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East Devon Local Plan: Proposed Changes

Sustainability Appraisal Addendum

Prepared by LUC
April 2015

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Introduction

- 1.1 This Sustainability Appraisal Addendum has been prepared by LUC on behalf of East Devon District Council as part of the integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the emerging East Devon Local Plan.
- 1.2 This SA Addendum relates to the Proposed Changes to the Local Plan (April 2015) and builds on the findings of the earlier SA work that LUC has carried out on behalf of the Council, in particular the October 2012 SA Report for the Publication Draft Local Plan and the July 2013 SA Addendum for the Submission version of the Local Plan. It should therefore be read in conjunction with those documents.
- 1.3 East Devon District Council and LUC have been taking an integrated approach to the SA and SEA of the Local Plan, in line with Government guidance. Throughout this document, the term 'SA' should therefore be taken to mean 'SA incorporating the requirements of the SEA Directive'.

Previous SA work undertaken

- 1.4 East Devon District Council and LUC working on behalf of the Council have previously carried out several iterations of the SA process in relation to the Local Plan (previously referred to as the Core Strategy) throughout its development. **Table 1** below lists the iterations of the Core Strategy/Local Plan that have been produced and consulted on by the Council, as well as the accompanying SA work that was undertaken at each stage.

Table 1: Iterations of the East Devon Core Strategy/Local Plan and accompanying SA Work

Plan Iteration	Accompanying SA Work
N/A	SA Scoping Report (2008) produced by East Devon District Council
Core Strategy Issues and Options (December 2008)	Initial Sustainability Appraisal Report (August 2010) produced by LUC
Core Strategy Preferred Approach (September 2010)	SA Report for the Preferred Approach version of the Core Strategy (September 2010) produced by LUC
Consultation Draft Local Plan (December 2011)	SA summary note for the Council produced by LUC (<i>this document was not subject to public consultation</i>)
Proposed Submission Draft Local Plan (May 2012) (<i>this document was not subject to public consultation</i>)	SA Report for the Proposed Submission Draft Local Plan (June 2012) produced by LUC (<i>this document was not subject to public consultation</i>)
Publication Draft Local Plan (November 2012)	SA Report for the Publication Draft Local Plan (October 2012)
Submission Local Plan (July 2013)	SA Addendum for the Submission Local Plan (July 2013)

- 1.5 The most recent full SA report for the Local Plan is therefore the October 2012 SA Report relating to the Publication Draft version of the Local Plan, and it was updated by the July 2013 SA Addendum for the Submission Local Plan. It was not considered necessary to produce a full SA Report at that stage as the changes made to the Local Plan since the Publication Draft version were relatively minor and no new policies or site allocations had been added to the plan.
- 1.6 The October 2012 SA Report described in detail the approach that has been taken to the SA, including the various iterations of the SA report that have been produced and how the SA process has influenced the development of the Local Plan thus far.

Current SA work

- 1.7 The East Devon Local Plan¹ was submitted to the Secretary of State for examination in August 2013 and initial hearing sessions were held between February and March 2014. The Inspector then called for a suspension of the examination process while further evidence gathering was undertaken. This included the preparation of an up-to-date assessment of housing need.
- 1.8 Once the additional technical assessment work requested by the Inspector was nearing completion, the Council identified a number of options for potential policy changes to the Local Plan as submitted. The additional options that the Council identified and which were subject to SA related to the following themes:
- The distribution strategy for additional housing required.
 - The strategy for allocating housing development at the district's villages.
 - The provision of sites for Gypsies and Travellers.
- 1.9 In addition, the Council was considering changing the start date of the Local Plan to 2013 (to align with the Strategic Housing Market Assessment) and extending the end date to 2031 or 2033. This change could not be subject to SA in the same way as a policy option; however it was considered in terms of its implications for the timescales over which the potential effects of the Local Plan would occur.
- 1.10 The above options were subject to SA by LUC in January 2015, with the findings being reported in an internal SA note to the Council. The findings of that SA work, which are summarised in **Appendix 3**, have contributed to the development of a set of detailed proposed changes which are the subject of this SA Addendum.
- 1.11 The purpose of this SA Addendum is to consider the implications of the proposed changes for the findings of the SA process to date. The work set out here draws on the SA findings reported on previously by LUC on behalf of East Devon District Council (in the October 2012 SA Report and updated in the July 2013 SA Addendum) and assesses only how the proposed changes affect those conclusions. Consideration is also given to the cumulative effects of the Local Plan as a whole on the SA objectives.

