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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
1	11/05/2020	Draft SA Report for Greater Exeter Strategic Plan: Draft Policies and Site Options Consultation document	Kieran Moroney Natalie Collins Harry Briggs 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 Natalie Collins Harry Briggs Kate Nicholls	Kate Nicholls	Taran Livingston
3	01/06/2020	Updated Final SA Report for Greater Exeter Strategic Plan: Draft Policies and Site Options Consultation document	Kieran Moroney Natalie Collins Harry Briggs Kate Nicholls	Kate Nicholls	Taran Livingston



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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 Directive¹, transposed in the UK by the SEA Regulations² (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 Guidance⁴ 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
<p>Consultation:</p> <ul style="list-style-type: none"> 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)) 	<p>Consultation on the SA Scoping Report was undertaken between 27th February and 10th April 2017.</p>
<ul style="list-style-type: none"> 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) 	<p>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.</p>
<ul style="list-style-type: none"> 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). 	<p>N/A</p>
<p>Taking the environmental report and the results of the consultations into account in decision-making (Reg. 16)</p>	
<p>Provision of information on the decision: 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:</p> <ul style="list-style-type: none"> the plan or programme as adopted a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report, the 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 the measures decided concerning monitoring 	<p>To be addressed after the GESP is adopted.</p>
<p>Monitoring of the significant environmental effects of the plan's or programme's implementation (Reg. 17)</p>	<p>To be addressed after the GESP is adopted.</p>
<p>Quality assurance: environmental reports should be of a sufficient standard to meet the requirements of the SEA Regulations.</p>	<p>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.</p>

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
<ul style="list-style-type: none"> • 1: Identifying other relevant policies, plans and programmes, and sustainability objectives • 2: Collecting baseline information • 3: Identifying sustainability issues and problems • 4: Developing the SA framework • 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
<ul style="list-style-type: none"> • 1: Testing the GESP vision and priorities against the SA framework • 2: Developing the GESP options • 3: Evaluating the effects of the GESP • 4: Considering ways of mitigating adverse effects and maximising beneficial effects • 5: Proposing measures to monitor the significant effects of implementing the GESP
Stage C: Preparing the Sustainability Appraisal Report
<ul style="list-style-type: none"> • 1: Preparing the SA Report
Stage D: Seek representations on the GESP and the Sustainability Appraisal Report
<ul style="list-style-type: none"> • 1: Public participation on GESP and the SA Report • 2(i): Appraising significant changes
GESP Step 3: Examination
SA stages and tasks
<ul style="list-style-type: none"> • 2(ii): Appraising significant changes resulting from representations
GESP Step 4 & 5: Adoption and Monitoring
SA stages and tasks
<ul style="list-style-type: none"> • 3: Making decisions and providing information
Stage E: Monitoring the significant effects of implementing the GESP
<ul style="list-style-type: none"> • 1: Finalising aims and methods for monitoring • 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 adaptation', '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 To conserve and enhance the habitat and wildlife of our natural environment.	<ul style="list-style-type: none"> • Natural habitats and biodiversity; flora and fauna • Recreational and leisure opportunities compatible with conservation, and creation of multi-functional green infrastructure 	<ul style="list-style-type: none"> • Biodiversity, fauna, flora • Population/human health (recreation)
2. LANDSCAPE To conserve and enhance the landscapes/seascapes of our natural environment.	<ul style="list-style-type: none"> • Landscapes (including AONBs and National Park) and landscape character • Coast 	<ul style="list-style-type: none"> • Landscape • Water (coast)
3. HISTORIC AND BUILT ENVIRONMENT To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development.	<ul style="list-style-type: none"> • Conservation of heritage assets within their setting, including Listed Buildings, Conservation Areas, Archaeological sites and Scheduled Monuments • 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. 	<ul style="list-style-type: none"> • Cultural heritage
4. CLIMATE CHANGE MITIGATION To minimise greenhouse gas emissions.	<ul style="list-style-type: none"> • Development that minimises the need to travel by providing access to public transport, cycle and walking links to help reduce use of private car • Energy efficient developments and buildings, which make the best use of renewable and low carbon energy generation. • Multi-use green infrastructure which supports or creates transport networks. 	<ul style="list-style-type: none"> • Air • Climatic factors
5. CLIMATE CHANGE ADAPTATION To adapt to the possible effects of climate change.	<ul style="list-style-type: none"> • Flood risk and the threat to people and property, and coastal change and adaptation. 	<ul style="list-style-type: none"> • Climatic factors
6. LAND RESOURCES To utilise our land resources efficiently and minimise their loss or degradation.	<ul style="list-style-type: none"> • Soil quality • Safeguard mineral resources • Reuse of previously developed land • Minimise waste (reuse, recycle, recover) 	<ul style="list-style-type: none"> • Soil • Material assets (land, minerals)
7. WATER	<ul style="list-style-type: none"> • Water quality and quantity 	<ul style="list-style-type: none"> • Water

