell Neighbourhood Plan Steering Group (195) | |
| Housing affordability and delivery are inextricably linked. | Persimmon Homes South West (259) | |
| Strategy should not limit housing supply to net needs but increased to support the economic objectives. | Persimmon Homes South West (259) | |
| Agree as a key issue for the amount for all types of housing to be established. | Peter Brett Associates (167) | |
| Would like a firmer commitment to delivering housing to meet all the needs across the GESP. | Peter Brett Associates (167) | |
| Welcome the identification of affordability, ability to find suitable accommodation for different groups in society as key concerns. | Planning Sphere Ltd (166) | |
| Delivery of housing numbers should be included. | RPS Group (301); Savills on behalf of Bloor Homes (325) | |
| Concern that housing requirements for Exeter will be offloaded to the districts. | Seaton Town Council (212) | |
| Concern where East Devon District Council will allocate once Cranbrook is at capacity. | Seaton Town Council (212) | |
| Creation of new settlements should be considered to no burden existing towns and villages. | Seaton Town Council (212) | |

| You said | Organisation/Individual | We did |
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| Issues relate to strong economic development, population growth pressures combined with environmental constraints. The rate of population growth in Greater Exeter is the 3rd highest in the UK. | WYG c/o Sibelco (215); WYG (146) | |
| Surging economic growth pressures will in turn affect housing demand. Exeter's economic success has placed growing pressure on housing need. | WYG (146) | |
| There is a clear and pressing need to deliver increased levels of market and affordable housing within the City, to meet historic under-delivery and future objectively assessed need. | WYG (146) | |
| The most pressing role of the GESP is to ensure that the full Objectively Assessed Housing Need (OAHN) for the Greater Exeter area is identified. Respondent summarises the position of existing Local Plans and housing targets and argues an increase in the OAHN based on an indicative economic assessment. | Barton Willmore c/o Barratt David Wilson Homes (367) | |
| While the paper focuses on affordable housing provision and the quality of new housing, a key issue will be ensuring that sufficient housing is not only planned for but delivered in the plan period. | David Lock Associates c/o East Devon New Community Partners (314) | |
| Provision of affordable homes in the Exeter area is a significant problem because of low salary levels. | Exeter Civic Society (356) | |
| Historic issues of low density suburban development lacking a sense of place and vibrancy. Suggested to focus development inwards and upwards in the city centre. | Exeter Cycling Campaign (357) | |

| You said | Organisation/Individual | We did |
|---|---|---|
| Increasing the population density in the city centre which would make it more likely that people will choose sustainable travel. | | |
| Exeter has a significant need for smaller dwellings. The provision of more suitable dwellings for downsizers, young professionals and students will help release existing housing stock closer to the city centre. | Exeter Cycling Campaign (357) | |
| Development proposals on the fringe of the city centre are currently dominated by student accommodation. Whilst important for a University City there is a risk the city centre and surrounding neighbourhoods fail to provide housing for a mixed demographic. | Exeter Cycling Campaign (357) | |
| Issues identified are correct and important. Mobility links within communities are important. Planning needs to take a more proactive role in defining and enforcing policies on the mixes of social, affordable and market housing. | Exeter Green Party (297) | |
| The challenges of providing the right housing is particularly acute around the City Centre where virtually no new private housing has been built in recent years whilst student accommodation has proliferated. | Exeter St James Forum, St David's Neighbourhood Partnership, and Newtown Community Association (349) | |
| The need for affordable housing for local people must be addressed. | Farringdon Parish Council (336) | |
| Better quality homes should be for new homes as well. | Farringdon Parish Council (336) | |
| Regeneration of brownfield sites should be a priority | Farringdon Parish Council (336) | |

| You said | Organisation/Individual | We did |
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| Question if affordable warden controlled housing to meet the needs of an aging population be considered. | Farringdon Parish Council (336) | |
| The key housing issue is that the GESP makes adequate provision for the housing needs of the sub region. Respondent notes that a re-calculation of the objectively assessed housing need will need to be undertaken using the Government's proposed standard methodology. | Home Builders Federation (369) | |
| GESP would benefit in addressing issue of inability of older people of find suitable housing to meet their needs in more detail. | McCarthy & Stone Retirement Lifestyles Ltd. c/o The Planning Bureau Ltd (345) | |
| Concern that focus appears to be only on affordability and finding the right property rather than the overarching NPPF objective to boost significantly the supply of housing. | Lichfields on behalf of Mr Peter Lee and Tim Davey (343) | |
| Little reference to the future housing requirement or any work proposed to determine how the calculation of objectively assessed housing needs will be progressed. Strategic allocations of the GESP together with the smaller scale development allocations in Local Plans should meet housing needs in full over the plan period. | Lichfields on behalf of Mr Roger Cooke (295) | |
| The early delivery of the Culm Garden Village must be a priority within the GESP. | Lichfields on behalf of Mr Roger Cooke (295) | |
| Support acknowledgement that affordability is an issue across the plan area. Expect authorities to work proactively to deliver much needed affordable housing. Housing box could also recognise the need for a variety of tenures to | Tetlow King for South West HARP Planning Consortium (371); Tetlow King Planning for Rentplus (363) | |

| You said | Organisation/Individual | We did |
|---|---|---|
| respond to this affordability challenge to drive change. | | |
| Need to deal with the problem of second homes and empty houses in order to encourage full occupancy and help to make homes more affordable. | Transition Exeter (206) | |
| Need to plan for more council-rented accommodation. | Transition Exeter (206) | |
| The GESP will need to make provision for future objectively assessed housing need, reference to which should be included as a matter of importance. | Turley on behalf of Bloor Homes South West Ltd (339); Turley on behalf of Gallagher Estates Limited (354). | |
| Transport | | |
| Specific suggestions for areas that require improvements:<br>- A376 and Clyst St Mary roundabout.<br>- North access to A38 from A379 | Bishops Clyst Parish Council (331)<br>Exminster Parish Council (180) | Comments noted. A wide range of responses were received in respect of transport issues. Taking into account the comments received, a series of draft policies are proposed, to include:<br>• A transport strategy for the wider GESP area, including a range of strategic transport and digital infrastructure investments which will mesh with growth decisions<br>• A clear sustainable transport hierarchy in major new developments<br>• The approaches to be taken for a variety of transport modes<br>• The strategy for improved digital connectivity and high speed digital communications. |
| Rail infrastructure should be considered. | South Somerset District Council (118); Exminster Parish Council (180) | |
| Priority – Maintain the region's connectivity with the rest of the UK. Improve local transport links and affordability to minimise the reliance on cars | Bishopsteignton Parish Council (318) | |
| Support sustainable transport including public transport, walking and cycling, however existing issues with the road network need to be addressed. Responded provided examples of traffic issues in the local area. | Clyst St George Parish Council (280) | |
| More emphasis on improvement to public transport, this directly impacts on pollution levels. | Cranbrook Town Council (324) | |

| You said | Organisation/Individual | We did |
|---|---|---|
| This issue will be important in determining how the Greater Exeter area develops over the next 30 years. | Crediton Town Council (Crediton Neighbourhood Plan) (189) | |
| Sustainable transport links are vitally important. | Devon Countryside Access Forum (181) | |
| Provision and protection of rural bus services. | Exminster Parish Council (180) | |
| Fundamental to resolving all other issues. | GL Hearn Ltd (296) | |
| The rural nature of the Greater Exeter area and associated reliance on private cars is referred to that is common with many rural districts however the Greater Exeter area benefits from a mainline railway line where there is scope for intermodal change at Junction 27 and Exeter. | GL Hearn Ltd (296) | |
| High car dependency identified as an issue can be addressed by adopting a more dispersed spatial strategy. | GL Hearn Ltd (296) | |
| Priority is to maintain the region's connectivity with the rest of the UK. Improve local transport links and minimise reliance on cars. | Individual – Teignbridge (228); East Devon (131) | |
| Plan does not address transport or accommodation issues related to tourism. | Individual – East Devon (151) | |
| Roads to the south of the city have become far too congested. No more development should take place in this area. | Individual – Exeter (139) | |
| Focus on the rail network and where this does not exist, working with bus services to form joined up public transport. | Individual – East Devon (31) | |
| Roads and rail are a big issue; extra lines/services from Cranbrook, Topsham and Exminster to cope with growing population. | Individual – East Devon (18) | |
| Accessibility is key. | Jillings Heynes Planning (332) | |
| Essential growth in housing and jobs recognises a large proportion of the need for housing comes | RPS Group (301) | |

| You said | Organisation/Individual | We did |
|---|---|---|
| from the growth in population of Exeter and its immediately surrounding area and that this can be adequately service by public transport as well as the private car. | | |
| If the focus is going to be high value jobs in Exeter then public transport links needs to be greatly improved so people in the rural areas are not disadvantaged. | Seaton Town Council (212) | |
| Include extending the rail network, using energy efficient trains and ensuring a network of recharging points are available for electric cars. | Seaton Town Council (212) | |
| New road should have trunking built alongside. | Seaton Town Council (212) | |
| Proper cycle routes that run alongside roads but keep cycles, pedestrian and other traffic separated. | Seaton Town Council (212) | |
| People working in Exeter are having to look beyond the City to meet their housing needs, resulting in unsustainable travel patterns. Exeter should meet its development needs within its administrative area as part of a sustainable development strategy. | WYG (146) | |
| Highways England appreciates the recognised high car dependency as an issue identified and understands a reduction in the reliance on private vehicles can contribute towards other objectives. However, we caution that although a shift towards more sustainable modes of travel is desired in a rural area such as GESP it is difficult to realise. Therefore traffic forecasts used in the evidence base for the Plan must be realistic and not overly optimistic. | Highways England (375) | |

| You said | Organisation/Individual | We did |
|---|---|---|
| Note that large portion of the area's economy is tourism based, creating large variations in traffic during summer months. This represents a unique challenge to ensure needs of both local and long distance travel are met and that tourism is supported through the provision of good accessibility. | Highways England (375) | |
| Transport to access jobs is a major issue within and around Exeter. Suggest improvement to public transport including to enable access to new employment concentrated on the outskirts of the city. | Exeter Civic Society (356) | |
| Suggests title of this is changed from should be changed from 'transport' to 'movement' to reflect a greater emphasis on moving people and goods rather than vehicles. | Exeter Cycling Campaign (357) | |
| Exeter's transport situation is one of the most significant issues facing the city and region. Reasons include a lack of safe and convenient alternatives and Exeter's large rural catchment area. There is a need for significant modal shift to enable people to walk and cycle. | Exeter Cycling Campaign (357) | |
| Exe Bridges and Western Way create a barrier to movement between the city's two greatest assets, the historic city centre and the river Exe. | Exeter Cycling Campaign (357) | |
| Do we continue to allow rural communities to develop as dormitories for Exeter and major towns to facilitate commuting? | Exeter Green Party (297) | |
| Is high car dependency in rural areas really a given, or are there other approaches? | Exeter Green Party (297) | |
| In urban areas are transport considerations still to be added on to solve the problems caused by | Exeter Green Party (297) | |

| You said | Organisation/Individual | We did |
|---|---|---|
| mismatch between housing and jobs or can the plan give equal weight to identifying and defining ways in which mobility options should influence the location and nature of housing and jobs. | | |
| The absence of transport in housing developments is an issue requiring attention from the start. | Exeter Green Party (297) | |
| No mention of rail which has strengths and limitations. | Exeter Green Party (297) | |
| Peaks and troughs of movement are significant contributors to congestion and should be recognised. | Exeter Green Party (297) | |
| The unreliability and infrequency of bus services remains a disincentive to use services. | Exeter Green Party (297) | |
| Attempts must be made to restrict parking, improve traffic management especially at several pinch-points e.g. Old Tiverton Road/Union Road Roundabouts, Cowley Bridge Road and Heavitree Road. | Exeter St James Forum, St David's Neighbourhood Partnership, and Newtown Community Association (349) | |
| Positive encouragement of alternative transport, especially the rail network this can also help improve air quality. | Exeter St James Forum, St David's Neighbourhood Partnership, and Newtown Community Association (349) | |
| Investment in the existing road and transport infrastructure should be focussed on rather than the provision of new infrastructure. | Farringdon Parish Council (336) | |
| Should engage with transport providers to discuss how better, more reliable and affordable public transport can be introduced to make it more attractive. | Farringdon Parish Council (336) | |
| Consideration should be given to provide dedicated cycle lanes when road improvements/development is undertaken. | Farringdon Parish Council (336) | |

| You said | Organisation/Individual | We did |
|---|---|---|
| In considering the option to cycle to work, not all companies/employers have suitable shower or storage facilities to accommodate who cycle. | Farringdon Parish Council (336) | |
| Economy and employment | | |
| Do not want to see large employment provision within Parish. | Bishops Clyst Parish Council (331);<br>Clyst St George Parish Council (280) | Comments noted. A wide range of responses were received in respect of economic issues. Taking these issues into account a series of draft policies to cover economic issues are proposed. These include:<br>• A jobs target<br>• Doubling the size of the economy<br>• Measures to increase business growth<br>• Support for digital exchanges<br>• Aim to deliver employment land within Greater Exeter<br>• Strategic guidance on the review and allocation of employment sites in local plans and with planning permission<br>• Protection and support for key economic assets<br>• Proposals for Exeter Airport<br>• Support for skills, education and training |
| Query whether tourism will be considered. | Bishopsteignton Parish Council (318) | |
| More types of development similar to the Met Office and Science Park are needed. | Cranbrook Town Council (324) | |
| Should recognise importance of tourism and retail assets in the area. | Exminster Parish Council (180) | |
| Emphasis should be placed on dispersing economic growth to other districts in the Greater Exeter area to facilitate more sustainable commuting patterns and a more balanced region in terms of job opportunities, earnings and proximity to services. | GL Hearn Ltd (296) | |
| M5 represents an economic corridor that can be better utilised to generate growth and investment in the Greater Exeter area. | GL Hearn Ltd (296) | |
| Issues consultation refers to the need to maximise the assets in the Greater Exeter area to drive high value economic growth. It is assumed this refers to education/transport/IT/social infrastructure across the area and is a consideration that should influence all aspects of the emerging GESP. This is particularly relevant to transport proposals needed to facilitate growth. Sensible to prioritise growth to locations where there is under-utilised infrastructure or infrastructure upgrades rather than new infrastructure. | GL Hearn Ltd (296) | |

| You said | Organisation/Individual | We did |
|---|---|---|
| The older demographic of this region does not require quantities of industrial sites pro rata to housing numbers. | Individual – East Devon & Exeter (252) | |
| Queries whether spatial planning can do anything about low wage levels or workforce skills. | Individual - Exeter (250) | |
| Separate out education/skills development/training the workforce for the future as a separate issue. | Individual – (154) | |
| Would like to see specific reference to tourism as our economy is highly dependent on it. | Individual – East Devon (143) | |
| Need to add flexibility to reflect changes in work & leisure patterns (e.g. more people working from home). | Individual – Teignbridge (114) | |
| What does maximising assets and encouraging high value growth mean? | Individual - East Devon (102) | |
| Needs to respond to the economic risks posed by Brexit, particularly in education and agriculture | Individual – Exeter (91) | |
| High value jobs are key aim but notes importance of tourism, trades and other business and industries. | Individual - East Devon (77) | |
| Should look to sustainable industries as a way in which to complement our natural environment. | Individual – East Devon (31) | |
| Agree with comments, but a key issue is diversity of jobs in the appropriate locations to meet the needs of businesses including rural areas. | Jillings Heynes Planning (332) | |
| More emphasis on education, choice, quality and appropriateness for work. | Musbury Parish Council (242) | |
| Increasing productivity is a challenge and a priority for the Greater Exeter area. | Persimmon Homes South West (259) | |
| Agree as a key issue for the amount of employment to be established. | Peter Brett Associates (167) | |

| You said | Organisation/Individual | We did |
|---|---|---|
| Robust economic forecasts and Employment Land Review will be required. An appropriate methodology should be used and would be wise to consult on the methodology in advance of their preparation. | Peter Brett Associates (167) | |
| The road haulage and logistics industry creates employment in the region and is in the position to offer more job opportunities to local people given the current shortage of heavy goods vehicle divers. The haulage sector also supports the wider business community as well as the public sector by delivering essential goods. | Road Haulage Association (303) | |
| Although high value economic growth is important, small town centres are also important to the local economy and communities. Concern employment sites will be Exeter-centric. | Seaton Town Council (212) | |
| Important to identify sector specific areas of employment across the area. | Seaton Town Council (212) | |
| The tourism industry should be mentioned. | Seaton Town Council (212) | |
| Information regarding education should be provided. | Seaton Town Council (212) | |
| Issues relate to strong economic development, population growth pressures combined with environmental constraints. GESP should support Exeter's economic role as part of a wider strategy of promoting sustainable development to meet need across Greater Exeter. | WYG c/o Sibelco (215) | |
| People working in Exeter are having to look beyond the City to meet their housing needs, resulting in unsustainable travel patterns. | WYG (146) | |
| Recent employment development have been divided up into single occupancy plots with large | Exeter Cycling Campaign (357) | |

| You said | Organisation/Individual | We did |
|---|---|---|
| areas of surface parking. This model makes it cheap and convenient for people to drive to work and is a significant contributor to Exeter's congestion problem. More employment space should be provided within and close to the city centre and in particular around public transport hubs. | | |
| No recognition of the potential of small/creative businesses and the pressures they are under. The plan stresses 'data-driven' and 'knowledge-led' industries but there is much more to a diverse economy than that. | Exeter Green Party (297) | |
| Focus on creating opportunities for jobs for local people to improve skills training, choice of jobs and improved wages. | Farringdon Parish Council (336) | |
| Argue that there are a number of existing units that are currently vacant therefore question why there is a need to build more. | Farringdon Parish Council (336) | |
| Should include an acknowledgement of the significant contribution the tourism industry makes to the sub-regional economy and the opportunities presented by this sector. | Lichfields on behalf of Bourne Leisure Ltd (351) | |
| Environment | | |
| Welcome recognition of heritage that contributes to exceptional environment. However should include term historic environment to encompass physical assets and cultural heritage. | Historic England (120) | Comments noted. Having regard to the issues consultation responses received, a series of policies are proposed, to include:<br>• Ensuring that developments provide at least a 10% overall enhancement in biodiversity |
| Greater emphasis of GI and need for landscape and biodiversity enhancement | Natural England (286) | |
| Theme Environment to include geodiversity. | Natural England (286) | |

| You said | Organisation/Individual | We did |
|---|---|---|
| Environment should also be enhanced not just conserved. | Natural England (286) | • Providing a strategy to protect the internationally important wildlife sites of the Exe Estuary, Dawlish Warren and East Devon Pebblebed Heaths through the funding of on-site management and off-site Suitable Alternative Natural Greenspace (SANG)<br>• Defining new limits to the Clyst Valley Regional Park and provide a strategy for its protection and enhancement.<br>• The planting of 10,000 hectares of new tree planting to link with existing woodland networks.<br><br>Alongside the draft GESP a draft Green Infrastructure Strategy will be published, setting out the locations of existing areas of high biodiversity, the corridors and sustainable movement networks that connect them, and the key areas of accessible open space.<br><br>See also responses in relation to climate change, as addressed through the suite of policies proposed within the 'Climate Emergency' chapter. |
| Important to preserve and enhance our rural environment. | Bishops Clyst Parish Council (331) | |
| Need to establish the level of protection that will be awarded to the designated landscapes of the AONB's in the context of future development pressures outlined, mindful of national policy regarding major development in AONBs. | Blackdown Hills AONB Partnership (208) | |
| We agree that is very important to preserve and enhance our environment especially in our rural areas. | Clyst St George Parish Council (280) | |
| 'Urban sprawl' and its impact on the sub-region's ecological networks. Identification of existing and future ecological networks should be carried out before land allocations are made for development. | Devon Wildlife Trust (213) | |
| Recognise the importance of tourism assets and value place on green spaces. | Exminster Parish Council (180) | |
| Greater protection of open countryside and prevention of urban sprawl. | Exminster Parish Council (180) | |
| Conserving the environment, for example AONB, should not be at the expense of meeting needs of housing which is also important in terms of social and economic needs. | Gleeson Developments Limited (262) | |
| Climate change is referenced but where does air pollution fit? | Individual – Exeter (235) | |
| Environment section should include commercial importance as it is the exceptional environment that gives our tourism. | Individual – Mid Devon (319) | |
| The task of GESP should be to seek a way to use the enhancement and protection of the | Individual – East Devon (41) | |

| You said | Organisation/Individual | We did |
|---|---|---|
| environment to underpin economic development and wealth creation. | | |
| EU protective designations should be enforced post-Brexit. | Individual – East Devon (31) | |
| Increased importance must be placed upon the preservation of landscape and natural environment. Development over the last 30 years associated with a huge loss of wildlife habitat and rural spaces for people to enjoy. | Individual - East Devon (27) | |
| Key issue is how growth can be accommodated whilst at the same time maintaining the quality of the local environment. It is unacceptable to resist development in all rural locations. | Jillings Heynes Planning (332) | |
| Agrees with the importance of conserving and enhancing the natural and built environment. Through this strategic plan, the natural environment should be considered at a landscape scale and both historic and environmental assets will be valued in terms of their social, environmental and economic importance. | National Trust (288) | |
| Should be clearer that certain parts of the plan area are affected by high level constraints, such as the AONB. | RPS Group (301) | |
| Reiterate how important the natural environment is to the local area. | Seaton Town Council (212) | |
| Plan should require Exeter's public spaces, especially the valley parks, to be protected from development. | Exeter Civic Society (356) | |
| Large greenspaces should be developed on the edge of the city to create a buffer between any new development and the city. | Exeter Civic Society (356) | |

| You said | Organisation/Individual | We did |
|---|---|---|
| Environmental limits is a major omission. Poor air quality is recognised as an issue in Exeter and Crediton. The relationship between new development and water sources should also be considered. Continuing loss of agricultural land but also pollution from agriculture. | Exeter Green Party (297) | |
| The success of GESP depends in a large part on the success and attractiveness of Exeter City Centre and the vibrancy of the communities around it. Essential that communities continue to be sustainable and balanced. | Exeter St James Forum, St David's Neighbourhood Partnership, and Newtown Community Association (349) | |
| Query how our natural environment will be conserved and enhanced when it is likely the natural environment will be built on. | Farringdon Parish Council (336) | |
| Concern that land brought forward for development will be farming which is important for managing our countryside. | Farringdon Parish Council (336) | |
| Given the number and importance of protected wildlife habitats within Greater Exeter, they should be explicitly recognised as a significant environmental receptor and a key determinant of the GESP's growth plans. | RSPB (341) | |
| It is disappointing that the setting within rich and varied rural and coastal landscapes is not acknowledged explicitly as a key driver of the City's growth and an attraction to current and future residents, businesses and visitors. | RSPB (341) | |
| Explicitly recognise Green Infrastructure (GI) as a vital component of functioning prosperous communities | RSPB (341) | |
| Air pollution is not mentioned as one of the issues that Greater Exeter faces. | Transition Exeter (206) | |

| You said | Organisation/Individual | We did |
|---|---|---|
| We welcome the commitment to 'conserve and enhance our natural environment'. We would recommend that two further explicit commitments are made here: 1)protect irreplaceable ancient woodland, 2) Increase the level of tree cover. Sets out benefits of trees and woodland to place making for local communities and creating ecological resilience. | Woodland Trust (317) | |
| Healthy communities | | |
| Given the growing population of the older generation, this is becoming even more important. | Bishops Clyst Parish Council (331);<br>Clyst St George Parish Council (280) | Health and wellbeing is an important, cross cutting theme for the Greater Exeter Strategic Plan as evidenced within the draft vision which states: 'we enable prosperous and healthy lives…' and is a key priority for GESP: 'Greater wellbeing – healthy active communities with a range of facilities and services'. Health and wellbeing considerations are therefore embedded within a number of draft policy options. |
| Pollution and provision of facilities such as doctors' surgeries should be considered. | Bishops Clyst Parish Council (331) | |
| Need to provide adequate health facilities. | Clyst St George Parish Council (280) | |
| Amenity land is important to include. Benefit of nearby greenspace should be stressed. | Devon Countryside Access Forum (181) | |
| Although an ageing population is mentioned, does not mention obesity and importance of all ages exercising. | Devon Countryside Access Forum (181) | |
| Access for those with limited mobility should be included. | Devon Countryside Access Forum (181) | |
| Too narrowly defined. Primary looks at mitigating the effects of ill health rather than benefits of a positive social context. | Exeter Diocesan Board of Finance (149) | |
| Strategic review of sports provision required. | Exminster Parish Council (180) | |
| Need for 50m swimming pool in Exeter. | Exeter City Swimming Club (293) | |
| Support the development of healthy communities but believe that this should aim for socially cohesive communities. | | |

| You said | Organisation/Individual | We did |
|---|---|---|
| Enabling active travel could have significant health benefits including through the reduction in air pollution. | Exeter Cycling Campaign (357) | |
| Rural communities need as much focus as urban communities. | Exeter Northcott Theatre (170) | |
| Document should mention culture and the arts which is an important dimension of any successful city. | Exeter St James Forum, St David's Neighbourhood Partnership, and Newtown Community Association (349) | |
| Question if GESP would consider more public/permissive rights of way to connect communities or provide connections to areas where public transport can be used. | Farringdon Parish Council (336) | |
| Suggest public transport is also important for an aging population. | Farringdon Parish Council (336) | |
| Consideration of eco-friendly houses to reduce fuel poverty. | Farringdon Parish Council (336) | |
| Should include facilities for youth activities. | Individual – Mid Devon (319) | |
| Need to consider the provision of adequate community hospitals. | Individual – East Devon (131) | |
| Be more specific about responding to housing, health and social care needs of an ageing population | Individual – Exeter (91) | |
| Importance of keeping hospitals in the community and improving social care. | Individual – East Devon (31) | |
| The loss of local sports and social facilities at Winslade Park goes against local and national policy to promote healthy lifestyles. | Individual (342; 346; 362) | |
| Does this adequately reflect a need for the area to strengthen its arts offering e.g. concert hall, libraries? | Musbury Parish Council (242) | |
| Need to look wider. Important there are appropriate community facilities at a local level | Seaton Town Council (212) | |

| You said | Organisation/Individual | We did |
|---|---|---|
| for all age ranges including safeguarding of hospitals. Parks and open spaces must be factored into the plan. | | |
| Infrastructure | | |
| Broadband is very poor in the area and needs improvement. | Bishops Clyst Parish Council (331); Clyst St George Parish Council (280) | The Greater Exeter councils acknowledge that high quality development relies on the timely provision of infrastructure to ensure that the community has the facilities and services it needs in order to function successfully. With this in mind, a suite of policies are proposed which seek to direct the delivery of great places in Greater Exeter. The draft policies propose:<br>• The strategic importance of delivering great places through masterplanning<br>• The innovative mechanisms to deliver the quantity of new homes needed<br>• The application of garden city principles for allocations and a series of potential new Garden Communities (dependent on growth distribution)<br>• An infrastructure categorisation approach for Greater Exeter<br>• The strategic infrastructure proposals for Greater Exeter<br>• The expectations regarding viability appraisal |
| Existing issues need to be addressed before increasing housing, examples are provided including provision of services, road infrastructure and broadband. | Clyst St George Parish Council (280) | |
| High-speed connectivity, reliable mobile phone services and community Wi-Fi are important factors in delivering a strong economic and social structure to the wider area. The Town Council remains concerned that not enough emphasis is placed on mobile phone signal infrastructure. | Cranbrook Town Council (324) | |
| Road and rail connectivity are key issues as well as our ability to respond to flooding. | Cranbrook Town Council (324) | |
| GESP should consider not just existing capacity but the ability and potential to deliver infrastructure associated with growth and development. A further element of the GESP process should be to identify funding streams for infrastructure delivery. | David Lock Associates c/o East Devon New Community Partners (314) | |
| Too narrowly defined. Emphasis is on hard infrastructure. The creation and sustaining of communities requires appropriate infrastructure in a broader sense. Social infrastructure should be considered e.g. facilities and services. | Exeter Diocesan Board of Finance (149) | |
| Education should be considered. | Exminster Parish Council (180) | |

| You said | Organisation/Individual | We did |
|---|---|---|
| Query over capacity of Royal Devon and Exeter Hospital. | Exminster Parish Council (180) | |
| As the Greater Exeter population grows, further infrastructure will be required to ensure residents can thrive. Infrastructure capacity and location/accessibility are issues to be addressed. | Farringdon Parish Council (336) | |
| Fundamental to resolving all other issues. | GL Hearn Ltd (296) | |
| Concern development will put pressure on local infrastructure. | Hennock Parish Council (133) | |
| Note that consultation document states 'infrastructure capacity and location/accessibility are issues to be addressed'. Highways England look forward to working with those progressing GESP in terms of the Strategic Road Network to identify those locations and develop appropriate and sustainable locations. | Highways England (375) | |
| Developers must be made to contribute to bolder strategic infrastructure provision. | Individual – Exeter (100) | |
| Lack of adequate infrastructure and facilities in new developments should be addressed. | Individual – Exeter (47) | |
| All infrastructure should have the three pillars of sustainability at their heart. | Individual – East Devon (31) | |
| Sustainable economic growth and prosperity is unworkable without major infrastructure improvements and provision of key services. | Individual (342; 346; 362) | |
| Should also include the need for infrastructure to help maintain and improve the attractiveness of the area for visitors. | Lichfields on behalf of Bourne Leisure Ltd (351) | |
| More emphasis on education at all levels. | Musbury Parish Council (242) | |
| To include GI (also relevant to other themes) | Natural England (286); Devon Countryside Access Forum (181) | |

| You said | Organisation/Individual | We did |
|---|---|---|
| Should explicitly recognise Green Infrastructure as a vital component of functioning prosperous communities. | RSPB (341) | |
| Provision should include local schools and health services with improvement to public transport for those that have to travel further. | Seaton Town Council (212) | |
| Broadband is important for both residents and businesses. | Seaton Town Council (212) | |
| Provision for flooding should be provided for. | Seaton Town Council (212) | |
| Adapting to future challenges | | |
| Climate change should also be considered as part of this, local examples are provided by respondents including flooding | Bishops Clyst Parish Council (331); Clyst St George Parish Council (280) | Comments noted. The draft vision recognises that transitioning to a net-zero carbon economy future should be a key driver of the GESP. Having regard to the wide range of issues consultation responses received a suite of draft policies have been formulated which set out measures to:<br>• Support the achievement of net-zero carbon emissions by 2040 at the latest.<br>• Ensure all new development is carbon neutral and avoids overheating through design, construction and performance<br>• Help increase the use and supply of renewable and low carbon energy and heat<br>• Enable decentralised energy networks to provide local energy solutions that are smart, flexible and resilient in relation to future energy demands<br>• Enable the decarbonisation of existing and proposed heat networks, electricity and gas grids and transportation options |
| This should be something addressed and incorporated into every topic and not its own category. | Exeter Cycling Campaign (357) | |
| GESP should be resilient and flexible to adopt to future challenges and opportunities. | Exeter Cycling Campaign (357) | |
| Investment in low-cost cycling infrastructure will be a key component in ensuring Exeter's resilience and flexibility. | Exeter Cycling Campaign (357) | |
| Greater thought should be given to where any new developments are located in terms of environmental impact. | Farringdon Parish Council (336) | |
| GESP should be flexible to allow to economic pressure post Brexit. | Farringdon Parish Council (336) | |
| Lack of integration between the issues listed in particular the healthy communities and the adapting to future challenges. | Individual – Exeter (235) | |
| Natural climate change; sea levels are likely to fall rather than rise and we therefore should be preparing for drought not flooding. | Individual – East Devon (88) | |

| You said | Organisation/Individual | We did |
|---|---|---|
| No development in Flood Zone 3. | Individual – East Devon (31) | through flexible utilisation of opportunities. |
| Any growth must consider future economic and environmental challenges associated with low carbon, energy, climate change and transport. Correct locations for renewable energy installations are critical; avoid impacts on housing and green areas. | Individual (342; 346; 362) | |
| Positive steps should be taken to create a diverse economy and environment whilst safeguarding the existing character of the GESP area. | Jillings Heynes Planning (332) | |
| Agree. | Seaton Town Council (212) | |
| Other | | |
| Active design cuts across Housing, Transport, Environment, Healthy Communities and Infrastructure. Suggests a model policy for active design. | Sport England (168) | Comments noted. Active design is a an important, cross cutting theme for the Greater Exeter Strategic Plan as evidenced within the draft vision which states: 'we enable prosperous and healthy lives…' and is a key priority for GESP: 'Greater wellbeing – healthy active communities with a range of facilities and services'. Health and wellbeing considerations are therefore embedded within a number of draft policy options. |
| Should be more focussed on meeting development needs in the future and the issues this raises e.g. supply of housing. | AP Planning c/o Bovis Homes (255) | Comments noted. Please see above responses regarding housing issues. |
| Should recognise Hinckley Point is an issue on the availability of skills in the Region, could have a major impact on the delivery of infrastructure and housing in the GESP area. | AP Planning c/o Bovis Homes (255) | Comments noted. |
| Needs to recognise the balance between ensuring the protection of national and internationally recognised environment and | AP Planning c/o Bovis Homes (255) | Comments noted. |

| You said | Organisation/Individual | We did |
|---|---|---|
| habitats and the delivery of housing and employment. | | |
| Ensure consistent approach across the GESP area e.g. CIL | AP Planning c/o Bovis Homes (255) | Comments noted. |
| Healthy communities should remain at District level with the NHS, DCC and local agencies working together. | Bishopsteignton Parish Council (318) | Comments noted. |
| Transport, Infrastructure, Employment, Education and Environmental issues lend themselves to co-operation across Districts. More emphasis should be put on education and it should have its own heading. | Bishopsteignton Parish Council (318) | Comments noted. Education is now a key element of the draft vision for GESP. |
| Links between the issues need to be considered. | Crediton Town Council (Crediton Neighbourhood Plan) (189) | Comments noted. |
| The need for energy should be mentioned as a separate issue, particularly consideration of renewable energy. | Crediton Town Council (Crediton Neighbourhood Plan) (189) | Comments noted. The draft GESP policies and site options document includes a specific chapter for climate change policies and includes a number of policies to support renewable energy provision. |
| Agree there is merit in co-operating across Districts and other agencies on Housing, Transport, Infrastructure, Employment and Environmental Issues. However believe partners should set their own housing targets. | Campaign to Protect Rural England (268) | Not agreed. Housing is a key cross-boundary issue where an agreed, consistent approach between the councils is important to improve outcomes. |
| Joint working in each District with NHS and Devon County Council to promote public health. | Campaign to Protect Rural England (268) | Comments noted. The Greater Exeter councils are working closely with NHS, Devon County Council public health and the Clinical Commissioning Groups to promote public health through the GESP. |

| You said | Organisation/Individual | We did |
|---|---|---|
| Green areas should include specific areas for dog walking and dog free space in line with publication Planning for Dog ownership in New Development. | Devon Countryside Access Forum (181) | Comments noted. This will be addressed in greater detail as the GESP progresses and as part of the masterplanning process for strategic sites. |
| Concern development will diminish the rural identity of the area. | Hennock Parish Council (133) | Comments noted. |
| Query what land will be allocated for building in the Parish and will the Parish Council have a say in this. | Hennock Parish Council (133) | Yes, the next stage of consultation on the GESP sets out 40 strategic site options which are considered to have potential for inclusion within the GESP. They will not all be needed. Consultation responses will help inform decisions about those we take forwards for further work and potential inclusion within the draft version of the GESP. |
| The important role played by other towns in the area e.g. Ottery St Mary should be highlighted in the plan. | IJP (261) | |
| Comments on the absence of any reference to sport and the arts. | Individual – Exeter (306, 230) | Comments noted. The draft policies and site options includes policies to ensure well designed, vibrant, mixed use places including a range of local facilities |
| Comments on the omission of food production. GESP should provide a vehicle for addressing the balance between food-producing land and land uses for other purposes. | Individual - Exeter (250, 223) | The Greater Exeter Councils recognise that food production is an important issue. However, this is outside of the scope of the Greater Exeter Strategic Plan and is therefore more appropriately addressed through other plans/programmes and initiatives |
| Significant weight should be given to leisure and wellbeing. | Individual – Teignbridge (249,230) | Health and wellbeing is an important, cross cutting theme for the Greater Exeter Strategic Plan as evidenced within the draft vision which states: 'we enable prosperous and healthy lives…' and is a key priority for GESP: 'Greater wellbeing – healthy active communities with a range of facilities and services'. Health and wellbeing considerations are therefore |

| You said | Organisation/Individual | We did |
|---|---|---|
| | | embedded within a number of draft policy options. |
| Two major issues missing that GESP could address: Geographical disparity/inequality and ongoing transparency and accountability. | Individual – (226) | Noted. |
| More consultation is needed with those who live in the area. | Individual – Teignbridge (122) | The GESP will be subject to various stages of public consultation as it progresses. An issues' consultation was held in 2017 in order to stimulate debate and gather views on the scope and content of the new joint plans, the key issues facing the area and to provide local knowledge. This next stage of consultation seeks views on a range of draft policies and site options. |
| Do not reflect the issues facing those that to not actively engage with Exeter. No mention of some substantial settlements in the area. | Individual – Teignbridge (107) | Comments noted. |
| Additional issue is the area's relationship with rest of Devon, Cornwall, Bristol and London. | Individual – East Devon (102) | Comments noted. |
| Change the name; 'Greater Exeter' is misleading. | Individual – Mid Devon (320) | Not agreed. The name reflects the need to address cross border issues and the sphere of influence of Exeter which is going to be key for the city and the neighbouring authorities. The impact of Exeter is felt beyond the boundaries of the city on a regional scale in terms of the economy, housing need and transportation patterns. This area of influence has expanded to encompass East Devon, Mid Devon and Teignbridge. Together with Exeter City itself, this wider area can now be regarded as 'Greater Exeter'. |
| Danger that Exeter will dominate the process; needs of those not in city or towns needs to be considered. | Individual – East Devon (41) | |

| You said | Organisation/Individual | We did |
|---|---|---|
| Those who live and work in the GE area should not just be consulted but should be actively represented in the shaping of decisions. | Individual – East Devon (31) | The joint plan is subject to separate decisions by each of the local planning authorities. Therefore, all four local planning authorities need to approve the plan at each relevant stage in accordance with their own constitutions/scheme of delegation and on behalf of the constituents they represent.<br><br>Further to this, the GESP is being prepared with full involvement of local communities. The GESP partner authorities approach to involvement is set out in the joint draft Statement of Community Involvement. |
| Governance (compliance) for growth | McMurdo Land Planning and Development Ltd (271) | |
| Agree with issues identified but argue a blanket approach will produce a one sided plan. Argue each town and village has its own unique issues and requirements. | Newton Abbot Town Council (264) | Comments noted. Please see responses above in relation to housing issues. |
| The issues are caused by new homes, yet new homes can help resolve issues. | Ogwell Neighbourhood Plan Steering Group (195) | |
| To understand infrastructure and capacity issues it is necessary to identify the transport opportunities and constraints, and environmental assets. These key issues are rightly addressed by GESP. | Peter Brett Associates (167) | |
| Overall welcome the identification of these strategic issues, particularly housing as a key issue. | Planning Sphere Ltd (166) | |
| Should only have headings and let residents and businesses say how they feel and what they want. | Sidmouth Chamber of Commerce (75) | |

| You said | Organisation/Individual | We did |
|---|---|---|
| Heart of Teignbridge and Newton Abbot in particular should be the focus for further sustainable development allocations | WYG c/o Sibelco (215) | |
| Suggestion to include inequality as an additional issue. | Exeter Civic Society (356) | |
| Concern that consultation does not ask for ideas to solve or mitigate issues at this stage. | Exeter Civic Society (356) | Not agreed. The initial 'issues' consultation sought to do this. It represented the first stage in the process, asking communities to comment on the content of the plan, provide local knowledge and stimulate debate early on in the process. |
| Believe that the provision of GESP is to deal with Exeter City's issues. Concern over mass development. | Farringdon Parish Council (336) | The GESP is being prepared in order to address the need for cross border co-ordination of issues affecting Exeter and the neighbouring authorities. The impact of Exeter is felt beyond the boundaries of the city on a regional scale in terms of economy, housing need and transportation patterns. A joint plan will give a clear strategy for the area to address these issues. |
| Would like to see more spatial specificity e.g. context of towns and constraints. | Pegasus Group on behalf of Lightwood Land (358) | Comments noted. |
| Critical to ensure that detailed and early work is undertaken to fully understand the specific issues which need to be addressed. This work should be undertaken at an appropriate level, recognising the settlement hierarchies which exist across the current Local Plans. | Stride Treglown (283) | Comments noted. |
| No reference to culture and tourism in issues; reference to Teign Estuary? | Teignmouth Town Centre Management Partnership (116) | Comments noted. Tourism matters are being considered through Teignbridge District Council's Local Plan Review. |