SA method

- 1.12 The October 2012 SA Report for the Publication Draft Local Plan describes in detail the methodology that has been used throughout the SA process, with SA matrices and colour coded scores being used to present the SA findings for each policy and site allocation. SA matrices for the strategic policies were presented in Appendix 3 of that document, while SA matrices for the development management policies were presented in Appendix 4 and SA matrices for the development site options were presented in Appendix 7. None of the SA matrices from the October 2012 SA Report were updated in the July 2013 SA Addendum as a result of the changes made to the Submission version of the Local Plan.
- 1.13 **Figure 1** below shows a key for the colour coding that has been used throughout the SA work to date and in this document.

¹ The version of the Plan that was submitted was the Publication Draft, with a document setting out proposed minor post-publication changes.

Figure 1: Key to SA Scores

++	Significant positive effect
+	Minor positive effect
0	Negligible effect
-	Minor negative effect
--	Significant positive effect
?	Uncertain effect
+/-	Mixed effect

- 1.14 A new table has been prepared to review the sustainability implications of the proposed changes to each of the Local Plan policies (presented in **Appendix 1**). The first two columns of the table summarise the changes that have been proposed to each policy, and in the final column the implications of each proposed change for the October 2012 or July 2013 SA findings are considered. A clear statement is made regarding whether any changes to the SA findings are expected as a result of each proposed change. Where changes have been identified these are shown in the table in **bold** text.
- 1.15 A small number of additional policies have been introduced into the Local Plan through the April 2015 Proposed Changes and additional SA matrices have therefore been produced for those policies – these can be found in **Appendix 2** of this SA Addendum.
- 1.16 Finally, consideration was given to the cumulative effects of the East Devon Local Plan as a whole and whether the likely cumulative effects that were described in the October 2012 SA Report and updated in the July 2013 SA Addendum are affected by the Proposed Changes.

Summary of SA implications of the Proposed Changes

- 1.17 The detailed table setting out the April 2015 Proposed Changes and describing the implications of each for the SA findings can be found in **Appendix 1**, and the key findings are summarised below.

Change to Local Plan period

- 1.18 The Local Plan is now proposed to cover the period 2013-2031 instead of 2006-2026, and the revised dates are referred to in the proposed changes to a number of the policies. The change that is proposed to the dates covered by the plan means that all of the effects identified (firstly in the October 2012 SA Report and updated in the July 2013 SA Addendum and again in this SA Addendum) would now be experienced over a slightly different time period. While the change of date applies to the whole Local Plan and therefore the likely effects associated with all of the policies, specific reference to the change of dates is made in the proposed changes to the following policies:
- Strategy 1 - Spatial Strategy for Development in East Devon
 - Strategy 2 - Scale and Distribution of Residential Development
 - Strategy 12 - Development at Cranbrook
- 1.19 The revised start date for the Local Plan brings it into line within the updated Strategic Housing Market Assessment (SHMA). This would ensure that the likely significant positive effects of the Local Plan that were identified previously in relation to SA objective 1: housing will still occur, as the housing provision made in the Local Plan would reflect the latest evidence regarding levels of

need over the period during which the Plan would be implemented. In addition, the extension of the end date of the plan would spread its sustainability effects over a longer time period.