Sustainability Objective	Factors	SEA Topic(s) covered
RESOURCES To utilise our water resources efficiently and minimise their loss or degradation.		
8. HOMES 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.	<ul style="list-style-type: none"> • Supply of housing (accommodating population growth and changes in household composition) • Housing mix (tenure and size) • Housing delivery and diversity of supply (e.g. Housing Association affordable, volume builder and small builder open market, custom and self-build) • Housing affordability 	<ul style="list-style-type: none"> • Population
9. HEALTH To support healthy and active communities where people can enjoy healthy lives with access to attractive environments and opportunities to enjoy and experience them.	<ul style="list-style-type: none"> • Cycle and walking networks • Open space and green infrastructure in new developments and existing settlements • Public recreational, play and leisure opportunities 	<ul style="list-style-type: none"> • Population • Human health
10. WELLBEING To support positive, safe and healthy communities.	<ul style="list-style-type: none"> • Social deprivation • Air quality, noise and light pollution • Safe and secure environment with reduced fear of crime 	<ul style="list-style-type: none"> • Population • Air
11. ACCESS TO SERVICES To provide accessible and attractive services and community facilities for all ages and interests.	<ul style="list-style-type: none"> • Access to area wide services (nursery and pre-school, primary, secondary, further and higher education; healthcare; etc.) • Community facilities (local shops, meeting venues, public houses, places of worship) • Cultural buildings and facilities (e.g. libraries, museums, cinemas) • Access to high speed broadband 	<ul style="list-style-type: none"> • Population • Human health
12. JOBS AND LOCAL ECONOMY 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.	<ul style="list-style-type: none"> • Employment land supply to cater for businesses of all sizes • Mix of employment offer • Productivity of local economy and access to labour supply • Access to education and skills training • Protect existing tourism businesses and offer 	<ul style="list-style-type: none"> • Population • Material assets
13. CITY AND TOWN CENTRES To safeguard and strengthen the vitality and viability of our city and town centres.	<ul style="list-style-type: none"> • Diverse city and town centre economy • Strengthen and safeguard the vitality and viability of centres • Impact of new development on existing centres • Access to existing centres 	<ul style="list-style-type: none"> • Population
14. CONNECTIVITY AND TRANSPORT To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks	<ul style="list-style-type: none"> • Access to services – links between homes, services and businesses by active modes of transport (e.g. cycling and walking) • Access to public transport (e.g. distance to and frequency of bus and rail services) • Estimated car reliance and use 	<ul style="list-style-type: none"> • Air • Climatic factors • 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.	<ul style="list-style-type: none"> • Access to local road network • Impact on Strategic Road Network (i.e. M5 J29 - 30) • 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 trip⁵