| You said | Organisation/Individual | We did |
|---|---|---|
| Only port in area not mentioned. | Teignmouth Town Centre Management Partnership (116) | It is considered that this is matter for the Teignbridge Local Plan to consider. The Devon Minerals Plans also considers the role of Teignmouth docks. |
| 'Degradation of the public realm' is not mentioned. The Plan should be seeking to build 'place' within our towns and city. | Transition Exeter (206) | The provision of high quality development and a focus of delivery are two key elements of the GESP draft vision. Therefore the draft policies and site options document include a number of policy mechanisms to secure the delivery of great places through masterplanning. |
| Not enough emphasis on need to build cohesive communities; divide between flourishing parts of Exeter and elsewhere in city and rural areas. | Transition Exeter (206) | |
| **3) Is the draft vision appropriate for guiding the future of the Greater Exeter area up to 2040? If not, what changes would you like to see?** | | |
| Tourism and the recognition of its relationship with the area's economy should be given a higher profile and its relationship with the environment. | Bishopsteignton Parish Council (318) | Comments noted. A wide range of responses were received in respect of the vision. These were collated and the GE councils have revised the draft vision as follows:<br><br>**Greater Exeter – Our Vision**<br><br>***THE PLAN***<br>*The Greater Exeter Strategic Plan makes the big, cross-boundary decisions about growth infrastructure and environment in the Greater Exeter area looking many years ahead. The innovative planning and ambitious investment decisions taken together by the local authority partners aim to realise our potential by creating great places for all people to live full lives.*<br><br>***THE PLACE*** |
| Sustainable farming and food production should be mentioned | Bishopsteignton Parish Council (318) | |
| Should have greater consideration of rural villages and their separate identities | Bishopsteignton Parish Council (318) | |
| Heritage is recognised in themes but not vision. Suggests the following:<br>"Our exceptional coastal, rural and historic and cultural heritage environments are maintained and enhanced."<br>"Growth is sustainable, resilient and proactively managed through good quality inclusive design to benefit both urban and rural communities." | Historic England (120) | |
| Support Vision | Exminster Parish Council (180); Cranbrook Town Council (324); Exeter Cycling Campaign (357) | |

| You said | Organisation/Individual | We did |
|---|---|---|
| Greater emphasis on ensuring that growth increases the quality and liveability for future generations. | Exeter Cycling Campaign (357) | *In 2040 we are a sustainable, accessible and networked city region of linked but distinct communities. Our economy is carbon neutral and productive. We invest in our citizens, celebrate the area's beauty and continue to work together for mutual long term benefit. We fully utilise our unique south western city-town-country-coast environment and our growing academic and skills base for smart growth. We enable prosperous and healthy lives in high quality homes and increasingly self-sufficient communities with access to great greenspaces and high quality jobs linked by a reliable, sophisticated and sustainable transport system.*<br><br>***THE PRIORITIES***<br>• *Greater efficiency – to be carbon neutral by 2040*<br>• *Greater ambition – hardwiring delivery in from the start*<br>• *Greater innovation – fast growth in cutting edge businesses including becoming the UK centre for data analytics, environmental futures, health innovation, smart transport and other digital future businesses*<br>• *Greater connectivity –gigabit ready communities with majority sustainable travel*<br>• *Greater prosperity – local wages rise to above the national average* |
| Greater emphasis on sustainable growth ensuring that it not an abstract concept. | Exeter Cycling Campaign (357) | |
| Does not have much meaning, it is difficult to see how it will guide the content of GESP. | Exeter Green Party (297) | |
| The pursuit of economic growth leading to more land take, greater travelling distance and working in unsustainable and fragile sectors without local infrastructure to support communities is outdated and will fail before 2040. | Exeter Green Party (297) | |
| Vision should address climate change by embracing a prosperous low carbon and circular economy supporting an inclusive society and equally valued jobs, respecting the physical and environmental limits that Exeter has. The importance of distinctive communities and networks they create and sustain should be recognised. | Exeter Green Party (297) | |
| Low carbon, energy, climate change and transport are mentioned as challenges, they should also be mentioned as opportunities. | Crediton Town Council (Crediton Neighbourhood Plan) (189) | |
| "Our exceptional coastal and rural environments are maintained and enhanced, supporting the healthy lifestyles of our communities" is supported but implied access to green space and nature is to be achieved outside of urban areas." | Natural England (286) | |
| Vision is a summation of the issues and challenges facing the area rather than a positive statement about planning to deliver land use | AP Planning c/o Bovis Homes (255) | |

| You said | Organisation/Individual | We did |
|---|---|---|
| related growth balanced with the protection of the environment going forward. | | • *Greater places for people – providing the homes we need in high quality neighbourhoods with the right infrastructure in the right places*<br>• *Greater places for nature – rebuilding biodiversity and peoples' access to it*<br>• *Greater education – nurturing, attracting and retaining a world class workforce*<br>• *Greater wellbeing – healthy active communities with a range of facilities and services*<br><br>Further comments on this amended vision are invited as part of the draft policies and site options consultation. |
| Will only work if all outstanding issues are addressed first. Main issue is transport. | Bishops Clyst Parish Council (331);<br>Clyst St George Parish Council (280) | |
| Provision for an ageing population. | Exminster Parish Council (180) | |
| Reference to the need to provide for adaptable housing for older people. | Blue Cedar Homes (299) | |
| Draft Vision is well phrased but it is vital that new development is sympathetically managed so as not to destroy the environment and in particular the very special landscape that forms the Greater Exeter area. | Chardstock Parish Council (187) | |
| Increased Park and Ride facilities serving the northern approaches | Coldridge Parish Council (97) | |
| Vision for education should be mentioned including links with Higher Education in the area and the economy. | Crediton Town Council (Crediton Neighbourhood Plan) (189); Exminster Parish Council (180) | |
| Biased in favour of business development, should recognise the importance of tourism, agriculture, landscapes, historic towns and cities and leisure. This future will be jeopardised by overdevelopment and losing valued landscapes and productive land. | Campaign to Protect Rural England (268) | |
| Change first sentence to 'The unique benefits of having a thriving, historic, University City situated within a network of rural towns and villages and an ecologically rich countryside, are maximised. | Devon Wildlife Trust (213) | |
| In its current form does not address National Planning Practice Guidance. It is a generic vision that could apply to other districts/plan areas in the country. | GL Hearn Ltd (296) | |

| You said | Organisation/Individual | We did |
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| Suggest vision should seek to prioritise an ambitious economic-led strategy that is more aligned with the wider strategies of the area e.g. Heart of the South West Devolution Prospectus. | GL Hearn Ltd (296) | |
| Vision should seek to address unsustainable commuting patterns by facilitating greater levels of self-containment. | GL Hearn Ltd (296) | |
| Implementation of GESP and monitoring of its effectiveness relies on a clear set of measurable targets. The Vision as currently drafted is ambiguous which some elements cannot be quantified. | GL Hearn Ltd (296) | |
| Tourism is a key component in the Greater Exeter area yet there is no reference within the draft Vision. | GL Hearn Ltd (296) | |
| Vision and Objectives are critical components of the emerging GESP, they will underpin all policies and proposals that will follow. Therefore it is crucial the vision is informed by and compatible with all other strategic documents and local plans. | GL Hearn Ltd (296) | |
| Concern that vision makes no reference for the need for additional housing. | Gladman Developments Limited (160); Lichfields on behalf of Mr Peter Lee and Tim Davey (343); Lichfields on behalf of Mr Roger Cooke (295) | |
| Vision needs to make more explicitly the importance of boosting housing supply and where these will be located. The benefits of this assisting in delivery of other aspects of the vision e.g. infrastructure should also be recognised. | Gleeson Developments Limited (262) | |
| Consider it essential that the Vision should positively state a commitment to meet the | Planning Sphere Ltd (166) | |

| You said | Organisation/Individual | We did |
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| identified housing need, reducing the affordability gap and providing greater diversity in the type and location of housing in the area. | | |
| Reference should be made to creating sustainable patterns of development. | Jillings Heynes Planning (332) | |
| Vision is too general, applies to urban areas and seems to be a vision for Exeter rather than small communities. | Hennock Parish Council (133) | |
| Penultimate sentence should be included 'towns and larger villages will be allowed to thrive to maintain important local services.' | IJP (261) | |
| Remove reference to 'unique', there are numerous examples of a City surrounded by rural towns/villages/ | Jillings Heynes Planning (332) | |
| Support the ambition of growth and it being directed to both urban and rural areas. | Jillings Heynes Planning (332) | |
| Governance for growth is a key issue | McMurdo Land Planning and Development Ltd (271) | |
| Imaginative reuse of brownfield land | McMurdo Land Planning and Development Ltd (271) | |
| Include cultural self-sufficiency of the area. Celebrate more cinemas, art galleries, museums, concert venues etc. | Musbury Parish Council (242) | |
| The vision has to be wide enough to encompass the four Local Planning Authorities. | Persimmon Homes South West (259) | |
| Support a vision designed to build on the economic successes and new growth opportunities and recognises the need to support economic objectives with housing supply. | Persimmon Homes South West (259) | |
| The draft vision is narrow in its aspiration for encouraging economic growth. The Road | Road Haulage Association (303) | |

| You said | Organisation/Individual | We did |
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| Haulage Association is keen to promote higher skills and professional development for managers and owners in the transport industry. | | |
| Vision is generally supported as it emphasises the importance of Exeter and the role to be played by other towns, as well as recognising the area's key natural assets. | RPS Group (301) | |
| Vision could be more ambitious in recognising vibrant and self-functioning new communities in locations accessible to Exeter. | RPS Group (301) | |
| Draft vision is broadly supported however it should include explicit reference to meeting the housing and economic development needs of the region. | Savills on behalf of Bloor Homes (325) | |
| Vision too long suggestion of 'By 2040 the Greater Exeter area will be prosperous and sustainable whilst being a unique and distinctive place where people choose to live, work and visit because everyone can realise their full potential and enjoy a high quality lifestyle.' | Seaton Town Council (212) | |
| Vision is far too focussed on Exeter. | Seaton Town Council (212) | |
| Support section 'our exceptional coastal and rural environments are maintained and enhanced, supporting the healthy lifestyles of our communities'. Should be one of the key aims and objectives of the plan. | Seaton Town Council (212) | |
| Should be a publication at least annually of what has been achieved and how the partnership has performed. | Seaton Town Council (212) | |
| Do not agree with vision. Instead should seek to develop a serious set of proposals that will bring benefit to Greater Exeter and its residents. There | Sidmouth Chamber of Commerce (75) | |

| You said | Organisation/Individual | We did |
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| is no evidence that the combined planning authorities have the skills to identify sectors or businesses that should receive favourable treatment within the Plan. | | |
| Debatable whether the combination of a thriving University City and network of rural towns and villages is 'unique'. | WYG c/o Sibelco (215) | |
| Recognition of the role of Exeter as a focus for investment and innovation and its potential to expand is supported. | WYG c/o Sibelco (215); WYG (146) | |
| However GESP should plan positively to meet the housing and employment needs where they arise. | WYG c/o Sibelco (215) | |
| Evidence required to demonstrate why it is appropriate for Greater Exeter to become a global leader in addressing economic and environmental challenges associated with low carbon energy and climate change. Should not place undue burdens on landowners and developers that could impact on the delivery of housing and jobs. | WYG c/o Sibelco (215); WYG (146) | |
| Question the evidence basis or relevance specifically to aspire to be a 'global leader in low carbon energy or climate change' which itself is not a driver of the strategy. | David Lock Associates c/o East Devon New Community Partners (314) | |
| Recognition of role of Exeter as a focus for investment and innovation supported. | WYG (146) | |
| For most part it is appropriate, however there is only minimal mention of transport in reference to the economic and environmental challenges. As a proven drive of economic growth, and likely to undergo significant changes during the plan's | Highways England (375) | |

| You said | Organisation/Individual | We did |
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| period the role of transport and in particular the Strategic Road Network should not be understated. | | |
| The full OAHN for Greater Exeter should form part of the vision for the Exeter Region. Suggested wording is provided by respondent. | Barton Willmore c/o Barratt David Wilson Homes (367) | |
| An explicit reference to grow the role of Exeter sub-region in the south west, should be made in the vision. | David Lock Associates c/o East Devon New Community Partners (314) | |
| Sports facilities set on the outskirts of Exeter with close links to major roads and hotels. This brings in major events which raise the profile of the city and bring in money via visitors. | Exeter City Swimming Club (293) | |
| Multi sport complex in Exeter which would benefit local communities and the economy. | Exeter City Swimming Club (237) | |
| Whilst supporting innovation and development of new industries, do not neglect the existing ones. | Exeter Northcott Theatre (170) | |
| GESP should be mindful to the quality of life here, this is what will attract and grow the region. | Exeter Northcott Theatre (170) | |
| Does not say enough about the City Centre which is the key economic and cultural heart of the plan area and will be the key to the success of the plan. | Exeter St James Forum, St David's Neighbourhood Partnership, and Newtown Community Association (349) | |
| Draft vision only refers to the economic and environmental challenges. It should also mention social aspects such as the challenges associated with the need for increased housing, leisure and community provision. | Genesis Town Planning Limited (353) | |
| Vision should be changed to include a statement on meeting housing needs. | Home Builders Federation (369) | |

| You said | Organisation/Individual | We did |
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| The Greater Exeter Draft vision should be re-drafted to include reference to meeting the area's housing needs in the right locations at the earliest opportunity. | Turley on behalf of Bloor Homes South West Ltd (339); Turley on behalf of Gallagher Estates Limited (354) | |
| Should include reference to the tourism industry as a key driver within the sub-regional economy, in recognition of its major role as a source of local income and employment in the Strategic Plan area. | Lichfields on behalf of Bourne Leisure Ltd (351); Individual – Teignbridge (228) | |
| Support vision. Whilst specific reference to meeting the needs of the elderly would be useful it is strongly implied with the statement 'the needs of Greater Exeter's Communities are embraced'. | McCarthy & Stone Retirement Lifestyles Ltd. c/o The Planning Bureau Ltd (345) | |
| Vision should be widened so that different towns and their environs within the plan area have a targeted vision for the future. | Pegasus Group on behalf of Lightwood Land (358) | |
| Vision should explicitly articulate an ambition to improve residents' quality of life. | RSPB (341) | |
| Environmental conservation as a principle should not outweigh the need to meet the full housing needs of the region. Substantial areas of greenfield land will need to be identified as strategic allocations through the emerging plan. | Lichfields on behalf of Mr Peter Lee and Tim Davey (343); | |
| Significance of Culm Garden Village and the opportunities it presents should be clearly recognised within the vision. | Lichfields on behalf of Mr Roger Cooke (295) | |
| Vision as currently drafted appears to be overly focused on Exeter. Offers ways to improve draft vision section in order to set out clear long term aspirations for both the GESP and the lower tier plans which are to follow. | Stride Treglown (283) | |

| You said | Organisation/Individual | We did |
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| Needs to be more locally distinctive. More clarity needed on what being a global leader means. | Teignmouth Town Centre Management Partnership (116) | |
| A degree of realism is needed that would make it more believable; e.g. Devon/UK is not currently global leader in way described but is good aspiration for the future. | Transition Exeter (206) | |
| Does not capture the need to build people-centric, safe, pleasant 'places' in our towns and cities. Neither does it talk about driving down pollution. | Transition Exeter (206) | |
| Define what is meant by 'growth is sustainable' | Transition Exeter (206); Individual – Exeter (223) | |
| Given level of development proposed essential that green infrastructure is maintained and enhanced; high quality green infrastructure design will be required in order to maintain biodiversity and connectivity and to mitigate the impacts of development. | Woodland Trust (317) | |
| Should be less emphasis on the University as a driver of the sub-regional economy and more recognition of the natural capital including grade 1 and 2 agricultural land which is no longer being cultivated to its full potential. | Individual – Exeter (100) | |
| Too much emphasis on University; recognise contribution but also has negative points | Individual – Exeter (11) | |
| The draft vision assumes we already have healthy lifestyles. It should stay 'to support increasingly healthy lifestyles for our communities'. | Individual – Exeter (310) | |
| Aspirations are non-specific so it will always be possible for the Councils to say that they have achieved them. SMART objectives are essential. | Individual – Exeter (306) | |
| Queries focus on economic growth. Not essential for the future of the city and failing to consider | Individual – Exeter (306) | |

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| whether it is needed leads to poor quality planning. | | |
| What are the 'unique benefits' referred to in the first sentence? How can they be maximised? | Individual – Exeter (250) | |
| More emphasis needed on sport and leisure facilities. | Individuals – Teignbridge (246); East Devon (238); Exeter (216) | |
| Huge destruction of the countryside will compromise the ability of future generations to meet their own needs. | Individual – East Devon (233) | |
| Draft vision focuses too much on Exeter as a central hub for growth rather than as one node in a network of equal cooperating communities. | Individual – (226) | |
| Vision should state 'zero carbon' rather than 'low carbon being the goal. | Individual – (226) | |
| States that more traditional skilled crafts and trades should also be included in the vision as economic goals to aspire to. | Individual – (226) | |
| Would be good to see some indication in the "vision" for limits to growth. | Individual – Exeter (193) | |
| Would like to see the balance of growth in housing between Tiverton and Cullompton much more relative to their population sizes. | Individual – Mid Devon (184) | |
| Would like to see sustainability coupled with growth. Suggests inclusion of 'whilst ensuring growth is sustainable' after '…new growth opportunities realised'. | Individual – Exeter (174) | |
| We should not be assuming a population growth. It is this growth which is unsustainable. | Individual – (164) | |
| It should mention that this is an area that others like to visit, and that we should be making it more accessible to and supportive of such visitors. | Individual – East Devon (151) | |

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| Questions accuracy of the claim that 'the area is a global leader addressing the economic and environmental challenges associated with low carbon, energy, climate change and transport. | Individual – East Devon (131) | |
| Would like to see a more sustained emphasis on sustainable development, protecting Devon against further sprawl and a reliance of cars. | Individual – East Devon & Exeter (124) | |
| Vision appropriate but questions presentation; additional text may be more useful, e.g. reference to historic and cultural heritage assets. | Individual – East Devon (77) | |
| More consideration should be given to a large number of retired couples who are likely to relocate to the area. | Individual – Teignbridge (122) | |
| Vision is very Exeter-centric. Suggests a vision for 'Southern Devon' along the lines of a largely rural area with a few small towns and the small city of Exeter. | Individual – East Devon (102) | |
| Suggests that global leadership visions are unrealistic. Suggests more achievable goals for wage levels and life expectancy. | Individual – East Devon (102) | |
| Less optimism, more economic realism. | Individual – Exeter (91) | |
| Set challenging targets – e.g. 100% carbon neutral developments, % jobs above minimum wage, low cost homes for rent and purchase. | Individual – Exeter (47) | |
| Need a vision of improvement and excellence for the lives of all our residents. | Individual – East Devon (41) | |
| Would like to see community participation written into the vision. | Individual – East Devon (31) | |
| Increased importance must be placed upon the preservation of landscape and natural environment. | Individual – East Devon (27) | |
| Plan must be adaptable to future challenges to ensure sustainable development. | Individual (342; 346; 362) | |

| 4) Have we missed anything?<br>If yes, what additions or changes should we make? (This referred to themes for the GESP) | | |
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| Housing theme | | |
| Suggest to remove the housing theme as argue these issues are properly addressed at a district level with local communities. | Bishopsteignton Parish Council (318); Campaign to Protect Rural England (268) | Comments noted. A wide range of responses were received in respect of housing issues. Taking these issues into account a number of draft policies have been formulated to include:<br><br>• A housing delivery target to include affordable homes, custom and self-build homes and gypsy and traveller provision.<br>• A total provision of new homes in future local plan reviews<br>• A requirement for quality new places by ensuring that new homes are accessible.<br><br>In terms of establishing housing need across the GESP area, the government's standard method set out in national policy gives the Greater Exeter housing need at 2,663 homes per year. The calculation uses data from the Office of National Statistics (ONS) 2014-based household projections and Office for National Statistics (ONS) 2018 household affordability statistics. |
| Housing density should be considered and should be relevant to the setting. | Exminster Parish Council (180) | |
| Recognition of how housing can help sustain local communities, existing shops, services and facilities. | Genesis Town Planning (172) | |
| Deliverability is an important consideration to take into account. | Gladman Developments Limited (160) | |
| Quantity and cost bullet should be amended to make it clear that the quantity of housing will need to be increased e.g. 'more and better quality housing'. | Gleeson Developments Limited (262) | |
| Should specifically identify the levels of housing growth required for the area at this stage of the process. | IJP (261) | |
| Still a significant shortfall of under provision in housing which will add further pressure on provision of new housing. Should not just take a minimum stance on supply. | Persimmon Homes South West (259) | |
| Government funding to assist in delivering infrastructure for major expansion schemes should continue to be sought. | Persimmon Homes South West (259) | |
| Objectives for housing should not be about cost but affordability. | Peter Brett Associates (167) | |
| Focus on building homes for life and future proofing them. | Seaton Town Council (212) | |
| Homes built in a manner sympathetic to their local environment. | Seaton Town Council (212) | |

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| Do not accept the large scale housing provision is the starting point, there should be a debate whether this is inevitable or desirable. | Sidmouth Chamber of Commerce (75) | |
| Should prioritise issues that need to be addressed. In this regard a key focus should be to identify and delivery the quantity of housing to meet the needs and the strategy of the area. This will require a new assessment of the OAHN's likely to result in an increase in requirement. Aspirations in relation to healthy communities (for instance) may be of secondary importance and should not detract from key objectives. | David Lock Associates c/o East Devon New Community Partners (314) | |
| What is meant by type of home? | Exeter Civic Society (356) | |
| Will Exeter City Council's residential design guide SPD be retained or will be superseded by guidance at a strategic level. | Exeter Civic Society (356) | |
| Plan should revisit current policies on housing density and energy use standards as part of housing quality. Facilitate use of the planning system to influence alternative ownership and renting models, examine temporary populations e.g. students, provision of communal green space should be integral to all housing development. | Exeter Green Party (297) | |
| Local distinctiveness in housing design. | Teignmouth Town Centre Management Partnership (116) | |
| Plan should specifically recognise rent to buy as a tenure. The Housing Theme should include 'tenure' as a separate bullet point, to properly reflect the full range of needs across the Plan area. | Tetlow King Planning for Rentplus (363); Tetlow King for South West HARP Planning Consortium (371). | |
| We need a balance between home ownership and rented accommodation. There is also an | Transition Exeter (206) | |

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| urgent need to improve the energy efficiency of the existing housing stock. | | |
| The current model of putting new housing for families on the outskirts of Exeter whilst allowing areas in the city centre to become dominated by student accommodation is unbalanced and will create a city culture that is off-putting to many people. | Transition Exeter (206) | |
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| Questions where need data is. Full implications of growth in housing in the 20 year period is still to be experienced. | Individual – Teignbridge (266) | Comments noted. A wide range of responses were received in respect of housing issues. Taking these issues into account a number of draft policies have been formulated to include:<br><br>• A housing delivery target to include affordable homes, custom and self-build homes and gypsy and traveller provision.<br>• A total provision of new homes in future local plan reviews<br>• A requirement for quality new places by ensuring that new homes are accessible.<br><br>In terms of establishing housing need across the GESP area, the government's standard method set out in national policy gives the Greater Exeter housing need at 2,663 homes per year. The calculation uses data from the Office of National Statistics (ONS) 2014-based household projections and Office for National Statistics (ONS) 2018 household affordability statistics. |
| Missing reference to energy efficiency. | Individual – Exeter (235) | |
| Houses should be designed to incorporate off-road parking, either by under house or road garage (space allowing). | Individual – Mid Devon (319) | |
| Proportions of affordable housing should be set out in planning policies. They plan should also facilitate social housing. | Individual – Exeter (250) | |
| Congestion and pollution should be a driving factor when planning any new housing development in the city. | Individual – Exeter (139) | |
| Finding routes to delivering social housing is needed. | Individual – Teignbridge (107) | |
| We should challenge housing target assumptions; local need could be met with much lower numbers | Individual – East Devon (41) | |
| Economy and employment theme | | |

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| Links between education and industry should be made | Exminster Parish Council (180) | Comments noted. A wide range of responses were received in respect of economic and employment issues. Taking these issues into account a series of draft policies to cover economic issues are proposed. These include:<br>• A target for extra jobs<br>• Doubling the size of the economy<br>• Measures to increase business growth<br>• Support for digital exchanges<br>• Aim to deliver employment land within Greater Exeter<br>• Strategic guidance on the review and allocation of employment sites in local plans and with planning permission<br>• Protection and support for key economic assets<br>• Proposals for Exeter Airport<br>• Support for skills, education and training |
| Should specifically identify the levels of economic growth required for the area at this stage of the process. | IJP (261) | |
| Although implicit, there is no reference to increasing productivity as part of the vision for building economic success. | Heart of South West Local Enterprise Partnership (176) | |
| Representation lists the key innovation assets which have been identified in the Innovation Exeter Strategy. They note these assets are concentrated within the city of Exeter and the western end of East Devon. Future plans for the expansion of the airport are planned and urge Councils to consider benefits of that investment in their growth strategy. | Persimmon Homes South West (259) | |
| Objectives for employment should recognise the importance of the location of new investment in relation to population and workforce, transport services and other facilities as well as quantity and types of jobs. | Peter Brett Associates (167) | |
| Consider sector specialisms and accommodate supply chains in the same area. | Seaton Town Council (212) | |
| Make reference to small and micro businesses. | Seaton Town Council (212) | |
| Education and re-education and the different forms this should take to meet the challenges over the next 30 years. | Seaton Town Council (212) | |
| Would like to see a commitment of protecting the environment and achieving economic growth. Do not accept economic growth as desirable in itself if it is at the cost of health, environment and quality of life. | Sidmouth Chamber of Commerce (75) | |

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| Need reference to farming and other elements of the land based economy which is a large part of the GESP area and its relationship to the urban areas. | Exeter Green Party (297) | |
| The importance of SMEs and social enterprises should be recognised and their development facilitated by planning policies. | Exeter Green Party (297) | |
| Should include a clear acknowledgement of the contribution that the tourism industry makes to the sub-regional economy and the opportunities presented by this sector. | Lichfields on behalf of Bourne Leisure Ltd (351) | |
| Should encourage the local economy, particularly in manufacturing. | Transition Exeter (206) | |
| No mention of the agricultural economy. | Individual – Exeter (100) | |
| Environment theme | | |
| Should include creating new special places. | Environment Agency (329) | Comments noted. Having regard to the issues consultation responses received, a series of policies are proposed, to include:<br>• Ensuring that developments provide at least a 10% overall enhancement in biodiversity<br>• Providing a strategy to protect the internationally important wildlife sites of the Exe Estuary, Dawlish Warren and East Devon Pebblebed Heaths through the funding of on-site management and off-site Suitable Alternative Natural Greenspace (SANG) |
| A theme of water quality should be included. | Environment Agency (329) | |
| Importance of ecological networks. | Devon Wildlife Trust (213) | |
| Policies for carbon neutral housing and percentage of energy from renewable sources | Exminster Parish Council (180) | |
| Conserving green buffers between Exeter and village on outskirts | Exminster Parish Council (180) | |
| Protect areas of great landscape value. | Exminster Parish Council (180) | |
| Insufficient detail, e.g. conserving and enhancing our environment, how will this be achieved? | Hennock Parish Council (133) | |
| Heritage aspect to include the built and natural environment. | Musbury Parish Council (242) | |
| Protecting the green wedge should be added. | Seaton Town Council (212) | |
| Would like to see a commitment of protecting the environment and achieving economic growth. | Sidmouth Chamber of Commerce (75) | |

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| It will be necessary to review all development opportunities within Exeter City's administrative area by reviewing the evidence base relating to previously identified constraints e.g. landscape and visual considerations on Exeter's northern fringe. | WYG (146) | • Defining new limits to the Clyst Valley Regional Park and provide a strategy for its protection and enhancement.<br>• The planting of 10,000 hectares of new tree planting to link with existing woodland networks.<br><br>Alongside the draft GESP a draft Green Infrastructure Strategy will be published, setting out the locations of existing areas of high biodiversity, the corridors and sustainable movement networks that connect them, and the key areas of accessible open space.<br><br>See also responses in relation to climate change, as addressed through the draft policies proposed within the 'Climate Emergency' chapter of the draft policies and site options consultation document. |
| The environment should not be considered in isolation but need to be fully considered under each topic. Should consider the local environment including streets and spaces as well as the global environment addressing climate change. Suggestion that cycling can provide benefits for local and global environment. | Exeter Cycling Campaign (357) | |
| Environmental issues need to be a golden threat running through all themes. Topics listed are important but overall scope is too limited. | Exeter Green Party (297) | |
| Absence of pollution is a major omission. | Exeter Green Party (297) | |
| Opportunity to adopt best waste collection practices across the area is not mentioned. | Exeter Green Party (297) | |
| Forests and trees have an important role in carbon management and should in encouraged in planning policies. | Exeter Green Party (297) | |
| Joint Strategic Plan is the correct forum for dealing with strategic mitigation matters with regards to development impacts upon the Pebblebed Heaths Special Protection Area (SPA), Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) and the Exe Estuary SPA and SSSI. Emerging plan should seek to identify a number of Suitable Alternative Natural Green Spaces (SANGS) which could be funded through the existing CIL regime; potential to ease development constraints on Exmouth. | Lichfields on behalf of Mr Peter Lee and Tim Davey (343) | |

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| Importance of agriculture should be recognised. | Transition Exeter (206) | |
| 'Environment' section does not mention the need to tackle pollution in its various forms. We need a joined-up approach to waste collection and recycling. | Transition Exeter (206) | |
| Reference to water and air quality. | Individual – Exeter (235) | See above |
| Needs to be 'Sustainably enhanced'. | Individual – Exeter (310) | |
| GESP should ensure that all policies advance the goals of the Paris Climate Agreement. | Individual – Exeter (250) | |
| Omission of recognition of land as a natural resource for food or more broadly as the provider of ecosystem services. | Individual – Exeter (250) | |
| Nothing on the surrounding hills due to water retention they provide. | Individual – Teignbridge (162) | |
| Must protect our River & Valley Parks to ensure there is no encroachment by development, whatever the pressures. | Individual – Exeter (139) | |
| Loss of green space | Individual – East Devon (18) | |
| Adapting to future challenges | | |
| Specific reference to climate change and coastal erosion should be made. | Environment Agency (329) | Comments noted. The draft vision recognises that transitioning to a net-zero carbon economy future should be a key driver of the GESP. Having regard to the wide range of issues consultation responses received a suite of draft policy options have been formulated which set out measures to:<br>• Support the achievement of net-zero carbon emissions by 2040 at the latest. |
| Should also consider air quality | South Somerset District Council (118) | |
| Should include bullet to read 'significant increases in older persons' | Blue Cedar Homes (299) | |
| Future challenges could also be an opportunity e.g. potential for renewable energy sources. | Crediton Town Council (Crediton Neighbourhood Plan) (189) | |
| Policies for carbon neutral housing and percentage of energy from renewable sources | Exminster Parish Council (180) | |
| A very rapidly growing population. | Sidmouth Chamber of Commerce (75) | |
| Add population growth. | Exeter Civic Society (356) | |

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| Want to emphasise that this should not be its own category but something that needs to be addressed and incorporated under each topic. | Exeter Cycling Campaign (357) | • Ensure all new development is carbon neutral and avoids overheating through design, construction and performance<br>• Help increase the use and supply of renewable and low carbon energy and heat<br>• Enable decentralised energy networks to provide local energy solutions that are smart, flexible and resilient in relation to future energy demands<br>• Enable the decarbonisation of existing and proposed heat networks, electricity and gas grids and transportation options through flexible utilisation of opportunities. |
| These are not future challenges they are present one. The real future challenges are those we don't yet know. | Exeter Green Party (297) | |
| Climate change initiatives should be reinforced without further degrading public and environmental assets e.g. traditional flood prevention. | Exeter Green Party (297) | |
| The need to mitigate the scale of climate change through the urgent reduction of carbon emissions must be addressed | Transition Exeter (206) | |
| Reference changing demographics and an ageing population. | Individual – Exeter (235) | Comments noted. These issues have been incorporated within the draft policies and site options document which includes a number of provisions to reflect the housing needs of older people and people with disabilities. The document also includes policies to ensure well designed, vibrant, mixed use places including a range of local facilities. |
| Consider the ageing population as an issue/area in its own right, including potential new role for councils: encouraging downsizing to free up properties; coordinated social care and home help services; identify future needs. | Individual – East Devon (84) | |
| Needs to include reference to relocation of space to make the most beneficial use of public realm. | Individual – Exeter (174) | |
| Provision of local facilities (e.g. doctors, dentists, school, and shops) needs more emphasis. | Individual – Teignbridge (114) | |
| Infrastructure | | |
| Include the identification and upgrading of inadequate strategic infrastructure. | Environment Agency (329) | The Greater Exeter councils acknowledge that high quality development relies on the timely provision of infrastructure to ensure that the community has the facilities and services it needs |
| Reference to mobile connectivity and community Wi-Fi should be made. | Cranbrook Town Council (324) | |

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| Innovation is mentioned under this heading but should be a theme of its own. | Crediton Town Council (Crediton Neighbourhood Plan) (189) | in order to function successfully. With this in mind, a suite of policies are proposed which seek to direct the delivery of great places in Greater Exeter. The draft policies propose:<br>• The strategic importance of delivering great places through masterplanning<br>• The innovative mechanisms to deliver the quantity of new homes needed<br>• The application of garden city principles for allocations and a series of potential new Garden Communities (dependent on growth distribution)<br>• An infrastructure categorisation approach for Greater Exeter<br>• The strategic infrastructure proposals for Greater Exeter<br>• The expectations regarding viability appraisal |
| Too narrowly defined. Emphasis is on hard infrastructure. The creation and sustaining of communities requires appropriate infrastructure in a broader sense. Social infrastructure should be considered e.g. facilities and services. | Exeter Diocesan Board of Finance (149) | |
| Planning for new infrastructure needs | Exminster Parish Council (180) | |
| Delivery of infrastructure provision will be driven by the Community Infrastructure Levy and possible local preferences in emerging Neighbourhood Plans. | Genesis Town Planning (172) | |
| The potential for new infrastructure should be considered. This does not necessarily mean new roads but could be means to encourage trips by sustainable modes such as new transportation interchanges. | Highways England (375) | |
| Add 'new low carbon infrastructure' | Exeter Civic Society (356) | |
| Recommend that an additional objective is added 'to maximise opportunities to deliver infrastructure' | Savills for St Modwen Developments Ltd (338) | |
| Support delivery of 'innovation' in infrastructure, however new infrastructure opportunities do not need to be 'innovative' to provide an opportunity to facilitate new development and/or provide betterment to existing assets. | Savills for St Modwen Developments Ltd (338) | |
| Transport theme | | |
| Should refer to congestion and how can be mitigated. Should also recognise transport is important in connecting the different themes. | South Somerset District Council (118) | Comments noted. A wide range of responses were received in respect of transport issues. Taking into account the comments received, a series of draft policy options are proposed, to include: |
| Sustainable transport links are vitally important. | Devon Countryside Access Forum (181) | |
| Rail infrastructure should be considered. | Exminster Parish Council (180) | |
| Provision and protection of rural bus services. | Exminster Parish Council (180) | |

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| The Travel to Work Area reflects the growing role of Exeter as the economic centre within the Greater Exeter area. Given the constraints of the city the surrounding districts will be required to consider how they can assist in providing facilities and services. | Persimmon Homes South West (259) | • A transport strategy for the wider GESP area, including a range of strategic transport and digital infrastructure investments which will mesh with growth decisions<br>• A clear sustainable transport hierarchy in major new developments<br>• The approaches to be taken for a variety of transport modes<br>• The strategy for improved digital connectivity and high speed digital communications. |
| Notes that strategic plan looks at if it will be possible to arrange for more goods to be moved by rail rather than roads. Argue that this would require major levels of investment and it is unlikely that significant modal shift will occur in the short or medium term therefore it is important the road system works well now. The city centre will never be vehicle free and trucks are an irreplaceable form of transport for the foreseeable future. | Road Haulage Association (303) | |
| Important trucks are not displaced from low emission zone to other areas where roads are unsuitable for HGVs. | Road Haulage Association (303) | |
| Change in consumer behaviour with more online purchases and deliveries provided should be considered in the strategic plan. | Road Haulage Association (303) | |
| Include extending the rail network, using efficient trains and ensuring a network of recharging points are available for electric cars. | Seaton Town Council (212) | |
| Ensure new roads built have trunking built along the side for utilities. | Seaton Town Council (212) | |
| Have proper cycle routeways that run alongside roads, but keep cycles, pedestrians and other traffic separated. | Seaton Town Council (212) | |
| Greater emphasis on moving people and goods rather than moving vehicles. Suggest the title of this section is changed to 'Movement' | Exeter Cycling Campaign (357) | |

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| Respondent provides various suggestions including the introduction and implementation of various strategies to support cycling infrastructure. | Exeter Cycling Campaign (357) | |
| Better provision for multi-modal journeys. | Exeter Cycling Campaign (357) | |
| Should consider changes in transport e.g. driverless cars. | Exeter Cycling Campaign (357) | |
| Cycling and walking are not just 'active lifestyle' issues and should be recognised as themes in this section which might be better titled 'Mobility'. | Exeter Green Party (297) | |
| Key goal should be the development of a low carbon integrated transport system. | Exeter Green Party (297) | |
| Policies for non-passenger transport need attention e.g. freight and light good deliveries. | Exeter Green Party (297) | |
| There should be specific mention of the Exe Valley Park and other Valley Parks as key avenues for sustainable movement and connections, these could develop as a crucial part of the infrastructure of GESP and could lead to reduced car use and health benefits. | Exeter St James Forum, St David's Neighbourhood Partnership, and Newtown Community Association (349) | |
| Cycling infrastructure development e.g. the Teign Estuary Trail. This has key links to the economy, health and recreation. | Teignmouth Town Centre Management Partnership (116) | |
| Need to pro-actively restrain the ever-increasing demand for vehicular transport. | Transition Exeter (206) | |
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| Promote cycling as a viable commuting alternative. | Individual – East Devon, Exeter, Mid Devon (72) | See above |
| More emphasis on river as a viable commuting option. | Individual – East Devon, Exeter, Mid Devon (72) | |
| Needs to include reference to minimising air/noise pollution, rebalancing transport system away from private car dominance and | Individual – Exeter (174) | |

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| reallocation of space to most efficient movement modes. | | |
| Would like to see tourism issues related to transport addressed directly, especially as planned housing expansion appears to be in areas which will cause even greater congestion at critical transport junctions. | Individual – East Devon (151) | |
| Devon Metro Rail Link should be developed to help keep cars out of the city. | Individual – Exeter (139) | |
| Insert 'Provision of new cycleways' under Transport and Communications. | Individual – East Devon (131) | |
| Need to plan for light rail/tram transit system so that movement of people is integrated. | Individual – Teignbridge (107) | |
| Concern regarding rat running in Gables Road, Willand; should be access only. | Individual – Mid Devon (56) | |
| GESP should consider the options for a suitable site for a rail freight hub for the South West | Individual – East Devon (360) | |
| Consider reinstatement of the branch line from Feniton to Ottery St Mary. | Individual – East Devon (360) | |
| Healthy communities theme | | |
| Suggest to remove healthy communities theme as argue these issues are properly addressed at a district level with local communities. | Bishopsteignton Parish Council (318); Campaign to Protect Rural England (268) | Health and wellbeing is an important, cross cutting theme for the Greater Exeter Strategic Plan as evidenced within the draft vision which states: 'we enable prosperous and healthy lives…' and is a key priority for GESP: 'Greater wellbeing – healthy active communities with a range of facilities and services'. Health and wellbeing considerations are therefore embedded within a number of draft policies. |
| Amenity land should be included. | Devon Countryside Access Forum (181) | |
| GI should be included with health and well-being benefits arising from nearby greenspace which people can reach without cars. | Devon Countryside Access Forum (181) | |
| Although an ageing population is mentioned, does not mention obesity and importance of all ages exercising. | Devon Countryside Access Forum (181) | |
| Access for those with limited mobility should be included. | Devon Countryside Access Forum (181) | |

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| Too narrowly defined. Primary looks at mitigating the effects of ill health rather than benefits of a positive social context. Suggest heading 'Resilient and cohesive communities'. | Exeter Diocesan Board of Finance (149) | |
| Developing and promoting pedestrian and cycle routes across the Greater Exeter area | Exminster Parish Council (180) | |
| Education and Arts. | Musbury Parish Council (242) | |
| Exeter is facing significant health challenges of obesity and air pollution, partly as a result of inactive lifestyles and high car usage. Suggests strategies and tools to adopt in response to this. | Exeter Cycling Campaign (357) | |
| Benefit of work done by volunteers, charities and local networks need to be recognised and valued. | Exeter Northcott Theatre (170) | |
| No mention of culture and the arts. | Exeter St James Forum, St David's Neighbourhood Partnership, and Newtown Community Association (349) | |
| The importance of public parks and green spaces for health and wellbeing should be recognised particularly within the City Centre. | Exeter St James Forum, St David's Neighbourhood Partnership, and Newtown Community Association (349) | |
| Health of children should be as equally important as looking after our ageing population. | Individual – Exeter (310) | See above |
| Investing in sports facilities that the population can benefit from as well as bring in sport/tourism from elsewhere. | Individual – Teignbridge (246); Exeter (230, 216) | |
| Insert 'Adequate access to GPs and specialised medical services – also adequate care at home for old or sick residents'. | Individual – East Devon (131) | |
| Need to make new houses more attractive and in keeping with surroundings. Create places people want live; space and greenery improves wellbeing. | Individual – East Devon (18) | |
| Delivery | | |

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| Essential for the success of GESP that delivery is properly addressed and considered on a strategic level. Strategic vision documents can end up as another plan document with little meaning on the ground because real barriers were not considered sufficiently on the strategic level. | Exeter Cycling Campaign (357) | Comments noted. The provision of high quality development and a focus on delivery are two key elements of the GESP draft vision. The draft policies and site options document seek to direct the delivery of great places through a range of mechanisms, including:<br>• The strategic importance of delivering great places through masterplanning<br>• The innovative mechanisms to deliver the quantity of new homes needed<br>• The application of garden city principles for allocations and a series of potential new Garden Communities (dependent on growth distribution)<br>• An infrastructure categorisation approach for Greater Exeter<br>• The strategic infrastructure proposals for Greater Exeter<br>• The expectations regarding viability appraisal |
| Garden Village at Culm should be a theme within the plan in order to cement its status and identify the opportunities this strategic development presents. | Lichfields on behalf of Mr Roger Cooke (295) | |
| Better integration of themes – infrastructure designed to make cycling and walking the norm for short distances. | Individual – Exeter (235) | |
| Other | | |
| Themes should be more closely related to Plan-making objectives. Examples of policy areas are provided by respondent including identifying housing supply, locations. | AP Planning c/o Bovis Homes (255) | Comments noted. |
| To ensure GESP takes into account strategic cross boundary issues with Torbay. May include housing and employment land matters, healthcare and education. | Torbay Council (275) | Comments noted. Continued close working with Torbay Council is welcomed to ensure the GESP takes account of strategic cross boundary issues with Torbay. |
| Should have clear break between urban and rural environment, example provided for local area. | Bishops Clyst Parish Council (331) | Comments noted. |