Changes to policy wording

- 1.20 Most of the proposed changes to the Local Plan involve amendments to policy wording. In most cases the proposed wording amendments to Local Plan policies do not change their meaning or their likely effects on the SA objectives. However, a number of changes to the SA findings have been identified as a result of wording amendments, as shown in **Table 2** below.

Table 2: Summary of changes to SA scores as a result of proposed wording changes to Local Plan policies

Local Plan policy	SA objective	Likely effect identified in October 2012 SA Report and updated in July 2013 SA Addendum	Likely effect taking into account Proposed Wording Changes
Strategy 9 - Major Development at East Devon's West End	2: Community services	?	+
Strategy 12 - Development at Cranbrook	4: Health	+?	+
Strategy 15 - Intermodal Interchange	7: Cultural, social and leisure provision	0	+
Strategy 17 - Future Development of Exeter International Airport	1: Housing	0	-?
	6: Noise	--	-
Strategy 20 - Development at Axminster	13: water quality	--?	-?
Strategy 22 - Development at Exmouth	11: Biodiversity	--?	-?
Strategy 26 - Development at Sidmouth	18: Employment	+	+?
Strategy 32 - Resisting Loss of Employment, Retail and Community Sites and Buildings	10: Amenity	0	+
	8: Historic assets	0	+
Strategy 34 - District Wide Affordable Housing Provision Targets	1: Housing	++	++?
Strategy 36 - Life time (accessible and adaptable) Homes and Care/Extra Care Homes	1: Housing	++	++?
	4: Health	++	++?
Strategy 38 - Sustainable Design and Construction	1: Housing	+	+?
	6: Noise	+	+?
	8: Historic assets	+	+?
	11: Biodiversity	+	+?
	13: Air, soil and water quality.	+	+?
	14: Greenhouse gas emissions	++	++?
	15: Flooding	++	++?
	16: Energy efficiency	++	++?
17: Waste	++	++?	
D8 - Re-use of Rural Buildings Outside of Settlements	2: Community services	0	+
EN22 Surface Run-Off Implications of New Development	15: Flood risk	+	++
H3 - Conversion of Existing Dwellings and Other Buildings to Flats	4: Health	0	+

Local Plan policy	SA objective	Likely effect identified in October 2012 SA Report and updated in July 2013 SA Addendum	Likely effect taking into account Proposed Wording Changes
E5 - Small Scale Economic Development in Rural Areas	13: Air, soil and water quality.	0	+
E7 - Extensions to Existing Employment Sites	16: Energy efficiency	+	+?
TC8 - Safeguarding of Land Required for Highway and Access Improvements	8: Historic assets	0	+
	9: Landscape character	0	+
TC12 – Aerodrome Safeguarded Areas and Public Safety Zones	20: Encourage investment	0	+

1.21 It can be seen from **Table 2** that in many cases the nature of the effect has not changed, but uncertainty has either been added (because the revised policy wording is generally less strong, and standards may be less likely to be met) or removed (generally due to the addition of specific criteria within the policy seeking to protect or enhance the relevant sustainability topic). For one policy (EN22), the effect on SA objective 15: flood risk that was previously minor positive is now likely to be significantly positive because the new and revised policy wording means that the policy will provide even stronger protection against flood risk. No new significant negative effects have been identified, and in three cases previously significant negative effects have been reduced to minor negative due to additional criteria being added to Strategies 17, 20 and 22 providing mitigation for potential effects relating to noise, water quality and biodiversity.