	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
<ul style="list-style-type: none"> • Provide limited employment opportunities. • No shops or services. • No school or education facilities on site. • Local public open space, and children’s play areas provided on site. • Active travel and roads within development and to nearest main settlement. • Flood risk management (e.g. SUDS). • Protection of European protected species and habitats and/or SANGS. • 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). 	<ul style="list-style-type: none"> • Provide small scale mixed use employment opportunities. • Small cluster / hub of shop and services. • Primary school on site or equivalent expansion of nearby facilities. • Local public open space and children’s play areas on site. • Active travel and roads within development and to nearest main settlement. • Flood risk management (e.g. SUDS). • Protection of European protected species and habitats and/or SANGS. • 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). 	<ul style="list-style-type: none"> • Provide medium scale mixed use employment opportunities and business park or employment estate. • Neighbourhood hub with shops and services including small supermarket. • Primary school on site. • Strategic and local scale public open space, children’s play areas and playing pitches on site. • Active travel, sustainable transport links and roads within development and to nearest main settlement (including an additional frequent bus service to the site). • Flood risk management (e.g. SUDS). • Protection of European protected species and habitats and/or SANGS. • No development on/over nationally or internationally designated wildlife or heritage sites (e.g. scheduled ancient monument, designated heritage asset, SSSI, ancient woodland, SAC, 	<ul style="list-style-type: none"> • Provide large scale mixed use employment opportunities and business park or employment estate. • Neighbourhood hub with shops and services including small supermarket and community building. • Primary school on site. • Strategic and local scale public open space, children’s play areas and other sport and leisure provision. • Active travel, sustainable transport links and roads within development and to nearest main settlement (including an additional frequent bus service to the site). • Flood risk management (e.g. SUDS). • Protection of European protected species and habitats and/or SANGS. • No development on/over nationally or internationally designated wildlife or heritage sites (e.g. scheduled ancient monument, designated heritage asset, SSSI, 	<ul style="list-style-type: none"> • Provide large scale mixed use employment opportunities and business park or employment estate. • Town centre with shops, services, commercial space and other mixed uses including small supermarket and community building. • Primary schools and secondary school on site. • Strategic and local scale public open space, children’s play areas and other sport and leisure provision. • Active travel, sustainable transport links and roads within development and to nearest main settlement (including an additional frequent bus service to the site). • Flood risk management (e.g. SUDS). • Protection of European protected species and habitats and/or SANGS. • 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
<ul style="list-style-type: none"> • No residential • Mix of plot sizes available to buy or rent • No shops or services. • Active travel and roads within development. • Flood risk management (e.g. SUDS). • Protection of European protected species and habitats and/or SANGS. • 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). 	<ul style="list-style-type: none"> • No residential • Mix of plot sizes available to buy or rent • 1 small shop • Active travel and roads within development and to nearest main settlement. • Flood risk management (e.g. SUDS). • Protection of European protected species and habitats and/or SANGS. • 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). 	<ul style="list-style-type: none"> • No residential • Mix of plot sizes available to buy or rent • Limited number of shops and other services or facilities (e.g.: gym, crèche) • One local green space • Active travel, sustainable transport links and roads within development and to nearest main settlement (including an additional frequent bus service to the site). • Flood risk management (e.g. SUDS). • Protection of European protected species and habitats and/or SANGS. • 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 Ofcom⁶. 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 amendments¹⁴, 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** document¹⁹ 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 paper²⁰ 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 25 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 Environment²³**: 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.	<p>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.</p> <p>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.</p> <p>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.</p>
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.	<p>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.</p> <p>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.</p>
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).	<p>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.</p> <p>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</p>

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. 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. 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. 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 vision 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)			
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	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							

SA Objective	Scenarios						
	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 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		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
Proposed Policy and Reasonable Alternatives															
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		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
Proposed Policy and Reasonable Alternatives															
	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		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
Proposed Policy and Reasonable Alternatives															
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		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
Proposed Policy and Reasonable Alternatives															
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		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
Proposed Policy and Reasonable Alternatives															
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		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
Proposed Policy and Reasonable Alternatives															
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 CO₂ 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 1000m² 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 2500m² 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 to 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		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
Proposed Policy and Reasonable Alternatives															
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		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
Proposed Policy and Reasonable Alternatives															
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		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
Proposed Policy and Reasonable Alternatives															
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		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
Proposed Policy and Reasonable Alternatives															
<i>GESP 30: Movement in Exeter</i>	Proposed Policy	0	0	0	++	0	0	0	0	+	+	0	+	+	++
<i>GESP 31: Settlement Specific Enhancements</i>	Proposed Policy	0	0	0	+	0	0	0	0	+	+	0		+	++
<i>GESP 32: Gigabit-Ready Developments</i>	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
<i>GESP 33: Digital Spine</i>	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 CO₂ per hectare (tCO₂e/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 a 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		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
<i>Proposed Policy and Reasonable Alternatives</i>															
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: Landscape and Historic Built	Climate Change Mitigati	Climate Change Adaptat	SA6: Land Resourc	SA7: Water Resourc	SA8: Homes	SA9: Health	SA10: Wellbei	Access to Service Jobs and Local	City and Town Connectivity 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 where 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 place 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 adaptation 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		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
Proposed Policy and Reasonable Alternatives															
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 Lypstone	--?/+	--?	+?/-?	++/--?	-?	--	--?	+	+	-	+	--/+	-	++
SA-ED-6: Cranbrook South-East	++/--?	--?	+?/-?	+++	-?	--	--?	++	+	-	++	+	++	+
SA-ED-7: Higher Greendale	++/--?	--?	+?/-?	+	-?	--	--?	++	++	-	--/+	++/-	-	+
SA-ED-10: Exmouth East	++/--?	--?	--?/+?	+++	-?	-	--?	++	++	-	++	++	++	+
SA-ED-12: Whimble	++/--?	-?	+?/-?	+	--?	--?	--?	++	++	-	++	++/--	-	+
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: Coplestone	++/--?	--?	--?/+?	++	-?	--	--?	++	++	+/-	++	++/--	-	++
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 sites²⁷, 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 Whimble, 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 assets²⁸ 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 employment) 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 employment 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 consultation 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 terms 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