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| Would like to see a forward thinking plan, capitalising on university city status embracing the future agenda in innovation and technology. | Blackdown Hills AONB Partnership (208) | Agreed. This is a key element of the draft vision for GESP. |
| Education as a theme has been missed. | Bishopsteignton Parish Council (318) | Greater education is a key element of the draft vision as this is fundamental to nurturing, attracting and retaining a world class workforce. |
| Tourism as a theme is suggested. | Bishopsteignton Parish Council (318); Campaign to Protect Rural England (268) | Comments noted. It is considered that local plans are best placed to address tourism matters. |
| Farming and food production as a theme is suggested. | Bishopsteignton Parish Council (318); Campaign to Protect Rural England (268) | Comments noted. |
| Excellent list of themes but must be delivered in a sustainable way, suggest the encouragement of brownfield development. | Chardstock Parish Council (187) | Comments noted. |
| Boundary of Clyst St George along the SE boundary of Exeter gives a clear break into the countryside which should be preserved. | Clyst St George Parish Council (280) | Comments noted. |
| Increased Park and Ride facilities serving the northern approaches | Coldridge Parish Council (97) | Comments noted – Policy GESP27 allocates a number of Park and Ride (and Park and Change) facilities along key transport corridors. |
| Green areas should include specific areas for dog walking and dog free space in line with publication Planning for Dog ownership in New Development. | Devon Countryside Access Forum (181) | Comments noted. |
| Consideration given to strategic land allocation for gypsy and traveller sites. | Exminster Parish Council (180) | Comments noted. Draft Policy GESP21 seeks to provide access to appropriate accommodation for the gypsy and traveller community. |
| Proactive and constructive stakeholder engagement is critical and should be a key theme in preparing and implementing GESP. Suggests Friends Life Ltd is one such stakeholder. | GL Hearn Ltd (296) | Comments noted. |
| Towns and villages should be specifically recognised for their contribution to growth. | IJP (261) | Comments noted. |

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| Governance. | McMurdo Land Planning and Development Ltd (271) | Comments noted. |
| A more local approach highlighting the individual needs of towns and villages. | Newton Abbot Town Council (264) | Comments noted. |
| No reference to 'skills' in the themes section to build upon the need for a skilled and productive workforce as identified under the 'issues'. | Heart of South West Local Enterprise Partnership (176) | Comments noted. This is a key element of the draft vision. In addition, draft Policy GESP15 recognises that the skills shortage (particularly evident in the digital, construction and health and social care sectors) is one of Greater Exeter's key constraints. The policy therefore recognises the importance of encouraging people to develop work-place skills in order to increase their likelihood of employment and career development, whilst also addressing skills shortages in the health and social care sectors. |
| Vision is a reasonable start and appropriately recognises the role of Exeter at the heart of this area. | Peter Brett Associates (167) | Comments noted. |
| Should recognise housing and employment delivery issues with allocated strategic sites in and around Newton Abbot as a result of planning and environmental constraints. | WYG c/o Sibelco (215) | Comments noted. Please see above responses regarding housing and employment issues. |
| Should quantify and translate under-delivery and combine it with future need projections into development allocations for new sites in order to meet the need for jobs and housing. | WYG c/o Sibelco (215) | Comments noted. |
| GESP should acknowledge the importance of Exeter's role in the south west and establish a strategy and policy framework that supports this. | WYG (146) | Comments noted. |
| Believe some themes are unattainable through the planning system e.g. how can planning influence the cost, type or quality of housing, | Exeter Civic Society (356) | Not agreed. The planning system has an important role in influencing the cost, type and quality of housing, provision of better paid jobs, active lifestyles and design standards. These |

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| better paid jobs, active lifestyles, design standards. | | themes are central to role of GESP and the draft vision for the area. |
| Food does not seem to be mentioned in the GESP, given its importance to the local community, environment and economy. Relationship with public health, food waste and pollution, agricultural which provides jobs directly and indirectly. Issues of food poverty, supply and culture are relevant to the future of the city and sub-region including infrastructure. | Exeter Food Network (245) | The Greater Exeter Councils recognise that these are important issues and many of them are addressed within the draft vision and policies for the GESP. However, issues such as food production fall outside of the scope of the Greater Exeter Strategic Plan and are therefore more appropriately addressed through other plans/programmes and initiatives. |
| Specific matters/objectives need to be informed by a thorough spatial portrait for the whole area and considered in a visionary and forward thinking manner. | Stride Treglown (283); | Comments noted. |
| Need to recognise links between themes; might be helpful to set out over-arching principles behind them. | Transition Exeter (206) | Comments noted. |
| Should include a review of the implementation of other Local Plans to date, the lessons learned and how that is avoided in taking GESP forward. | Individual – Teignbridge (266) | Comments noted. |
| More focus on providing facilities for sport and the arts. | Individual – Exeter (306); Teignbridge (249) | Comments noted. The draft policies and site options includes policies to ensure well designed, vibrant, mixed use places including a range of local facilities. |
| Key omission is any sense that the policy themes will be joined up. Plan should make it clear how trade-offs between objectives will be managed. | Individual – Exeter (250, 223) | Comments noted. The 'Quality Places and Infrastructure' chapter of the draft policies and site options consultation document includes a number of policies to ensure joined-up thinking about achieving the key plan objectives such as net-zero carbon emissions, green spaces, public realm, transport and the provision of buildings which are sympathetic to local character, history, nature and the landscape. |

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| Need for a more local approach highlighting individual needs of towns and villages. | Individual – Teignbridge (246) | Comments noted. |
| Education receiving sufficient funding to ensure young people have the relevant skills to meet future needs. | Individual – Teignbridge (228) | Comments noted. The draft site option information sets out education infrastructure requirements. |
| Will the Plan address its relationship to rest of Devon and the wider South West region? | Individual – East Devon (77) | Yes – this is reflected in the draft vision for Greater Exeter. |
| More detail – targets for infrastructure in new developments etc. | Individual – Exeter (47) | Please see Chapter 10 'Quality Places and Infrastructure' of the draft policies and site options document which sets out a number of policies to ensure the timely provision of infrastructure to ensure that the community has the facilities and services it needs to function successfully. |
| Transport and other infrastructure in place before development | Individual – Exeter (29) | |
| Local residents should have vote on large development plans. | Individual – Exeter (14) | The Greater Exeter Strategic Plan is being prepared in full consultation with local communities in accordance with relevant legislation and associated government guidance. |
| Education; many of themes identified rely on good quality education. | Individual – Exeter (11) | Comments noted. This is reflected in the draft vision for Greater Exeter and indeed. |
| Maybe a little more focus on how you intend to maintain and develop communities and bring up the poorer areas. | Individual – Exeter (92) | Comments noted. |
| **5) If we are to meet the area's needs for housing and employment, what forms of development do you feel best deliver our draft vision? For example: More efficient use of land in Exeter, Major urban extensions in Exeter and main towns, Dispersed small scale development, stand-alone new communities, Other.** | | |
| More efficient use of land in Exeter | Aylesbeare Parish Council (191); Bishops Clyst Parish Council (331); Chardstock Parish Council (187); Crediton Town Council (Crediton Neighbourhood Plan) (189); Exminster Parish Council (180); Hennock Parish Council (133); | Comments noted. Seeking increased densities in our urban areas and around transport hubs is a key element of the spatial development strategy for GESP. Much work has been done to look at the opportunities across the Greater Exeter area |

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| | Lympstone Parish Council (182); Ogwell Neighbourhood Plan Steering Group (195); Seaton Town Council (212); WYG (146); Exeter City Swimming Club (293); Genesis Town Planning Limited (353). Individuals – Teignbridge (114, 122, 142); Exeter (306); Mid Devon (272); East Devon (102); (76); (373) | to achieve this. Alternative 'distribution scenarios' have also been considered which have informed our suggested approach.<br><br>To achieve growth that brings the success factors needed to create great places of the future, we consider that the GESP spatial development strategy should focus:<br>• On brownfield and greenfield land in Exeter and other main towns where there is an easily accessible range of jobs, services, transport facilities and the potential to enhance these factors.<br>• In new or expanded settlements of scale on key transport corridors, particularly the rail corridors which extend out from Exeter, ideally where cycling is also a feasible option to key jobs and services.<br><br>Accordingly, the Central Strategic Growth Area includes Exeter and recognises that there is significant brownfield regeneration potential for high quality sustainable development. |
| Plan should avoid reliance on unrealistic assumptions about re-efficient use of land in Exeter. | IJP (261) | |
| Favour over a more dispersed pattern of distribution. | National Trust (288) | |
| Support higher density but this should be of high quality. Provides suggestions for development within the city centre. Suggests GESP should set out a masterplan for the city centre and identify strategic sites within the city for higher density development. | Exeter Cycling Campaign (357) | |
| Communities for Exeter should be properly planned making the best use of available land within Exeter where might provide for the needs of that community, whilst taking the opportunity to address key issues of imbalance in the established urban communities. | Exeter St James Forum, St David's Neighbourhood Partnership, and Newtown Community Association (349) | |
| Suggest that given those who choose to live in a city environment do so a urban lifestyle, suggest that further development should continue within the City boundaries using what 'green space' is left e.g. Ludwell Valley Park. | Farringdon Parish Council (336) | |
| New housing in the city needs to be higher density; prevent sprawl and longer commuting distances. | Transition Exeter (206) | |

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| There could be more maisonette type houses of three storeys. | Individual – Teignbridge (142) | |
| There should be a limit to cramming new development in the city – new public realm open spaces are needed to help the city breathe. | Individual – Exeter (100) | |
| Current green spaces need to be protected and enhanced. | Individual – Exeter (310); East Devon (27) | |
| Housing multi-storey style with underground car parks on existing building sites. | Individual – Exeter (310) | |
| Benefits of terrace housing include many houses being built close to services e.g. public transport provision, avoiding waste of land and energy efficiency. | Individual – Exeter (306) | |
| Quality high density housing directly alongside workplaces e.g. terraced flats above the shops, or close to offices, local community centres schools etc. | Individual – (226) | |
| More could be achieved by increasing the density of existing housing developments in Exeter. | Individual – Exeter (174); Teignbridge (107) | |
| Supports more efficient use of land in Exeter and extensions of Exeter itself with infill, small scale proportional development of other towns. | Individual – East Devon & Exeter (124) | |
| More efficient use of land in Exeter and in particular development of high quality, spacious apartment blocks with ground level community shopping facilities etc. based on the models that can be seen all over Europe. | Individual – Exeter (91) | |
| More efficient use of land ( e.g. building over car parks) & please ensure that architecturally any new build reflects the environment in which it is built & avoid endless rows of identikit buildings. | Individual – Mid Devon (73) | |

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| Concern that 'more efficient use of land' may mean higher density and poorer living environment. | Individual – Exeter (47) | |
| More efficient use, particularly of brownfield sites, but with sufficient green spaces, and lots of playgrounds. Greater mix of tenures/housing types in developments. | Individual – Exeter (23) | |
| New houses to make provision for future loft conversions and facilitate future addition of lifts for elderly. | Individual (373) | |
| Major urban extensions to the city and the main towns. | AP Planning c/o Bovis Homes (255), Bishops Clyst Parish Council (331); Chardstock Parish Council (187); Torbay Council (275); Genesis Town Planning (172); Hennock Parish Council (133); Holcombe Rogus Parish Council (200); Lympstone Parish Council (182); Rapleys (282); Seaton Town Council (212); Genesis Town Planning Limited (353) | Comments noted. Identifying accessible and well connected development locations to create the homes and jobs we need, which reduce the need to travel, enabling healthy living and reducing our carbon impact is a key element of the GESP spatial development strategy. Much work has been done to look at the opportunities across the Greater area to achieve this. Alternative 'distribution scenarios' have also been considered which have informed our suggested approach.<br><br>To achieve growth that brings the success factors needed to create great places of the future, we consider that the GESP spatial development strategy should focus:<br>• On brownfield and greenfield land in Exeter and other main towns where there is an easily accessible range of jobs, services, transport facilities and the potential to enhance these factors. |
| Major urban extensions in Exeter and main towns should be kept within the boundaries of the M5 and foot of the Haldon Hills | Bishops Clyst Parish Council (331) | |
| Suggest 50% of planned growth at Exeter given limitations at other centres, suggests land south east of the A30 adjoining the South West Exeter allocation. | AP Planning c/o Bovis Homes (255) | |
| Should only be located next to strategic employment, Exeter or main towns. Smaller towns and villages also need development to ensure they flourish as self-sustaining settlements. | Blue Cedar Homes (299) | |
| Support in the context of adequate infrastructure provision. | Exminster Parish Council (180) | |

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| Urge caution to this approach owing to the physical, technical and infrastructure constraints at some of the towns in the Greater Exeter area which could lead to unsustainable and undeliverable proposals. | GL Hearn Ltd (296) | • In new or expanded settlements of scale on key transport corridors, particularly the rail corridors which extend out from Exeter, ideally where cycling is also a feasible option to key jobs and services. |
| Support and maintain the vitality and viability of market and coastal towns as sustainable locations not just concentrate housing to Exeter, provides Honiton as an example for growth. | Gleeson Developments Limited (262) | |
| Also including growth in larger villages | IJP (261) | |
| Urban extensions and new settlements have long lead-in times. GESP needs to lay the groundwork for future strategic scale growth. | McMurdo Land Planning and Development Ltd (271) | |
| Urban rather than rural community expansion | Musbury Parish Council (242) | |
| Favour over a more dispersed pattern of distribution. | National Trust (288) | |
| The fundamental principle should be that development is sustainably located with Exeter identified as the most sustainable location for a large proportion of the growth. New development should be focused towards locations adjacent to the city. But should not all be in the form of major urban extensions as these are difficult and slow to deliver. | Peter Brett Associates (167) | |
| Should not have too much reliance of delivery of large sites. | Planning Sphere Ltd (166) | |
| Whilst a wide range of housing opportunities are required across the plan area to deliver the scale of growth needed there is a logic to focusing large scale growth at, or close to, the areas where the need is greatest. | Savills on behalf of Bloor Homes (325) | |
| Continued expansion and delivery of Cranbrook. | David Lock Associates c/o East Devon New Community Partners (314) | |

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| What needs to be avoided is Exeter urban sprawl and the linking up of settlements and loss of green linkages between settlements. | Cranbrook Town Council (324) | |
| Cullompton does not want to be a dormitory facility for Exeter. Expansion in housing should have adequate local jobs to minimise commuting. There also needs to be appropriate investment in infrastructure. | Culm Valley in Business & Cullompton Neighbourhood Plan Steering Group (81) | |
| Area on the northern boundary of Exeter provides an opportunity to provide room for future growth avoiding AONB and other nationally designated sensitivities. | McMurdo Land Planning and Development Ltd (271) | |
| Not enough infrastructure in Newton Abbot for additional growth e.g. schools, roads. Need for large employment/industrial development close to A38. | Newton Abbot Town Council (264) | |
| Small and medium sites on the edge of towns should also be identified within the GESP rather than left to individual Local Plans. | Peter Brett Associates (167) | |
| Suggestion of Axminster, development particularly to the east. | Rapleys (282) | |
| Too much reliance on the main towns, or dispersed rural development that are not easily accessible to Exeter will likely result in longer distance trips by private car. | RPS Group (301) | |
| Suggestion of Newton Abbot as an area for growth. | Savills on behalf of Bloor Homes (325); WYG c/o Sibelco (215) | |
| Whilst there may be some scope for development both within the city and on the borders we would like GESP to explore how neighbouring towns can share the city's economic success. | Exeter Civic Society (356) | |

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| Exeter has a strong natural setting and the views to the surrounding hills are highly valued. This setting should be protected. | Exeter St James Forum, St David's Neighbourhood Partnership, and Newtown Community Association (349) | |
| Urban extensions and new towns have an important role to play in boosting the supply of housing. However our experience nationally has shown that these will take a significant period of time to come on line. In addition, the need for growth in existing towns and villages in the region need to be addressed in order for them to be able to grow to meet the needs of their respective populations. | Lichfields on behalf of Mr Peter Lee and Tim Davey (343) | |
| Advocate the continuation of existing development strategy, focusing growth in and around Exeter and in key market towns. | Savills for St Modwen Developments Ltd (338) | |
| Planning of urban extensions should follow same approach as new settlements to meet needs and ensure cohesion. | Teignmouth Town Centre Management Partnership (116) | |
| No infrastructure to support any more major extensions of Exeter. | Transition Exeter (206) | |
| Ok if they have the associated infrastructure provided; lacking in current developments | Individual – Exeter (47) | |
| Dispersed small scale development | Genesis Town Planning Limited (353). Individual – East Devon (308); Individual (198); Individual (29) | Comments noted. Identifying accessible and well connected development locations to create the homes and jobs we need, which reduce the need to travel, enabling healthy living and reducing our carbon impact is a key element of the GESP spatial development strategy. Much work has been done to look at the opportunities across the Greater area to achieve this.<br><br>To achieve growth that brings the success factors |
| Dispersed small scale development is not appropriate. | Bishops Clyst Parish Council (331) | |
| Provided there is connectivity on sustainable transport principles. | Crediton Town Council (Crediton Neighbourhood Plan) (189) | |
| Do not support, other than minor infilling. | Exminster Parish Council (180) | |
| There is benefit in this option to avoid delays to delivery. | Gladman Developments Limited (160) | |

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| A dispersed approach should be given to villages as well as smaller towns. | Jillings Heynes Planning (332) | needed to create great places of the future, we consider that the GESP spatial development strategy should focus:<br>• On brownfield and greenfield land in Exeter and other main towns where there is an easily accessible range of jobs, services, transport facilities and the potential to enhance these factors.<br>• In new or expanded settlements of scale on key transport corridors, particularly the rail corridors which extend out from Exeter, ideally where cycling is also a feasible option to key jobs and services.<br><br>Alternative 'distribution scenarios' have also been considered which have informed our suggested approach. Scenario 3 'Mainly Rural Distribution' sets out that a rural focus would place the majority of the growth in the smaller settlements. This scenario would be likely to cause a significant increase in car travel and carbon emissions due to the challenges of serving rural communities with public transport. |
| Parish Council led development around existing communities. | Ogwell Neighbourhood Plan Steering Group (195) | |
| Do not support dispersed small scale development. | Seaton Town Council (212) | |
| Sustainable development in rural area to maintain and enhance rural vitality and viability. | Gladman Developments Limited (160) | |
| Too much reliance on the main towns, or dispersed rural development that are not easily accessible to Exeter will likely result in longer distance trips by private car. | RPS Group (301) | |
| The need and benefits to grow smaller scale settlements (including rural villages) should be given sufficient thought to enhance the vitality, viability and self-sufficiency of those settlements. | Turley on behalf of Gallagher Estates Limited (354) | |
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| Ensure high priority to quality of life and not destroying this by development. | Individual – East Devon (308) | To achieve growth that brings the success factors needed to create great places of the future, we consider that the GESP spatial development strategy should focus:<br>• On brownfield and greenfield land in Exeter and other main towns where there is an easily accessible range of jobs, services, transport facilities and the potential to enhance these factors. |
| Supports small scale developments on brownfield sites. | Individual – East Devon & Exeter (252) | |
| Smaller developments of housing with a high percentage of affordable units more preferable in coastal towns. | Individual – East Devon (143) | |
| Small scale development only in villages; should be widely spread. | Individual – Mid Devon (272) | |

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| Dispersed small scale development in outlying towns to help them become more sustainable thriving communities and decrease dependency on Exeter | Individual – East Devon (69) | • In new or expanded settlements of scale on key transport corridors, particularly the rail corridors which extend out from Exeter, ideally where cycling is also a feasible option to key jobs and services.<br><br>Alternative 'distribution scenarios' have also been considered which have informed our suggested approach. Scenario 3 'Mainly Rural Distribution' sets out that a rural focus would place the majority of the growth in the smaller settlements. This scenario would be likely to cause a significant increase in car travel and carbon emissions due to the challenges of serving rural communities with public transport. |
| Supports as this build communities and gives smaller builders the opportunity to participate in developments. | Individual – Exeter (47) | |
| Village character in Devon must be retained as part of our unique cultural heritage. | Individual – East Devon (27) | |
| Reasonable sized developments in all villages should be considered to help communities grow and stay viable. Appropriate housing on the edge of villages is preferable to stand alone new communities which would take up large areas of open countryside. | Individual (376) | |
| Stand-alone new communities | Rapleys (282); Seaton Town Council (212). Individual (198); Individual – Exeter (37) | Comments noted. Identifying accessible and well connected development locations to create the homes and jobs we need, which reduce the need to travel, enabling healthy living and reducing our carbon impact is a key element of the GESP spatial development strategy. Much work has been done to look at the opportunities across the Greater area to achieve this. Alternative 'distribution scenarios' have also been considered which have informed our suggested approach.<br><br>To achieve growth that brings the success factors needed to create great places of the future, we consider that the GESP spatial development strategy should focus:<br>• On brownfield and greenfield land in Exeter and other main towns where |
| If new communities are required they should be some distance from Exeter | Bishops Clyst Parish Council (331) | |
| Avoid stand-alone new communities | Chardstock Parish Council (187) | |
| New settlements like Cranbrook provide strong levels of development and enable the delivery of both affordable homes and the provision of suitable infrastructure. | Cranbrook Town Council (324) | |
| Least preferred as more car dependent, scale of infrastructure needed may be difficult to provide and most likely to be dormitory towns. | Crediton Town Council (Crediton Neighbourhood Plan) (189) | |
| Possibly, provided close to major road networks but away from Exeter city and neighbouring settlements. | Exminster Parish Council (180) | |
| Suggest J27 as an option. | Exminster Parish Council (180); Lympstone Parish Council (182); GL Hearn Ltd (296) | |

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| Should have good design. | Lympstone Parish Council (182) | there is an easily accessible range of jobs, services, transport facilities and the potential to enhance these factors.<br>• In new or expanded settlements of scale on key transport corridors, particularly the rail corridors which extend out from Exeter, ideally where cycling is also a feasible option to key jobs and services. |
| Urban extensions and new settlements have long lead-in times. GESP needs to lay the groundwork for future strategic scale growth. | McMurdo Land Planning and Development Ltd (271) | |
| No need to define a further new settlement which will take many years to be established and therefore jeopardise early delivery of homes to match the economic development of the sub region. | Persimmon Homes South West (259) | |
| Should not have too much reliance of delivery of large sites. | Planning Sphere Ltd (166) | |
| Development of one or more small new communities accessible to Exeter would be the only way to deliver the level of housing required and respond to the issues facing Greater Exeter. | RPS Group (301) | |
| The proposal of J27 in the emerging Mid Devon local Plan Review should be transposed into the GESP given the strategic importance of the allocation. | GL Hearn Ltd (296) | |
| Suggestion of area around J27 and Tiverton Parkway as an area for development. | Barton Willmore c/o Barratt David Wilson Homes (367) | |
| Culm Garden Village presents a clear opportunity to deliver a significant amount of the growth required within Greater Exeter in a sustainable and comprehensive way. The early stages of the GESP should avoid setting an initial artificial ceiling to the garden village's housing capacity until there has been a full detailed assessment of the strategic site's area of search. The potential for greater development at the garden village will also further help to support important aspirations such as the reopening of the train | Lichfields on behalf of Mr Roger Cooke (295) | |

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| station and major highway infrastructure improvements e.g. Junction 28 of the M5. | | |
| One or more new settlements following the Cranbrook approach should be included. | Teignmouth Town Centre Management Partnership (116) | |
| No room in rural areas for new communities. | Individual – East Devon (277) | Comments noted. Identifying accessible and well connected development locations to create the homes and jobs we need, which reduce the need to travel, enabling healthy living and reducing our carbon impact is a key element of the GESP spatial development strategy. Much work has been done to look at the opportunities across the Greater area to achieve this. Alternative 'distribution scenarios' have also been considered which have informed our suggested approach.<br><br>To achieve growth that brings the success factors needed to create great places of the future, we consider that the GESP spatial development strategy should focus:<br>• On brownfield and greenfield land in Exeter and other main towns where there is an easily accessible range of jobs, services, transport facilities and the potential to enhance these factors.<br>• In new or expanded settlements of scale on key transport corridors, particularly the rail corridors which extend out from Exeter, ideally where cycling is also a feasible option to key jobs and services. |
| Supports stand-alone new communities as long as they are rail served. | Individual – Exeter (139) | |
| New communities only in areas with suitable transport links; must take care with rural environment. | Individual – Mid Devon (272) | |
| If new communities have to be built, they should be more self-sufficient to avoid the need for commuting. | Individual – Mid Devon (73) | |
| Same problems of lack of infrastructure as in urban extensions | Individual – Exeter (47) | |
| Suggests one more stand-alone community like Cranbrook | Individual (29) | |
| Stand-alone new communities, developed to fit with the landscape and adequately provided with transport links and employment. | Individual – East Devon (27) | |
| Stand-alone new communities if they have the infrastructure to go with them. | Individual – East Devon (18) | |
| If new communities are to be created, it is important to try to give them the look and feel of a traditional settlement. | Individual (373) | |
| Stand-alone new communities alongside excellent community facilities, green/wellbeing space; set up residents' management schemes for communal areas/facilities. | Individual (92) | |
| A combination of these options | South Somerset District Council (118); Devon Wildlife Trust (213); Gladman Developments Limited (160); WYG c/o Sibelco (215); WYG (146); | Comments noted. Identifying accessible and well connected development locations to create the homes and jobs we need, which reduce the need |

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| | Barton Willmore c/o Barratt David Wilson Homes (367); Lichfields on behalf of Mr Peter Lee and Tim Davey (343); Turley on behalf of Bloor Homes South West Ltd (339); Turley on behalf of Gallagher Estates Limited (354) | to travel, enabling healthy living and reducing our carbon impact is a key element of the GESP spatial development strategy. Much work has been done to look at the opportunities across the Greater area to achieve this. Alternative 'distribution scenarios' have also been considered which have informed our suggested approach.<br><br>To achieve growth that brings the success factors needed to create great places of the future, we consider that the GESP spatial development strategy should focus:<br>• On brownfield and greenfield land in Exeter and other main towns where there is an easily accessible range of jobs, services, transport facilities and the potential to enhance these factors.<br>• In new or expanded settlements of scale on key transport corridors, particularly the rail corridors which extend out from Exeter, ideally where cycling is also a feasible option to key jobs and services. |
| All options listed in the issues document should be explored. | GL Hearn Ltd (296) | |
| The plan should consider all options available to reinforce and sustain the benefits that Exeter offers. Making efficient use of land in Exeter and other towns, and increasing the densities of development should be investigated to inform options. | Peter Brett Associates (167) | |
| A mixture of all with a hierarchy. Important from the road haulage and distribution industry is that deliveries can be made to all. | Road Haulage Association (303) | |
| Support balanced growth throughout the GESP area. | Jillings Heynes Planning (332) | |
| 360 search in city, larger towns and major hubs to include imaginative strategies for residential led mixed use redevelopment of brownfield (and some well located greenfield) land. | McMurdo Land Planning and Development Ltd (271) | |
| Identifying a range of sites with differing sizes and locations which would help increase the diversity of housing land supply to aid faster delivery. | Planning Sphere Ltd (166) | |
| A mix appropriate to the individual circumstances. | Exeter Northcott Theatre (170) | |
| The HBF is supportive of a variety of options to accommodate anticipated housing growth. A broad portfolio of sites will maximise housing delivery. GESP should provide contingency in its overall housing land supply. | Home Builders Federation (369) | |

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| Balanced portfolio of locations and sites will be needed to meeting housing and employment needs in a timely way. | Pegasus Group on behalf of Lightwood Land (358) | |
| Plan must adopt a multifaceted approach to boosting the supply of housing. | Lichfields on behalf of Mr Peter Lee and Tim Davey (343) | |
| When allocating strategic sites the widest possible range of sites, by size and market location are required so that developers of all types and sizes have access to suitable land in order to offer the widest possible range of products. A good mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector. | Lichfields on behalf of Mr Peter Lee and Tim Davey (343) | |
| Importance of flexibility: emerging plan should provide contingency in respect of strategic allocations to ensure that the full housing needs of the region can be met in the light of changing circumstances. | Lichfields on behalf of Mr Peter Lee and Tim Davey (343) | |
| Opportunities to deliver development that fits between the definitions of major urban extensions and standalone new communities; e.g. existing urban fringe and smaller settlements well-related to Exeter and major towns. | Savills (UK) Ltd : for Darts Farm Properties Ltd (352); Savills for St Modwen Developments Ltd (338) | |
| Given the size of the GESP area and the varied pattern of development across the constituent authorities, it is likely that all options will need to be delivered in some form or another. It is critical to ensure that the approach to future development meets local need within particular settlements, whilst also recognising those which may have more potential but are currently constrained. | Stride Treglown (283) | |

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| More efficient use of land in Exeter, urban extension in Exeter (as at Cranbrook) and dispersed small scale development. | Individual – Mid Devon (184); East Devon (143) | |
| Combination of options. Exeter should not take up any more land in East Devon for housing. | Individual – East Devon (131) | |
| Only way to deliver the plan is to have a mix of the above with the exception of a stand-alone community. | Individual – East Devon, Exeter & Teignbridge (126) | |
| Brownfield land | Individual – Mid Devon (319); Individual – East Devon (88); Individual (29); (76); (373) | Comments noted. To achieve the growth that brings the success factors needed to create great places of the future, we consider that the GESP spatial development strategy should focus:<br>• On brownfield and greenfield land in Exeter and other main towns where there is an easily accessible range of jobs, services, transport facilities and the potential to enhance these factors.<br>• In new or expanded settlements of scale on key transport corridors, particularly the rail corridors which extend out from Exeter, ideally where cycling is also a feasible option to key jobs and services.<br><br>The draft policies and site options document recognises that there is significant brownfield regeneration potential for high quality sustainable development and seeks to maximise these opportunities as far as possible. |
| Consideration of bringing disused/unoccupied houses and other buildings into use for housing or light industrial purposes. | Exminster Parish Council (180) | |
| Priority should be given to brownfield land. | Bishopsteignton Parish Council (318); Crediton Town Council (Crediton Neighbourhood Plan) (189); Campaign to Protect Rural England (268) | |
| More use of brownfield land. | Musbury Parish Council (242) | |
| Caution needs to be attached to assumptions regarding the capacity of brownfield sites. | David Lock Associates c/o East Devon New Community Partners (314) | |
| Bringing forward brownfield land and infill sites to densify existing urban areas can prove difficult and can receive strong opposition from residents. Concerns are often transport and parking related. This is why increasing and improving the provision for cycling and walking is essential. | Exeter Cycling Campaign (357) | |
| In accordance with the NPPF, should consider a sequential brownfield first approach for employment land. Risk to the delivery of brownfield sites if areas of competing greenfield land is allocated for employment instead. | GVA Grimley Limited for Skypark Development Partnership LLP (344) | |
| Brownfield sites are a finite resource of which some will have viability issues due to their past | Lichfields on behalf of Mr Peter Lee and Tim Davey (343) | |

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| use; need for reduction of planning obligations (e.g. affordable housing) | | |
| Supports wherever possible without high rise buildings unsympathetic to the local area. | Individual – Teignbridge (266) | |
| Transport and accessibility | | |
| Unclear how transport issues will be dealt with in the GESP area. GESP needs to plan for transport. | AP Planning c/o Bovis Homes (255) | Comments noted. A wide range of responses were received in respect of transport issues. Taking into account the comments received, a series of draft policies are proposed, to include:<br>• A transport strategy for the wider GESP area, including a range of strategic transport and digital infrastructure investments which will mesh with growth decisions<br>• A clear sustainable transport hierarchy in major new developments<br>• The approaches to be taken for a variety of transport modes<br>• The strategy for improved digital connectivity and high speed digital communications. |
| Accessible locations close to strategic transport links, particularly the M5 motorway and mainline rail network. | GL Hearn Ltd (296) | |
| Concern over congestion along A376 Exmouth to Exeter road and roundabouts at Clyst St Mary and Sandygate. Any substantial increase in housing along this corridor should avoided including Exmouth itself. | Lympstone Parish Council (182) | |
| Further investment along the M5 corridor would facilitate a growth option. | Persimmon Homes South West (259) | |
| The A30 growth corridors should not be overlooked, Axminster is provided as an example. | Persimmon Homes South West (259) | |
| Development which are in transport terms most sustainable and thus minimise any potential impacts upon the Strategic Road Network. | Highways England (375) | |
| More development should be planned and focused around public transport hubs rather than around motorway junctions. | Exeter Cycling Campaign (357) | |
| Particular emphasis on providing for a mix of major urban extensions and small scale greenfield development on the edges of Exeter, especially in locations that are within easy walking and cycling distance of facilities or in good public transport corridors. | Genesis Town Planning Limited (353) | |

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| A certain weight should be attached to opportunities that would minimise commuter times in the context of the Travel to Work Area whilst recognising that more local employment centres elsewhere in the districts will also be required to accommodate growth. | Origin 3 for Burrington Estates (368) | |
| Focus developments around railway stations. Enhance Pinhoe- Honiton line to improve services. | John Phillips, Tarka Rail Association (109) | |
| The GESP should identify requirements for major new transport links around the north and west of the city to support new Urban Extensions here. | Individual – Exeter (100) | Comments noted. A wide range of responses were received in respect of transport issues. Taking into account the comments received, a series of draft policies are proposed, to include:<br>• A transport strategy for the wider GESP area, including a range of strategic transport and digital infrastructure investments which will mesh with growth decisions<br>• A clear sustainable transport hierarchy in major new developments<br>• The approaches to be taken for a variety of transport modes<br>• The strategy for improved digital connectivity and high speed digital communications. |
| When encouraging high density housing, do not allow car parking provision and pace future restrictions that mean no uses of the dwellings (except disabled) will be permitted on-street parking permits. | Individual – Exeter (174) | |
| New developments should be focused on reducing car dependence – Only built where rail, bus and cycle links make other choices available to them. | Individual – Exeter (174) | |
| Vilification of the car is not a sensible strategy, so some thought about the provision of simple, easy flowing road junctions, sufficient and suitable parking spaces needs to be included. | Individual – East Devon (151) | |
| Employment | | |
| Wholesaling ware house distribution for the south west. Avoid manufacturing that has the potential for waste pollution. | Individual – Mid Devon (319) | Comments noted. A wide range of responses were received in respect of economic and employment issues. Taking these issues into |

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| Newton Abbot in need of large employment/industrial development close to the A38. | Individual – Teignbridge (243) | account a series of draft policies to cover economic issues are proposed. These include:<br>• A target for extra jobs<br>• Doubling the size of the economy<br>• Measures to increase business growth<br>• Support for digital exchanges<br>• Aim to deliver employment land within GESP<br>• Strategic guidance on the review and allocation of employment sites in local plans and with planning permission<br>• Protection and support for key economic assets<br>• Proposals for Exeter Airport<br>• Support for skills, education and training |
| Employment opportunities are needed closer to where people live. | Individual – Exeter (47) | |
| Other | | |
| Development that is underpinned by historic environment evidence base in line with the NPPF. | Historic England (120) | Comments noted. |
| Unclear how transport issues will be dealt with in the GESP area. GESP needs to plan for transport. | AP Planning c/o Bovis Homes (255) | Comments noted. Please see above responses in relation to transport issues. |
| To minimise confusion a clear distinction should be made between matters covered in GESP and those covered in the District's Local Plan. | Torbay Council (275) | Comments noted. Chapter 1 of the draft policies and site options consultation document explains the role of other plans. |
| Query where the evidence is for new development in addition to what is in our existing planning documents. Do not believe we should be planning for future housing and business development at a time of economic uncertainty. | Bishopsteignton Parish Council (318); Campaign to Protect Rural England (268) | Comments noted. Please see above responses in relation to housing and economic issues. |

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| Whatever 'forms' are chosen the impact of development on the rural setting parishes/villages should be considered. | Brampford Speke Parish Council (257) | Comments noted. |
| Smaller sites, 50+ dwellings will play an important contribution in meeting need. | IJP (261) | Comments noted. |
| The strategy for growth will have to be established following extensive evidence gathering. | Jillings Heynes Planning (332) | Comments noted. |
| Stronger empty homes policy. | Musbury Parish Council (242) | Comments noted. |
| Listen to Parish Councils | Musbury Parish Council (242) | Comments noted. |
| Not green belt | Musbury Parish Council (242) | Comments noted. |
| The Trust would support options that have been tested to be demonstrably sustainable. | National Trust (288) | Comments noted. |
| A balanced and flexible approach. | Heart of South West Local Enterprise Partnership (176) | Comments noted. |
| Agree provision of housing and planning for new development to meet the full objectively assessed need to 2040. | Peter Brett Associates (167) | Comments noted. |
| Establish high tech hubs in satellite towns. Evidence from Seaton Development Trust shows how this increases high wage employment and reduces commuting into Exeter. | Seaton Development Trust Ltd (240) | Comments noted. |
| Site identification and the form of development should not be within the remit of GESP. The best approach is to leave site identification to Neighbourhood Plans. | Sidmouth Chamber of Commerce (75) | Comments noted. There will still be a role for site identification within neighbourhood plans. The GESP will provide the high level strategic planning policy framework for the area and will focus on large scale strategic allocations. More localised policies such as development management policies and locations for smaller scale development will be included in new Local Plans produced subsequently by the partner authorities. Neighbourhood plans are able to |

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| | | support the strategic development needs set out in the Local Plan and GESP. |
| Caution needs to be attached to assumptions regarding assumed housing densities in new development. | David Lock Associates c/o East Devon New Community Partners (314) | Comments noted. |
| New sports facilities to support the major building of new homes already underway. | Exeter City Swimming Club (293) | Comments noted. |
| Danger is that if Exeter continues to be the centre of employment there is a risk that some neighbouring towns run the risk of becoming dormitory towns. | Exeter Civic Society (356) | Comments noted. Please see draft policies within the 'Prosperity' chapter of the draft policies and site options consultation document which recognises the importance of providing economic opportunities to individuals across the Greater Exeter area as a whole, whilst also needing to maintain an outward-facing and networked city region. |
| Mixed use development at Alphington suggested. | Genesis Town Planning Limited (353) | Noted. Comments are invited on specific site options as part of this 'Draft Policies and Site Options' consultation. |
| Specific reference to the potential for further phases of development at new settlements that are already allocated in current and emerging Plans, as distinct from further additional new settlements, e.g. Culm Garden Village. | Pegasus Group on behalf of Lightwood Land (358) | Noted. Comments are invited on specific site options as part of this 'Draft Policies and Site Options' consultation. |
| Smaller-scale developments should be considered to complement planned urban extensions, e.g. in Cullompton. Sets out advantages of pursuing this strategy, e.g. reduce risks in under-delivery. More flexible policy approach for smaller rural settlements. | Savills (UK) Ltd (Agent) for Mr G Grant-Sturgis (94) | Comments noted. The GESP will provide the high level strategic planning policy framework for the area and will focus on large scale strategic allocations. Locations for smaller scale development will be included in new Local Plans produced subsequently by the partner authorities. Neighbourhood plans are also able to support the strategic development needs set out in the Local Plan and GESP. |

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| Communities using renewable energy to power homes. The efficiency of new builds needs to be increased as this can save money and time. | Individual – (305) | Comments noted. Chapter 5 'Climate Emergency' of the draft policies and site options consultation document includes policies to ensure that developments are designed, constructed and will perform to deliver net zero carbon emissions. The chapter also includes policies to support renewable energy development and in particular to encourage community owned low/zero carbon energy projects. |
| Focus on creating specific communities. E.g. female only developments, communities that focus on a pastime such as fitness, art, sport etc. | Individual – East Devon, Exeter & Mid Devon (72) | Comments noted. |
| Less student accommodation. | Individual – East Devon & Exeter (252) | Comments noted. |
| Need to consider renovating any empty houses before rebuilding massive new developments. | Individual – East Devon (238) | Comments noted. |
| Overall housing need cannot be known until effects of Brexit are established. | Individual – East Devon (88) | The government's standard method set out in national policy gives the Greater Exeter housing need at 2,663 homes per year. The calculation uses data from the Office of National Statistics (ONS) 2014-based household projections and Office for National Statistics (ONS) 2018 household affordability statistics. |
| Understand what works for each locality | Individual – East Devon (77) | Comments noted. |
| Consider tax on second homes. Compulsorily purchase empty buildings/vacant land after a fixed period. | Individual – Mid Devon (73) | Comments noted. |
| Focus of retail development in Exeter not sustainable | Individual – Exeter (47) | Comments noted. |
| Need a positive attitude to innovative building methods; consider quicker and less expensive options. | Individual – Mid Devon (42) | Comments noted. |