New and significantly revised policies

- 1.22 Two entirely new policies have been added into the Local Plan and two have been completely re-written. For these policies, supplementary SA matrices have been prepared and are presented in **Appendix 2**.
- 1.23 The likely effects of the new and rewritten policies are summarised in **Table 3** overleaf.
- 1.24 The revised Strategy 13 (Development North of Blackhorse/Redhayes) is likely to have significant positive effects on SA objectives 1: housing, 2: community services, 7: leisure and recreation and 12: sustainable transport as the policy provides for mixed use development which would deliver housing, services and facilities, and would incorporate sustainable transport links as well as being located within fairly close proximity of the jobs, services and facilities in the West End. The appraisal of the revised site boundary for the allocation also identified a number of significant positive effects, including in relation to SA objectives 18: employment and 20: investment due to the fact that the site would also incorporate employment development although this is uncertain depending on how much employment land is to be provided. Potential significant negative effects were identified in relation to SA objectives 9: landscape, 13: air, soil and water, 15: flooding and 17: waste, due to the scale of the development proposed which would be almost entirely on greenfield land.
- 1.25 The revised appraisal of Strategy 27 (development at the small towns and larger villages) would have broadly positive effects on the social SA objectives as it would steer some housing development to rural areas, with the identified towns and villages selected on the basis of the infrastructure which is available to support housing growth. Potential mixed effects have been identified for several of the environmental SA objectives including SA objectives 12: sustainable transport, 13: air, soil and water quality and 14: greenhouse gas emissions as, while development in rural areas could result in higher levels of car use, the scale of development is likely to be small and the housing would be steered to those settlements that have better public transport links.
- 1.26 The new policy proposing redevelopment of the office complex at Winslade is generally positive as the proposal would involve mixed use housing and employment development which would benefit SA objectives 1: housing and 20: investment. The fact that the site is previously developed

means that there may be good opportunities to minimise waste through re-using existing buildings and materials (SA objective 17: waste) and the loss of high quality agricultural land would be avoided (SA objective 13). However, potential significant negative effects have been identified in relation to SA objectives 6: noise and 8: historic assets as the site is within close proximity of an 'A' road which may result in high noise levels, particularly in the west of the site, and because the site includes and is close to a number of listed buildings. However, the potential effect on those assets is uncertain as appropriate design could mitigate effects and some building reuse/conversion would be expected.

- 1.27 The effects of the new policy relating to Development at Uplyme are generally very uncertain and will depend largely on the nature of any development that may come forward as a result of joint evidence gathering. However, potential minor positive effects have been identified in relation to SA objectives 1: housing, 2: community services, 3: education, 7: leisure and recreation, and 20: investment. The potential effects of any development that may result from this policy on the environmental SA objectives are generally uncertain and would depend on the specific location as well as the nature of the development.

Table 3: Summary of SA scores for new and rewritten policies

Policy	1: Housing	2: Community services	3: Education	4: Health	5: Crime	6: Noise	7: Leisure and recreation	8: Historic assets	9: Landscape	10: Amenity	11: Biodiversity	12: Sustainable transport	13: Air, soil and water	14: Ghg emissions	15: Flooding	16: Energy efficiency	17: Waste	18: Employment	19: Viability of towns	20: Investment
Strategy 13: Development North of Blackhorse/Redhayes	++	++	+	+?	0	-?	++	+/-?	-?	-?	-?	++	+/--?	+/-	+/--?	++/-	+/-	+/-?	+/--	0
Site appraisal for revised site boundary north of Blackhorse/Redhayes	++	+?	+/-?	+?	0	-?	+?	-?	--	-?	0?	+/-	--	++	--	0	--	++?	-	++?
Strategy 27: Development at the Small Towns and Larger Villages	+	+	+?	+	0	-?	+	+/-?	?	-?	?	+/-	+/-?	+/-	-?	+/-?	+/-?	0	+	0
New Policy: Redevelopment of Redundant Offices Complex at Winslade Park	+	+	-?	+	0	--?	+	--?	+	0	0?	+/-	0	++	-	0	0	+	-	+
New Policy: Development at Uplyme	+?	+?	+?	0	0	-?	+?	-?	?	-?	-?	+/-?	?	+/-?	?	?	-?	?	0	+?