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| Any development should be sustainable with a minimal environmental footprint; utilise innovative technologies; value local knowledge. | Individual – East Devon (31) | Comments noted. Chapter 5 'Climate Emergency' in the draft policies and site options consultation document includes policies to ensure that developments are designed, constructed and will perform to deliver net zero carbon emissions. |
| Less development in and around Exeter; more extensions in other main towns, e.g. Crediton and Honiton. | Individual – Exeter (14) | Noted. Comments on specific site options are invited as part of the 'Draft Policies and Site Options consultation. |
| Small scale stand-alone communities, e.g. in vicinity of farmhouses. | Individual – Exeter (14) | Comments noted. |
| None of the above without addressing affordability and quality of housing. | Individual – Exeter (11) | Comments noted. Draft Policy GESP17 sets out that GESP and Local plans will give high priority to providing affordable housing. |
| Development must not place excessive demands on infrastructure and services; risk of detrimental impact on character of local communities. | Individual (342; 346; 362) | Comments noted. The GESP will establish the strategic policy for the area and set out strategic infrastructure proposals. The draft policies and site options document recognises that high quality development relies on the timely provision of infrastructure to ensure that the community has the facilities and services it needs to function successfully. |
| Meeting housing and employment needs must not compromises tourism in East Devon and other areas surrounding Exeter. | Individual – East Devon (360) | Comments noted. |
| Keep addressing issue of unoccupied housing. | Individual – Exeter (92) | Comments noted. |
| 6) Are there any further comments you would like to make on the Greater Exeter Strategic Plan? | | |
| No specific comments but note interests in development or effect of development on the Uplyme/Lyme Regis area. | Dorset County Council (315) | Comments noted. |
| Support GESP | Devon County Council (300); Budleigh Salterton Town Council (287) | Support noted. |

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| Early consultation on evidence base. | Historic England (120) | Comments noted. This next stage of consultation seeks comments on draft policies, potential site options and supporting information. |
| Welcome opportunity to discuss further. | Natural England (286) | Comments noted. Continued close working with Natural England welcomed. |
| Look forward to seeing details of infrastructure requirements to mitigate the impact of development. | Somerset County Council (289) | Comments noted. |
| Would be concerned if identified sites for development are, or have been, or are proposed for sport and recreation buildings or land including playing fields. | Sport England (168) | Comments noted. |
| Infrastructure including schools and doctors surgeries must be provided alongside housing. | Aylesbeare Parish Council (191) | Comments noted. |
| Further housing stock is needed but poor infrastructure must be addressed together with retaining the rural nature of the countryside and its diverse wildlife habitats. Rural communities wish to preserve and retain their individuality. | Bishops Clyst Parish Council (331) | Comments noted. |
| Welcome references to the natural and built environment. | Blackdown Hills AONB Partnership (208) | Noted. |
| Not enough weight given to the infrastructure provided at the same time as development. | Bishopsteignton Parish Council (318) | Comments noted. The GESP will establish the strategic policy for the area and set out strategic infrastructure proposals. The draft policies and site options document recognises that high quality development relies on the timely provision of infrastructure to ensure that the community has the facilities and services it needs to function successfully. More detailed infrastructure phasing arrangements will be considered at the detailed master planning and planning application stage. |

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| Call for Sites premature. Will encourage speculative planning applications from developers and landowners. | Bishopsteignton Parish Council (318); Campaign to Protect Rural England (268) | Not agreed. The purpose of the call for sites was to provide an opportunity for landowners and developers to put forward land for housing and economic development. A positive assessment of a site's development potential in the HELAA is no guarantee of future planning consent or that the site will be selected for allocation in the Greater Exeter Strategic Plan or other local planning policy documents. |
| This process should not dilute democracy at a local level. | Bishopsteignton Parish Council (318) | Noted. |
| Suggest delaying any work on the GESP until the implications of Brexit are known. | Bishopsteignton Parish Council (318) | Not agreed. This would not be a proportionate response and would be inconsistent with the national policy agenda in relation to plan making. |
| Biodiversity needs some greater consideration. | Bishopsteignton Parish Council (318) | Comments noted. The draft policies and site options document includes a policy requirement for major development to demonstrate at least a 10% net gain in biodiversity compared with the pre-development situation. |
| Document is well thought out | Chardstock Parish Council (187) | Noted. |
| In our rural area it is very important to preserve our countryside and wild life habitats and improve it while catering for the needs of an increasing population. It is also important to preserve the individuality of each rural settlement. | Clyst St George Parish Council (280) | Comments noted. This is an important component of the draft vision for GESP. |
| No mention of definition of affordable homes. | Crediton Town Council (Crediton Neighbourhood Plan) (189) | The definition of affordable housing is set out in Annex 2 of the National Planning Policy Framework. |
| Connectivity is an issue not sufficiently developed. | Crediton Town Council (Crediton Neighbourhood Plan) (189) | Comments noted. Please see Chapter 8 'Movement and Communication' of the draft policies and site options document which |

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| | | includes a strategy for improving digital connectivity and high speed digital communications. |
| Cullompton has huge potential to support the Greater Exeter plan but the infrastructure needs to be addressed as a matter of priority | Culm Valley in Business & Cullompton Neighbourhood Plan Steering Group (81) | Comments noted. |
| GESP process should give much closer attention to the natural environment than seen in previous plans in relation to the benefit to improving the places in which people live. | Devon Wildlife Trust (213) | Comments noted. Please see Chapter 9 'Nature' which includes a series of proposed policies as follows:<br>• Ensuring that developments provide at least a 10% overall enhancement in biodiversity<br>• Providing a strategy to protect the internationally important wildlife sites of the Exe Estuary, Dawlish Warren and East Devon Pebblebed Heaths through the funding of on-site management and off-site Suitable Alternative Natural Greenspace (SANG)<br>• Defining new limits to the Clyst Valley Regional Park and provide a strategy for its protection and enhancement.<br>• The planting of 10,000 hectares of new tree planting to link with existing woodland networks. |
| Welcomes wider, sub-regional consideration of development pressures in Greater Exeter but do not want to see Neighbourhood Plans undermined. Concern rural communities | Exminster Parish Council (180) | Comments noted. The GESP will establish the overall spatial strategy and level of housing and employment land needed up to 2040, beyond the timeframes of current plans (which plan up to 2026 – 2033). Once adopted it will supersede |

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| bordering Exeter will be required to allocate land to meet Exeter's growing housing needs. | | specified strategic parts of each partner authority's local plans and provide the high level strategic planning policy framework for the area. More localised policies such as development management policies and locations for smaller scale development will be included in new Local Plans produced subsequently by the partner authorities. Neighbourhood plans are able to support the strategic development needs set out in the Local Plan and GESP. |
| Error on p.5 map. A35 indicated on the map should be A3052. | Farringdon Parish Council (53) | Error has been amended for future publications. |
| Will have to meet objectively assessed housing need and ways by which this can be accommodated in the early phases of the plan period as large urban extensions can have long lead in times for housing. | Genesis Town Planning (172) | Comments noted. Please see above responses in relation to housing issues. |
| Not enough detail to comment at this stage but would like to be consulted on further documents where detailed land allocations and use class proposals are made. | Health and Safety Executive (99) | Noted. |
| Concern that the rural nature of communities is under threat as the Plan seeks to combine rural and urban areas. | Hennock Parish Council (133) | Noted. This is reflected in the revised draft vision for GESP which states 'we fully utilise our unique south western city-town-country-coast environment…' and policy GESP1 which helps support strong, vibrant and healthy communities, both urban and rural. |
| Care needs to be taken to avoid development which increases flood risk elsewhere. | Lympstone Parish Council (182) | Agreed. |
| Policies restricting growth of Exeter must be criteria based and appropriately scaled and not contrary to the NPPF. | McMurdo Land Planning and Development Ltd (271) | Comments noted. |

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| More officers to work in planning would mean a speedier outcome on new initiatives. | Musbury Parish Council (242) | Comments noted. |
| Map on p.5 should include the Heritage Coast. | National Trust (288) | Noted. |
| Give the towns and villages a say in the process, we are not just consultees. | Newton Abbot Town Council (264) | Comments noted. The approach to consultation is set out in the joint Statement of Community Involvement. Community involvement is integral to the production of GESP. |
| Query who will be developing the Plan. Suggests people in the community should help deliver it rather than Council's. | Ogwell Neighbourhood Plan Steering Group (195) | The plan is being developed by the local authorities of East Devon District Council, Exeter City Council, Mid Devon District Council and Teignbridge District Council in partnership with Devon County Council. Community involvement is integral to the production of GESP, this was key to the issues consultation which aimed to stimulate debate early in the process and to ask for views on the scope and content of the new joint plan and the key issues facing the area. The next stage of consultation will build on this by inviting comments on draft policies, potential development locations and supporting evidence. |
| Suggests no urgency for this plan given Local Plans are in place until 2033 | Ogwell Neighbourhood Plan Steering Group (195) | Not agreed. A joint plan has a number of clear benefits aside from simply meeting the duty to co-operate. It provides an opportunity to coordinate the delivery of infrastructure, coordinate an approach to secure government funding and investment and provide potential cost savings to all partner authorities. There is also a requirement to review plans every five years and the GESP provides an opportunity to do this across the four partner districts. |
| Argue not enough consultation. | Ogwell Neighbourhood Plan Steering Group (195) | The approach to consultation is set out in the joint Statement of Community Involvement. There is a need to balance wide involvement in |

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| | | the planning process with the need for effective operation of the planning system. This difficult balancing act reflects cost and time constraints, and our level of discretion on the outcome. |
| Argue the GESP is not necessary. Exeter should consider developing higher density rather than developing outwards. | Ogwell Neighbourhood Plan Steering Group (195) | Not agreed. Please see above response. |
| Call for sites is premature, appears decision to develop on greenfield has been made rather than redevelopment. | Ogwell Neighbourhood Plan Steering Group (195) | Not agreed. The call for sites process ran alongside the Issues consultation to understand what land was available for development within the GESP area. This is a technical exercise. A positive assessment of a site's development potential in the HELAA is no guarantee of a future planning permission or that the site will be selected for allocation in the GESP or other local planning policy documents. Draft policies, potential development locations and supporting information will be consulted on as during the next stage of consultation. |
| Should consider masterplanning. | Ogwell Neighbourhood Plan Steering Group (195) | Noted. |
| Suggest conflict of interest in those making decisions. Argue Council officers will benefit from decisions. | Ogwell Neighbourhood Plan Steering Group (195) | Not agreed. The GESP is subject to separate democratic decisions by each of the partner Local Planning Authorities. In other words, all four councils will need to approve the plan at each relevant stage in accordance with their own constitutions/schemes of delegation. |
| Recognition in future growth allocation of need to provide flexibility of supply to address housing delivery shortfalls. | Persimmon Homes South West (259) | Noted. |
| GESP must be informed by the changing national planning policy context e.g. Housing White Paper implications. | Savills on behalf of Bloor Homes (325) | Comments noted. |

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| Query the name 'Greater Exeter' as it gives the perception the focus will be around Exeter. How will you ensure the other districts are equal partners and are perceived to be? | Seaton Town Council (212) | The impact of Exeter is felt beyond the boundaries of the city on a regional scale in terms of economy, housing need and transportation pattern. This area of influence has expanded to encompass East Devon, Mid Devon and Teignbridge. Together with Exeter City itself, this wider area can now be regarded as 'Greater Exeter' and therefore there is a clear benefit of planning across this functional geography. The GESP is subject to decisions by each of the Local Planning Authorities. In other words, all four councils will need to approve the plan at each relevant stage in accordance with their own constitutions/schemes of delegation. |
| How will governance arrangements work? | Seaton Town Council (212) | |
| Query how the various needs across the area will be provided for e.g. Exeter is very different to Seaton. | Seaton Town Council (212) | |
| How will funding for the infrastructure be provided for needed to deliver the vision? | Seaton Town Council (212) | The GESP will enable the partner authorities to coordinate the delivery of infrastructure to support the development that is needed. This coordinated approach is also necessary when looking to secure government funding and investment; Government now strongly favours a coordinated approach between authorities to secure large scale funding. A joint plan will give a clear strategy for the area that will assist in accessing funding for infrastructure. |
| Query regarding site selection and how it will be scrutinised. | Sidmouth Chamber of Commerce (75) | The GESP is being prepared by planning professionals from each of the partner councils involved with additional specialist advice called in where necessary. However, ultimately the GESP is subject to decisions by each of the Local Planning Authorities. In other words, all four councils will need to approve the plan at each relevant stage in accordance with their own constitutions/schemes of delegation. |
| Query the qualifications of those employed for GESP and those involved in judging the suitability of sites. | Sidmouth Chamber of Commerce (75) | |

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| Will there be an appeal decision. | Sidmouth Chamber of Commerce (75) | No, however the Greater Exeter Strategic Plan will be subject to an examination conducted by an Independent Planning Inspector. The final decision on the soundness of the Plan will be made by that Inspector. |
| Various queries raised questioning the openness and transparency of the process | Sidmouth Chamber of Commerce (75) | The GESP is being prepared in full consultation with local communities. Indeed, the partner councils undertook an issues consultation whilst the plan was at a formative stage, in order to stimulate debate and gather views of interested parties and local people. The next stage of consultation will include draft policies, potential development locations and supporting information. The GESP is subject to decisions by each of the Local Planning Authorities. Therefore, all four councils will need to approve the plan at each relevant stage. |
| Query weight given to local communities and elected representatives and how involved GESP officers will be with the public. Query the process. | Sidmouth Chamber of Commerce (75) | |
| Concern over a bias towards Exeter. | Sidmouth Chamber of Commerce (75) | |
| Importance of SMEs not highlighted, how are smaller businesses going to be heard? | Sidmouth Chamber of Commerce (75) | |
| GESP should be supported by robust transport evidence. Highways England identify the following:<br><br>- Any further planned growth at Cullompton may require significant improvements to M5 J28.<br>- Current forecasting suggests M5 J29 and J30 will be over capacity in 2030. Impact on Strategic Road Network by further growth will need careful consideration.<br>- Further growth south of Exeter could be constrained by the A38/A379 and A38/A380 junctions.<br>- Potential for A380 improvement between A38 and Torbay to influence call | Highways England (375) | Comments noted. The Greater Exeter councils welcome continued close working with Highways England to ensure that the GESP is supported by robust transport evidence. |

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| for sites, this may result in the A38 becoming a key congestion point on the network. | | |
| Concern over loss of countryside, argue no need for additional housing, concern the additional housing would not be for local housing needs. | Bishopsteignton Residents Association (163) | Noted. Comments on specific site options are invited as part of this next stage of public consultation. |
| Growth necessary to support economic development of Exeter should be spread around the city in all directions. | Lympstone Parish Council (330) | Comments noted. |
| Okehampton would benefit from more development, it would be good to assess the re-opening of rail links there. | Lympstone Parish Council (330) | Okehampton is not located within the GESP area. |
| The A376 is not of sufficient capacity to cope with any more commuter traffic therefore Exmouth is not suitable for more large scale development. | Lympstone Parish Council (330) | Noted. Comments on specific site options are invited as part of this next stage of public consultation. |
| Suggestion to build a Sports Village for the benefit of the community and will help the economy. | Exeter City Swimming Club (293) | A regional sports hub concept is considered within the draft policies and site options consultation document. |
| Exeter is suffering as a result of its success with a surplus of jobs causing significant community and congestion. Any future development in the GESP area must mitigate the impact of car usage and congestion. | Exeter Civic Society (356) | Comments noted. Please see above responses in relation to transport issues. |
| Concerned that any ambition or infrastructure suggested within the plan may not align with the views or aspiration of the Local Enterprise Partnership. Hope proposals within the GESP will be endorsed by local people rather than those proposed by the LEP. | Exeter Civic Society (356) | Not agreed. The GESP partner authorities undertook an 'issues' consultation whilst the plan was at a formative stage in order to stimulate debate early on in the process and ask for views on the scope and content of the new joint plan and the key issues facing the area. The next stage of consultation on the draft plan will use the information gained from the issues consultation |
| Timetable and process proposed does not offer local organisations or the public an opportunities to propose idea or suggestions for development, | Exeter Civic Society (356) | |

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| or for the constraint of development, before the publication of a draft plan. | | and consult on draft policies, potential site options and supporting information. |
| The plan shows insufficient passion for people and places. GESP should pursue the following overarching goals:<br>- Develop a pattern of economic and social activity which is not based on Exeter at the centre but rather a lattice of distinctive interconnected towns and villages. This should also be applied within Exeter.<br>- Recognise environmental enhancement and protection as a golden thread that runs through all policies. | Exeter Green Party (297) | Comments noted. This is recognised within the revised draft vision for GESP which states that 'In 2040, we are a sustainable, accessible and networked city region of linked but distinct communities.' It is considered that a number of the emerging GESP policies support the delivery of this vision. |
| Quality of life and the difference across the area. | Exeter Northcott Theatre (170) | Comments noted. |
| The neighbourhoods around the City are under huge pressure and much of the development on the edge of the City is of poor quality. We believe the way to address this is to start to plan positively for the needs of existing and emerging communities of Exeter. | Exeter St James Forum, St David's Neighbourhood Partnership, and Newtown Community Association (349) | Comments noted. |
| The need to conserve and enhance the natural and built environment of the GESP is acknowledged as important. Exmoor National Park Authority (ENPA) welcomes this inclusion. ENPA would further welcome the acknowledgement of and the need to conserve and enhance designated areas in and around the GESP, including National Parks and the duty to have regard to the setting of National Parks. | Exeter St James Forum, St David's Neighbourhood Partnership, and Newtown Community Association (349) | Comments noted. A series of draft policies are proposed in order to conserve and enhance the natural environment. These include:<br>• Ensuring that developments provide at least a 10% overall enhancement in biodiversity<br>• Providing a strategy to protect the internationally important wildlife sites of the Exe Estuary, Dawlish Warren and East Devon Pebblebed Heaths through the funding of on-site management and |

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| | | off-site Suitable Alternative Natural Greenspace (SANG)<br>• Defining new limits to the Clyst Valley Regional Park and provide a strategy for its protection and enhancement.<br>• The planting of 10,000 hectares of new tree planting to link with existing woodland networks.<br><br>Alongside the draft GESP a draft Green Infrastructure Strategy will be published, setting out the locations of existing areas of high biodiversity, the corridors and sustainable movement networks that connect them, and the key areas of accessible open space. |
| Consider Farringdon Parish to be unsustainable for large scale development. | Farringdon Parish Council (336) | Comments noted. |
| GESP will be prepared in the context of proposals set out in the recently published Housing White Paper. Representors identifies areas of the White Paper to consider in relation to the preparation of GESP. | Home Builders Federation (369) | Comments noted. |
| Greater coverage of the strategic economic plan of the wider Heart of the South West Local Enterprise Partnership to inform plan-making response in the GESP. | Pegasus Group on behalf of Lightwood Land (358) | Comments noted. Please see above responses in relation to economic issues. |
| Limited detail provided on background information and scale of the additional development requirements that need to be identified and planned for. A full SHMA is needed | Pegasus Group on behalf of Lightwood Land (358) | Comments noted. This next stage of public consultation provides clarity on many of the issues raised, taking into account any comments received during the Issues consultation in 2017. |

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| to provide an updated assessment to extend the analysis for 2040. | | |
| Plan should set out a proposed spatial distribution of growth guided by the size and function of the settlements within the region and their ability to accommodate further growth sustainably. Respondent sets a sustainability hierarchy of settlements in the GESP area; considers Exmouth as being suitable for more development than is identified in the East Devon Local Plan. | Lichfields on behalf of Mr Peter Lee and Tim Davey (343) | Noted. Comments on the suggested spatial development strategy for GESP are invited as part of the draft policies and site options consultation. |
| The consultation document identifies the proposed stages for the GESP, and these are supported; however, we would recommend that the Councils publish a timetable indicating when the next stages are anticipated to provide clarity for interested parties. | Savills for St Modwen Developments Ltd (338) | The timetable for GESP is published here. |
| The recently published Housing White Paper (February 2017) will be material in progressing the GESP and its evidence base; notably in respect to the implementation of a standard methodology for calculating housing need. | Savills for St Modwen Developments Ltd (338) | Noted. |
| The need for the Plan comes over as the response to Exeter City's wish to expand | Silverton Neighbourhood Plan Steering Group (333) | It is acknowledged that the impact of Exeter is felt beyond the boundaries of the city on a regional scale in terms of economy, housing need and transportation patterns. Therefore, there is a clear benefit of planning across this functional geography and allowing cross border co-ordination to address key planning issues. |
| Call for land, before Mid Devon's Local Plan has been published and commented upon, is premature. Responses for the call for land are | Silverton Neighbourhood Plan Steering Group (333) | The call for sites process ran alongside the Issues consultation to understand what land was available for development within the GESP area. This is a technical exercise. A positive assessment |

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| likely to influence the designation of development sites. | | of a site's development potential in the HELAA is no guarantee of a future planning permission or that the site will be selected for allocation in the GESP or other local planning policy documents. Draft policies, potential development locations and supporting information will be consulted on during the next stage of consultation. |
| What plans are there to deal with the inevitable increase of pollution/vehicles in Exeter? | Silverton Neighbourhood Plan Steering Group (333) | Please see above responses in relation to transport issues. |
| Questions what types of employment are envisaged to improve the prosperity of the local area | Silverton Neighbourhood Plan Steering Group (333) | Please see above responses in relation to employment issues. |
| Important that the infrastructure implications are fully researched; sufficient resource input must be obtained, and guaranteed. | Silverton Neighbourhood Plan Steering Group (333) | Comments noted. |
| Will get more meaningful answers from your consultations if you were to give the community several options with their pros and cons and we can comment or build on your ideas. | St Leonards Neighbourhood Association (125) | Comments noted. This next stage of consultation seeks views on a wide range of policies and site options. |
| It is critical that the plan makes the difficult decisions and does not artificially restrict the future prospects of success for the GESP area. | Stride Treglown (283) | Comments noted. |
| Need a network of orbital public transport services linking employment and residential sites. Creative solutions needed to address parking and congestion issues. | John Phillips, Tarka Rail Association (109) | Noted. |
| Important to address the needs and investment needed in exiting settlements as well as focus on new land use. | Teignmouth Town Centre Management Partnership (116) | Comments noted. |
| Recommends inclusion of a policy to support development of new cultural and community facilities to enhance the well-being of the local | Theatres Trust (145) | Comments noted. The draft policies in the draft policies and site options consultation document include a number of provisions to ensure well |

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| community and support the vitality and viability of centres. | | designed, vibrant, mixed use places including a range of local facilities. |
| Need to be bold in embracing new solutions to manage growth in city region. | Transition Exeter (206) | Noted. |
| Concern regarding potential development in Cowley area; lack of infrastructure, not sustainable location. | Upton Pyne and Cowley Parish Council (381) | Noted. Comments on site options are invited as part of the draft policies and site options consultation. |
| Important that area and timeframe are clearly identified within GESP and supporting evidence base so that relationship with Local Plan can be fully understood. Potential conflict if GESP identified higher housing numbers that current Local Plans. | Vail Williams for Gleeson Developments Limited (372) | Comments noted. |
| Too many highway and drainage constraints in the area along the A376/A3052/M5 to consider any further large developments in this area. Need to consider provision of local infrastructure to support housing and economic development. Consider relocating M5 services to release land for economic development? | Woodbury Parish Council (365) | Comments noted. |
| Public transport has to be a major consideration. Infrastructure cannot cope with the number of cars on the road, overcrowding on trains and buses (particularly during summer months with high numbers of tourists). | Individual – Teignbridge (142) | Comments noted. Please see above responses in relation to transport issues. |
| Green space in the form of gardens, parks and trees should be built into all new housing schemes. | Individual – Teignbridge (142) | Comments noted. |
| Infrastructure such as roads, schools, medical centres and leisure facilities must be put in place. | Individual – Teignbridge (142) | Comments. The Greater Exeter Councils agree that high quality development relies on the timely delivery of infrastructure. |
| Envisages the city being served by a northern ring road linking the M5 near Poltimore with the | Individual – Exeter (100) | Comments noted. |

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| A377 at Cowley & the A30 at Wheatley; the A3052 at Clyst St Mary being linked to the A30 at the Airport & onto Cranbrook & the B3180 near Poltimore. | | |
| Consultation periods should be longer than 6 weeks and should allow 6 weeks following the last exhibition date. | Individual – Teignbridge (266) | Comments noted. However, there is a need to balance wide involvement in the planning process with the need for effective operation of the planning system. This difficult balancing act reflects costs and time constraints |
| More emphasis on providing safe and pleasant walking and cycling facilities. | Individual – Exeter (235) | Comments noted. |
| Don't want towns and villages to be the poor relations to Exeter in control. | Individual – Mid Devon (272) | The plan is being developed by the local authorities of East Devon District Council, Exeter City Council, Mid Devon District Council and Teignbridge District Council in partnership with Devon County Council is also assisting with producing the GESP. The GESP is subject to separate decisions by each of the Local Planning Authorities. In other words, all four councils will need to approve the plan at each relevant stage in accordance with their own constitutions/schemes of delegation. |
| Needs to include a sustainable vision which considers biodiversity and insisting that developers include systems for recycling water, green roofs, cycle routes etc. | Individual – Exeter (310) | Comments noted. The draft vision includes 'Greater Places for nature – rebuilding biodiversity and peoples' access to it' as a key priority for the area. |
| Need to be able to learn from mistakes and delivery of what is promised. | Individual – East Devon (308) | Comments noted. |
| Exeter should concentrate on quality projects like a well-designed theatre in town which would attract residents and visitors. | Individual – East Devon & Exeter (252) | Comments noted. |
| Sacrifice community and landscape with more house building. | Individual – East Devon & Exeter (252) | Not agreed. A key priority for the GESP is to provide the homes we need in high quality |

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| | | neighbourhoods with the right infrastructure in the right places. |
| Not clear how the plan being developed is going to factor in the breakthroughs that we hope and expect Exeter City Futures to come up with. | Individual – Exeter (250) | Comments noted. |
| Disproportionate weight applied to developing opportunities which are 'data-driven' and 'knowledge led' which is likely to exclude a significant proportion of the population. | Individual – Exeter (250) | Noted. |
| Consultation period too short with insufficient publicity. | Individual – East Devon (233) | The approach to consultation is set out in the joint Statement of Community Involvement which states that consultation processes will be chosen by balancing cost and time constraints, and our level of discretion on the outcome. There is a need to balance wide involvement in the planning process with the need for effective operation of the planning system. Consequently, six weeks is considered appropriate to allow an informed response. |
| Work on GESP should be delayed until implications of Brexit are known. | Individual – Teignbridge (228) | Not agreed. This would not be a proportionate response and would be inconsistent with the national policy agenda in relation to plan making. |
| Make sure that consultation is accessible to people. E.g. does it need to be labelled 'Regulation 18'? | Individual – Exeter (223) | Comments noted. The approach to consultation is set out in the joint Statement of Community Involvement which requires that consultation publications are clear and concise and avoid unnecessary jargon, without understating the complexities of any decision. |
| Missing is any reference to children and young people. | Individual – Exeter (174) | Comments noted. |
| Plan for this to be a partnership between private, public and academic organisations for future | Individual – Mid Devon (158) | Comments noted. |

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| development. Use the University's skills and knowledge. | | |
| Develop infrastructure first then the actual development. Especially for broadband. | Individual – Mid Devon (158) | Comments noted. |
| All major areas up for examination. Has anyone considered setting a limit to development and expansion? | Individual – Mid Devon (156) | Comments noted |
| Suspect that this is a step towards a plan to bid for an expanded unitary authority. | Individual – Teignbridge (107) | Not agreed. The cross border co-ordination of issues particularly those associated with the growth of Exeter as the region's city is going to be key for Exeter and its neighbouring authorities. The impact of Exeter is felt beyond the boundaries of the city on a regional scale in terms of economy, housing need and transportation pattern. This area of influence has expanded to encompass East Devon, Mid Devon and Teignbridge. Together with Exeter itself, this wider area can now be regarded as 'Greater Exeter' and therefore there is a clear benefit of planning across functional geography. It is subject to separate decisions by each of the Local Planning Authorities. In other words, all four councils will need to approve the plan at each relevant stage in accordance with their own constitutions/schemes of delegation. |
| More clarity on term "Greater Exeter"; assure the public that this is NOT the precursor of a new unitary local authority. | Individual – Exeter (91) | |
| Ban students from bringing their cars to Exeter. Encourage cycling by building better/more cycle paths. Offer free swimming and free bus passes to residents. Build a children's play park in town centre. | Individual – Exeter (232) | Comments noted. |

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| Control of development in rural villages should be given to the communities that live there in order to address economic decline in rural areas. | Individual – East Devon (328) | Comments noted. Neighbourhood planning provides the opportunity for communities to shape development in their areas. The Greater Exeter Strategic Plan will be a formal statutory document providing the overall spatial strategy and level of housing and employment land needed up to 2040, beyond the timeframes of current plans (which plan up to 2026 -2033). |
| No more development until current infrastructure/service issues are resolved: upgrade and enhance frequency of local rail services; improve rural and urban bus services. | Individual (326) | Comments noted. The Greater Exeter councils acknowledge that high quality development relies on the timely provision of infrastructure to ensure that the community has the facilities and services it needs in order to function successfully. |
| Consider minority sports. | Individual (198) | Noted. |
| Explicitly promote equality and fairness. | Individual – East Devon (102) | Comments noted. |
| Build in sustainable transport options at development stage not afterwards; cycle routes essential. | Individual – Mid Devon (93) | Comments noted. A key priority for the GESP vision is to work towards achieving sustainable travel. |
| Emerging themes need to feed down to neighbourhood plan groups and their own ideas actively sought. | Individual – East Devon (77) | Comments noted. |
| Future transport technologies/options not considered. Is GESP promoting a new rail line between Exeter and Newton Abbot? | Individual – Exeter (47) | Comments noted. Please see draft policies within Chapter 8: Movement and Communications. |
| The plan appears to start from a point where decisions have been made on what the strategic plan looks like | Individual – Exeter (47) | Not agreed. The 'issues' consultation sought to stimulate debate and gather views on the scope and content of the new joint plan, the key issues facing the area and local knowledge of the Greater Exeter area. The next stage of consultation on the draft policies and site options seeks views on draft policies and a wide range of site options, taking into account the results of the Issues consultation. |

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| Well planned development to reduce impact on scenery, countryside and coast which is major appeal of Devon. | Individual – East Devon (69) | Comments noted. |
| Suspicious of 'evidence-based' planning. GESP too top-down. Support cooperative and integrated approach but concerned about site selection being undertaken at sub-regional level. | Individual – East Devon (41) | Comments noted. |
| No building on hills surrounding Exeter. | Individual – Exeter (37) | Noted. |
| Suggests road system similar Milton Keynes or American cities | Individual (29) | Noted. |
| Hopes strategic approach can avoid negative impacts from developments over past 30 years, including destruction of green space and attractive landscapes. | Individual – East Devon (27) | Comments noted. |
| Stronger focus on environment, sustainability and wellbeing; access to the countryside, green transport modes, inbuilt green electricity sources and solar water heating. | Individual – Exeter (23) | Comments noted. |
| Opposed to swimming pool development in Exeter; not large enough for events and competitions. | Individual – East Devon (18) | Comments noted. |
| Exeter, Sidmouth, Exmouth should halt expansion and revert to other areas. Exeter to Cranbrook and Crediton. Exmouth to Woodbury. Sidmouth to Honiton/Ottery. | Individual – Exeter (14) | Noted. Comments on site options are invited as part of this next stage of consultation on draft policies and site options. |
| Address large differences in quality of education across area. | Individual – Exeter (11) | Noted. A key priority for the area is 'Greater Education – nurturing, attracting and retaining a world class workforce'. |
| Information on housing needs required before detailed thought can be given. | Individual (337) | Comments noted. A Local Housing Needs Assessment is published on the GESP website. |
| Future consultation should be advertised in local press | Individual (337) | The joint Statement of Community Involvement sets out the GESP's approach to consultation. Among other consultation processes, this |

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| | | requires that consultations are publicised by a combination of methods including website, press release, leaflets, posters, displays, social media, community groups and community events. |
| The call for sites could heavily influence the determination of new development. Knowing what and where should be the determinant. | Individual (337) | The call for sites process ran alongside the Issues consultation to understand what land was available for development within the GESP area. This is a technical exercise. A positive assessment of a site's development potential in the HELAA is no guarantee of a future planning permission or that the site will be selected for allocation in the GESP or other local planning policy documents. Draft policies, potential development locations and supporting information will be consulted on during the next stage of consultation. |
| Better infrastructure potential on larger sites. | Individual (337) | Comments noted. |
| Mid Devon seems to have absorbed a lot of development lately. | Individual (337) | Noted. |
| Method for retaining affordability of properties when ownership changes. | Individual (337) | Comments noted. |
| Provide access to services for self-employed. | Individual (337) | Comments noted. |
| Traffic/environmental implications if current trends continue; cater for new transport technologies | Individual (337) | Comments noted. The draft policies seek to enable and facilitate new transport technologies. |
| No Park and Ride provision on the Tiverton/Crediton side of Exeter | Individual (337) | Please see draft policy GESP27 which includes park and ride provision. |
| Might the University be prevailed upon to carry out any of the necessary research? | Individual (337) | Noted. |
| Finance and land available for future school expansion should be considered. Potential school closures if larger scale development favoured. | Individual (337) | Comments noted. |

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| Traffic impacts from new developments on rural minor roads; adverse impacts on local communities. | Individual (337) | Comments noted. Please see |
| Clyst St Mary should not become a town or large suburb of Exeter. | Individual (342; 346; 362) | Noted. Comments on specific site options are invited as part of this next stage of public consultation. |
| Much more of our green space and ecosystems will likely be destroyed; character of Devon at risk of being ruined and tourism will suffer. | Individual (359) | Not agreed. The GESP includes a wide range of policies to conserve and enhance the natural environment. Policies include:<br>• Ensuring that developments provide at least a 10% overall enhancement in biodiversity<br>• Providing a strategy to protect the internationally important wildlife sites of the Exe Estuary, Dawlish Warren and East Devon Pebblebed Heaths through the funding of on-site management and off-site Suitable Alternative Natural Greenspace (SANG)<br>• Defining new limits to the Clyst Valley Regional Park and provide a strategy for its protection and enhancement.<br>• The planting of 10,000 hectares of new tree planting to link with existing woodland networks. |
| If it is possible to restrict the use of properties in new developments as holiday lets, perhaps this should be considered. | Individual – East Devon (360) | Comments noted. |
| Infrastructure requirements not kept up with level of development. | Individual (366) | Comments noted. The Greater Exeter councils recognise that high quality development relies upon the timely delivery of infrastructure. |

| | | |
|---|---|---|
| How can individuals be a part of the process going forward? E.g. information centre/point of contact. Getting more young people involved. | Individual – Exeter (92) | Comments noted. The GESP is being prepared in full consultation with local communities in accordance with the principles set out in the joint Statement of Community Involvement. |
| Better build quality; ensure contractors do a good job when spending public money. | Individual – Exeter (92) | Comments noted. |
| Inadequate road system and traffic congestion; poor air standards. Lack of surgeries and schools | Individual (106) | Comments noted. |

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## Appendix F:

## GESP team staff resources: future options

### Option 1: Maintain the status quo

This option would see the GESP team remain at 5.2 FTEs, with each team member employed solely by their individual authority. Under this option, there would be no financial equalisation agreement.

| | |
|---|---|
| Benefits | - No additional financial costs for the Local Planning Authorities (LPAs) to those already committed |
| Risks | - Insufficient resources to meet the GESP timetable and deliver effective consultation, as well as accommodate any peaks in workload<br>- Current staffing commitments by the four LPAs are not financially comparable<br>- No appointed team leader – The project would continue to be coordinated by the two Principal Officers in the team<br>- There is no resilience to future staff changes or losses |

### Option 2: Retain existing staff and identify additional resource to bring staffing levels up to 8.0 FTEs

There are 3 scenarios under this option:

2a. Identify resource from within the existing planning teams and, subject to how these staffing contributions come forward, agree financial equalisation arrangements as necessary between the four LPAs covering the full LPA resource. Officers would continue to be employed solely by their individual authority. This would require all LPAs to reprioritise current plan programmes in order to divert staff to the GESP.

2b. Recruit additional staffing resources through a competitive recruitment process. The full costs of LPA staff in the team would be apportioned equally between the four LPAs by way of a financial equalisation agreement, payable to a host authority. New officers appointed would be employed by a single host authority. This would improve the contractual management arrangements for the GESP team.

2c. A hybrid between 2a and 2b whereby additional resources are obtained through a combination of existing team members and external recruitment. All contributions, whether financial or existing officers, would be balanced equitably through a financial equalisation agreement for the four LPAs. New officers appointed would be employed by a single host authority.

| | |
|---|---|
| Benefits | - May be difficult for the LPAs to identify surplus resources within existing teams for 2a to be a realistic option on its own. However, if they could be identified or additional external resource could be brought in, then there would be sufficient resources to meet the GESP timetable and deliver effective consultation, as well as accommodate any peaks in workload<br>- Financial contributions would be equitable between the 4 LPAs<br>- Potential to provide defined roles within the team such as an appointed team leader and technician – either internally or externally appointed<br>- Less ability for individual LPAs to withdraw resource by way of a unilateral decision<br>- Better resilience to future staff changes or losses |
| Risks | - The different status of existing team members and new employees would not entirely overcome the informal arrangements of the existing staff team<br>- Need to backfill staff if internal recruitments are made<br>- Administrative/HR processes involved in establishing a host authority may take some time, delaying recruitment<br>- Total additional costs of resourcing are likely to be in the region of £100,000 annually<br>- Total annual GESP staff cost to each LPA is likely to be approximately £62,000 (depending on the composition of the team-assumptions have been made that the team could include a team leader and technician but this is to be determined) |

**Option 3: All GESP team members (excluding DCC officers) to be hosted by a single LPA**

This would comprise both existing and new GESP team members who would be seconded to a host authority, with all financial contributions underpinned by an equalisation agreement. As per option 2, additional staff members would be recruited to bring staffing levels up to 8.0 FTEs.

| | |
|---|---|
| Benefits | - Sufficient resources to meet the GESP timetable and deliver effective consultation, as well as accommodate any peaks in workload<br>- Financial contributions would be equitable between the four LPAs<br>- Potential to provide defined roles within the team such as an appointed team leader and technician – either internally or externally appointed |

| | |
|---|---|
| | - Less ability for individual LPAs to withdraw resource by way of a unilateral decision<br>- Better resilience to future staff changes or losses<br>- All team members would have the same status-employed by a single host authority. This would overcome the existing issues with informal staffing arrangements<br>- Line management would move to the Team Leader/Principals to improve project coordination |
| Risks | - Administrative/HR processes involved in establishing a host authority may take some time, delaying recruitment of additional staff<br>- Total additional costs of resourcing are likely to be in the region of £100,000 annually<br>- Total annual GESP staff cost to each LPA is likely to be approximately £62,000 (depending on the composition of the team-assumptions have been made that the team could include a team leader and technician but this is to be determined)<br>- Withdrawal of a LPA from the formal equalisation process and GESP would result in financial implications for the remaining authorities |

**Financial implications of options 2 and 3:**

| Options 2 and 3 – Equalisation | | | |
|---|---|---|---|
| | Annual existing staff cost/contribution (£) | Annual equalised contribution or equivalent resource cost for the additional staff (£) | Total annual equalised staff cost/contribution (£) |
| Staff costs (TOTAL) | 145,952 | 103,000 | 248,952 |
| East Devon | 39,213 | 25,750 | £62,238 |
| Exeter | 28,670 | 25,750 | £62,238 |
| Mid Devon | 44,933 | 25,750 | £62,238 |
| Teignbridge | 33,136 | 25,750 | £62,238 |

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**CABINET**
**6 AUGUST 2020**

**REPORT OF THE HEAD OF PLANNING, ECONOMY AND REGENERATION**

**GREATER EXETER STRATEGIC PLAN (GESP): JOINT STATEMENT OF COMMUNITY INVOLVEMENT (JOINT SCI)**

| | |
|---|---|
| **Cabinet Member(s):** | Cllr Graeme Barnell, Cabinet Member for Planning & Economic Regeneration |
| **Responsible Officer:** | Mrs Jenny Clifford, Head of Planning, Economy and Regeneration |

**Reason for Report:**
To consider and approve the Joint Statement of Community Involvement for the Greater Exeter Strategic Plan (GESP). The Statement of Community Involvement sets out the Greater Exeter Council's approach to consultation on, and involvement in, the preparation of the Greater Exeter Strategic Plan (GESP).

**Recommendations:**

**That Cabinet recommends to Council that:**

**A: The Council approves the contents and adopts the Joint SCI that has been prepared for the Greater Exeter Strategic Plan (GESP); and**

**B: The Council gives delegated authority to the Leader, in consultation with the Portfolio Holder and Chief Executive, to agree changes to the Joint SCI arising from decisions by the other GESP local planning authorities and to approve it as a Local Development Document, noting that it will apply jointly to East Devon District, Exeter City, Mid Devon District and Teignbridge District Councils**.

**Financial implications:**
The adoption of the Joint SCI will commit the Greater Exeter local planning authorities to undertaking public consultation on the GESP in accordance with the methods set out in the Joint SCI. The costs associated with consultation will be funded by the joint GESP budget, to which each of the Greater Exeter local planning authorities have currently agreed to each contribute £170,000. Devon County Council has also made financial contributions to the preparation of the plan.

**Budget and Policy Framework:** The Joint Statement of Community Involvement will form part of the Council's policy framework.

**Legal implications:**

The preparation of an SCI, setting out how a local authority will involve its communities, businesses and other interested parties in the preparation of planning policies and in determining individual planning applications, is a legal requirement under section 18 of the Planning and Compulsory Purchase Act 2004. However, there are currently no formal or regulatory requirements setting out how an SCI should be prepared and there is no legal requirement to consult on its contents.

Each of the Greater Exeter local planning authorities already have their own SCIs and these contain different consultation requirements. In order to overcome any difficulties with aligning these individual existing SCIs, a single Joint SCI specifically for the GESP is considered necessary. The Joint SCI will only apply to consultations on the GESP. The Greater Exeter local planning authorities' existing SCIs will remain in force for all other planning consultations.

**Risk Assessment:**
Each of the four local planning authorities in the Greater Exeter area are making appropriate arrangements for approving the Joint SCI. There is a risk that one or more of the Councils does not approve the Joint SCI. This would mean that such an authority would instead consult on the GESP in accordance with their existing SCI. This would increase the likelihood of inconsistent consultation and public confusion across the Greater Exeter area which could lead to challenges as the plan progresses and it is therefore not appropriate.

There is also a risk that revisions to the Joint SCI are made at Committee. This would then require each of the other local planning authorities to approve the revised versions. To overcome this potential issue, approval is sought to give the Leaders of the Greater Exeter local planning authorities, in consultation with the Chief Executives and Portfolio Holders, delegated authority to agree changes to the Joint SCI a part of the approval process.

**Equality Impact Assessment:**
Under the Act's Public Sector Equalities Duty, decision makers are required to consider the need to:

- Eliminate discrimination, harassment, victimisation and any other prohibited conduct;
- Advance equality by encouraging participation, removing disadvantage, taking account of disabilities and meeting people's needs; and
- Foster good relations between people by tackling prejudice and promoting understanding.

In order to comply with the general duty, authorities must assess the impact on equality of decisions, policies and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

In making decisions the authority must take into account the potential impact of that decision in relation to age, disability, race/ethnicity (includes Gypsies and Travellers), sex and gender, gender identity, religion and belief, sexual orientation, pregnant

women and new and breastfeeding mothers, marriage and civil partnership status in coming to a decision.

It is considered the Joint SCI will have a positive impact on people with protected characteristics. This is because, in setting out a range of methods of consultation, it seeks to ensure (as far as possible, taking cost and resource constraints into account) that all members of the community are able to engage in the preparation of the GESP.

**Impact on Climate Change:**
There are no direct climate change/environmental impacts arising from the recommendations. However, the Joint SCI includes the potential use of significant electronic, online and social media platforms which will help minimise the carbon impact of future GESP consultations.

**Relationship to Corporate Plan:**
Implementation of a Joint Statement of Community Involvement for the Greater Exeter Strategic Plan will help to ensure that our services are accessible and meet the needs of our community as well as helping to maximise the potential health and well-being of our communities. It will therefore help deliver all four of the Corporate Plan priorities.

**Appendices:**

**Appendix 1: Greater Exeter Strategic Plan Joint Statement of Community Involvement: Summary of representations**

**Appendix 2: Greater Exeter Strategic Plan Joint Statement of Community Involvement. 2020**

**MAIN BODY OF REPORT**

## 1. Purpose

1.1. Statements of Community Involvement (SCI) are produced by local authorities to explain to the public how they will be involved in planning matters. This report concerns the proposed Joint Statement of Community Involvement (Joint SCI) that has been prepared for the Greater Exeter Strategic Plan (GESP). The Joint SCI sets out the proposed approach to public consultation on the GESP as it progresses through its statutory plan-making stages towards adoption.

1.2. Whilst there is no legal requirement to do so, a draft of the proposed Joint SCI was itself subject to public consultation in 2017. This report explains how the proposed Joint SCI has been amended, both in light of responses to the 2017 consultation and to take account of Covid-19 restrictions on social interaction.

1.3. The proposed Joint SCI will cover the four Greater Exeter local planning authorities of Exeter City, East Devon District, Mid Devon District and Teignbridge District Councils. If approved by all four local planning authorities, the Joint SCI will become a Local Development Document.

## 2. Introduction

2.1. The 2004 Planning and Compulsory Purchase Act requires local planning authorities to prepare an SCI. Each of the Greater Exeter local planning authorities already have their own SCIs containing different consultation requirements. In order to overcome any difficulties with aligning these individual existing SCIs, a single Joint SCI specifically for the GESP has been prepared, which will only apply to consultations on that plan. The authorities' existing SCIs will remain in force for any other planning consultations.

2.2. Although consultation on SCIs and their revision is not legally required, a draft Joint SCI was published for consultation in 2017. Representations were received from 13 respondents and these are published at https://www.gesp.org.uk/consultation-phases/procedural-documents/statement-of-community-involvement/

2.3. A summary of the representations, together with responses, is attached at Appendix 1 to this report.

## 3. The Proposed Joint SCI

3.1. The proposed Joint SCI is attached at Appendix 2 to this report. The proposed Joint SCI balances the representations received in 2017 against the need to progress with the preparation of the GESP during the ongoing uncertainties of the COVID-19 pandemic. The main changes that have been made since consultation took place on the draft Joint SCI are as follows:

- Clarification has been provided that Devon County Council does not need to adopt the GESP, which is a matter for the four local planning authorities;
- It is recognised that consultation methods for the GESP must be chosen by balancing cost and time constraints;
- Whilst the statutory consultation period for plan making remains as 6 weeks, the standard consultation period for the GESP has been increased to 8 weeks;
- A clear explanation has been added that respondents' personal contact details will be retained in order to inform them about progress with the GESP, in line with the Data Protection Act 2018 and the EU General Data Protection Regulations;

- An additional requirement has been added to prepare a communication and engagement strategy with more specific proposals for each stage of consultation;
- It is now stated that paper copies of consultation documents will be made available at council offices and libraries where possible (see final bullet point below)
- It is also stated that electronic copies of consultation documents (or paper copies, on request) will be made available to community groups, councils and statutory organisations;
- It is stated that other requests for paper copies will be met, but at a price that reflects publication costs. This is necessary to help ensure that the local authorities can cover the costs of consultation costs;
- It now clarifies that, where resources allow, consultation documents will be made available in alternative formats upon request;
- More detail has been provided on the stages of plan preparation; and
- It is specified that some consultation methods (such as public exhibitions involving face-to-face contact and making paper copies of consultation documents available in public places) will be undertaken 'where possible' to reflect the ongoing uncertainties and implications of the COVID-19 pandemic.

3.2. It should be noted that there is no requirement to consult on a revised SCI before adoption.

## 4. Implications

4.1. Of the amendments listed above, two key changes have been made to the Joint SCI since draft stage. The increase in the consultation period from 6 to 8 weeks will help to ensure that individuals and organisations are more able to prepare thoughtful and well evidenced comments. This includes organisations who need to take comments through a committee structure. The reference to some consultation methods taking place 'where possible' enables greater flexibility to progress the plan during the uncertain period of COVID-19. If some events such as face-to-face public exhibitions cannot take place, meaningful engagement will still be ensured using alternative means such as social media and online exhibitions. This flexible approach is supported by Government guidelines that urge local authorities to progress plan-making during the coronavirus pandemic (see https://www.gov.uk/guidance/plan-making#covid19).

4.2. Other changes made to the Joint SCI are generally fairly minor and improve the readability of the document.

## 5. Conclusion

5.1. The GESP Joint SCI will provide the framework for consultation on the GESP as it progresses. It is recommended that Council approves the content of the document and adopts the joint SCI.

5.2. During July and August 2020, support for the GESP Joint SCI will also be sought from the relevant decision making body/ies of each of the other Greater Exeter local planning authorities. Should any one of the Greater Exeter local planning authorities suggest a change to the Joint SCI, there will need to be a meeting of the council Leaders, in consultation with Portfolio Holders and Chief Executives or equivalent, to agree a consolidated version of the document. Recommendation B, sets this out formally.

## 6. Options

6.1. The alternative option is for the Council not to support the content of the Joint SCI and for the authority to instead consult on the GESP in accordance with the adopted Mid Devon SCI. Each of the other Greater Exeter authorities would then also consult on the GESP in accordance with their individual adopted SCIs. The risk of potential inconsistencies and public confusion that this option could cause is set out in the risk assessment above and it is therefore not appropriate.

## 7. Planning Policy Advisory Group (PPAG)

7.1. The Planning Policy Advisory Group (PPAG) has considered the Joint Statement of Community Involvement and recommended that Cabinet approve the document for adoption by Council.

## 8. Scrutiny Committee

1.1. Scrutiny Committee considered the Joint Statement of Community Involvement for the Greater Exeter Strategic Plan at its meeting of 20th July 2020. Members discussed the recommendations in the reports and specifically the recommendation that Cabinet give delegated authority to the Leader, in consultation with the Portfolio Holder and Chief Executive, to agree changes to the above documents arising from decisions by the other GESP authorities before they are published for consultation. Following discussion, Scrutiny Committee agreed to note the recommendations to Cabinet subject to the following comments which the Scrutiny Committee asked to be brought to the attention of the Cabinet:

- That the Cabinet recognised the concerns within the GESP expressed by the Scrutiny Committee on 20th July including:
    - The democratic process
    - Lack of scope including neighbouring authorities
    - Over complexity
    - Overly Exeter focussed

    - Hierarchy of plans
    - Infrastructure concerns
- That any delegated authority given should be for minor editorial changes only.

**Contact for more Information:**

Jenny Clifford, Head of Planning, Economy and Regeneration – (01884 234346) / jclifford@middevon.gov.uk

Tristan Peat, Forward Planning Team Leader – (01884 234344) / tpeat@middevon.gov.uk.

Arron Beecham, Forward Planning Officer – (01884 234221) / abeecham@middevon.gov.uk

**Circulation of the Report:** Cllr Graeme Barnell

**List of Background Papers:**

## Appendix 1: Greater Exeter Strategic Plan Joint Statement of Community Involvement: Summary of representations

Consultation on the Joint Statement of Community Involvement (SCI) ran from 27 February 2017 to 10 April 2017. A total of 13 valid representations were received. These have been summarised and responses from the Greater Exeter Councils provided in the table below.

| Summary of representation | Organisation/Individual | Response |
|---|---|---|
| Supports the principle of meaningful and early engagement of the general community, community organisations and statutory bodies. | Natural England | Support noted. |
| Councils should talk to communities about the emerging plan and invite active participation. Councils should also produce a summary analysis of the comments received on the first round of consultation and the extent to which these have influence work on the draft plan. | Exeter Green Party; Individual – ECC | Agreed. The issues consultation which took place between 27 February and 10 April 2017 represented the first stage in the process of preparing the GESP, asking communities to comment on the content of the plan, provide local knowledge and stimulate early debate. A summary analysis of the comments received during the issues consultation is to be published with the GESP draft policies and site options consultation document and will explain how the comments have been taken into account. |
| Draft SCI says all the right things but at what point will people be considered? It also doesn't specify weight/meanings attributed to responses. | Exeter Community Forum | The SCI promotes involvement for all and therefore it would not be appropriate to attribute different 'weightings' to responses. All comments are considered individually based on their merits or recommendations. It is considered that the SCI already expresses this approach in the section 'General principles for consultation and involvement'. |
| SCI doesn't mention what will happen with consultation input. Results need to be discussed with communities and explanation of why ignored. | Exeter Community Forum | Comments will not be ignored. The SCI states that comments will be published as soon as feasible and will include an explanation of how comments have been taken into account in decisions that have been taken. |
| SCI does not give enough information to inspire people to be involved. | Exeter Community Forum | The purpose of the Joint SCI is to set out the approach to consultation and involvement in the Greater Exeter Strategic Plan. Any information on planning issues or the content of the plan which would encourage involvement will be published as part of any subsequent consultation documentation. |

| | | |
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| Would help to have approximate timetable with official consultation periods. | Exeter Community Forum | It is beyond the scope of the SCI to set out dates for plan preparation or specific timescales for consultation stages. The timescale for the preparation of the Greater Exeter Strategic Plan is set out in the Local Development Scheme which is available at www.gesp.org.uk . This link is provided in the SCI. |
| Draft SCI doesn't give any opportunities to seek redress if the process lets them down. No explanation of how to challenge. | Exeter Community Forum | Comments noted. However, it is considered that this is beyond the scope of the SCI and therefore, no amendments are proposed. Interested stakeholders will be able to put forward their views during consultation stages and the examination process, where an Independent Planning Inspector carries out an examination of the Greater Exeter Strategic Plan, considering the views of interested people. |
| Agree that use of technical terms/jargon should be explained in lay terms and general document should be accessible and written in a straightforward way. | Exeter Community Forum | Support noted. |
| Fuller participation needs consideration. For example a meeting in a town hall in the town centre is not likely to be an effective means to enable participation from a broad section of the community. | Exeter Community Forum. | The SCI is intended to promote involvement for all. As a result, a wide range of methods will be used for any consultation relating to the GESP as set out under 'How we will consult and how you can get involved'. Social media will become a greater part of consultation going forward. |
| People need to have confidence that plans may be influenced. Pre-determined preferences should be identified beforehand. | Exeter Community Forum | Agreed. It is considered that the SCI already makes this clear by stating 'We will also explain how these comments have been considered or taken into account in the process of preparing the GESP'. No pre-determined preferences were identified during the issues consultation as this stage of consultation was primarily aimed at gathering people's views and local knowledge. The next stage of consultation will invite people to comment on draft policies, potential development locations and supporting information. The next stage of the plan will be informed by previous comments received and the results of ongoing evidence gathering. |
| Consultation processes should be discussed and agreed in advanced. Community organisations should be funded to facilitate consultation processes. | Exeter Community Forum | Comments noted. It is agreed that consultation processes should be discussed and agreed in advance. The approach to consultation is therefore set out in the SCI which itself has been subject to public |

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|---|---|---|
| | | consultation. However, there is a need to balance wide involvement in the planning process with the need for effective operation of the planning system. This difficult balancing act reflects cost and time constraints, and a level of discretion on the outcome. |
| An indicative timetable overall for the process and key decisions should be set out. | Exeter Community Forum | It is beyond the scope of the SCI to set out the timetable for the Greater Exeter Strategic Plan. This is set out in the Local Development Scheme which is available at www.gesp.org.uk. This link has been added to the SCI. |
| Consultation period should be longer than six weeks. | Exeter Community Forum | Agreed, and extended to 8 weeks. |
| It is not clear how 'conscientious consideration' will happen. What if there is disagreement about this? | Exeter Community Forum | All comments are considered individually based on their merits or recommendations. It is considered that the SCI as currently worded is clear in the approach taken under 'General principles of planning consultation'. Where there is disagreement, stakeholders will have the opportunity to express their views during any subsequent stages of consultation and through the examination process. |
| Assume there will be no charge to view or download documents. | Exeter Community Forum | Documents in electronic form will be published on the website and be available to download for free. Electronic copies (or paper copies, on request) will also be made available to community groups, councils and statutory organisations. Paper copies will be available to view at council offices and public libraries during normal opening hours where possible. Other requests for paper copies will be met, but at a price that reflects publication costs. |
| Not clear who 'we' is: Is this each district council, Devon County Council or another body that is overseeing the process. | Exeter Community Forum | This refers to the four authorities working in partnership on the GESP: East Devon District Council, Exeter City Council, Mid Devon District Council and Teignbridge District Council. Devon County Council will assist with producing the GESP. This is stated in the 'Background' section of the SCI. |
| There needs to be more transparency and public involvement during the next stage. At the very least, minutes of the meetings should be published, and the meetings should be open to the public. Technical | Devon Campaign to Protect Rural England | Comments noted. The Greater Exeter Strategic Plan is subject to separate decisions by each of the local planning authorities in accordance with their own constitutions/schemes of delegation. Details of minutes/agendas are published on each Council's website and these meetings are open to the public. Technical documents are |

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| documents should be published as soon as they are available. | | published on an ongoing basis on the GESP website. The purpose of the SCI is to set out the approach to consultation and involvement and not the decision making process. As such, no additional changes are proposed. |
| Concerned that local wishes encapsulated by NPs can be over-ruled by the GESP. | Ottery St Mary Neighbourhood Plan Group | Comments noted. However, they do not appear to directly relate to the scope of the Joint SCI. No changes are proposed as a result. |
| Draft SCI proposes a top-down consultation process with no sense of involving or engaging the community in plan-making other than inviting them to respond to fully worked out drafts. | Exeter Green Party | Not agreed. An issues consultation which took place between 27 February and 10 April invited people to comment on the content of the plan, provide local knowledge and stimulate debate early on in the process. This did not include any fully worked out proposals but represented a formative stage of consultation early in the development of the plan. |
| Issues should be put to the electorate via the ballot box. | Individual – East Devon | Not agreed. The Greater Exeter Strategic Plan is being prepared in full consultation with local communities in accordance with relevant legislation and associated government guidance, led by democratically elected councils. |
| What consultation has been carried out, or is intended to be carried out, to identify whether or not residents and businesses in these five local authority areas wish to develop into a 'Greater Exeter' and the implications that could contribute to loss of local identities and local environments. | Individual – East Devon | The decision to prepare a Greater Exeter Strategic Plan was taken at public Council meetings of each of the authorities involved. The issues consultation which took place between 27 February and 10 April 2017 invited people to comment on the potential content of the plan, provide local knowledge and stimulate debate early on in the process. Additional stages of consultation will take place on the draft policies and site options and going forward before submission. |
| Suggests inclusion of 'fully independent' before consultants. | Individual – Mid Devon | Not agreed. The SCI promotes involvement for all stakeholders interested in the Greater Exeter Strategic Plan. |
| Suggests inclusion of 'to all residents in all areas' under how we will consult. | Individual – Mid Devon | Not agreed. There is a need to balance wide involvement in the planning process with the need for effective operation of the planning system. This difficult balancing act reflects cost and time constraints, and our level of discretion on the outcome. |
| Suggests inclusion of 'hard copy' before consultation documents under how we will consult. | Individual – Mid Devon | Agreed. An amendment is proposed to state 'We will make paper copies of consultation documents available at council offices and public libraries where possible'. |

| | | |
|---|---|---|
| Suggests replacing ‘we will consider organising or supporting consultation events’ with ‘we will organise and support consultation events if requested by local councils.’ | Individual – Mid Devon | Comments noted. The following amendment is proposed to reflect the concerns raised: ‘During the initial and publication stages of consulting on the GESP, we will organise or support consultation events such as public exhibitions where possible’. |
| Suggests removal of ‘or a summary’ before ‘as soon as feasible’. | Individual – Mid Devon | Comments noted. The following amendment is proposed to reflect the concerns raised: ‘We will publish comments received, including a summary, as soon as feasible.’ |

**Appendix 2: Greater Exeter Strategic Plan Joint Statement of Community Involvement. 2020**

2020

# Greater Exeter Strategic Plan

To request this information in an alternative format please call xxxx or email gesp@devon.gov.uk

We consider requests on an individual basis.

# Greater Exeter Strategic Plan
# Joint Statement of Community Involvement

This is a Joint Statement of Community Involvement (SCI) that sets out our approach to consultation on, and involvement in, the preparation of the Greater Exeter Strategic Plan (GESP) only. It has been prepared in accordance with Government guidance on the production of SCIs: https://www.gov.uk/guidance/plan-making

The Joint SCI has been adopted by the four local planning authorities working in partnership on the GESP: East Devon District Council, Exeter City Council, Mid Devon District Council and Teignbridge District Council.

This SCI is clear and concise to ensure that as many people as possible will read it and understand our approach to consultation on the GESP.

**Important Note:**
This joint SCI only sets out the consultation approach for the GESP and not for other planning policy documents (such as local and neighbourhood plans) or planning applications. All the partner local planning authorities (LPAs) have existing SCIs that specify their approach to consultation and involvement for other planning policy documents and planning applications. These existing SCIs are not affected by this document. Please contact the individual authorities for details of existing SCIs.

## Background

The GESP will be a formal statutory Development Plan Document, providing the strategic planning policy framework for the four local planning authority areas (excluding any part of Dartmoor National Park) that together form the Greater Exeter area. Devon County Council is also a partner in producing the GESP. The GESP will contain strategic site allocations and policies, including those that set the overall spatial strategy and amount of housing and employment land to be provided in the area. It will cover the period 2020 - 2040.

Consultation is required at various stages during the GESP's preparation, in accordance with legislation, after which it will be submitted to Government. An independent Planning Inspector will then carry out an examination of the GESP, considering the views of interested people that submitted representations on the plan. The final decision on the soundness of the GESP will be made by the Inspector, after which the GESP will be adopted by the four local planning authorities. You can find government guidance on preparing local plans here: www.gov.uk/guidance/local-plans

**It should be noted that because Devon County Council is not a LPA in the context of the GESP it will not formally adopt the plan. Similarly this SCI will not apply directly to the County Council or its planning functions.**

## General principles for consultation and involvement

We will apply some general principles to consultation on the GESP:

- Involvement will be open to all regardless of age, disability, gender, race, pregnancy or maternity, marital status, faith, sexual orientation or gender reassignment, rural isolation and social deprivation.

- We will undertake consultation when the plan is still at a formative stage, to ensure that there are sufficient opportunities for views to be shared throughout the preparation of the GESP
- We will choose consultation processes by balancing cost and time constraints
- Consultation publications will be clear and concise and avoid unnecessary jargon. They will give sufficient information to allow an informed response.
- At least **8 weeks** will be given for responses to be made on consultation material
- Responses will be published and considered conscientiously
- We will give an opportunity for anyone to be kept informed as the plan progresses

## When we will consult

The timetable for the preparation of the GESP is set out in the Local Development Scheme which is available on the GESP website www.gesp.org.uk.

An initial 'issues' consultation took place between 27th February and 10th April 2017 to ask for views about the scope and content of the plan.

## Who we will consult

- Statutory organisations including councils, infrastructure providers and government bodies as legally required or otherwise appropriate
- The general public
- Groups representing places or interested communities
- Local businesses
- Voluntary groups and other organisations
- The planning and development industry including consultants
- Others who have expressed an interest in the plan

Anyone can register to be kept informed about the preparation of the GESP and opportunities to engage in the plan-making process. Personal contact details will be retained to inform you about progress with the plan. Your data will be processed in line with the Data Protection Act 2018 and the EU General Data Protection Regulations.

## How we will consult and how you can get involved

- We will contact appropriate organisations and individuals directly
- We will publicise consultations by a combination of the following methods: website, press release, social media, leaflets, posters, displays, community groups/community events where possible and in accordance with a communication and engagement strategy
- Consultation documents will be made available for download on the Council's websites and on the GESP website (www.gesp.org.uk). Paper copies of consultation documents will be made available for purchase at a price that reflects publication costs
- Where resources allow, consultation documents will be made available in alternative formats upon request. Requests will be considered on an individual basis
- We will provide consultation documents in an electronic format (and paper copy when asked) to community groups, councils and other statutory organisations
- We will make paper copies of consultation documents available at council offices and public libraries where possible
- During the initial and publication stages of consulting on the GESP, we will organise or support consultation events such as public exhibitions where possible

Once a consultation has been completed we will publish comments received, including a summary, as soon as feasible. We will also explain how these comments have been considered or taken into account in the process of preparing the GESP.

Figure 1 shows the possible methods of consultation that will be used at each stage of the GESP's preparation.

| GREATER EXETER STRATEGIC PLAN - PREPARATION STAGES[1] | | POSSIBLE METHODS OF ENGAGEMENT |
|---|---|---|
| INITIAL PREPARATION OF THE PLAN (REG. 18) | During the formative stages of the plan we will ask you about:<br>- Initial issues,<br>- Draft policies and site options, and<br>- Key elements of the plan as needed. | Social media<br>Website<br>Emails<br>Letters<br>Questionnaires<br>Surveys<br>Exhibitions(*)<br>Meetings(*)<br>Focus groups(*)<br>Leaflets |
| PUBLICATION OF THE PLAN (REG. 19) | Continuing involvement by asking you to make comments on the Publication Draft version of the plan - this is the version (technically the 'pre-submission version') of the plan which will be submitted to Government together with the consultation representations received | Social media<br>Website<br>Emails<br>Letters<br>Questionnaires<br>Surveys<br>Exhibitions(*)<br>Meetings(*) |
| SUBMISSION AND EXAMINATION (REGS. 22 – 25) | The plan will be submitted to Government for examination by an independent planning Inspector. The submitted plan, representations, and accompanying documents will be available for you to view | Social media<br>Website<br>Emails<br>Letters |
| | If you have made comments on the plan at the Publication stage you will have the opportunity to submit further material in response to questions from the Inspector, and you will have the right to appear at the examination hearings | Emails<br>Letters |
| | We will consult you on any additional modifications | Social media<br>Website<br>Emails<br>Letters |
| | The Inspector's Report will be available for you to view | Social media<br>Website<br>Emails<br>Letters |
| ADOPTION (REG. 26) | Once the strategic plan has been adopted by the partner councils, it will be available to view with the supporting adoption documents | Social media<br>Website<br>Emails<br>Letters |

Figure 1: Mechanisms for consulting on GESP through the plan's preparation

[1] The Town and Country Planning (Local Planning) (England) Regulations 2012
(*) Face to face and/or online

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**MID DEVON DISTRICT COUNCIL**

**MINUTES** of a **MEETING** of the **SCRUTINY COMMITTEE** held on 20 July 2020 at 2.15 pm

**Present**
**Councillors** F W Letch (Chairman)
W Burke, R J Chesterton, Mrs C P Daw, J M Downes, R Evans, B Holdman, B A Moore, R L Stanley, B G J Warren and A Wilce

**Also Present**
**Councillor(s)** R M Deed, G Barnell, E J Berry, D J Knowles, A White and Mrs N Woollatt

**Also Present**
**Officer(s):** Stephen Walford (Chief Executive), Andrew Jarrett (Deputy Chief Executive (S151)), Jenny Clifford (Head of Planning, Economy and Regeneration), Kathryn Tebbey (Head of Legal (Monitoring Officer)), Ian Chilver (Group Manager for Financial Services), Lisa Lewis (Group Manager for Business Transformation and Customer Engagement), Simon Newcombe (Group Manager for Public Health and Regulatory Services), Maria De Leiburne (Legal Services Team Leader), Aarron Beecham (Forward Planning Assistant), Clare Robathan (Scrutiny Officer) and Carole Oliphant (Member Services Officer)

40 **VIRTUAL MEETING PROTOCOL**

The Committee had before it, and **NOTED**, the *Virtual Meeting Protocol.

Note: *Virtual Meeting Protocol previously circulated and attached to the minutes

41 **APOLOGIES AND SUBSTITUTE MEMBERS (00.02.10)**

There were no apologies or substitute Members

42 **DECLARATIONS OF INTEREST UNDER THE CODE OF CONDUCT (00.02.20)**

Members were reminded to make declarations of interest when appropriate

43 **PUBLIC QUESTION TIME (00.02.29)**

There were no members of the public present.

44 **MEMBER FORUM (00.02.58)**

There were no issues raised under this item.

## 45 MINUTES OF THE PREVIOUS MEETING (00.03.07)

The minutes of the last meeting held on 22nd June 2020 were approved as a correct record.

## 46 DECISIONS OF THE CABINET (00.05.10))

The Committee **NOTED** that none of the decisions made by the Cabinet on 9th July 2020 had been called in.

## 47 CABINET MEMBER FOR FINANCE REPORT (00.05.25)

The Cabinet Member for Finance highlighted the contents of his *report and thanked officers for distributing the business grants which had involved many extra hours of work. He wanted to show his appreciation for all the hard work completed.

He addressed the loss of income due to Covid 19 and the fact that Council had received circa £900k in Government funding and confirmed that a revised budget would be brought forward in September 2020.

He explained that there was a budget gap challenge for 2023/2024 and that the Council was exploring more innovative ways of working, looking to increase income, share resources, prioritise budgets and take on new ways of delivering services. This would all help move towards bridging the Council's estimated funding gap.

In response to a direct request to provide more detail on the steps being taken to address the budget gap the Cabinet Member for Finance stated that it was a work in progress but he agreed to attend the next meeting of the Scrutiny Committee to present that information.

Consideration was given to:

- The restrictions of grants through the Housing Infrastructure Fund
- Whether the circa £900k received from the Government covered the Council's loss of income

The Deputy Chief Executive (S151) Officer explained that in addition to the Government monies already received the Government had announced an income protection guarantee which would include the loss of income from car parking revenue and the leisure centres having to be closed. Initial indications were that the Council would need to fund the first 5% of lost income but the Government would fund the remaining 95% but the full details of the scheme were not yet known. He stated that the Council was currently looking at a shortfall in income of circa £1m but that it was not possible to give an exact figure now.

Note: *report previously circulated and attached to the minutes

## 48 CHAIRMAN'S ANNOUNCEMENTS (00.24.46)

The Chairman announced that he would pause the meeting if required if it was still in session after a number of hours.

## 49 REPORT OF THE CUSTOMER EXPERIENCE WORKING GROUP (00.25.26)

Cllr Mrs C P Daw, the Chairman of the Customer Experience Working Group, presented the *final report and explained that it contained 6 recommendations for the Committee to consider.

She explained that members of the Working Group had agreed that they should explore the end to end customer experience and had visited 11 departments. They felt that the current CRM system was not fit for purpose and found that customers were having to make repeat calls for information and feedback. The Group wanted to stress that MDDC Officers were doing a good job despite the system issues. She explained that the Group had investigated the CRM system used by North Devon District Council and felt this to be the best option for a solution.

The Scrutiny Officer further explained that the CRM recommendation was the key issue as it involved monies for a new system. She explained the North Devon District Council were using the Firmstep system and they had described how it had more than paid for itself by freeing up time and that they had found it good value for money.

The Committee discussed the report of the Working Group and were in agreement with the recommendations but were concerned that there were no timeframes attached for the Cabinet to act upon them.

The Cabinet Member for the Working Environment and Support Services stated that she noted the comments and that this had been a valuable exercise which she was willing to support and take forward.

It was therefore:

**RECOMMENDED** to the Cabinet:

1. That a business case for a new Customer Relationship Management (CRM) system to replace the existing technology is developed and considered by the Cabinet. That any new system be designed with customer need at the centre of the process.
2. That systems work to full capacity and meet the needs of the customer first and foremost. Back offices should carry out service reviews and review business processes to ensure they are customer focused.
3. To ensure customers are at the heart of the Council, a customer focused culture should be promoted across the whole organisation - for all staff from the top down. This could include training (for Leadership Team, Officers and Members), Members/staff workshops or the use of advocates/case studies to promote a new system.
4. That a customer survey is carried out with members of the public regarding their experience and satisfaction as customers of the Council. Results are reported back to the Working Group when available.
5. That the Planning Department consider re-establishing a dedicated phone answering system, to ensure officers have capacity to focus on applications.
6. That the phone waiting times are reduced. A review of why the Service Level Agreement is not being met is carried out.

(Proposed by the Chairman)

Note: *report previously circulated and attached to the minutes

## 50 REVENUE AND OUTTURN REPORT (00.39.13)

The Committee had before it, and **NOTED**, the *Revenue and Outturn report previously presented to the Cabinet on 9th July 2020.

The Group Manager for Finance explained that this was a generic report which detailed the performance against budget. He explained that in December 2019 the budget deficit had been predicted at £252k but this had improved to an actual year end deficit of £232k which was very close to an overall budget of £10m.

He explained that the £863k utilised from the Ear Marked Reserves indicated the progress of projects and that funds had been set aside for future projects.

In response to a question asked about the usefulness of the Scrutiny Committee being presented the report after it had been seen by the Cabinet. The Deputy Chief Executive (S151) Officer explained that it was a statutory requirement that the budget was brought before the Scrutiny Committee and that it was Scrutiny's role to scrutinise it.

Consideration was given to:

- Monies would only be released for a replacement CRM system when a successful business case had been presented
- Impairments on loans to 3 Rivers Developments Ltd

Note: *Revenue and Outturn report previously circulated and attached to the minutes

## 51 COMMUNITY SAFETY PARTNERSHIP (00.57.54)

The Committee had before it, and **NOTED**, a *report from the Group Manager for Public Health and Regulatory Services detailing the Community Safety Partnership (CSP) activities during 2019-2020.

The Group Manager for Public Health and Regulatory Services explained that this was a retrospective report which detailed the activities of the partnership over the 2019-2020 period and outlined the partnership funding and Domestic Homicide Reviews (DHR's). He explained that a DHR was a multi-agency review of the circumstances in which the death of a person aged 16 or over had, or appears to have been as a result of violence, abuse or neglect.

In response to a question asked about the role of the CSP in investigating these deaths when the Coroner already carried out this work he explained that there was a statutory duty of all the agencies to investigate these deaths to see if lessons could be learned going forward.

He explained that self-help guides for user of the Devon Sexual Abuse and Rape Crisis Support Services provided by the CSP whilst victims wait for 1:1 support from the services. Unfortunately, these services, not funded by the CSP, had been

oversubscribed and had been a victim of their own success, that unfortunately resulting in up to a 9 months delay for people needing to obtain the guides. He explained that the funding for this project was currently being reviewed by those agencies that support it directly.

Members expressed concerns regarding the wait times and felt that the Community PDG should look at additional funding for this project. They requested an update report be brought back to the Scrutiny Committee to assess the resolution.

Note: *report previously circulated and attached to the minutes

52 **STATEMENT OF COMMUNITY INVOLVEMENT REVIEW 2020 (01.07.50)**

The Committee had before it, and **NOTED**, the *Statement of Community Involvement Review from the Head of Planning, Economy and Regeneration.

She explained that the report detailed how the Council would consult on local plans, supplementary planning documents and planning applications.

The Forward Planning Officer then went on to explain that a review had been undertaken to take account of the revised National Planning Policy Framework and outlined the temporary solutions and key changes.

He outlined the new section which set out area's in which the Council could provide additional support on Neighbourhood Planning processes.

In response to a questions asked as to why S106 Governance arrangements had been removed from the original Statement the Head of Planning, Economy and Regeneration explained that the arrangements would form part of a separate governance paper which would be brought before the Scrutiny Committee before it was presented to the Cabinet. She further explained that S106 was not part of the planning process and therefore should not be included within the Statement of Community Involvement and required its own governance arrangements.

Note: *report previously circulated and attached to the minutes

53 **GREATER EXETER STRATEGIC PLAN (01.21.48)**

The Head of Planning, Economy and Regeneration explained that the Committee had two reports before them the * Joint Statement of Community Involvement for the Greater Exeter Strategic Plan (GESP) and the ** Greater Exeter Strategic Plan Draft Policies and Site Options consultation document.

She informed the Committee that the Greater Exeter Strategic Plan Draft Policies and Site Options consultation document was being presented across all four authorities and had previously been considered by Exeter City Council and Teignbridge District Council.

The Forward Planning Officer then gave an overview of the GESP by way of a presentation which highlighted:

- Maintained Member engagement in formulating policies

- Sustainable development
- High level strategic plans
- Site options
- Evidence documents

Members then discussed the GESP in detail and raised various concerns including:

- The relevance of GESP to the Local Plan which was due to be formally adopted
- What was the definition of a larger development
- Why a Statement of Common Ground could not be considered in the place of GESP
- If signing up to GESP would address employment opportunities in Mid Devon
- GESP was too Exeter centric
- That Okehampton was not included as it fell outside of the district boundary of the GESP
- The effect of the GESP on property prices within Mid Devon and that the GESP appeared to be to solve Exeter's housing problems
- The numbers of new houses proposed by the GESP seemed to high to sustain employment opportunities
- Not enough time for Members to consider the documents and to make comments and that the GESP would take precedence over the MDDC Local Plan
- Previously rejected development sites had reappeared on the GESP
- The lack of provision for increased secondary education in Tiverton
- The current capability of digital networks and could it cope with more development
- The 8 week timescale of the initial public consultation was not long enough and how this would be presented to the public

In response to the concerns raised the Head of Planning, Economy and Regeneration and the Forward Planning Officer provided the following responses:

- The GESP plans sat alongside the Local Plans and dealt with cross boundary issues such as climate change and how people lived and worked in the area
- GESP was focussed on development of 500 houses or more. As part of the GESP local landowners and developers had been asked to identify possible future development sites
- The Council had a duty to co-operate and would always need to engage with neighbouring authorities but the GESP could tackle the wider picture such as climate change, transport policy and the economy. It was an opportunity to coordinate the big issues and there was strength on working together
- The were more opportunities for employment in Exeter but the plan sought to address local employment across the districts
- A number of the districts had a rail network but Okehampton was not included as it fell outside the plan. However, there was still a duty to co-operate with neighbouring authorities and the GESP would be working with local authority partners
- House numbers included were not all new homes and included existing commitments and allocated sites. Exeter City Council were taking a

responsible approach and looking across the city and brownfield land opportunities
- The Local Planning Authorities had the power to reject planning applications even if they were brought forward by the GESP and that the Joint Statement of Community Involvement detailed the proposed consultation
- Education requirements were considered as part of any process of plan making and evidence was taken from the education authority based on projected numbers and the need for additional education infrastructure
- The GESP strategy and proposal made a greater digital connectivity a key element of the GESP vision, especially in rural area's. A number of policies had been introduced to improve home working
- The GESP team would need to think carefully about the presentation to the public and this would be the first of a series of consultations. There would be a range of different options which would ensure communication with the public

Members then went on to discuss the recommendations in the reports and specifically the recommendation that Cabinet give delegated authority to the Leader, in consultation with the Portfolio Holder and Chief Executive, to agree changes to the above documents arising from decisions by the other GESP authorities before they are published for consultation.

The Head of Planning, Economy and Regeneration explained that the recommendation was to ensure that each of the local authorities could make amendments to the plan or debate changes without the need for full consultation each time. She confirmed that Teignbridge District Council Scrutiny Committee had also considered this point and had amended the recommendation so that the delegated powers only related to 'minor editorial amendments'.

Therefore:

It was **AGREED** to **NOTE** the recommendations to the Cabinet contained within the Joint Statement of Community Involvement for the Greater Exeter Strategic Plan and the Greater Exeter Strategic Plan Draft Policies and Site Options consultation document, subject to the following comments which the Scrutiny Committee asked to be brought to the attention of the Cabinet:

- That the Cabinet recognised the concerns with the GESP expressed by the Scrutiny Committee on 20th July 2020 including:
    - The democratic process
    - Lack of scope including neighbouring authorities
    - Over complexity
    - Overly Exeter focussed
    - Hierarchy of plans
    - Infrastructure concerns
- That any delegated authority given should be for minor editorial changes only

(Proposed by the Chairman)

Notes:

i.) * Joint Statement of Community Involvement for the Greater Exeter Strategic Plan previously circulated and attached to the minutes

ii.) ** Greater Exeter Strategic Plan Draft Policies and Site Options consultation document previously circulated and attached to the minutes

## 54 HOUSING INFRASTRUCTURE FUND (03.14.29)

The Committee had before it, and **NOTED**, a *report from the Head of Planning, Economy and Regeneration detailing the housing infrastructure fund and the funding agreement with Homes England.

Members discussed the report and consideration was given to the following:

- A planning appeal allowed by an Inspector which did not award S106 funds towards the funding of the relief road in Cullompton
- Concerns of Members that there were risks with refunding the housing infrastructure fund
- The road infrastructure arrangements and timings for the Tiverton Urban Extension

Therefore;

It was **RECOMMENDED** that the Housing Infrastructure Funding risks were investigated by the Audit Committee.

(Proposed by the Chairman)

Note: *report previously circulated and attached to the minutes

## 55 FORWARD PLAN (03.43.45)

The Committee had before it, and **NOTED**, the *Forward Plan

Note: *Forward Plan previously circulated and attached to the minutes

## 56 SCRUTINY OFFICER UPDATE (03.43.49)

The Scrutiny Officer updated Members on the Scrutiny Committee Menopause Working Group and the fact that they welcomed more female Members getting involved.

## 57 IDENTIFICATION OF ITEMS FOR THE NEXT MEETING (03.46.15)

The following items were identified for the next meeting:

- The Cabinet Member for Finance was asked to attend and give more detail on the income, shared resources, prioritised budgets and new ways of delivering services to bridge the £1.4m funding gap
- The Group Manager for Public Health and Regulatory Services would provide a further update on additional funding for the self-help guides for service users of the Devon Sexual Abuse and Rape Crisis Support Services

(The meeting ended at 6.13 pm) **CHAIRMAN**

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**MID DEVON DISTRICT COUNCIL**

**MINUTES** of a **MEETING** of the **AUDIT COMMITTEE** held on 11 August 2020 at 5.30 pm

**Present**
**Councillors** R Evans (Chairman)
Mrs C Collis, B A Moore, D F Pugsley,
A Wilce and F W Letch

**Apologies**
**Councillor(s)** J Wright and A Wyer

**Also Present**
**Councillor(s)** N V Davey, R M Deed, R J Dolley, Ms E J Wainwright, B G J Warren and A White

**Also Present**
**Officer(s):** Andrew Jarrett (Deputy Chief Executive (S151)), Andrew Busby (Group Manager for Corporate Property and Commercial Assets), Ian Chilver (Group Manager for Financial Services), Catherine Yandle (Group Manager for Performance, Governance and Data Security), Dean Emery (Group Manager for Revenues and Benefits) and Sarah Lees (Member Services Officer)

27. **APOLOGIES**

Apologies were received from Cllr J Wright and also Cllr A Wyer who was substituted by Cllr F Letch.

28. **PROTOCOL FOR REMOTE MEETINGS**

The protocol for remote meetings was noted.

29. **PUBLIC QUESTION TIME**

Mr Nick Quinn, a local resident, stated that his questions concern: Agenda Item 12 – Grant Thornton Findings 2019/20.

Firstly; on page 21 of the report, at the bottom of the 'Findings' column, the auditors refer to '3 Rivers Governance Reports' and 'the 17 recommendations approved by Cabinet'.

The Auditors state that the most critical of these recommendations is:
"*That 3 Rivers Developments Ltd suspends any new site purchases and the commissioning of work relating to sites where construction has yet to be started, until the appointment of new Directors, in accordance with recommendations 3 and 4, has been completed and their subsequent updated business plan has been approved".*

They continue: *"For clarity, recommendations 3 and 4 relate to the recruitment of a Finance Director with construction industry experience to replace Mr Jarrett, as soon as possible, and a suitable Director or Non-Executive Director with regional property development experience to complement and strengthen the existing board arrangements*".

My question on this section is:

**If the Auditors were confident that these recommendations are suitable to be made in an open report - why did Audit Committee judge, at their last meeting, that they should be withheld from the Mid Devon Public?**

Secondly; on page 27 - in the 'Impact of Unadjusted Misstatements' section, the Auditors make reference to the agreed settlement of a 'longstanding contractual dispute' which is likely to cost the Council around £600,000.