Deleted policies

- 1.28 A number of policies have been deleted from the Local Plan and so the effects of these policies that were previously identified (described in the October 2012 SA Report and updated in the July 2013 SA Addendum) would no longer occur. The deleted policies are listed in **Table 4** below, which also shows the significant positive and negative effects that were associated with each of these policies and which would therefore no longer occur. It can be seen that a number of potentially significant positive effects associated with the deleted policies will no longer occur, particularly in relation to the social and economic objectives, but also in relation to some of the environmental objectives (Strategy 42). However, two potentially significant negative effects on the vitality and viability of towns in relation to Strategies 16 and 19 will be avoided.
- 1.29 It should be noted that in the case of policy E1 which previously set out allocations for employment land, most of the allocations previously made in that policy are still included in the Local Plan but have been moved to the strategic policies for the relevant towns. Therefore, most of the effects associated with the site allocations would still occur, as described in **Table 4** below.

Table 4: Deleted policies and significant effects no longer expected to occur

Policy	Significant positive effects previously identified	Significant negative effects previously identified
Strategy 16 – Exeter Science Park	SA Objective 18: Employment SA Objective 20: Encourage investment	SA Objective 19: Vitality and viability of towns
Strategy 19 – Skypark Business Park	SA Objective 18: Employment SA Objective 20: Encourage investment	SA Objective 19: Vitality and viability of towns
Strategy 42 - Green Infrastructure Provision and Strategy	SA Objective 4: Health SA Objective 7: Cultural, social and leisure provision SA Objective 10: Amenity/local environment SA Objective 11: Biodiversity SA Objective 12: Sustainable transport SA Objective 13: Air, soil and water	<i>No likely significant negative effects identified.</i>
D5 - Advertisements within Areas of Special Control of Advertisements and Advance Advertisement Signs	<i>No likely significant positive effects identified.</i>	<i>No likely significant negative effects identified.</i>
EN11 - Demolition of Unlisted Buildings in Conservation Areas	SA Objective 9: Landscape character SA Objective 10: Amenity/local environment	<i>No likely significant negative effects identified.</i>
EN12 - Development Affecting Parks and Gardens of Special Historic Interest	<i>No likely significant positive effects identified.</i>	<i>No likely significant negative effects identified.</i>
EN15 - Environmental Impacts, Nuisance and Detriment to Health	SA Objective 4: Health	<i>No likely significant negative effects identified.</i>
EN20 - Private Sewage Treatment Works	<i>No likely significant positive effects identified.</i>	<i>No likely significant negative effects identified.</i>
EN23 - Coastal erosion and surface water run-off	<i>No likely significant positive effects identified.</i>	<i>No likely significant negative effects identified.</i>
EN24 - Coastal Defence Schemes	<i>No likely significant positive effects identified.</i>	<i>No likely significant negative effects identified.</i>

Policy	Significant positive effects previously identified	Significant negative effects previously identified
H1 - Residential Land Allocation	SA Objective 1: Decent homes	<i>No likely significant negative effects identified.</i>
E1 - Provision of Employment Land	SA Objective 18: Employment SA Objective 20: Encourage investment	<i>No likely significant negative effects identified.</i>
E3 - Safeguarding Employment Land and Premises	SA Objective 18: Employment	<i>No likely significant negative effects identified.</i>
E8 - Agricultural Development and Succession Housing	<i>No likely significant positive effects identified.</i>	<i>No likely significant negative effects identified.</i>

Changes to site allocations

- 1.30 Most of the residential and employment site allocations in the Local Plan were previously included in policies E1 and H1 which have now been deleted from the plan, as described above. Most of the employment land allocations previously included in policy E1 have been moved into other strategic policies but remain in the Local Plan; however one employment site allocation and a number of the residential site allocations previously included in policy H1 have been removed from the Local Plan entirely, as described below. Therefore, the effects of those sites (as set out in Appendix 7 of the October 2012 SA Report) would no longer occur.
- 1.31 Most of the residential site allocations now deleted from the Local Plan have been removed because they now have planning permission and as such have been taken into account in the overall housing figures set out in Strategy 2: Scale and Distribution of Residential Development. Therefore, while the likely effects of those site allocations (as described in Appendix 7 of the October 2012 SA Report) would no longer occur as a direct result of the Local Plan, the developments are still progressing separately to the Local Plan process and may still result in some of the sustainability effects identified. **Table 5** below lists the likely significant positive and negative effects that were previously associated with the site allocations that have been removed from the Local Plan because they already have planning permission.

Table 5: Site allocations deleted because they have planning permission and significant effects no longer expected to occur as a result of the Local Plan

Site allocations	Significant positive effects previously identified	Significant negative effects previously identified
Cloakham Lawns, Axminster (residential)	1: Housing 2: Community services 3: Education 4: Health 7: Cultural, social and leisure provision 14: Greenhouse gas emissions 18: Employment 19: Vitality and viability of towns	6: Noise 8: Heritage assets 9: Landscape 11: Biodiversity 15: Flooding 17: Waste
Land North East of Deepways, Budleigh Salterton (residential)	7: Cultural, social and leisure provision	9: Landscape 13: Air, soil and water quality
Island Farm, Ottery St Mary (residential)	2: Community services 4: Health 7: Cultural, social and leisure provision 12: Sustainable transport 14: Greenhouse gas emissions 18: Employment	6: Noise 8: Heritage assets

Site allocations	Significant positive effects previously identified	Significant negative effects previously identified
Part of the regeneration area, Seaton (mixed use)	2: Community services 4: Health 7: Cultural, social and leisure provision 12: Sustainable transport 14: Greenhouse gas emissions	8: Heritage assets 11: Biodiversity 15: Flooding
E006, Seaton (residential)	3: Education 14: Greenhouse gas emissions 18: Employment	8: Heritage assets

- 1.32 However, two site allocations have been removed from the Local Plan for other reasons and therefore the likely effects of those sites (described in Appendix 7 of the October 2012 SA Report) would no longer be expected to occur either as a result of the Local Plan or separately. **Table 6** below lists the likely significant positive and negative effects that were previously associated with those two site allocations.

Table 5: Deleted site allocations and significant effects no longer expected to occur

Site allocations	Significant positive effects previously identified	Significant negative effects previously identified
Land east of the Harepath Road/Fosseway, Seaton (reserve site)	4: Health 14: Greenhouse gas emissions	8: Heritage assets 11: Biodiversity 13: Air, soil and water quality
Land North of Sidford, Sidmouth (employment)	4: Health 14: Greenhouse gas emissions	8: Heritage assets 9: Landscape

Cumulative Effects of the Plan

- 1.33 The October 2012 SA Report included a description of the cumulative effects of the Local Plan on the SA objectives, and this was updated in the July 2013 SA Addendum to take into account the changes made to the Submission version of the Local Plan. In general, the cumulative effects of the Local Plan on the social and economic SA objectives were positive as the Local Plan makes provision for housing and employment development to meet local need as well as the development of community and social infrastructure to support population growth. While the scale of development proposed in the Local Plan meant that potential negative effects were identified in relation to the environmental SA objectives in particular, the Local Plan included various mitigation measures to reduce the extent of effects on issues such as biodiversity, loss of high quality agricultural land and increase in flood risk.
- 1.34 The changes that have been identified to the SA scores as a result of the Proposed Changes to the Local Plan do not affect the overall likely cumulative effects of the Plan that were described in the October 2012 SA Report and updated in the July 2013 SA Addendum. While a number of housing allocations have been removed from the Local Plan and changes have been made to the housing figures, these changes are based on an up to date assessment of housing need and the revised housing figures provide for meeting local need, based on updated evidence. The Local Plan will still therefore have a significant positive effect on SA objective 1: housing.