The loss of £600,000 will have a significant impact on the Council finances this year and it will, no doubt, affect the Mid Devon Council Tax payer.
My question on this section is:

**In the light of this loss - Will Audit Committee be asking for any actions to be taken?**

The Chairman thanked Mr Quinn for his two questions and stated that he would begin by responding to the first question:

The meeting held on the 23rd June 2020 was a special Audit meeting to consider the 3RDC governance review documents.

The report was some 122 pages in total and encompassed an amount of detail that is considered exempt, this included details of commercial confidentiality and personal data.

The approach taken was consistent with that taken across all MDDC meetings when considering part two discussions, that being committee are asked to consider the item to be discussed and to decide if they wish to hear the item in part two.

At the meeting of the 23rd June this was the approach taken by myself as chair and after a round table discussion committee voted to hear the report in part two.
This was again consistent with the discussions and outcomes at the Cabinet and scrutiny meetings that had previously considered the same reports.

With regard to the second question, the Chairman stated that, save for the fact of settlement and the amount, the details of the dispute are subject to a settlement agreement – and therefore confidential.

This was a longstanding contractual dispute which could have resulted in high-risk, high stakes litigation. The dispute has now been settled to provide certainty and minimise the risk to the Council. A confidential briefing paper will be provided to Members shortly and the Audit Committee may follow this up as they then see fit.

The settlement has been made from the Housing Revenue Account (HRA) and the deduction backfilled from the HRA reserves. For those reasons, there will be no direct impact upon the Council's finances this year and no direct impact upon the Mid Devon Council Tax payer.

30. **DECLARATION OF INTERESTS UNDER THE CODE OF CONDUCT**

Cllr A Wilce declared a personal interest in that he had asked a question with regard to the 3 Rivers Development Company at the last meeting.

No other interests were declared under this item.

31. **MINUTES OF THE PREVIOUS MEETING**

The minutes of the special meeting held on 23 June 2020 were confirmed as a true and accurate record.

32. **CHAIRMAN'S ANNOUNCEMENTS (00:07:25)**

The Chairman informed the Committee that the Devon Audit Partnership had met virtually on 14 July 2020. The Chairmanship of this group was undertaken on a rolling basis each year. In the previous financial year he had been the Chairman but this had now passed to Cllr George Gribble from Devon County Council. He and Cllr A Moore would continue to attend future meetings as the Mid Devon District Council representatives.

33. **UPDATE ON CLIMATE CHANGE DECLARATION AND ASSOCIATED RISKS (00:08:35)**

The Cabinet Member for Climate Change had been invited to attend the Audit Committee to provide an update and to explain what actions had been identified as 'easy to do', what may be more medium term, plus any high investment opportunities whilst also recognising the severe restrictions on the Council's budget.

She explained that the emerging Climate Plan had passed through the Environment PDG and it was hoped that the final version would be brought before the Cabinet next month. This plan looked at where the Council was now within the context of the Council's finances and examines what it would cost to make small changes right away. She was in regular contact with different Council departments where changes could be made and this work had already thrown up some opportunities.

The Plan also set out an approach where by an opportunity was examined in terms of what the benefits could be and what the financial cost would be to the Council.

There was a great deal of collaborative work taking place across Devon and a Citizens Assembly was planned for 2021.

As a priority, carbon literacy training would be taking place across the Council in areas such as housing and waste collection. Currently there were lots of conversations taking place regarding cycling and walking and they were working with the Solar Together Scheme.

Additionally a large part of the work in this area centred around the communication of all these initiatives. Plans and opportunities needed to be relayed both in terms of what the Council was doing but also what was happening in local communities to push this agenda forwards.

The Group Manager for Corporate Property and Commercial Assets explained that the Emergency Action Plan had been considered by the Scrutiny Committee in June and that there was a tracking process within the document to monitor the progress of actions within the plan, for example, identifying the 'end of life' of particular assets such as old boilers that could be replaced by gas boilers that could also be run on hydrogen.

Grant funding was being applied for to help improve the housing stock with a view to reducing our emissions on our housing stock, enhancing the assets energy efficiency further. Procurement and the supply chain was also being examined as part of this process. He reiterated the point that all officers would be trained and he informed the Committee that the website would be constantly updated regarding the actions taking place.

Discussion took place regarding:

- How the Leisure Centre recharging scheme was going? It was explained that the electric recharging points were very well used. Monthly data could be circulated to Members. This was an important element in trying to encourage green travel within the district.
- The comment was made that it was vital to look at the 'whole life' costs of introducing new initiatives, for example, the manufacture of a hydrogen boiler took three times the amount of energy than a traditional type, although the long term benefits needed to be weighed up against this.
- A guide book would be created to assist the public and residents.
- A lot of learning would take place with the Hydro Mills project that had been approved by the Cabinet in the previous week.

34. **PROCEDURES USED FOR THE CHECKING OF THE COVID 19 GRANTS ADMINISTERED BY MDDC (00:21:13)**

The item had been brought to the Committee as a result of the Chairman attending a DAP meeting and needing his Committee to discuss whether, given the amount of money involved, there were adequate checking procedures in place for the administration of Covid 19 grants undertaken by this authority.

The Group Manager for Revenues and Benefits informed the Committee that approximately 1,700 grant payments had been made using a system called Spotlight which was the Government recommended tool and was free. The Group Manager for Performance, Governance and Data Security had signed the Council up to the National Fraud Initiative (NFI) to help identify fraud in this area. The results so far had been extremely favourable with just a few applications being identified as a potential risk. This Council's approach had been to request more information from an applicant than the Government had required it to do prior to payment.

The Council had been pushed by the Government to release grants as quickly as possible. The Government had also issued guidance on how it wanted fraud tracked with any instances needing to be reported back to central Government.

In the initial stages of Covid 19, fraud had been rife but had now settled at a national average of between 3 to 5%.

Discussion took place with regard to:

- The amount paid out, which totalled circa £22m and this included both primary and discretionary payments.
- Large rather than small batches would be processed through the NFI system which would help to reduce costs.

The Deputy Chief Executive (S151) wished to place on record his thanks to the Revenues and Benefits team and also the Economic Development team for all their hard work in recent months. Most people had received their grant within 24hours of applying for it. The Chairman also requested that the thanks of the Committee be taken back to the relevant teams.

35. **PERFORMANCE AND RISK (00:31:54)**

The Committee had before it, and **NOTED**, a report * from the Group Manager for Performance, Governance and Data Security updating it on performance against the Corporate Plan and local service targets for 2020/21 as well as providing an update on the key business risks.

The contents of the report were outlined and a brief discussion took place regarding:

- The data before the Committee presented the first results for the 2020/2021 financial year.
- The Environment and Climate Change splits were identified within the report.
- Recommendations in relation to an external review of the 3 Rivers Governance Arrangements appearing to be behind schedule in the risk mitigating actions. This was partly due to the limitations of the SPAR system which was the software used to record performance data. However, the Leader informed the Committee that the Cabinet would be monitoring all 17 recommendations made regarding this issue. There would be no hold up but due to the large number of recommendations it would take some time to work through them.

Note: Report * previously circulated; copy attached to the signed minutes.

36. **ANNUAL GOVERNANCE STATEMENT FOR 2019/2020 AND CORPORATE GOVERNANCE FRAMEWORK (00:39:55)**

The Committee had before it a report * from the Group Manager for Performance, Governance and Data Security presenting it with the finalised Annual Governance Statement (AGS) and Action Plan and accompanying Corporate Governance Framework.

The contents of the report were outlined and consideration was given to:

- Feedback had been sought from Members at a training session in July.
- Section H was new and had been inserted to take consideration of Covid 19 implications on governance and the Council's response.
- Clarification had been provided within the Statement about Part II business and meeting recordings. However, discussions were on-going with Members about the treatment of Part II reports going forwards since it was felt that 'other limited circumstances' had not yet been fully identified. A question was asked as to what percentage of business had actually been undertaken in Part II? An answer would be circulated to all Members after the meeting.
- Members had requested that the majority of reports presented to them in the future would be in Part I with any Part II information presented in a separate appendix.
- The AGS now had an update in relation to equalities and it included reference to the appointment of a new Cabinet Member with responsibility for Climate Change.
- Mention was also made of the fact that the Executive arrangements of the Council were currently under review.
- The Main Accounting system had received a good audit although the internal audit of the Development Control system for monitoring S106 agreement had identified the need for improvements.
- The Corporate Risk Register would closely monitor risks in relation to 3 Rivers.
- The Action Plan would monitor the roll out of the HR 'Evolve' programme and the new Appraisal and Competency processes.
- The Corporate Governance Framework column in relation to 'Periodic Documents' now included Register of Interests and Statement of Community Involvement. Also under 'Contributory Processes' the Equalities Forum and Net Zero Advisory Group were included.
- Phishing emails presented a considerable risk and should not be opened but forwarded to the IT security email address and then deleted.

**RESOLVED** that the Annual Governance Statement be approved and that the Leader of the Council and the Chief Executive sign the Statement as per the statutory guidance.

(Proposed by the Chairman)

Reason for the decision:

Regulation 6(1)(a) of the Accounts and Audit Regulations 2015, require an authority to conduct a review at least once in a year of the effectiveness of its system of internal control, and to include a statement reporting on the review with any published Statement of Accounts. Regulation 6(1) (b) of the Accounts and Audit Regulations 2015 require that for a local authority in England the statement is an Annual Governance Statement (AGS). The AGS must be signed by the Leader and Chief Executive and be published with the Statement of Accounts.

Note: * Report previously circulated; copy attached to the signed minutes.

37. **ANNUAL REPORT AND ACCOUNTS FOR 2019/2020 (01:04:36)**

The Committee had before it a report * from the Deputy Chief Executive (S151) presenting the final version of the annual Statement of Accounts highlighting any areas which have been amended since the draft accounts were published on the website and presented for external audit in June.

The Deputy Chief Executive (S151) outlined the contents of the report and provided the following summary of the main points:

He stated that here were four reports that need to be jointly considered; the AGS; the accounts; the Audit Findings Report from Grant Thornton and the Letter of Representation, supplied to Grant Thornton.

He continued….we are now arriving at the conclusion of the annual audit process. In a separate agenda item to be discussed you will hear from the external auditors, Grant Thornton, when you will be asked to consider their Audit Findings and the Letter of Representation.

- The statements themselves are on pages:
    - 44 being the Movement in Reserves Statement
    - 46 being the Comprehensive Income and Expenditure Statement
    - 47 being the Balance Sheet
    - & 48 being the cash flow
- These statements account for the General Fund, the Housing Revenue Account and the Collection Fund.

- General Fund
    - Deficit in the year of £232k
    - General Fund balance at 31 March - £2.252m satisfying the requirement set by Cabinet in January that a balance of at least £2m should be held
    - EMR utilisation in the year £683k – after also allowing for the transfer of Brexit funding received in 2018/19 to the General Fund of £18k balance of GF EMR at 31 March was £13.688m.
    - This represents a healthy level of balances for known future expenditures
    - Details note 6 – page 61

- HRA
    - Surplus in year was £608k
    - After this was transferred to the Housing Maintenance Fund the HRA balance remained at £2m
    - HRA also carries ear marked reserves of £18.310m
    - This includes the 30 year modernisation reserve of £14.198m. Officers are working on plans to increase the housing stock over the coming years.
    - HRA notes P113–125

- Collection Fund
    - Mid Devon is a collection authority for council tax and national non-domestic rates (NNDR), and as such, is required to produce a

collection fund account for the Mid Devon area. The Council collects council tax on behalf of Devon County Council, Devon Fire and Rescue Service, Devon & Cornwall Police and the Town/Parish Councils, as well as Mid Devon Council itself.
    - The **council tax collection rate for 2019/20 was 97.8%** (97.8% in 2018/19). This demonstrates how our Revenues section has consistently been effective in collecting the annual charge in extremely challenging economic times. The **Non Domestic Rates collection rate was 98.8% for 2019/20** (99.3% in 2018/19
    - Collection Fund notes P126-129

- Pension Fund – Note 21 – page 72
    - Net liability from the defined benefit obligation relating to the LGPS reduced £541k to £57.785m.
    - Fair value of plan assets £5.375m lower at £60.635m largely due to a downward revaluation of assets caused by economic concerns arising from the pandemic.

- PPE – Note 22 – page 80
    - £198m 2019 to £194m 2020
    - Relatively flat year with no major asset purchases.
    - Construction of 26 properties at Palmerston Park – now Turner Rise – completed – then immediately revalued to 35% being existing use social housing valuation.
    - Similar for 3 RTB properties repurchased in year.
    - Also commencement of new finance lease arrangements for vehicles.

- Covid 19 – Note 59 – page 112
    - Little impact in year due to limited overlap of crisis with the reporting period.
    - Expectations of negative economic impacts led to increase in bad debt provisions.
    - Financial statements given an ‘except for’ audit opinion in respect of material valuation uncertainty. The District Valuer who completed the annual valuation of the Council’s assets applied this qualification to his work, once again in view of the market uncertainty caused by Covid 19 and to a lesser extent Brexit.
    - Note 59 describes the ongoing financial implications of the crisis. As members are acutely aware the implications of Covid 19 continue to unravel. The prudent financial management of this Council means that it is able to place some reliance, in the short term, on its reserves. Those reserves were however accumulated to counter other more foreseen threats to funding in the coming years. It must be the objective of this Council therefore to maintain its reserve level. With this in mind the Authority continues to lobby government for substantial compensation for its losses.

- 3 Rivers – group p130-141
    - 3 Rivers is the wholly owned subsidiary to the Authority. This development company is consolidated into the accounts which are available on pages 130-141.

- In the year development and working capital loans to 3 Rivers increased from £2.613m to £9.061m or by £6.448m.
- These loans are largely represented within the Group Accounts as work in progress being the construction costs for projects not yet completed.
- During the year 3 Rivers returned to MDDC £251k by way of interest charges. Whilst this is funded during the construction period through the mechanism of the working capital loan from Mid Devon, ultimately it will be repaid from profits arising from the development projects. As such it represents a significant increase on alternative investment returns.
- The accounting team have assessed and made provision for likely repayment and non-payment of loans within the 19/20 accounts.

- Audit
  - Auditors worked on these financial statements over a 3 week period in June.
  - Since then there have been outstanding queries which the finance team have worked with them to resolve.
  - Due to Covid 19 this has involved remote working and I think both teams would agree that in the circumstances the arrangements have worked well, thanks largely to a committed and cooperative attitude all around.
  - A couple of outstanding issues which are out of our hands relating to pension fund reporting.
  - Reference to the auditors' report to this committee in the form of the Audit Findings Report.
  - They have given the financial statements a clean audit report except for the material valuation uncertainty described above. Once again this does not reflect on these financial statements but rather the circumstances we find ourselves in.
  - Finally the auditors intend to apply an "except for" audit opinion in respect of the value for money audit reflecting their concerns regarding group governance arrangements.

The Chairman extended the thanks of the Committee to the Deputy Chief Executive (S151) and his team for their hard work and dedication in producing the Accounts. He would be writing to staff individually to reiterate this.

**RESOLVED** that the Statement of Accounts be approved (subject to the recommendations made by the external auditor, Grant Thornton) and that the letter of representation attached at the back of the Accounts be signed by the appropriate people.

(Proposed by Chairman)

Reasons for the decision:

There was a legal requirement to produce and publish audited accounts for the year to 31 March 2020, by 30 November and for those accounts to be considered by a committee and approved by the person providing at the committee.

The Accounts had been confirmed as true and fair by auditors Grant Thornton with an “except for” opinion relating to material valuation uncertainty.

The Letter of representation was provided to Grant Thornton for the purposes of expressing their opinion.

Note: * Report previously circulated; copy attached to the signed minutes.

38. **GRANT THORNTON AUDIT FINDINGS 2019/2020 (01:17:34)**

The Committee had before it, and **NOTED**, a report * from Grant Thornton summarising the key findings arising from the statutory audit of the Council’s financial statements for the year ending 31 March 2020.

The following issues within the report were highlighted:

- The audit process had been carried out remotely, everybody involved had been very flexible and used different types of IT to progress the audit.
- ‘Headlines’ within the report were referred to and it was stated that Grant Thornton were proposing to issue an unqualified opinion on the Financial Statements. However, in relation to the ‘Value for Money’ arrangements they anticipated issuing a qualified “except for” conclusion.
- As was the case with a lot of council’s, the external auditors hadn’t received reassurance regarding the Pension Fund. This was still outstanding.
- Factors in relation to ‘materiality’ were set out within the report and it was stated that the materiality percentage with regard to 3 Rivers had been revised to reflect the increased risk.
- Covid 19 would have a significant effect upon the Financial Statements for the following financial year. There had been no significant issues to report this year other than financial sustainability in relation to loss of income.
- Findings in relation to 3 Rivers were set out within the report.
- Estimates and judgements in the areas of NNDR appeals and ‘Land and Buildings’ had been deemed to be ‘reasonable’.
- A Letter of Representation had been requested from the Council. This included specific representations in relation to:
    - Assumptions regarding the impairment of loans to 3 Rivers and all remaining loans being fully recoverable
    - The preparation of the Group Accounts on a going concern basis
    - Confirmation of reasons for not processing the unadjusted misstatement set out in Appendix C.
- Financial Sustainability continued to be a significant risk as was an anticipated budget gap for 2021/2022.

Note: * Report previously circulated; copy attached to the signed minutes.

39. **LETTER OF REPRESENTATION TO GRANT THORNTON (01:36:09)**

The Committee had before it, and **NOTED**, a draft Letter of Representation from Grant Thornton which was provided in connection with the audit of the financial statements of Mid Devon District Council and its subsidiary undertaking, 3 Rivers Development Limited.

It was further **NOTED** that this needed to be signed by the Deputy Chief Executive (S151) and the Chair of the Audit Committee once all outstanding issues had been resolved.

40. **IDENTIFICATION OF ITEMS FOR THE NEXT MEETING (01:37:20)**

The following was requested to be on the agenda for the next meeting (in addition to the items already identified within the work programme):

- Consideration of a Housing Infrastructure Fund (HIF) report as recommended by the Scrutiny Committee
- Security issues associated with using Outlook as an email system and in particular the risks in relation to 'phishing' emails.

(The meeting ended at 7.15 pm) **CHAIRMAN**

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# Minute Annex

The reply to this question, from the Deputy Chief Executive, has been published as a supplement to minutes of the meeting held on 23 June 2020, being the meeting at which the question was first put.

Question from Cllr Wilce – PQT – Audit Committee – 23 June

*Cllr A Wilce stated that the MDDC Constitution section 9.1, Audit Committee: General Role says:*

*Within their terms of reference, the Audit Committee may:*

*(a) Provide independent assurance of the adequacy of the risk management framework and the associated control environment including (from the perspective of the Council) those partnership or joint working arrangements the Council has with other bodies and how their risk management and controls might impact the Council.*

*I find it bizarre that this function is permissive according to the Constitution and not a duty or function specifically directed by the Council, to be carried out by this Committee. Certainly, in my mind, the Audit Committee has a duty to examine and comment on risks to the Council.*

*With this in mind, I ask members to carefully consider what was said in the report to the Cabinet of the previous administration, setting up 3RDL on 30th March 2017.*

*This report was about 3RDL was considered in private, as usual, but it was released on the order of the Information Commissioner. Notwithstanding that, it is not available in the meeting pack. In it, in as many words, it was stated 3RDL would not be allowed*
*to fail.*

*5.5 ……There may be a risk that it may not be able to recover any loans or property which has transferred to the company but it is very unlikely a council owned wholly owned company would be willing to allow the company to reach the point of insolvency.*

*This Council has to date paid 3RDL circa £10M of public money, with an option for many millions more; originally another £99 million but reduced to £12.1 million by the current administration.*

*Is this Committee able to give taxpayers assurance that this was done with due diligence and competence by MDDC officers, fully in accordance with the usual business risk management processes and in particular, in accordance with Section 5.17 of that report, in which it was stated that:*

*5.17…… The council will develop robust agreements between the council and the company to ensure the council does not cover the company's full liabilities and indebtedness.*

*The Deputy Chief Executive and S151 Officer stated that a full and thorough response would be provided to Cllr Wilce and the members of the Committee as soon as was practicable.*

Response from the Deputy Chief Executive (S151) – 13 August 2020

I can confirm that the Council has 6 individual project loan agreements with its wholly owned property development company, 3Rivers, totalling £9.061m, as at the 31 March 2020. 4 of them are for individual development projects, 1 is for an individual property acquisition and 1 is for their working capital requirements. The loan agreements stipulate: the project name, start and finish dates, all payments dates, type of loan, interest rate, full amount of the loan, repayment frequency, completion date + a schedule of all estimated drawdowns in amounts and months when required. In addition there is a single working capital loan agreement which covers staffing costs, external consultancy, when required, office accommodation and other associated overheads.

All of these loan agreements comply with amounts agreed in 3Rivers Business Plan approved by Cabinet in February of each year and then reflected in the Council's Capital Programme and Treasury Management Strategy.

All of these loan agreements comply with the overarching Funding Agreement agreed by Cabinet and signed by the 3Rivers MD, the Chief Executive and the Leader on the 8 January 2018.

Qualified accountants within the Council's finance team review the amounts included within all of the loan agreements, are responsible for making any payments requests (after they are duly authorised) and also calculate any impairment provision required, if there is any perceived risk that full recovery may not be forthcoming, in full compliance with Local Authority accounting code.

**MID DEVON DISTRICT COUNCIL**

**MINUTES** of a **MEETING** of the **ENVIRONMENT POLICY DEVELOPMENT GROUP** held on 14 July 2020 at 5.30 pm

**Present Councillors** B G J Warren (Chairman)
E J Berry, W Burke, D R Coren, B Holdman, Miss J Norton, R F Radford, R L Stanley and J Wright

**Also Present Councillor(s)** L J Cruwys, R M Deed, R Evans, L D Taylor, Ms E J Wainwright and A White

**Also Present Officer(s):** Stephen Walford (Chief Executive), Andrew Busby (Group Manager for Corporate Property and Commercial Assets), Ian Chilver (Group Manager for Financial Services), Stuart Noyce (Group Manager for Street Scene and Open Spaces), Catherine Yandle (Group Manager for Performance, Governance and Data Security), Clare Robathan (Scrutiny Officer) and Carole Oliphant (Member Services Officer)

1 **ELECTION OF CHAIRMAN (CHAIRMAN OF THE COUNCIL IN THE CHAIR) (00.00.15)**

Cllr B G J Warren was duly elected Chairman of Environment PDG for the municipal year 2020-2021

(Proposed by Cllr E J Berry and seconded by Cllr D R Coren)

2 **ELECTION OF VICE CHAIRMAN (00.01.00)**

Cllr J Wright was duly elected Vice Chairman of Environment PDG for the municipal year 2020-2021

(Proposed by Cllr B Holdman seconded by Cllr D R Coren)

3 **VIRTUAL MEETING PROTOCOL (00.01.53)**

The Group had before it and **NOTED** the *Virtual Meeting Protocol.

Note: *Virtual Meeting Protocol previously circulated and attached to the minutes

4 **APOLOGIES AND SUBSTITUTE MEMBERS (00.02.09)**

There were no apologies or substitute members.

## 5 DECLARATIONS OF INTEREST UNDER THE CODE OF CONDUCT (00.06.13)

Members were reminded of the need to declare any interests when appropriate.

## 6 PUBLIC QUESTION TIME (00.06.33)

There were no members of the public present.

## 7 MINUTES OF THE PREVIOUS MEETING (00.06.40)

The minutes of the previous meeting held on 10th March 2020 were agreed as a correct record.

## 8 CHAIRMAN'S ANNOUNCEMENTS (00.10.08)

The Chairman announced that Stuart Noyce, Group Manager for Street Scene and Open Spaces was leaving the authority after 6 years and the Group thanked him for his support and wished him well for the future.

## 9 REVENUE AND OUTTURN REPORT (00.12.32)

The Group had before it and **NOTED** the *Outturn report for 2019-2020 from the Group Manager for Finance who explained that the report had previously been presented to the Cabinet on 9th July 2020.

The Chairman expressed a view that the PDG could add little to the report as it had been previously seen and approved by the Cabinet. The Leader stated that he would investigate the timing of the report being sent to the PDG.

In response to concerns raised with regard to the £0.5m variance in the budgeted and actual Planning income for 2019/2020 the Cabinet Member for Finance stated that the Cabinet were constantly looking at the revenue streams for Planning but the current crisis would have an effect on the current years projections.

The Chief Executive explained that the shortfall in the 2019/2020 Planning service figures was due to the number of smaller planning applications which had come forward and a downward trend in the number of medium and large scale applications received which generated the most income.

The Group discussed the impact of the current crisis on the financial year 2020-2021.

Note: *Outturn report previously circulated and attached to the minutes

## 10 CONTRACTED OUT ENFORCEMENT DUTIES (00.24.16)

The Group received a verbal update from the Group Manager for Street Scene and Open spaces who explained that he had been investigating the PDG's request to explore a trial of contracted out enforcement duties for littering and dog fouling. He stated that negotiations prior to lockdown had been ongoing with a local authority company who provided this service for 8 other local authorities and that a meeting

had been scheduled with the company to meet with himself and the Councils Legal Services Team to discuss the options available.

He explained that traditional contracted out enforcement used by other Authorities had resulted in low payment rates and increases in their Legal Services time as more people were handed fines but more people had challenged them. The company who had been approached claimed an 87% pay rate and as it was a local authority company the Council would not need to go out to tender for the trial. The company did have concerns that the MDDC District may not be financially viable for them to operate in as it had a relatively low number of instances and was very rural.

Members discussed the increase in the amount of litter which appeared to be affecting many rural parishes as people had been home for longer periods during the lockdown and had been using the countryside for leisure pursuits and not taking their litter home.

In response to a question about how using an external company for enforcement would increase the number of enforcement officers the Group Manager for Street Scene and Open Spaces explained that by using an external company it could increase the number of officers by 2-4. He explained that there would have to be a dialogue with the company about where it operated within the district and include a caveat that our rural parishes would be included. He explained that even with more officers patrolling the service would continue to rely on intelligence from members of the public who witnessed littering and dog fouling.

Members then discussed the possibility of catching fly tippers from take away receipts but the Group Manager for Street Scene and Open Spaces explained that this would not meet the evidence level set and would unlikely lead to a successful prosecution.

The Group discussed the possibility of putting up signs on the main trunk roads within the district which encouraged people to take their litter home. The Group Manager for Street Scene and Open Spaces explained that the Council worked in partnership with other groups such as Highways England, Clean Devon Group and DCC Highways. He explained that there were currently a few vacant spots on sponsored roundabouts in the district and that anti littering signs could be erected on them whilst new sponsors were found. He stated he would provide costings for signs to be erected at suitable roundabouts.

The Group discussed the potential to have wildlife camera’s installed on fly tipping or dog fouling hotspots once the use of CCTV Camera’s Policy and Guidance had been investigated by the Community PDG.

In response to a question asked about trade waste the Group Manager for Street Scene and Open Spaces explained that trade waste generated an income for the Council. Trials had been conducted of food waste from schools and that if that led to reduced costs of disposing of the residual trade waste it could be something to consider but as the Council would be in direct competition with other waste providers it would need to be competitive.

11 **CLIMATE CHANGE UPDATE (00.48.18)**

The Group had before it and **NOTED** the *Climate Handbook presented by the Group Manager for Corporate Property and Commercial Assets who explained that it had been rolled out to support the Climate Change Action Plan.

He explained that the Council had identified various work streams and that the Renewal Energy Fund would be tracked via the action plan. He stated that a decision making tool was in development and that the Councils housing policy would play a major part in the reduction of Climate Change.

Consideration was given to:

- Whether the power network infrastructure was able to support the installation of more domestic solar panels on council houses
- If future open spaces designated to the Council from ongoing local developments could be turned into wild flower meadows
- Whether the plan would get the Council to Carbon Neutral by 2030
- Other Councils and if they had more assertive plans
- Did current budget schemes support the Council to 'go green'

The Cabinet Member for Climate Change explained that currently there was no budget for officer support but that they were looking at other funding streams to support the work including the recently announced Government Green Homes Bonus. She explained that public meetings would feed into the plan and that communication with the local population was important and that the Handbook would help with this. She encouraged Members to share ideas and learning.

The Group Manager for Street Scene and Open Spaces reminded the Group that all reports produced by Officers were required to state the impact on climate change and that the Council were hosting an electric vehicle day so that neighbouring authorities could come and see what commercial electric vehicles including refuse lorries were currently available.

Note: *Climate Handbook previously circulated and attached to the minutes

12 **PERFORMANCE AND RISK (01.16.12)**

The Group had before it and **NOTED** a *report of the Group Manager for Performance, Governance and Data Security presenting Members with an update on performance against the corporate plan and local service targets for 2020-2021 as well as providing an update on key business risks.

She outlined the contents of the report stating that this was the first report against the new corporate plan.

The Groups expressed its thanks to the Waste and Recycling teams for they way in which they had coped with the impact of Covid 19 which had increased the amount of household waste by 2.53% compared to the same period last year.

In response to a question asked, the Group Manager for Performance, Governance and Data Security confirmed that no enforcement had been conducted at the beginning of the lockdown as staff had been moved to other duties.

Note: *Report previously circulated and attached to the minutes

13 **START TIME OF MEETINGS (01.23.00)**

The Group **AGREED** that the start time of the meetings should remain at 5.30pm for the remainder of the municipal year.

(Proposed by the Chairman)

14 **IDENTIFICATION OF ITEMS FOR FUTURE MEETINGS (01.27.20)**

The following items were identified:

- Members requested whether commercial and trade waste could be added to the performance and risk register.
- Members wanted to look at the figures for trade waste and compostable waste, to see if there were opportunities to increase the rates of trade waste (and therefore the Councils income)
- Members requested an external enforcement update
- Members requested a review into the current equipment used by district officers and to look at additional equipment being supplied such as bodycams

(The meeting ended at 7.11 pm) **CHAIRMAN**

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**MID DEVON DISTRICT COUNCIL**

**MINUTES** of a **MEETING** of the **HOMES POLICY DEVELOPMENT GROUP** held on 21 July 2020 at 2.15 pm

**Present Councillors** R J Dolley (Chairman)
Mrs E M Andrews, J Cairney, D R Coren, L J Cruwys, C J Eginton, F W Letch, S J Penny and Mrs C P Daw

**Also Present Councillor** R M Deed

**Also Present Officers** Jill May (Director of Corporate Affairs and Business Transformation), Claire Fry (Group Manager for Housing), Simon Newcombe (Group Manager for Public Health and Regulatory Services), Catherine Yandle (Group Manager for Performance, Governance and Data Security), Ian Chilver (Group Manager for Financial Services), Mike Lowman (Interim Building Maintenance Manager) and Sarah Lees (Member Services Officer)

1 **ELECTION OF CHAIRMAN (CHAIRMAN OF THE COUNCIL IN THE CHAIR)**

**RESOLVED** that Cllr R Dolley be elected Chairman of the Group for 2020 / 2021.

2 **ELECTION OF VICE CHAIRMAN**

**RESOLVED** that Cllr S Penny be elected Vice Chairman of the Group for 2020 / 2021.

3 **APOLOGIES AND SUBSTITUTE MEMBERS**

There were no apologies for absence.

4 **REMOTE MEETINGS PROTOCOL**

The protocol for remote meetings was noted.

5 **PUBLIC QUESTION TIME**

There were no members of the public present.

6 **DECLARATION OF INTERESTS UNDER THE CODE OF CONDUCT**

Cllr Mrs E Andrews declared a personal interest as she was a Council tenant.

7 **MINUTES**

The minutes of the meeting held on 17 March 2020 were confirmed as a correct record by the Members who had been present at the meeting.

8 **CHAIRMAN'S ANNOUNCEMENTS (00:11:00)**

The Chairman stated that these were unprecedented times and Housing and Building Services had worked exceptionally hard during a very challenging period.

9 **PERFORMANCE AND RISK (00:11:33)**

The Group had before it, and **NOTED**, a report * from the Group Manager for Performance, Governance and Data Security providing it with an update on performance against the Corporate Plan and local service targets for 2020/2021 as well providing an update on the key business risks.

The contents of the report were outlined with particular reference to the following:

- This was the first report of 2020/2021 containing details of performance against the new Corporate Plan.
- The number of 'Net additional homes provided' would have a target of 393 for this year from the Local Plan.
- Targets in relation to 'Affordable Homes delivered' had not yet been set.

Discussion took place regarding:

- Figures in relation to the number of empty homes being brought back into use had dropped significantly. It was explained that, as a result of the pandemic, it had not been possible to conduct the normal number of inspections, however, it was hoped that this would be brought back on track for the remainder of the year. Consideration would need to be given towards the funding of this service when the budget was reconsidered in the autumn. A long term view would need to be taken.
- It had been difficult gaining access to some properties for repairs and gas servicing as some tenants were shielding, isolating or just unhappy about people entering their home during the pandemic.
- The number of complaints responded to on time was showing as 100% against target. The Group Manager for Performance, Governance and Data Security was asked to check this.
- Risks in relation to the 'Supply of Housing' and 'Homelessness' remained high in terms of severity.

The Group wished for their sincere thanks to be passed onto the Housing and Building teams who had had an extremely difficult job in recent months.

Note: * Report previously circulated; copy attached to the signed minutes.

10 **CAPITAL AND REVENUE OUTTURN FIGURES FOR 2019 / 2020 (00:22:20)**

The Group had before it, and **NOTED**, a report * from the Deputy Chief Executive (S151) presenting the revenue and capital outturn figures for the financial year 2019/20.

This report and been presented to the Cabinet on 9th July and the recommendations within it had been approved.

The Group Manager for Finance explained that this was a generic report detailing how spending for the 2019/2020 financial year had compared against budget. The effect of the pandemic upon these reports had been minimal since they concerned the previous year. However, details were provided regarding the 3 tranches of compensation received from the Government since lockdown totalling £994k as well as payments in respect of the job retention scheme and an expected amount in relation to the income protection guarantee.

Returning to the previous financial year it was explained that at the year end the closing position had shown a deficit of £232k across all services. This had been predicted to be £252k, therefore the final position had shown a small improvement. The shortfall had been met by Ear Marked Reserves.

The following was also noted within the report:

- For 2019/20 the Housing Revenue Account (HRA) had achieved a surplus of £608k. The Cabinet had approved a transfer to the HRA Reserves in order to bring this to zero.
- A number of capital projects had been funded during the year including works at the Lords Meadow Leisure Centre, including a gym refurbishment. Six new tipper vehicles had also been purchased.
- Underspends within the capital programme had been transferred to Ear Marked Reserves.
- There had been a drop in the return on investment relating to units purchased by the Council in Market Walk and Fore Street, Tiverton. This had been as a consequence of the recent pandemic.

Discussion took place regarding:

- It was confirmed that the percentage of Council Tax not collected was divided between all beneficiaries.
- The large variance between ‘budget’ and ‘actual’ in the Corporate Management area. Impairment loans in respect of the 3 Rivers Development Co.had been a large factor in this.
- CCTV initiatives budget – more detail was requested since two of the towns did not have CCTV. The Leader informed the Group that he had met with the Police and Crime Commissioner earlier in the year to discuss initiatives to expand CCTV provision within the district. He would ask the Cabinet Member for Community Well Being to chase this up.
- Additional employee costs in the Legal & Democratic Services area. It was explained that this was in relation to election costs.
- Why expenditure costs were showing in relation to Tiverton Town Hall and the Crediton Offices when both had been sold off.

- It was difficult to predict the extent of non-collection of Council Tax at the current time since the effects of the pandemic and people's ability to pay would not be felt for some time yet. However, the current shortfall was not as significant as feared.
- Cost centre SH027, 'Depreciation', was showing a significant variance. It was explained that assets in relation to this cost centre were introduced at cost and then a revaluation process had had to take place in relation to the social housing element.
- Cost centre SH029 'Bad debt provision': There had been a significant increase between the budget and the actual figure. It was explained that a reasonable provision had had to be recalculated as a result of lockdown.
- Businesses within Tiverton Town Centre were returning and the current situation was not as bad as originally feared.
- It was noted that there appeared to be a minor housing boom at the moment.

Note: (i) * Report previously circulated; copy attached to the signed minutes.

(ii) Cllr C Eginton declared a personal interest as he owned a business in Tiverton.

11 **BUILDING AND HOUSING SERVICE DELIVERY DURING THE PANDEMIC (00:51:08)**

The Group had before it, and **NOTED**, a report * from the Group Manager for Housing Services providing an update on the work of the Building and Housing services during the national emergency arising from the Covid 19 pandemic.

The contents of the report were outlined area by area with additional reference being made to the following:

- It was predicted that the end of the Government's furlough scheme would have an effect upon the income received by the housing service.
- Homeless people had been housed in the Council's accommodation during the pandemic. There had been challenges in the Homelessness area of work with a lot of liaison Government which had also provided some additional funding from the MCHLG.
- Rather than face to face a lot of communication had taken place with tenants electronically.
- The Housing Service had worked closely with other Devon local authorities as well as the Local Resilience Forum in connection with homelessness.
- The number of gas safety inspections being able to be carried out had decreased significantly during lockdown. This had been as a result of people shielding, people in isolation or tenants just being nervous about strangers entering their home. Non-compliance had not been so much of an issue as long has tenants had maintained contact with the Council.
- It had also been difficult to maintain the routine servicing schedule during recent months.
- For tenants that were unable to access Devon Home Choice (DHC) on-line, adverts were usually placed in libraries. Also a dedicated DHC co-ordinator had been present in Phoenix House throughout lockdown and could be contacted by phone and in person when the offices were open. An auto-bid system could also be set up to bid on their behalf.

- The effect of the pandemic on income was a 'watch and wait' situation at the current time. However, it was noted that the HRA was mainly funded by tenant rent and therefore housing services would need to be tailored accordingly if there was a significant drop in tenant income. A significant number of tenants were receiving Housing Benefit or Universal Credit and this had had a positive impact upon our performance in recent weeks.
- A letter had been sent out to tenants by the Housing Minister approximately 6 weeks ago stating that there was £500m available nationally to help tenants if they were suffering financial hardship as a result of the pandemic. This was not paid directly to Council's but could be applied for via the Revenues team. This was known as the ''Council Tax Hardship Scheme' and many applications to it had been made.
- It was confirmed that access to support didn't just have to be by digital means but also contact could be made by tenants on the phone or in person.
- Tenants had been extremely co-operative in terms of social distancing and disinfecting their properties when Council operatives have had to enter for maintenance or repair reasons.
- All emergency repairs had been able to be carried out during April and May. Adaptations had also still been completed enabling some people to be released from hospital early.
- The window replacement and modernisation contracts were both still on hold due to employees being furloughed.

The Group wished again to extend its thanks, and the thanks of the tenants who had spoken to Members, to the Housing Service staff for all they had done to support tenants through a very difficult time.

Note: * Report previously circulated; copy attached to the signed minutes.

12 **START TIME OF MEETINGS (01:30:00)**

The Group **AGREED** to continue to hold meetings at 2.15pm on Tuesday afternoons for the remainder of the municipal year.

13 **IDENTIFICATION OF ITEMS FOR THE NEXT MEETING (01:32:00)**

The following items were identified for the next meeting (in addition to those already listed in the work programme):

- An update regarding the painting and decorating companies the Council used who had had to furlough their staff during the pandemic.
- Enforcement update
- Houses of multiple occupation (HMO) update
- Syrian Refugee Scheme update

(The meeting ended at 4.00 pm) **CHAIRMAN**

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**MID DEVON DISTRICT COUNCIL**

**MINUTES** of a **MEETING** of the **ECONOMY POLICY DEVELOPMENT GROUP** held on 16 July 2020 at 5.30 pm

**Present**
**Councillors** J M Downes (Chairman)
N V Davey, R J Dolley, Mrs S Griggs,
D F Pugsley, R F Radford and A Wyer

**Apology**
**Councillor** T G Hughes

**Also Present**
**Councillors** A White and B G J Warren

**Also Present**
**Officers** Stephen Walford (Chief Executive), Jenny Clifford (Head of Planning, Economy and Regeneration), Adrian Welsh (Group Manager for Growth, Economy and Delivery), John Bodley-Scott (Economic Development Team Leader), Catherine Yandle (Group Manager for Performance, Governance and Data Security), Rob Fish (Principal Accountant), Dean Emery (Group Manager for Revenues and Benefits) and Sarah Lees (Member Services Officer)

12 **APOLOGIES AND SUBSTITUTE MEMBERS**

Cllr T G Hughes had sent his apologies for the meeting.

13 **PROTOCOL FOR REMOTE MEETINGS**

The protocol for remote meetings was noted.

14 **PUBLIC QUESTION TIME**

There were no members of the public present.

15 **DECLARATION OF INTERESTS UNDER THE CODE OF CONDUCT**

There were no interests declared under this item.

16 **MINUTES**

The minutes of the meeting held on 4 June 2020 were confirmed as a true and accurate record.

17 **CHAIRMAN'S ANNOUNCEMENTS (00:02:53)**

The Chairman stated that 12 chairs had recently been placed in Crediton Town Square and these had made an enormous difference in both providing a place to sit

for the public and helping to create a convivial atmosphere. He hoped the same sort of initiative could be undertaken in the other towns.

18 **PERFORMANCE AND RISK REPORT (00:03:36)**

The Group had before it, and **NOTED**, a report * from the Group Manager for Performance, Governance and Data Security providing it with an update on performance against the Corporate Plan and local service targets for 2020/2021 as well as providing an update on key business risks.

The contents of the report were outlined with particular reference to the following:

- This was the first set of data measured against the new Corporate Plan.
- Some measures had been affected by the impact of the pandemic and the Council having to reallocate resources. One of these measures was in relation to empty shops and the vacancy count. This had not been done in April but it was hoped a full shop survey would be undertaken by the end of July 2020. However, data had been added about the town centre units owned by the Council.
- The new Corporate Plan aims in relation to this Group were referred to.
- Several risks falling under the umbrella of this Group had increased in severity as a result of the pandemic. These included:
    - Economic Development Service
    - Economic Strategy
    - Infrastructure Delivery

  It would be important for this Group to monitor these increased risks and the mitigating actions at each meeting going forwards and to also think about how data in relation to these risks is presented. It was recognised that the full implications of the pandemic in relation to these risks would not be known for some time.
- This report reflected the current position but there was still a lot of uncertainty. The situation regarding the current economic position in both Mid Devon and Devon as a whole was constantly changing. It was not possible to see at the current time the impact of positive interventions.

Note: * Report previously circulated; copy attached to the signed minutes.

19 **REVENUE AND CAPITAL OUTTURN 2019/20 (00:15:00)**

The Group had before it, and **NOTED**, a report * from Deputy Chief Executive (S151) presenting the revenue and capital outturn figures for the financial year 2019/20. This report had been discussed by the Cabinet on 9th July 2020 and the recommendations within it approved.

The contents of the report were outlined in addition to a brief update on the financial position as a result of Covid 19:

- The Council had suffered significant losses in terms of income since the start of the pandemic and lockdown particularly in the areas of leisure and car parking.
- The various tranches of funding compensation from the Government were explained which included an income protection scheme.

- The authority had ended the year with a £232k deficit which had been funded from the General Fund Reserve. The areas that related to the Economy PDG amounted to £133k and there were three main areas that had contributed to this variance from budget. These included the Tiverton Town Centre Regeneration Project, units in relation to Fore Street, Tiverton and Market Walk, Tiverton. There had been a loss of rental income from the Londis and Tony Pryce units. However, negotiations were underway to secure a new tenant at one unit and options for remodelling another unit were being considered.
- The Group requested that more information be provided to it in relation to the Fore Street units and the flats above as well as the old 'Curiosity' shop and whether anything could be done to improve its visual appearance.
- The effect of out of town supermarkets on town centres. It was explained when any such development proposals came forward a retail impact assessment was undertaken and the impact on town centres was assessed within the planning system.

Note: * Report previously circulated; copy attached to the signed minutes.

20 **COVID 19 ECONOMIC RESPONSE UPDATE (00:29:33)**

The Group had before it, and **NOTED**, a report * from the Head of Planning, Economy and Regeneration providing it with updated information regarding the Growth, Economy & Delivery team's COVID 19 emergency economic and community response activities. It also informed Members of the Devon wide economic recovery work and sought Members endorsement for the current business support and economic recovery activities.

The contents of the report were outlined with particular reference to the following:

- The situation in terms of the effects and response to the pandemic was constantly changing and there had been a number of developments since the report for the meeting had been published.
- Covid 19 had affected different businesses in different ways. The easing of lockdown restrictions had been welcome news for the tourism industry in Devon and Cornwall but it was important not to become complacent.
- The number of businesses assisted and the amounts provided, as outlined in the report, was reiterated.
- Community support had continued with vulnerable people required to shield being supported with food parcels. This would be scaled down at the end of July once these people were no longer required to shield. However, efforts would be made to ensure that vulnerable people had alternative arrangements in place to support their needs after 1 August.
- The Council had worked closely with CHAT who had received 5 times more enquiries for help with food than normal.
- Emergency community hardship grants, funded by Devon County Council, had also been issued although the sums of money involved had been small. It was expected that people would need considerable financial help in the coming months as the full effect of the pandemic and loss of income impacted residents of Mid Devon.
- An action plan in relation to the re-opening of town centres had been considered by the Cabinet on 9th July. The plan included informational and

directional signage as well as providing key information to the public as they move through town centres. The Council would be updating its messaging as a result of having to wear face coverings in all shops as from 24th July.

- The re-opening of café's, restaurants and pubs on the 4th July had presented challenges to business owners but the town councils had been very helpful in providing essential support and information at very short notice. Specific thanks were extended to the Clerk at Tiverton Town Council who had been very helpful in organising a webinar for local traders. This had been very well received. Similar support and assistance had also been provided by Crediton and Cullompton Town Councils in conjunction with the Clerk of Tiverton Town Council.
- 'Love your Town Centre' funds had been distributed. Crediton Town Council had used this to provide the seating referred to by the Chairman earlier in the meeting.
- Planning for recovery was taking place on a number of different levels. The Group were referred to the 'Team Devon Covid 19 Economy and Business Recovery Prospectus'. This was a lobbying document setting out how the region could benefit from funding opportunities. It focussed on 4 key areas which were, businesses, places, people and opportunities. A number of action points were listed which the partnership were working hard to implement. The document provided a good basis for the recovery plan and had achieved effective collaborative discussion in its production. It also had support from local MP's. The Group considered that what was contained within the document was very promising but also hoped its aspirations were realistic and forthcoming.
- The context of the Discretionary Grant Scheme was explained. The Council had been able to use 5% of the total grant allocated to it under the national scheme to help businesses under this scheme. The Council was doing all it could to access any unspent monies in the national scheme to further support local businesses in Mid Devon.

Note: * Report previously circulated; copy attached to the signed minutes.

## 21 HYDRO MILLS PROJECT - TIVERTON WEIR (01:03:00)

The Group received a verbal update from the Head of Planning, Economy and Regeneration regarding the Tiverton Weir Hydro Mills Project. This included the following information:

- Extensive discussion had taken place with the Environment Agency in order to progress this project.
- A report would be presented to the Cabinet on 6th August seeking not only support for the project but also an agreement to proceed with a planning application. Cabinet approval to fund the project as part of the capital programme would also be sought.

Discussion took place with regard to:

- How this project aligned with the Council's commitment to climate change targets and the eventual aspiration to become carbon neutral.
- Other mill projects within the district and how they could be progressed. The Group requested to be kept updated.

22 **START TIME OF MEETINGS (01:11:00)**

The Group **AGREED** to continue to meet at 5.30pm on Thursday evenings.

23 **IDENTIFICATION OF ITEMS FOR THE NEXT MEETING (01:16:00)**

The Group requested that its attention be focussed on Covid 19 economic issues only, for the immediate future, but also felt that it was important not to lose sight of other important issues. Therefore it was suggested that the wording of this agenda item be amended for the time being to state 'future items for discussion ***post*** Covid 19'.

(The meeting ended at 6.50 pm) **CHAIRMAN**

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**MID DEVON DISTRICT COUNCIL**

**MINUTES** of a **MEETING** of the **COMMUNITY POLICY DEVELOPMENT GROUP** held on 28 July 2020 at 2.15 pm

**Present Councillors** C R Slade (Chairman)
E J Berry, W Burke, L J Cruwys, Mrs C P Daw, J M Downes, B Holdman, D F Pugsley and Mrs M E Squires

**Also Present Councillor(s)** R M Deed, D J Knowles and Mrs N Woollatt

**Also Present Officer(s):** Jill May (Director of Corporate Affairs and Business Transformation), Ian Chilver (Group Manager for Financial Services), John Bodley-Scott (Economic Development Team Leader), Lee Chester (Leisure Manager), Nicola Cuskeran (Senior H R Business Partner), Tanya Wenham (Lead Officer Private Sector Housing), Clare Robathan (Scrutiny Officer) and Carole Oliphant (Member Services Officer)

1 **ELECTION OF CHAIRMAN (CHAIRMAN OF THE COUNCIL IN THE CHAIR)**

Cllr S R Slade was duly elected Chairman for the municipal year 2020-2021.

2 **VIRTUAL MEETING PROTOCOL (03.25)**

The Group had before it, and **NOTED**, the *Virtual Meeting Protocol.

Note: *Virtual meeting protocol previously circulated and attached to the minutes.

3 **ELECTION OF VICE CHAIRMAN (04.06)**

Cllr B Holdman was duly elected Vice Chairman for the municipal year 2020-2021.

4 **APOLOGIES AND SUBSTITUTE MEMBERS (04.35)**

There were no apologies or substitute members.

5 **DECLARATIONS OF INTEREST UNDER THE CODE OF CONDUCT (04.55)**

Members were reminded to make declarations of interest when appropriate.

6 **PUBLIC QUESTION TIME (05.10)**

There were no members of the public present.

7 **MINUTES OF THE PREVIOUS MEETING (05.19)**

The minutes of the last meeting held on 28th January 2020 were **AGREED** as a true record.

8 **CHAIRMANS ANNOUNCEMENTS (06.08)**

The Chairman thanked members for his re-election of Chairman..

9 **MEETING MANAGEMENT (07.00)**

The Chairman indicated that he intended (with the Groups approval) to take agenda items number 15 (Access to information) and 16 (Leisure Services update) as the next item of business.

10 **ACCESS TO INFORMATION - EXCLUSION OF PRESS AND PUBLIC (07.11)**

Prior to considering the following item postponed from item 16 on the agenda, discussion took place as to whether it was necessary to pass the following resolution to exclude the press and public having reflected on Article 15 15.02(d) (a presumption in favour of openness) of the Constitution. The Community Policy Development Group decided that in all the circumstances of the case, the public interest in maintaining the exemption outweighed the public interest in disclosing the information.

It was therefore:

**RESOLVED** that under Section 100A(4) of the Local Government Act 1972 the public be excluded from the next item of business on the grounds that it involves the likely disclosure of exempt information as defined in paragraph 3 respectively of Part 1 of Schedule 12A of the Act, namely information relating to the financial or business affairs of any particular person (including the authority holding that information).

(Proposed by the Chairman)

11 **LEISURE SERVICES UPDATE (08.54)**

The Leisure Services Manager gave a brief overview of the service throughout the pandemic and answered questions about the re-opening of the Leisure Centres.

12 **DEVON DISTRICT COUNCIL'S JOINT SAFEGUARDING POLICY AND MDDC GUIDANCE AND PROCEDURES (09.15)**

The Group had before it the *Devon District Council's Joint Safeguarding Policy and MDDC Guidance and Procedures. The Director of Corporate Affairs and Business Transformation explained that the report had been initially issued under the incorrect Cabinet Member portfolio but this would be rectified before it was presented to the Cabinet.

The Senior Human Resources Business Partner explained that it was an annual report and detailed the progress over the previous 12 months. She stated that there were no changes to the policy and that there were three main area's of consideration:

- Safeguarding policy
- Training – All required training had been completed
- Monitoring – There were 12 reported instances in 2019-2020

The PDG therefore:

**RECOMMENDED** to Cabinet that the Group had reviewed the policy and noted that no amendments had been made to the policy in the last 12 months.

(Proposed by the Chairman)

Note: * Devon District Council's Joint Safeguarding Policy and MDDC Guidance and Procedures previously circulated and attached to the minutes

13 **COMMUNITY SAFETY PARTNERSHIP (12.04)**

The Group had before it, and **NOTED**, the *Community Safety Partnership priorities report 2020-2021.

The Lead Officer, Private Sector Housing, explained that the report detailed the priorities of the Community Safety Partnership for the municipal year 2020-2021. She stated that the activities would be centred around the Devon Partnership Trauma informed approach. This approach encouraged practitioners and staff to recognise that many service users had experienced some form of traumatic event. This may impact on their life choices, activities and actions.

She explained that people suffering trauma needed extra support during the pandemic and there had been an increase in domestic violence and anti social behaviour during the lockdown.

Note: * Community Safety Partnership priorities report 2020-2021 previously circulated and attached to the minutes.

14 **CONTAMINATED LAND COST RECOVERY POLICY (15.35)**

The Group received the *Contaminated Land Cost Recovery Policy prepared by the Group Manager for Public Health and Regulatory Services.

The Lead Officer, Private Sector Housing, explained that the policy related to the recovery of costs for remedial action taken to clear private contaminated land.

She explained that previously the Council had been reimbursed for this service by the DEFRA Contaminated Land Capital Project Programme by this initiative had closed in 2017 and the Council now had a duty to reclaim the costs via individuals. She further explained that there was a Hardship policy aimed at people who could not afford to pay for remedial actions.

She outlined the revisions to the policy:

- Reformatting the policy in-line with current policy document templates and changing reference to the 'local authority' to 'the Council' where necessary

- Minor legislative updates (EU Exit regulations on Environmental Regulations in 2019 and repeal of Housing Act 1996 in England)

- Pending changes to updated Environment Agency Guidance (Land contamination: risk management (LCRM – due to replace current model procedures called CLR11 in 2020)

- Closure of the Defra Contaminated Land Capital Projects Programme in March 2017

- The updated Housing Assistance Policy 2019-22 (availability of Healthy Homes Grants in addition to the on-going Wessex Home Improvement Loan product)

It was therefore:

**RECOMMENDED** to the Cabinet to adopt the revised Contaminated Land Cost Recovery Policy

(Proposed by Cllr B Holman and seconded by Cllr Mrs M E Squires)

Note: * Contaminated Land Cost Recovery Policy previously circulated and attached to the minutes.

15 **GRANT PAYMENTS TO EXTERNAL ORGANISATIONS (THE STRATEGIC GRANTS REVIEW PROCESS) (20.00)**

The Group received the *Strategic Grants Programme Evaluation and Review report from the Economic Development Team Leader.

He explained that the grants review process was due to commence in March 2020 but had been delayed by the current pandemic. He informed the Group that the programme for 2021 – 2024 now included both Strategic Grants and Economic Grants which were previously dealt with separately.

He further explained that the Council urgently needed to look at priorities for funding of grants as the Council would be looking at budgets in September and partners needed sufficient time to prepare bids.

The Group **AGREED** to set up a Working Group to review the processes and level of funding to individual strategic and economic grant recipients for 2021-2024. The members of the Working Group were agreed as:

- Cllr J E Berry
- Cllr B Holdman
- Cllr Mrs M E Squires.

Cllr D J Knowles, Cabinet Member for Community Wellbeing, was co-opted onto the Working Group.

(Proposed by the Chairman).

Note: *Strategic Grants Programme Evaluation and Review report previously circulated and attached to the minutes.

16 **REVENUE & CAPITAL OUTTURN REPORT (29.93)**

The Group had before it, and **NOTED**, the *Revenue and Outturn report previously presented to the Cabinet on 9th July 2020.

The Group Manager for Finance explained that this was a generic report which detailed the performance against budget. He explained that in December 2019 the budget deficit had been predicted at £252k but this had improved to an actual year end deficit of £232k which was very close to an overall budget of £10m.

He explained that the £863k utilised from the Ear Marked Reserves indicated the progress of projects and that funds had been set aside for future projects.

In response to questions asked he explained that not all of the capital projects had been completed in 2019/2020 and therefore there was a recommendation to carry forward any unused capital projects funding to future years.

He confirmed that he would provide answers to specific questions about the loss of income from the Tiverton Town centre regeneration project.

Note: *Revenue and Outturn report previously circulated and attached to the minutes

17 **CHAIRMANS ANNUAL REPORT (47.32)**

The Committee had before it, and **NOTED**, a draft report * by the Chairman of the Committee, a final copy of this report would be submitted to Council on 26 August 2020.

Note: *Report previously circulated and attached to the minutes

18 **IDENTIFICATION OF ITEMS FOR THE NEXT MEETING (48.24)**

The Scrutiny Officer informed the Group that a Working Party would be proposed at the next meeting to look at the Customer Engagement Strategy before it was presented to the Group in November.

19 **START TIME OF MEETINGS (50.41)**

The Group **AGREED** to continue with a 2.15pm start time for meetings for the remainder of the municipal year.

(Proposed by the Chairman).

(The meeting ended at 3.29 pm) **CHAIRMAN**

**MID DEVON DISTRICT COUNCIL**

**MINUTES** of a **MEETING** of the **PLANNING COMMITTEE** held on 15 July 2020 at 2.15 pm

**Present Councillors**
Mrs F J Colthorpe (Chairman)
E J Berry, S J Clist, L J Cruwys, Mrs C P Daw, D J Knowles, F W Letch, S J Penny, R F Radford and B G J Warren

**Also Present Councillor(s)**
G Barnell, D R Coren, R J Dolley, J M Downes, R Evans, B Holdman and B A Moore

**Present Officers:**
Jenny Clifford (Head of Planning, Economy and Regeneration), Kathryn Tebbey (Head of Legal (Monitoring Officer)), Lucy Hodgson (Area Team Leader), Eileen Paterson (Group Manager for Development), Alison Fish (Area Team Leader), Adrian Devereaux (Area Team Leader), Oliver Dorrell (Planning Officer), Daniel Rance (Principal Planning Officer), Helen Govier (Principal Planning Officer), Greg Venn (Conservation Officer), Tim Jarratt (Tree Officer), Sarah Lees (Member Services Officer) and Carole Oliphant (Member Services Officer)

## 24 VIRTUAL MEETING PROTOCOL (00.04.40)

The Committee had before it, and **NOTED**, the *'Protocol for Remote Meetings.

Note: *'Protocol for Remote Meetings' previously circulated and attached to the minutes.

## 25 APOLOGIES AND SUBSTITUTE MEMBERS (00.05.26)

There were no apologies or substitute members.

## 26 PUBLIC QUESTION TIME (00.05.32)

1. Mrs Hill spoke in relation to item 12 on the agenda, land north of Town Farm, Burlescombe. My questions relate mainly to the ancient boundary hedge. Context very quickly, Blackdown Environmental conducted an ecology assessment report in February 2018, the plan then was for 13 houses and Blackdown's understanding was that the ancient hedge would remain intact as per the design proposals. They refer to

the boundary hedge along Old Road as species rich, potential to be categorised as an important hedgerow under the Hedgerow Regulations Act 1997. There also exists a Devon biodiversity and geodiversity action plan from Devon County Council with policies to protect the hedgerows. Blackdown's views can still be viewed on MDDC Planning portal. It was never updated dated but revised in July 2019. That has significant differences from plans report in 2018.

Can Officers explain why they have not met the requirements of the Hedgerow Regulations Act 97 by requesting an up-to-date assessment to address the ecological, botanical and heritage importance of the ancient boundary hedge?

Can Officers also explain why they failed to reconsult the ecologists (as the ecologists advised in the report) and or ensure an opportunity for a revised consultation response addressing the now proposed removal of 55 metres of the boundary hedgerow?

Can Officers explain why they did not ensure this was done?

The Ecologists wanted retention and protection of this historically important hedgerow. Can Officers explain why MDDC subsequently recommended Approval on a Revised Scheme that would destroy it?

Can Officers explain the discounting of the documented historic background to the Boundary Hedge from Devon County's Historic Records team, reference to the Domesday, and the hedgerows importance?

You say there isn't sufficient reason to recommend refusal on its own but MDDC has failed to address these issues and failed to conduct a proper survey of the impact. So it leaves the authority in danger of a breaching the Hedgerow's Regulation Act of 1997 and the Environmental Impact Regulations too.

Would Councillors not agree that the hedgerow's historic origins and in particular the Ecologist's requirements for retention and protection of this Boundary is an additional and valid Reason for Refusal as is the imminent adoption of the Local Plan which puts this site out of the settlement limit?

2. Mrs Hill spoke on behalf of Cllr Lewis Worrow from Burlescombe Parish Council, in relation to the same item (as he had not been in attendance at this point in the meeting).
The preservation and importance of Burlescombe's Grade I listed church and its setting is now listed as a reason for Refusal, supported by MDDC's Statutory duty under Section 66 of the Planning Act of 1990 and Policies DM27 and DM25.

The starting point for Appeals Inspectors in cases such as these is a 'strong presumption against granting permission' if there is any harm to the heritage asset itself or its setting.

This Application does not overcome or negate even 'less than substantial' harm to the setting of the Church and Historic England has consistently advised MDDC to focus on whether the public benefit outweighs the harm.

To this end I have two (2) questions:

a) Have Members been clearly informed that the starting point for Planning authorities and Appeals Inspectors is a "'strong presumption against granting permission if there is any harm to the heritage asset itself or its setting?", particularly so when there is no public benefit but significant and less than significant harm?
b) Can Officers explain why, until now, there has been no acknowledgement of the absence of public benefit and why MDDC's Statutory duty under Section 66 of The Planning Act 1990 has not been cited as a Refusal reason until now?
Further to this, the current Application is a Revised Scheme containing significant differences to that of the previous Application Refused in June 2019.

In the December 2019 Report, P32, Officers detail that the current scheme relates to revisions made to overcome the reason for Refusal (highways) and that the Authority cannot consider any other aspects of the development that was previously considered unless the changes made to overcome this reason for refusal cause additional harm to the surrounding area and the heritage assets.

This Revised Application includes a platform of additional and significant excavation to the proposed site: visibility splays, significantly increased parking/turning area and a covered roof not shown in the previous Application.

The Application also now requires the destruction of 55 metres of an historic, protected and irreplaceable boundary hedge, in contravention of the Hedgerows Protection Act 1997 and of the Environmental Impact Assessment Regulations.

To this end, I have three (3) subsequent questions for a total of five (5) questions:

a) Can Officers explain why they did not treat such significant changes to the Plans as material considerations, and why they seem not to have concluded the changes would cause additional harm to the surrounding area and the heritage asses, as they detailed in the December 2019 Report?
Officers incorrectly claim they cannot include new Reasons for Refusal, in contrast to their statement of December.

b). Would Councillors not agree that these material differences provide MDDC with compelling and in Planning terms, justifiable reasons that permit MDDC to take into account and introduce new, legitimate reasons for Refusal that were previously not included?
c). Would Councillors not agree there are flaws in this process, and that the Application should be finally Refused today?

3. Mr Jamie Byrom then spoke in relation to item 16, Appeal in relation to Higher Town, Sampford Peverell. After the closed session about this same site last October, this Council dropped one of its reasons for refusal, I therefore fear you are being asked to do something similar today, forgive me if I am mistaken. I urge you not to drop either of the remaining reasons for refusal.

Reason for refusal 3 concerns the safety of pedestrians who move in between the site and the village. A year ago you found that the Appellant's proposals for the canal area would be unsafe and they still are. You will soon adopt our new Local Plan, its policy SP2 requires that access to and from the village must be improved. If you drop this reason for refusal just when the plan is about to be adopted you will in effect be

ignoring a Local Plan policy requirement and I think you will all agree this will be a very bad signal to send to the public at the moment.

The same is true of reason for refusal 1. This concerns landscape impact. A year ago you decided that the landscape proposal would do significant harm to the surrounding landscape character and appearance. This too is covered by policy SP2. It requires landscaping and design which respect the setting and character of the area, conservation of the area and listed building. To help achieve this the policy defines a large area of green infrastructure where there must be no development. The Local Plan Inspector described this area of green infrastructure as essential in providing the protection required but this Council's landscape expert witness for the Appeal never once mentions in his evidence how the Appellants proposals would harm this green infrastructure, something has held him back. In your private session councillors you might like to ask what this is. May be it is because the Local Plan had not yet been adopted when he wrote his evidence but the plan will soon have full force. This includes the requirement for the green infrastructure to remain undeveloped. Rather than give up on the landscape reason for refusal this committee should surely urge officers and your very capable experts to pursue it more aggressively backed up by the requirements of the soon to be adopted plan. If you drop reason for refusal 1 you will be ignoring the SP2 requirement for green infrastructure to remain undeveloped. Once again this is surely a very bad signal to send to the public.

In conclusion my question is, will officers give a clear undertaking here today that the Council and its experts will uphold in full every part of policy SP2 at the forthcoming Appeal enquiry? I am looking simply for a 'yes' or 'no' answer.

4. Professor Barney Dunn spoke in relation to item 13 on the agenda, the Tree Preservation Order at the former Primary School, Newton St Cyres. He stated that he wanted to comment on the appeal made to the imposition of the Tree Preservation Order.This first reason for objection was that the tree was in a poor structural condition. From a non-expert view it is beautiful and its thriving and I note that none of the other 2 experts that came out to see the tree said that it was in a poor state. There is a comment made that the process wasn't followed properly in placing the TPO. As far as I can tell the process has been followed properly.

There is some question about the amenity of the tree, I would just say that the tree has clear visual amenity and that there are multiple site points along Sand Down Lane and on the A377 whether you are a walker, a pedestrian or a cyclist and when they knock down the old school the visual amenity of the tree will potentially increase because it will be more visible.

Also the tree has some historical amenity in that generations of kids went to school there and remember having lessons under it and doing outdoor learning so it is kind of a cultural landmark in the village.

There were some questions raised that it will bias a subsequent planning application with views of the public. My understanding of planning law is that a TPO can be overturned at the planning stage but that it is good to have it there so that that tree is given due process.

The other reason for appeal is that the tree is an inappropriate species for a confined space within a development environment. Just to note the rival bidder for the site which was a Community Housing Trust had come up with a scheme that could successfully incorporate the tree and didn't see any problems with it. That bid was refused on the grounds of profitability for the Council not for viability of the proposal, that is my understanding.

For those reasons I think the original TPO was fine and I would hope that it continues to be upheld. Thank you.

5. Beverly Tolley then spoke in relation to item 12 on the agenda, land north of Town Farm, Burlescombe. She stated that MDDC would seem to be inconsistent in the consideration of applications and in its decisions regarding the harmful effect this proposal will have on the appearance of Old Road, one of the oldest parts Burlescombe has been discounted. On a recent application, outside of the settlement area of Craddick, polices of COR2 and DM 2 concerning local distinctiveness were fully considered and cited as reasons for refusal so my question is can MDDC officers explain why they did not explore and properly consider the relevance of COR2 and DM2 to this application and apply them instead of claiming that the application complied with both?

6. Caroline Pitchin also spoke in relation to land north of Town Farm, Burlescombe.

Good news for the village we now have a farm shop, however the location is in front of the proposed development. Visitors to the shop are already trying to park when the shop is busy, often parking two abreast as we simply do not have anywhere to park. The visitors in the shop are only parking for a few minutes but my question is where are the visitors to park for the proposed development? I cannot see that they will park in the proposed parking area as these are family homes that could mean several cars per household. We have measured the lane and it's 4.2 metres in width on the road outside the proposed development.

The Leylandii trees are growing out of control, spoiling the view for all in the Parish. This has been mentioned by several parties and in previous proposals these were to be cutback or replaced. However will these be allowed to grow even taller if the proposal is denied? I feel that the Leylandii is being used as a bargaining tool. Please will these be cut if the proposal is denied or if permission is given?

The hedge row is an ancient hedge and should remain. The developers Assessment report in 2018 does state that the ancient hedge needs to be protected and remain intact. I have also read on the Mid Devon website that you cannot simply remove an ancient hedge.

7. Cllr Andrew Moore, Ward Member for Clare and Shuttern, stated that he was speaking in relation to item 11 on the agenda – erection of an office building and a Change of Use from agriculture to a groundworks depot at Highfield Farm.

Members of the Committee, you will recall that I called this retrospective application in with concerns about cumulative impact, whether this is the right sort of development to be promoting in remote, heartland countryside and because of

potential amenity impact given the history on the wider site. I stand by those concerns.

You'll remember that a simple search uncovered 8 businesses at Highfield Farm, with this one, "a new employment site" per the report, proudly proclaiming that its growth had been "exponential" and employed 30 people. Taking into consideration everything else that goes on at Highfield Farm is this an appropriate scale or over-development? Is there sufficient adverse impact to refuse the application? You must decide, again in the context of other noisy operations in the immediate area: there must come a point where yet another business is the straw that breaks that particular camel's back.

We are told there are no other suitable sites in the area so the criteria for DM20 are met, but given that the business operates right across the south of England is a 3 km search radius enough? As for adverse impact to the "appearance and character of the countryside", or alternatively "sustaining local distinctiveness, character and environmental assets", you saw photos that showed that a green field site has been completely taken over by this business. Are you aware that, contrary to the report, this site does have a Statutory designation: part is in the North Devon Biosphere, a UNESCO-designated reserve? Are you entirely happy that the requirements of COR2 and COR18 are being fulfilled?

Amenity impact for the few local properties in this quiet area is an important consideration. The recommendations strongly restricting operating hours, lighting and noise are welcome. As this report mentions, a further restriction on vehicle access times might well be appropriate - within the past week there was reportedly regular activity from 5:30 am and vehicles were reportedly entering site with materials at 9:00 pm: Environmental Health Officers have been informed. As always, we rely on the integrity of the operator to honour the conditions, and so it has to be. But I worry that on this remote site with few neighbours, despite the controls, regular Enforcement visits will be needed. And there's a risk that this business's operation could spill conveniently onto the adjacent site where there are currently no specific controls on operating hours, lighting or noise and there have been several Enforcement actions. Are you happy that controls are enough to safely secure the wider policy requirements for the protection of the countryside environment?

So, is this the right thing to be approving, and if so, are you happy that the conditions are sufficient to ensure that all concerns are being comprehensively addressed?

The Chairman stated that the questions would be raised when the Committee got the relevant item on the agenda.

## 27 DECLARATION OF INTERESTS UNDER THE CODE OF CONDUCT (00.25.44)

Members were reminded of the need to declare any interests when appropriate.

## 28 MINUTES OF THE PREVIOUS MEETING (00.25.55)

The minutes of the meeting held on 17th June 2020 were agreed as a true record.

29 **CHAIRMAN'S ANNOUNCEMENTS (00.27.55)**

The Chairman had the following announcements to make:

- She informed the meeting that item 14 on the agenda - Tree Preservation Order 20/0003 – Land at Meadow Park, Willand, Devon had been deferred
- She informed Members that Lucy Hodgson would be leaving the authority after 16 years and she thanked her for her support of the Planning Committee and wished her well for the future

30 **DEFERRALS FROM THE PLANS LIST (00.30.20)**

There were no deferrals from the Plans list.

31 **THE PLANS LIST (00.30.34)**

The Committee considered the applications in the *Plans List.

Note: *List previously circulated; copy attached to the signed Minutes.

**a) 20/00189/FULL – (Conversion of agricultural building to dwelling, retention of office building with temporary use as living accommodation while barn conversion takes place, erection of garage/carport and summerhouse at Land and Buildings at NGR 279660 98291, Brookdale, Neopardy).**

The Area Team Leader had informed the Committee that a completed Unilateral Undertaking had been received from the applicant providing a financial contribution towards Air Quality Management in Crediton.

He outlined the contents of the report by way of a presentation highlighting the location, the block plan including the proposed landscaping and the existing and proposed plans.

He explained that the application was seeking approval to convert an agricultural building into one dwelling. The log cabin on site was the same dimensions as a caravan and would be converted to an office building once the main house was completed.

He provided the Committee with a background to the previous Class Q approval for the site which approved the change of use of the agricultural building to 2 x 4 bedroomed dwellings. The prior approval allowed the applicant to live in a temporary building on site under permitted rights.

He explained the appeal decision of Mansell v Tonbridge and Malling Borough Council (2017) and deemed that an original decision of the Class Q application (2 x 4 bedroomed dwellings) would be a fall back position if the current application was refused and went to appeal.

The Area Team Leader stated that the revised application of one dwelling would reduce the amount of traffic and that the building would be completely off grid with extensive tree planting. He stated that the one neighbouring property would not be

overlooked and the log cabin would be repurposed into an office building once the conversion was complete.

Consideration was given to:

- The fall back position if the application was refused and went to appeal
- The log cabin would be converted to offices once the conversion was complete and could not be used as self contained residential accommodation
- The footprint of the proposed building was the same as the original
- Legislation which determined when Class Q could be applied for and possible restrictions through condition
- The views of the applicant who stated that the log cabin would be used as offices for his business once the conversion was completed and that he intended for this to be his forever home built to the highest quality
- The views of the Parish Council who were against the application and felt that the original application would have improved the area but the proposed dwelling was too large for 2 people and questioned the need for offices on site
- The views of the Ward Members with regard to the large mobile home on site that was built without requiring separate planning permission, that the proposal was not betterment when 2 buildings were reduced down to one, that it exceeded the original application, the design of the building and that the curtilage had been considerably increased by this new proposal
- The size of the log cabin
- Whether the application was sympathetic to agricultural heritage
- The ability of the Authority to impose conditions on the revised application with regard to materials and curtilage which could not be imposed with the current Class Q approved scheme

It was therefore:

**RESOLVED** that: Planning permission be granted subject to conditions as recommended by the Head of Planning, Economy and Regeneration

(Proposed by the Chairman)

Note:

i.) Cllr Mrs F J Colthorpe, Cllr D R Coren and Cllr S J Penny made declarations in accordance with the Protocol of Good Practice for Councillors dealing with planning matters as they had received contact from the applicant.
ii.) Mark Broster (applicant) spoke;
iii.) Cllr Mortimer spoke on behalf of Crediton Hamlets Parish Council
iv.) Cllrs D R Coren and S J Penny spoke as Ward Members;
v.) Cllr B G J Warren requested that his vote against the decision be recorded

**b) 19/01309/FULL - Erection of a dwelling including demolition of a garage at Fair Havens, Mill Street, Crediton.**

The Principal Planning Officer outlined the contents of the report that had been produced to address Member concerns with:

- The requirement of an enhanced landscaping scheme to include semi-mature tree planting to site boundaries
- The colour of the cladding
- The weathering of the roof tiles to tone down the colour
- The need for the amount of roof lights installed and the glare from those that had already been installed

She highlighted by way of a presentation the elevations of the original agreed building to the one that had been built out, photographs of the site from various aspects, the revised landscaping scheme, the extra heavy standards trees and photographs of the previous bungalow showing the roof tiles in a less weathered state.

She informed members that the applicant had suggested two options to address the colour of the cladding, either replacement with hanging tiles or lead cladding but she informed members that officers were unconvinced that lead would be an appropriate solution.

Consideration was given to:

- The property was a 3 storey dwelling with rooms in the attic space
- The shared driveway and that the applicants garage would be removed
- The views of the objector who had concerns about the proposed tree planting in particular the Holm Oaks which she felt would be over whelming. Windows that were not included within the original application and the addition of a section of the building which was not permitted development and should be removed
- The views of the Agent who stated that the new landscaping proposals introduced larger trees and was based on Member discussions at the last meeting. The siting of the Holm Oaks and the proposal the replace the cladding on the bay window with leads which had been rejected by officers
- The views of the Ward Member who stated that the building had been built on an extant loophole and that the amenity could be improved if the extension was not approved but permission had been granted and the authority would need to ensure that any works carried out were in accordance with the plan.

It was therefore:

**RESOLVED** that: Planning permission be granted subject to conditions and including the additional conditions set out in the addendum report, as recommended by the Head of Planning, Economy and Regeneration

(Proposed by the Chairman)

(Vote 5 for: 5 against – Chairman's casting vote)

Notes:

i.) Cllr F W Letch declared a personal interest as he knew the occupants

ii.) Cllr J Downes declared a personal interest as his property overlooked the application site
iii.) Cllr Mrs C P Daw, Cllr S J Clist and Cllr B G J Warren made declarations in accordance with the Protocol of Good Practice for Councillors dealing with planning matters as they had received contact from the agent and objectors
iv.) Sinead Partridge (objector) spoke
v.) Joseph Marchant (Agent) spoke
vi.) Cllr J Downes spoke as Ward Member
vii.) The following late information was provided via the update sheet:

Since the officer report was completed a revised landscaping plan has been provided, drawing reference JW719/07/d, this supersedes drawing number JW719/07/c. The updated plan demonstrates the location of the dwarf brick wall which has recently been constructed on site to support the access path to the front of the property from the parking area. The applicant has confirmed that the maximum height of this wall is 900mm. The revision does not propose any amendments to the scope of landscaping as set out on the previous revision and discussed within the officer report.

**c) 19/02013/FULL - Erection of dwelling and demolition of agricultural building at Land at NGR 306728 119836 (Wardmoor), Holcombe Rogus, Devon.**

The Principal Planning Officer outlined the contents of the report by way of a presentation highlighting the location, site plan, proposed elevations, floor plans and photographs of the site.

He explained that Class Q had been granted in 2018 and that this original application would be the fall back position if the application was refused and went to appeal.

He explained that the ridge height of the new proposal was significantly higher than the original plans but there was no evidence that the new development would cause more significant harm than the original position.

Consideration was given to:

- The footprint of the proposed building compared to the original permission
- The views of the objector who stated COR18 required that development in the countryside should be strictly controlled and that this application should be no greater in scale than the original, be agricultural in style and be a betterment of the original granted permission.
- The views of the agent which confirmed that because there was existing permission on the site that a residential building of some form would be built out and referred Members to the fall back position. That solar panels would be installed and that no neighbouring properties would be affected
- The views of the Parish Council regarding the character of the proposed building bore no resemblance to the existing building and it was not betterment in the countryside.
- The views of the Ward Member who had visited the site and had concerns with the size and scale of the building and the relocation away from the hedge. That the new building style would be in keeping with the local area and that

local objections were due to the site being outside the settlement of Holcombe Rogus
- Members views on the visual impact of the new building
- A consistent approach to Class Q redevelopment proposals

It was therefore:

**RESOLVED** that: Planning permission be granted subject to conditions as recommended by the Head of Planning, Economy and Regeneration

(Proposed by the Chairman)

(Vote 5 for: 5 against – Chairman's casting vote)

Note:

i.) Cllr Mrs F J Colthorpe, Cllr E J Berry, Cllr S J Clist, Cllr L J Cruwys, Cllr Mrs C P Daw. Cllr D J Knowles, Cllr F W Letch, Cllr R F Radford, Cllr S J Penny and Cllr B G J Warren made declarations in accordance with the Protocol of Good Practice for Councillors dealing with planning matters as they had received contact from the applicant.
ii.) Mr Grubb (Objector) spoke
iii.) Hannah Cameron (Agent) spoke
iv.) Cllr Pilgrim spoke on behalf of Holcome Rogus Parish Council
v.) The Chairman read a statement on behalf of Cllr Mrs J Norton (Ward Member)
vi.) The following late information was provided:

Letter of objection received:

Dear Councillor Colthorpe

I am writing to you personally as a neighbour of the application adjacent to Wardmoor to remove an agricultural barn and replace it with a modern house of very mediocre design. This is not a case of NIMBYism but a serious objection to development of the open countryside.

The application site is 1 mile from Holcombe Rogus and the Planning Officer in his report acknowledges that a new dwelling in this location would not be policy compliant because it is development of the open countryside. In particular Policy COR18 and Para 79 of the National Planning Policy Framework seek to prevent the provision of isolated new homes in the open countryside. The Planning Officer's reason for approval is that the design and layout represents betterment over the Class Q proposal. I very strongly disagree with that point as the new agricultural barn, built in 2009/10, is in good condition and can be easily converted to a dwelling without extremely affecting the external appearance in the countryside. Plans for the Class Q conversion can be seen. Whereas the proposed building is a standard, modern building, more fit for an estate than its proposed location. There is no mention of sustainability or consideration for the environment other than the basic minimum with regard to building a low bank and hedge to surround the garden. The agricultural barn conversion (permitted by Class Q) would be far less intrusive and is therefore a much better solution than the application.

If the application is approved, this will lead others in the district, to argue that a new build should be permitted to replace any barn. The intention of Class Q is not to allow new build, but to convert existing barns into dwellings with minimal impact on the environment and local amenity.

I know that it may not be considered now, but when the application was first granted for an agricultural barn, the planning officer at the time included a condition to remove the barn when it was no longer required. A Planning Inspector deemed that condition unnecessary but it shows that in 2009 the planning officer wanted to avoid further development of the site.

There is absolutely no reason to permit this application, as there is no betterment in the application, so I would appreciate it, if you could follow your council's policies and refuse the application.

32 **MAJOR APPLICATIONS WITH NO DECISION (02.20.27)**

The Committee had before it, and **NOTED,** a *list of major applications with no decision.

It was **AGREED** that:

- Application 20/00876/MFUL (Land at NGR 302456 107324 Cullompton Devon) be brought before the committee for determination
- Application 20/00745/MOUTH (Land at NGR 286628 106169 R/O Barton Close Cheriton Fitzpaine Devon) be brought before the committee if the officer recommendation was minded to approve, no site visit was requested
- Application 20/00832/MOUT (Land at NGR 295372 113642 Bolham Road Tiverton Devon) be brought before the committee for determination, no site visit was requested

Note: *list previously circulated and attached to the minutes.

33 **APPEAL DECISIONS (02.23.29)**

The Committee had before it, and **NOTED**, a *list of appeal decisions providing information on the outcome of recent planning appeals.

Note: *list previously circulated and attached to the minutes.

34 **19/01430/FULL HIGHFIELD FARM - ERECTION OF AN OFFICE BUILDING AND CHANGE OF USE OF AND CHANGE OF USE FROM AGRICULTURE TO GROUNDWORKS DEPOT (02.24.54)**

At the Planning Committee meeting on 17th June 2020, Members advised that they were minded to refuse the above application and invited an implications report for further consideration. The Committee therefore had before it an *implications report of the Head of Planning, Economy and Regeneration setting out the implications of refusal.

The Planning Officer explained the implications report highlighting the reasons for refusal that members had identified at the previous meeting:

- Number of developments in the area
- Suitability of this particular business in this particular area
- Impact of noise on site and the number of hours worked

He explained that Public Health had appraised the application and that they concluded that subject to restrictions on hours that the impact could be adequately mitigated.

He informed members that the north end of the site had been determined as in the fringes of the North Devon Biosphere, a UNESCO-designated reserve, that officers had considered this and that with regard to the scale and nature of the proposed development within that portion of the site that the proposed conditions were adequate.

He addressed the points submitted by the Ward Member at public question time:

- Alternative sites had been investigated within a 3 mile radius not 3km
- Members should only consider the noise impacts of the application site and not from other locations

Members requested confirmation of the additional and updated conditions which had been presented at the previous Committee meeting.

The Planning Officer confirmed the additional and updated conditions as:

- Additional Condition - No external lighting shall be installed on site unless details of such lighting, including the intensity of illumination and predicted lighting contours, have been first submitted to, and approved in writing by, the Local Planning Authority prior to its installation. Any external lighting that is installed shall accord with the details so approved.
- Amended reason for Condition 3 - To allow the Local Planning Authority to retain control over the future use of the site, in the interests of visual and residential amenity, in accordance with policy DM2.
- Amended Condition 4 - The building hereby approved shall be used for purposes falling within Use Class B1(a) or (b) only and for no other purpose (including any other purpose in any Use Class of the Schedule to the Town and Country Planning (Use Classes) Order 1987, or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification), or any other use permitted under the provisions of Article 3 of The Town and Country Planning (General Permitted Development)(England) Order 2015 (or any Order revoking and re-enacting that Order with or without modification).
- Amended Condition 6 - No external lighting shall be installed on site unless details of such lighting, including the intensity of illumination and predicted lighting contours, have been first submitted to, and approved in writing by, the Local Planning Authority prior to its installation. Any external lighting that is installed shall accord with the details so approved.

It was therefore:

**RESOLVED** that: Planning permission be granted subject to conditions as recommended by the Head of Planning, Economy and Regeneration

(Proposed by the Chairman)

(Vote 5 for: 5 against – Chairman's casting vote)

Notes: * implications report previously circulated and attached to the minutes

35 **19/01189/OUT LAND NORTH OF TOWN FARM BURLESCOMBE - OUTLINE FOR THE ERECTION OF TWO DWELLINGS (REVISED SCHEME) (02.41.59)**

At the Planning Committee meeting on 17th December 2019, Members advised that they were minded to refuse the above application and invited an implications report for further consideration. The Committee therefore had before it an *implications report of the Head of Planning, Economy and Regeneration setting out the implications of refusal.

The Principal Planning Officer explained the implications report highlighting the reasons for refusal that members had identified at the previous meeting:

1. The impact of the proposal on the historic hedge/wall
2. The impact of the proposal on the historic location
3. The impact of the proposal on the setting of the Grade I listed church
4. The lack of pavements in the area and the narrowness of the roads.

He explained that the first two reasons for refusal could be combined as they dealt with the same. He explained this would leave 3 reasons for refusal:

1. The impact of the proposal on the historic hedge/wall & The impact of the proposal on the historic location
2. The impact of the proposal on the setting of the Grade I listed church
3. The lack of pavements in the area and the narrowness of the roads.

He further explained that reason 1 could be considered as a reason for refusal as this was a revised application but he would go into more details about this later on in his presentation. He explained that reason 2 could be considered as a reason for refusal and the Conservation Officer would give further details but reason 3 was not supported by Highways and therefore was unlikely to succeed.

He explained that a further reason for refusal could be considered as the application site was now deemed to be outside of the settlement limit as confirmed in the

published Mid Devon Local Plan review which carried substantial weight for a reasons for refusal.

The officer then went on to address the questions raised at public question time:

- Under section 6 of the Hedgerow Regulations planning applications were exempt from needing to be being considered so carrying out planning applications is deemed to be accepted and does fall to be considered under that regulation
- An Ecology assessment was submitted with the previous application it identified the potential for the hedge to be an important roadside hedge. Natural England were consulted on the application at every stage and the LPA should be reasonable in their requests for additional information from applicants, not putting them to any additional expense unless absolutely necessary. Given that the application was being refused and therefore there would be no need for the roadside hedge to be removed it was not considered proportionate to request additional survey work be undertaken. Where protected species are likely to be removed a licence is required from Natural England before works can progress. This is a requirement outside of the planning system.
- The issue of the loss of the hedge in the current application was addressed in the officer report to committee in December 2019 and also addressed in the implications report before Members today and your officers are stating that could be a defendable position but highlighted the possibility of costs being awarded due to this not being raised in the original reasons for refusal. There is clearly a lot of local feeling towards the hedge and Members may wish to include this as a reason for refusal if they are so minded.
- Hedgerow regulations fall outside of the the consideration of planning applications
- The revised scheme was dealing with original reasons for refusal and we are unable to introduce new reasons into a revised scheme
- Documented historic background has not been discounted and is included within the officers report however members could utilise the loss of the hedge as an additional reason
- Councillors are aware of the starting point with regard to harm to heritage assets and settings and members have been advised of section 66 of the Act and their statutory duty
- There is public benefit as two houses towards the housing need in the district and employment would be provided during the construction phase
- It was considered that the additional works were not substantial for the alterations made. Yes they were going to be digging more into the hillside however the initial application did show a very large wall in which we said we weren't keen with and that was replaced with a canopy which would then be covered with the earth to mimic the rest of the hill leaving a chamber underneath for the cars to turn around in. There are conditions with this in that there will be no lighting underneath and to be kept for a turning area only.
- The amended scheme limits the impact of the proposal with regard to the church is not a huge change and the appearance appears to be appropriate although main appearance and size and scale will be dealt with at reserved matters
- Complied with COR2 and DM2 and dealt with on December 2019 report

- Parking for the proposal does meet the planning policies under DM8and the revised Local review Plan . There is no parking restrictions on this part of the road and not aware of anything we can control on that via planning legislation. The farm shop has the same issues.
- The Leylandii trees are not something the planning service can deal with and they would be the responsibility of the owner if minded to refuse
- The latest Historic England advice has been provided to members

The Conservation Officer then provided Members by way of a presentation views to and from the Church and historic monuments. He provided further details of Section 66 of the listed building act and that heritage assets and conservation was enforced by DM27 and repeated in DM25. He explained that in his balanced view the development did not cause harm to the Grade 1 Church but members may have an alternative view.

Consideration was given to:

- The hedge not being an original reason for refusal
- The original highways reason for refusal
- The possibility of costs being awarded against Council if the hedge was now introduced as a reason for refusal
- The significant weight of the Local Plan Review and that the Local Plan was due to be adopted prior to any appeal being received

It was therefore:

**RESOLVED** that that application be refused for the following reasons:

1. The proposal is within the setting of a Grade I listed Church with associated Grade 2 structures and monuments. The significance of the Church relates to views to and from the Church principally, in relation to this application, towards the east from the unnamed road to the west of the site, and from the Church and Church Yard out to the West. The Council considers that the introduction of two dwellings as per the submission, would alter these views by creating two dwellings that would result in an unjustified distraction and intrusion into these important historic views from the public highway and be harmful to the local experience of this Grade 1 listed building contrary to the statutory duty under section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and contrary to Policy DM27 of the current Adopted Local Plan, Policy DM25 of the Mid Devon Local Plan review 2013- 2033:Pre Adoption Draft and the National Planning Policy Framework 2019
2. National and local planning policy states that local planning authorities should avoid new homes in the countryside unless there are special circumstances to justify an approval. A case has been submitted for the provision of two dwellings in this rural location; however this justification is not considered to amount to special circumstances and considered to carry insufficient weight so as to override local and national policy. The proposed residential development would be in an unsustainable location and is considered to be in conflict with policies S1, and S14 of the Mid Devon Local Plan Review 2013-2033: Pre Adoption Draft and the National Planning Policy Framework 2019

(Proposed by Cllr B G J Warren and seconded by Cllr F W Letch)

Notes:

i.) Cllr Mrs F J Colthorpe, Cllr E J Berry, Cllr S J Clist, Cllr L J Cruwys, Cllr Mrs C P Daw. Cllr D J Knowles, Cllr F W Letch, Cllr R F Radford, Cllr S J Penny and Cllr B G J Warren made declarations in accordance with the Protocol of Good Practice for Councillors dealing with planning matters as they had received contact from the applicant and objectors.
ii.) Cllrs S J Clist and R F Radford declared a personal interest for personal reasons and left the meeting during the discussion thereon
iii.) * implications report previously circulated and attached to the minutes

36 **TREE PRESERVATION ORDER 20/00002 - FORMER PRIMARY SCHOOL, NEWTON ST CYRES, EXETER (03.31.10)**

The Committee had before it a * report of the Head of Planning, Economy and Regeneration regarding the above application.

The Area Team Leader outlined the contents of the report via a presentation highlighting the location of the tree , photographs of the tree from various locations and the tree itself.

Consideration was given to:

- The views of the agent who stated that the tree was structurally poor and only some of the issues had been addressed by the tree officer and that the tree had many defects. The applicant was not looking to clear the site of all trees
- The Ward Member who said the challenge to the TPO was unnecessary and it was not to stop development but that the Parish Council were looking forward to development plans for the site be being brought forward. The tree had historic significance.
- Confirmation from the Council's Tree Officer to the age of the tree and how many years of useful life were remaining
- Whether the tree was safe
- The rooting system of the tree
- Responsibility for the tree

**RESOLVED** that the Tree Preservation Order be confirmed.

(Proposed by Cllr F W Letch and seconded by Cllr L J Cruwys)

Notes: *Report previously circulated copy attached to the minutes.

37 **TREE PRESERVATION ORDER 20/00003 - LAND AT MEADOW PARK, WILLAND, DEVON**

This item was deferred as stated in minute No 29

38 **ACCESS TO INFORMATION - EXCLUSION OF PRESS AND PUBLIC (04.00.02)**

Prior to considering the following item on the agenda, discussion took place as to whether it was necessary to pass the following resolution to exclude the press and

public having reflected on Article 15 15.02(d) (a presumption in favour of openness) of the Constitution with the following issues being raised:

- Legal advice with regard to information pertaining to individuals, financial and business affairs and legal professional privilege
- The financial and business affairs of the company and that much of that information was confidential or had been provided as such
- Members needed to be have a full and frank debate on the issues which should take place in closed session

The Planning Committee decided that in all the circumstances of the case, the public interest in maintaining the exemption outweighed the public interest in disclosing the information.

It was therefore:

**RESOLVED** that: under Section 100A(4) of the Local Government Act 1972 the public be excluded from the next item of business on the grounds that it involves the likely disclosure of exempt information as defined in paragraph 1 namely information relating to any individual; paragraph 3 respectively of Part 1 of Schedule 12A of the Act, namely information relating to the financial or business affairs of any particular person (including the authority holding that information) and paragraph 5 namely information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.

(Proposed by the Chairman)

Prior to going into closed session the Head of Planning, Economy and Regeneration provided answers to questions that had been asked at public question time:

**Public Question response Higher Town, Sampford Peverell**

- It is for Committee to instruct Officers over defence of reasons for refusal.
- As a public inquiry, consultants have been secured on behalf of the Council to defend the Council's position and will appear as expert witnesses and have submitted their proofs of evidence.
- The wording of policy SP2 in full, the Inspector's report on the Local Plan and its adoption status are material considerations at the appeal and the Council's case at appeal will take these into account.

39 **APPEAL - APPLICATION 17/01359/MOUT - OUTLINE FOR THE ERECTION OF 60 DWELLINGS AND CONSTRUCTION OF NEW VEHICULAR ACCESS ONTO HIGHWAY TO THE WEST OF THE SITE - LAND AND BUILDINGS AT NGR 302469 114078, HIGHER TOWN, SAMPFORD PEVERELL**

Returning to open session:

The Planning Committee **RESOLVED** to continue with the defence of the appeal of Application 17/01359/MOUT in accordance with the current position.

(The meeting ended at 7.10 pm) **CHAIRMAN**

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**MID DEVON DISTRICT COUNCIL**

**MINUTES** of a **MEETING** of the **PLANNING COMMITTEE** held on 12 August 2020 at 2.15 pm

| | |
|---|---|
| **Present Councillors** | Mrs F J Colthorpe (Chairman)<br>J Cairney, Mrs C P Daw, R F Radford, E J Berry, S J Clist, F W Letch, D J Knowles, S J Penny and B G J Warren |
| **Apologies Councillor(s)** | L J Cruwys |
| **Also Present Councillor(s)** | R Evans, Mrs S Griggs, D F Pugsley and C R Slade |
| **Present Officers:** | Eileen Paterson (Group Manager for Development), Maria De Leiburne (Legal Services Team Leader), Adrian Devereaux (Area Team Leader), Alison Fish (Area Team Leader), John Millar (Principal Planning Officer), Daniel Rance (Principal Planning Officer), Chris Shears (Economic Development Officer), Greg Venn (Conservation Officer), Sally Gabriel (Member Services Manager) and Carole Oliphant (Member Services Officer) |

## 40 REMOTE MEETING PROTOCOL (00.03.59)

The *Remote meeting protocol was **NOTED.**

Note: *Remote meeting protocol was previously circulated and attached to the minutes.

## 41 APOLOGIES AND SUBSTITUTE MEMBERS (00.04.13)

Apologies were received from Cllr L Cruwys who was substituted by Cllr J Cairney.

## 42 PUBLIC QUESTION TIME (00.04.45)

Mr Roderick Crawford referring to Item 1 on the Plans List (Shortacombe Lane) stated that: the report that was developed for 19/01118/FUL refers solely to flood risk from the sea and rivers, the Council and LPA were sent video evidence of flooding caused by rain water, I would like to know why the LPA did not undertake a flood risk assessment at the site, given that they had this evidence. The site is officially

categorised by DEFRA as being at risk of flooding and both DEFRA's and your own guidance state that an assessment must be undertaken for sites in Flood Zone 1 when a change of use in development type is for a more vulnerable class, e.g. in this instance from agricultural to residential where the site could be affected by sources of flooding other than by rivers and the sea.

James Hudson referring to the same application stated: we have lived in Binneford for about 16 years we came for the tranquillity of the place and for the outstanding natural beauty. We came for dark skies and we came for a real sense for the seasons changing and in relation to the seasons changing it is very apparent in Binneford. In the winter, it can be really sharp and there are many times when we have been snowed in for 3 or 4 days and even with a 4 wheel drive, you still slither around. I take an interest in the weather and I check the temperatures every morning. The coldest that it has been here, since I have lived here was minus 15 degrees Celsius which felt very cold and this leads me on to ask. The LPA's report is materially misleading, it fails to mention that the proposed site is located on a high ridge line plateau , exposed to high winds, dangerous flash flooding and falling mature trees. When it freezes or snows, the site is regularly cut off in winter, often for days. So why is the Council choosing to discriminate between gypsy travellers by placing them in a dangerous unsustainable location?

Mr Crane referring to Items 2/3 (Blackborough House) on the Plans List stated that: these applications have been with the planning department for over two and a half years and have come across so many of the planning rules and regulations with little concern and regard to the actual building which is in a declining state of dereliction and will not survive much longer without positive intervention. This is a golden opportunity to both restore a once magnificent Grade II listed building and to add something special to Blackborough. I believe that I can work with the residents of the village with regard to issues which will no doubt arise and together we can move forward to provide more facilities and amenities for Blackborough. Having lost one significant asset in the village with the destruction of All Saints Church, lets not make any similar mistake with Blackborough House. My question relates to the Temple Group report which was commissioned at a very late stage by the Planning Authority to review other reports. Although given sight of the report, I as the applicant was not given enough time to respond to any criticisms made and was indeed told that I would not be asked to respond under regulation 25 of the Town and Country Planning regulations 2017, such was the haste of Mid Devon to bring these applications to committee. The decision to recommend refusal was therefore pre-determined before the planning process had been completed, so surely there is a flaw in the planning system that allows an abrupt finish to what should be a democratic process that is fair to all parties.

Mr Jeremy Penfold again referring to the Blackborough House application stated: that the officers report presents a very balanced view of the application and the submissions made by various parties including BACO. The Temple report commissioned by MDDC highlights that the applicants Environmental Statement is deficient on traffic matters, amongst other issues and that in the absence of additional information they state in para 1.2.4 that the ES is incomplete and hence the application should be refused.

With that in mind, if the committee were minded to go against the well reasoned planning officers recommendation for refusal is it considered likely that the

application would be called in by the Secretary of State and what would be the next steps ?

Mr Awcock again referring to Blackborough House stated that: I have been advising for many years on the development at Blackborough House and working with Mr Crane and looking at the traffic impact in particular and I wanted to draw your attention to the fact that the analysis that has gone on there has taken place over many years and to question why the Temple Report hasn't taken any considerations of the consultation that has been taken out by Devon County Council and in particular to bring the members attention to no objection from Devon County Council given their detailed consideration of the scheme.

Mr Adam Watts again referring to the Blackborough House application stated that:
I understand that the Economic Development Officer at Mid Devon DC was very supportive of the scheme at Blackborough House. Is that still the case, and how much weight has been given to the economic case for the site, bearing in mind the adopted Mid Devon Economic Strategy for tourism and the food & drink industry?

There seems to be conflict between the Council's recommendation and the adopted economic policies, which seek to encourage and grow tourism, hospitality and the food and drinks sectors in Mid Devon. Based on these economic policies, would the Economic Development Officer agree that this is the type of development that the Council should be striving to support to boost the local economy?

Finally, would the Economic Development Officer agree that with there being nothing comparable to Blackborough House and the application proposal in the area, this would provide Mid Devon with a huge USP, creating a promotional and brandable 'flagship' destination, which is at the heart of Mid Devon's economic policies? Again, how much weight has the promotional opportunity that this scheme would provide for Mid Devon's tourism industry as a whole been given?

Sasha Scougall-Knight referring to Item 1 on the Plans List Shortacombe Lane stated: in their report for Her Majesty's Government entitled Impact of Insecure Accommodation and the living Environment on Gypsies, the traveller movement outlines the impact on gypsy travellers, who they acknowledge as being the least healthy segment of our society, of being placed in sites with poor access to health care. Again why is the council seeking to discriminate against gypsy travellers by placing them in a site, 1 hour and 45 minutes by public transport from any A&E and a site that cannot be accessed by emergency services at certain points in the winter?

Mr Graham Knight again referring Shortacombe Lane stated that: vortex water treatment plants must run continuously 24/7 by means of electric power to avoid contaminating the landscape. The proposed solar panels will only operate during daylight hours, there is no reference to the required battery storage in the applicants plans, furthermore the proposed vortex system will not have the capacity for 3500 litres of water produced by 18 people each day. Again this will lead to contamination of the landscape. Would the LPA care to comment on why they have omitted these points in their report?

Lisa -Jayne Steadman again referring to Shortacombe Lane stated: one of the 15 conditions in the LPA report states that the caravan including the static caravan must move on the public highway in one piece. According to the plans the applicant's static

caravan is 12 ft wide and 28 feet long. A transportation expert has independently verified that it will be impossible to bring this static caravan onto the site on a legally approved low-loader due to the sharp twists and turns of the narrow lanes. Could the LPA explain therefore how this caravan can be brought into the site except perhaps by the use of a commercial helicopter?

David Pearson again referring to Shortacombe Lane stated that: the LPAs report talks of one car generating seven daily incremental vehicular movements within the community with negligible impact to the roads, road safety and the environment. 18 people can live at this site. 18 adults with 18 cars would therefore generate 126 movements each day. Clearly, this would have a terrible impact on the roads, road safety and the environment given that Highways describes the lanes as sub standard road without footway, lighting and with limited passing. Can the LPA confirm why they omitted this eventuality from their report?

Mrs Pugh referring to Item 10 on the Plans List and referring to the application for Tidcombe Hall stated that she was representing the views of over 200 residents from 'Local Voices against the Tidcombe Hall Canal Side' application: I will focus on the principle of the development and access arrangements and I will ask 3 questions: the committee will be aware that the Tidcombe Hall application is deeply controversial, Land Value Alliance have chosen to submit their application in the midst of the Covid 19 emergency, the timing of this public consultation period given the restrictions of social distancing threatens to undermine our democratic right to lodge an effective opposition. We wrote in the Gazette last November that once the application was submitted, we proposed an open public meeting with all parties, residents, councillors and representatives from Land Value Alliance. Such a meeting cannot take place during a pandemic, indeed we cannot meet in groups of more than 6 to plan our opposition. Planning meetings held by Zoom undermine the democratic right of residents unable to access that technology. My question is, will the Council defer the application until the restrictions regarding attendance of all meetings are relaxed?

Secondly the Local Plan has now been adopted, at least 9 or 10 sites have been allocated for residential development and the number of houses they are scheduled to deliver meets the Council's 5 year target. Part of this site is allocated as a contingency, but in the modified document, zero housing is given to Tidcombe Hall canal side development. In asking the Local Plan to be adopted, the argument was given that it would protect the area from speculative planning applications which fall outside of the plan, is this such an application?

Thirdly, access, we believe that a number of assessments need to be carried out before this application comes before the Planning Committee. Firstly all councils have a statutory duty to make areas immediately outside their schools as safe as possible. We believe that the Council has yet to carry out their own risk assessment for Tidcombe Primary School in the light of this application, such a risk assessment will need to demonstrate that the applicant's plans around Tidcombe School such as the gateway features and contrasting surfacing are adequate to counter the impact of the extra traffic from 179 houses. Councillors will be aware that there has been a near miss incident involving a child outside the school in recent months.

The Chairman stated that the Tidcombe Hall application would not be discussed at the meeting, all that was to be discussed was whether the committee wished to determine the application.

Answers to other questions would be provided during the debate on the specific applications.

## 43 DECLARATION OF INTERESTS UNDER THE CODE OF CONDUCT (00.26.35)

Members were reminded of the need to declare any interests when appropriate.

## 44 MINUTES OF THE PREVIOUS MEETING (00.26.51)

The minutes of the meeting held on 15th July 2020 were agreed as a true record.

## 45 CHAIRMAN'S ANNOUNCEMENTS (00.27.48)

The Chairman made the following announcements:

- That she was delighted that the Local Plan review had been adopted on 29th July 2020. She reminded members that the planning policy numbers referred to in today's reports are from the previous Local Plan and may not coincide with the planning policy numbers under the new plan.
- As Members of the Planning Committee may be aware the virtual public inquiry for the refusal of planning permission for 60 dwellings at Higher Town , Sampford Peverell, was due to start on Tuesday 11th August. The virtual inquiry has been postponed as result of the third Inspector, being appointed to hold the Inquiry, being unable to meet the agreed timetable of dates to hold the Inquiry over 6 consecutive days. The Planning Inspectorate would now review available dates of all parties to the appeal. It is anticipated that the virtual inquiry would now be held in October 2020.

## 46 ENFORCEMENT LIST (00.29.58)

There were no items on the enforcement list.

## 47 DEFERRALS FROM THE PLANS LIST (00.30.01)

No items had been deferred from the plans list.

## 48 THE PLANS LIST (00.30.17)

The Committee considered the applications in the *Plans list.

Note: *List previously circulated and attached to the signed minutes.

**a) 19/01188/FULL - Change of use of agricultural land to allow 1 pitch for the siting of 1 static caravan, 2 touring caravans and associated works for the use of gypsy and traveller family at Land at NGR 276600 96594 (North of Shortacombe Farm), Shortacombe Lane, Yeoford**

The Planning Team Leader addressed questions asked at public question time:

- The Environment Agency and the Public Health team were consulted in regard to drainage. The site was not within a functional flood plain or within flood

zones 2 and 3 and our records show it is not within a surface water area where flooding of 1 in a 1000 years is expected and so it was decided to use the Environment Agency standing advice in regard to the type of drainage required. The proposals started out as a reed bed system which was then altered to a packaged treatment plant preferred by the Public Health team.

- In regard to the location it was not a site that the applicant had been told that they needed to go to, it was an application that they had submitted and that this is where they wanted to be.
- Location and impact to services would be covered in his presentation.
- With regard to the power to the drainage system it must be noted that this was not for 18 people it was for a mother and son, one family pitch. They have outlined a portable solar panel for electricity and they may require additional battery back up power.
- With regard to delivery of the caravan on site, the caravan needed to be legally transported along the highway but that didn't prevent it from being delivered in 2 parts.
- The Highways Authority did not raise the number of vehicle movements for one family as an issue and noted the slight increase from the comparable agricultural use of the site.

He then outlined the contents of the report by way of a presentation highlighting the location, site layout, elevations, proposed shed, visibility splays and photographs of the site.

He explained that SP14 allowed for gypsy and traveller accommodation within the countryside subject to meeting other criteria such as presevering and where possible enhancing the character, appearance and biodiversity of the site. He stated that the applicant met the criteria of gypsy and show travellers.

He reminded members of Section 149 of the Equality Act 2010 that local authorities had to have regard to discrimination and their public sector equality duty.

He explained that the application was to approve a site for a mother and son gypsy and traveller family and that policy DM7 of the Local Plan Review indicated that planning permission would allow for new sites within the countryside. He explained that there were currently no gypsy or traveller sites available to the family in tjis part of Mid Devon and no alternative location had been identified by the applicant. He further explained that the family had been known to the Gypsy Traveller Service of Devon County Council for 11 years.

Policy DM7 stated the need for 35 pitches to be available for gypsy and traveller families within the district between 2014-2034 but these would be provided by large developments in Tiverton, Crediton and Cullompton which were some time away from completion. An appeal decision issued in November last year allowed traveller accommodation in a countryside location where the Planning Inspector commented that the most significant factor in favour of the appellant's case was down to the degree of doubt over the delivery of sites put forward for the windfall allowance and within the urban extensions. Whilst the Local Planning Authority would now state that a five year allocation for pitches has been identified, there is still the issue of delivery and that of previous under delivery.

Consideration was given to:

- Number of vehicle movements stated by the Highways Authority
- No objections had been received from any of the consultation agencies
- The right of the applicant to cut back or remove the hedge to allow access to the site
- Actual number of people who would live on the site and if this could be controlled
- Definition of a gypsy and traveller pitch
- Existing hard standing on the site
- Advice given during the pre application process
- Landscaping and fencing proposals
- Waste and recycling arrangements for the site
- The applicants desire to live on the site had not been imposed by the Local Authority
- If there was adequate drainage on the site
- The views of the objector who stated that the site was not safe and due to high winds would be a risk to life if the caravans were not tethered and the risk of unaccompanied children being swept away during flooding instances. That she felt it was unfair that the family were being dumped on the site by the Local Planning Authority which was not adequate for disabled people
- The views of the applicant who stated she had searched for 10 years for a suitable site for her and her son. That she had listened to the Parish Council and the Case Officer and had made amendments to the application. That the site had good access to schools, dentists and health facilities for her and her son. That the site design would compliment the local area
- The views of the Ward Member who felt that the site could accommodate up to 20 people. That there were flood issues with the site, children could not play on the site in the winter and it was an unacceptable landscape. There were bats and ancient woodland in the area and there was no ditch system on site.
- Concerns that the applicant would allow more people to move onto the site and it would not just be for her and her son
- Caravans being squashed by trees during high winds
- Accessibility of the site during snowy conditions

It was therefore:

**RESOLVED** that:

Members were minded to refuse the application and therefore wished to defer the application for an implications report to consider the proposed reasons for refusal that of:

- Policy Planning for Traveller Sites - Section 14. When assessing the suitability of sites in rural or semi-rural settings, local planning authorities should ensure that the scale of such sites does not dominate the nearest settled community.
- Policy DM7 A, Space for children's Play
- Policy DM7 -C, unacceptable landscape or ecological impact
- Policy DM7 -E, safe and convenient access to local facilities.
- Policy DM2 -High quality design

- Policy DM2 – Positive contribution to local character including any heritage or biodiversity assets and the setting of heritage assets
- Policy DM2 - Visually attractive places that are well integrated with surrounding buildings, streets and landscapes
- Policy DM2 - Appropriate drainage including sustainable drainage systems

(Proposed by Cllr S J Penny and seconded by Cllr S J Clist)

Notes:

i) Cllr Mrs F J Colthorpe, , Cllr J Cairney, Cllr Mrs C P Daw, Cllr E J Berry, Cllr S J Clist, Cllr D J Knowles, Cllr F W Letch, Cllr S J Penny, Cllr R F Radford, Cllr B G J Warren declared an interest in accordance with Protocol of Good Practice for Councillors dealing with planning matters as they had had communication from the objector
ii) Cllr Mrs F J Colthorpe, Cllr J Cairney, Cllr Mrs C P Daw, Cllr E J Berry, Cllr S J Clist, Cllr D J Knowles, Cllr F W Letch, Cllr S J Penny, Cllr R F Radford, Cllr B G J Warren declared a personal interest as the knew the Ward Member
iii) Cllr R F Radford did not participate in the vote in line with the Protocol of Good Practice for Councillors dealing in planning matters, due to a loss of internet connection part way through the debate of the application
iv) Stephanie Crawford (objector) spoke
v) Ms Tyrer (applicant) spoke
vi) The following late information was provided via the update sheet:

This committee report was written prior to the adoption of the Mid Devon Local Plan Review which was adopted at an extraordinary meeting of the Full Council held on 29th July. As a result the Mid Devon Local Plan Review 2013-2033 replaces the Core Strategy, AIDPD and Development Management policies that make up the previous Local Plan and are no longer in force.

Therefore the relevant policies and material considerations for this proposal are as follows:
Mid Devon Local Plan Review 2013-2033
S3 - Meeting housing needs
S8 - Infrastructure
S9 - Environment
S14 - Countryside
DM1 - High quality design
DM4 - Pollution
DM5 - Parking
DM7 – Traveller sites
DM28 - Other protected sites

'Planning policy for traveller sites' produced August 2015 by the Department for Communities and Local Government

The National Planning Policy Framework ("the NPPF")

One additional representation received objecting as follows:

We understand that this application has already received numerous objections for a wide variety of reasons, most importantly being that it does not comply with the criteria for Gypsy sites, i.e public transport and local amenities. In addition to this the vehicular access and nature of the plot would appear to be unsuitable for permanent residence.

As newcomers to this area we wanted to assist the Binneford community with objecting to this application but understand that no public meeting will be allowed. We are unsure if we will be able to join the Zoom meeting on the 12th August due to very poor internet speed. Please ensure that in our absence our objection to this application is noted for the records.

**b) 17/01904/MFUL - Change of use and refurbishment of house to hotel and spa with 24 letting rooms, Piazza garden, 36 letting rooms in Pavilion (60 letting rooms in total) with Botanical Gardens, restoration of walled garden with new orchard and amphitheatre, erection of 7 detached dwellings, all associated car parking and erection of bat house at Blackborough House, Blackborough, Cullompton.**

The Conservation Officer outlined the content of the report by way of a presentation highlighting the location, site location plans, external and internal photographs, roof plans, and floor plans and a 3D model of the proposed development.

The Principal Planning Officer then outlined by way of a presentation the proposed passing bays and the advice received from Historic England.

He then addressed the questions asked at public question time:

- Application had been with the authority for 2.5 years and in that time it was likely that some further decay had occurred to the building. Officers felt that there were considerable deficiencies in the environmental study and the request for additional information would elongate the process even further. Officers felt that they had sufficient information to come to a determination on the application. Members should be advised that the applicant has a duty of care towards the building and the officer would seek to work with the applicant to complete remedial works to prevent further decline
- Should members be minded to approve the application officers would need to provide members with a further report in due course for planning committee to consider. Once the deficiencies in the environmental statement and other outstanding issues had been resolved it could go forwards
- The response of the Highway Authority
- The weight that had been applied to economic benefits and the local economy in the Mid Devon area as set out in the report. Officers had concluded that the economic benefits did not outweigh the identified harm

The Principal Planning Officer explained that the proposal was contrary to Local Plan policies and that the enabling development of 7 houses in open countryside did not outweigh the benefits of the proposed development.

He stated that the house was in a poor condition and that there was a substantial shortfall in funding for the development of it. He informed members that Historic England had serious concerns with the proposed scheme.

Consideration was given to:

- Alternative roads leading to and from the property
- The possible outcome for the building if the application was refused
- The advice received from Public Health concerning contaminated land
- The views of the objector who stated that BACO had formed in response to the application but had never been against development. The developer had never engaged with the local community and highlighted the objections from Historic England. That she felt the scheme was not financially viable and would have a negative impact on the local community and traffic movements.
- The views of the agent who had not worked on any project with this amount of significant opposition. Officers had supported the application and the applicant had continued to make improvements. The scheme would provide employment and a leisure business for the local area. The applicant should be regarded as a white knight for the community and this was the last chance to save the building
- The views of the Parish Council who were concerned about the current contamination of the site. its future viability and the ability of the applicant to sell off parts of the site
- The views of the ward member who questioned the suitability of the road network as main access to the site would be through the village. Concerns about horse riders and children who had to use the roads which had no pavements and the effect of 1000's of houses due to be built in the adjoining valley
- The application would provide the ANOB an opportunity to promote the area
- The need to preserve the building for economic reasons
- The houses were not in keeping with the area
- A site visit was requested by Members but this was not possible due to current Government restrictions

It was therefore:

**RESOLVED** that: Planning Permission be refused as recommended by the Head of Planning, Economy and Regeneration

(Proposed by Cllr F Letch and seconded by Cllr S J Clist)

Notes:

i) Cllr Mrs F J Colthorpe, , Cllr J Cairney, Cllr Mrs C P Daw, Cllr E J Berry, Cllr S J Clist, Cllr D J Knowles, Cllr F W Letch, Cllr S J Penny, Cllr R F Radford, Cllr B G J Warren declared an interest in accordance with Protocol of Good Practice for Councillors dealing with planning matters as they had had communication from the objectors and applicant

ii) Cllr R F Radford did not participate in the vote in line with the Protocol of Good Practice for Councillors dealing in planning matters, due to a loss of internet connection part way through the debate of the application

iii) Joanne Talling (Objector) spoke

iv) Nigel Bird (Agent) spoke
v) Nicholas Allen spoke on behalf of the Parish Council
vi) Cllr David Pugsley spoke as ward member

**c) 17/01905/LBC - Listed Building Consent for the change of use and refurbishment of house to hotel and spa with 24 letting rooms, Piazza garden, 36 letting rooms in Pavilion (60 letting rooms in total) with Botanical Gardens, restoration of walled garden with new orchard and amphitheatre, erection of 7 detached dwellings, all associated car parking and erection of bat house at Blackborough House, Blackborough, Cullompton**

The Conservation Officer outlined the content of the report by way of a presentation highlighting the location, site location plans, external and internal photographs, roof plans, and floor plans and a 3D model of the proposed development.

The Principal Planning Officer then outlined by way of a presentation the proposed passing bays and the advice received from Historic England.

He then addressed the questions asked at public question time:

- Application had been with the authority for 2.5 years and in that time it was likely that some further decay had occurred to the building. Officers felt that there were considerable deficiencies in the environmental study and the request for additional information would elongate the process even further. Officers felt that they had sufficient information to come to a determination on the application. Members should be advised that the applicant has a duty of care towards the building and the officer would seek to work with the applicant to complete remedial works to prevent further decline
- Should members be minded to approve the application officers would need to provide members with a further report in due course for planning committee to consider. Once the deficiencies in the environmental statement and other outstanding issues had been resolved it could go forwards
- The response of the Highway Authority
- The weight that had been applied to economic benefits and the local economy in the Mid Devon area as set out in the report. Officers had concluded that the economic benefits did not outweigh the identified harm

The Principal Planning Officer explained that the proposal was contrary to Local Plan policies and that the enabling development of 7 houses in open countryside did not outweigh the benefits of the proposed development.

He stated that the house was in a poor condition and that there was a substantial shortfall in funding for the development of it. He informed members that Historic England had serious concerns with the proposed scheme.

Consideration was given to:

- Alternative roads leading to and from the property
- The possible outcome for the building if the application was refused
- The advice received from Public Health concerning contaminated land

- The views of the objector who stated that BACO had formed in response to the application but had never been against development. The developer had never engaged with the local community and highlighted the objections from Historic England. That she felt the scheme was not financially viable and would have a negative impact on the local community and traffic movements.
- The views of the agent who had not worked on any project with this amount of significant opposition. Officers had supported the application and the applicant had continued to make improvements. The scheme would provide employment and a leisure business for the local area. The applicant should be regarded as a white knight for the community and this was the last chance to save the building
- The views of the Parish Council who were concerned about the current contamination of the site. its future viability and the ability of the applicant to sell off parts of the site
- The views of the ward member who questioned the suitability of the road network as main access to the site would be through the village. Concerns about horse riders and children who had to use the roads which had no pavements and the effect of 1000's of houses due to be built in the adjoining valley
- The application would provide the ANOB an opportunity to promote the area
- The need to preserve the building for economic reasons
- The houses were not in keeping with the area
- A site visit was requested by Members but this was not possible due to current Government restrictions

It was therefore:

**RESOLVED** that: Listed Building Consent be refused as recommended by the Head of Planning, Economy and Regeneration

(Proposed by Cllr F Letch and seconded by Cllr S J Clist)

Notes:

i) Cllr Mrs F J Colthorpe, , Cllr J Cairney, Cllr Mrs C P Daw, Cllr E J Berry, Cllr S J Clist, Cllr D J Knowles, Cllr F W Letch, Cllr S J Penny, Cllr R F Radford, Cllr B G J Warren declared an interest in accordance with Protocol of Good Practice for Councillors dealing with planning matters as they had had communication from the objectors and applicant
ii) Cllr R F Radford did not participate in the vote in line with the Protocol of Good Practice for Councillors dealing in planning matters, due to a loss of internet connection part way through the debate of the application
iii) Joanne Talling (Objector) spoke
iv) Nigel Bird (Agent) spoke
v) Nicholas Allen spoke on behalf of the Parish Council
vi) Cllr David Pugsley spoke as ward member

## 49 MAJOR APPLICATIONS WITH NO DECISION (02.46.45)

The Committee had before it, and **NOTED**, a*list of major applications with no decision.

It was **AGREED** that:

- Application 20/01174/MOUT (Tidcombe Hall, Tidcombe Lane, Tiverton EX16 4EJ) be brought before the committee for determination if the officer recommendation was minded to approve

Note: *List previously circulated and attached to the minutes

50 **APPEAL DECISIONS (02.50.20)**

The Committee had before it, and **NOTED**, a *list of appeal decisions providing information on the outcome of recent planning appeals.

Note: *list previously circulated and attached to the minutes.

51 **19/01156/FULL - Land at NGR 302839 111143, Lloyd Maunder Road, Willand (Installation of a 24MW Reserve Power Plant with associated infrastructure) (02.52.18)**

At the Planning Committee meeting on 12th February 2020, Members advised that they were minded to refuse the above application and invited an implications report for further consideration. The Committee therefore had before it an *implications report of the Head of Planning, Economy and Regeneration setting out the implications of refusal.

The Group Manager, Development Management explained the implications report highlighting the reasons for refusal that members had identified at the previous meeting:

- In the open countryside
- Not producing renewable energy
- Not an energy efficient measure
- Not in accordance to policies COR5, DM5 or COR18 (f) of the Local Plan
- Cumulative impact with other Devon renewable energy plants in the area

The officer reminded members of the application by way of a presentation highlighting the site location, site plans, tree & pipeline, proposed elevations and a current container.

In response to questions from members she advised:

- There was an extension of time on the application due to constraints of virtual committees
- The Council could enforce the conditions attached to the application
- Officers considered the application a renewable energy facility

Consideration was given to:

- Members unwillingness to pursue reason for refusal B

    - Taken together with other energy facilities in the locality, the proposal would have an adverse impact on the visual and general amenities of the area, contrary to Policy DM2 of the Mid Devon Local Plan
- Traffic movements in the area
- Members felt that the application was contrary to the National Planning Policy Framework

It was therefore:

**RESOLVED** that the application be refused for the following reason:

The proposed development would result in the creation of a power plant in the open countryside, which would not generate renewable energy. As such, the proposal does not meet the criteria for acceptable development outside settlement limits and is contrary to Policy COR18 of the Mid Devon Local Plan and was contrary to the National Planning Policy Framework

(Proposed by Cllr R F Radford and seconded by Cllr B G J Warren)

Notes:

i.) Cllr B G J Warren declared a personal interest as Chairman of Willand Parish Council and made a declaration in accordance with Protocol of Good Practice for Councillors dealing with planning matters as he had received correspondence with regard to this application
ii.) Cllrs R F Radford and B G J Warren would represent the Council should the application be appealed;
iii.) *Implications report previously circulated and attached to the minutes

52 **19/01862/FULL - Land and Buildings at NGR 299326 114323, Bradford Farm, Uplowman (Change of use of farm buildings to mixed B1/B8 use and retention of external works)(03.16.37)**

The Committee had before it a *report of the Head of Planning, Economy and Regeneration following the submission of an appeal to the Planning Inspectorate against non-determination, the report requested members to advise how they would have determined the application.

The Principal Planning Officer outlined the application by way of a presentation highlighting the location and site plans. He advised members that in the officer's opinion the reason for refusal A was not applicable to the application and should be avoided.

He further explained that the applicant had withdrawn support for condition 8 for the provision of an acoustic fence and replacement of the car park surface as it had not been a requirement of the Environment Agency.

He explained that none of the original reasons for refusal were reasonably defendable but provided members with 2 alternative reasons.

Consideration was given to:

- Members felt that the building did not comply with policy DM11
- Members were disappointed that the applicant had withdrawn their support for condition 8

It was **RESOLVED** that had the committee had the opportunity to determine the application then it would have refused the application for the following reason:-

The proposed retention of the shipping container to be used for the storage of bee-keeping equipment and agricultural use, and the gravelled car park, by reason of their siting, layout, scale and appearance, represent incongruous features on site, which fail to respect or relate to its character and rural context. As such they would have a detrimental impact on the visual amenity of the locality due to its failure to demonstrate a clear understanding of the characteristics of the site, its wider rural context and the surrounding area. The proposal is therefore contrary to policies COR2, COR18 of the Mid Devon Core Strategy (Local Plan Part 1), DM2 of the Local Plan Part 3 (Development Management Policies) policies S1, S9, S14 and DM1 of the Mid Devon Local Plan Review 2013-2033: Pre Adoption Draft and the aims and objectives of the National Planning Policy Framework.

(Proposed by Cllr B G J Warren and seconded by Cllr E J Berry)

Note:

i.) Cllrs S J Clist and B G J Warren made declarations in accordance with the Protocol of Good Practice for Councillors dealing with planning matters as they had received correspondence with regard to the application;
ii.) Cllrs R F Radford and D J Knowles declared a personal interest as the objector was known to them
iii.) *report previously circulated and attached to the minutes

**Update Sheet**

(The meeting ended at 6.19 pm) **CHAIRMAN**

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