Next Steps

- 1.35 The Proposed Changes to the Local Plan are being subject to public consultation between April and June 2015, and this SA Addendum is being published alongside the Proposed Changes document

during that period. Following the consultation, the representations received will be considered by the Inspector when producing his final report regarding the soundness of the Local Plan.

LUC

April 2015

Appendix 1

Detailed assessment of Proposed Changes and their implications for the earlier SA findings

Policy number and title (reflecting Proposed Changes where relevant)	Summary of proposed changes to Local Plan policy	Implications of changes for SA findings as set out in the October 2012 SA Report and updated in the July 2013 SA Addendum
<p>Strategy 1 - Spatial Strategy for Development in East Devon</p>	<p>Revised target for the provision of 17,100 new homes between 2013 and 2031 (previously 15,000 between 2006 and 2026).</p> <p>Removal of statement that 122ha out of the 150ha of employment land to be provided will come forward through site allocations.</p> <p>Removal of text relating to the proportion of new homes that will be provided at the West End, the seven main towns and the smaller towns, villages and rural areas.</p>	<p>The increased total housing figure reflects both the change in the time period covered by the Plan and the updated evidence regarding housing need; therefore the potential significant positive effect on SA objective 1: housing remains unchanged. However, the time period over which the effect would occur would shift forwards in line with the revised plan period, i.e. from 2013 to 2031 as opposed to 2006 to 2026.</p> <p>The overall amount of employment land to be provided through the policy is unchanged and employment land allocations are still made through other policies in the plan, although the summary figure is removed from this policy. Therefore, the likely significant positive effect on SA objective 18: employment that was identified in the SA Report is unchanged.</p> <p>The removal of references to the proportion of development to be located in each area of the district (i.e. at the West End, at the seven main towns and at the other villages and rural areas) reflects changes that have been made to allocations within the plan, and the fact that the proportions previously quoted in the policy are no longer accurate. The majority of development is still focussed at the West End, followed by the main towns with the remainder at the small towns and villages; therefore no changes to the SA findings are required.</p>
<p>Strategy 2 - Scale and Distribution of Residential Development</p>	<p>Revised table of distribution of residential development for period 2013-2031 (previously provided for period 2006-2026).</p> <p>Revised list of sites that have made significant progress through the planning system.</p> <p>Removal of references to allocated sites that already have permission.</p>	<p>The changes to the housing numbers set out in the policy and the details of which sites are included in the calculations have been made to reflect the current situation with regards to completions and commitments and the updated evidence regarding housing need. Therefore, the likely significant positive effect on SA objective 1: housing that was identified in the October 2012 SA Report remains unchanged. However, the change in the period of time covered by</p>

Policy number and title (reflecting Proposed Changes where relevant)	Summary of proposed changes to Local Plan policy	Implications of changes for SA findings as set out in the October 2012 SA Report and updated in the July 2013 SA Addendum
	Text added to clarify that care/extra care bed spaces are counted as dwelling equivalents.	<p>the policy means that the effects previously identified would occur over a slightly later time period, i.e. from 2013 to 2031 as opposed to 2006 to 2026.</p> <p>The additional text relating to care/extra care beds is provided as a clarification and does not affect the SA findings.</p>
Strategy 3 - Sustainable Development	No changes proposed.	N/A – no changes to policy are proposed.
Strategy 4 - Balanced Communities	No changes proposed.	N/A – no changes to policy are proposed.
Strategy 5 – Environment	Minor rewording of clause 8 to refer to the protection and enhancement of ‘European sites’, as opposed to the protection and enhancement of the ‘highest tier of wildlife sites’.	No change to SA findings – the likely significant positive effect on SA objective 11: biodiversity that was identified in the October 2012 SA report remains unchanged.
Strategy 5B – Sustainable Transport	No changes proposed.	N/A – no changes to policy are proposed.
Strategy 6 - Development within Built-Up Area Boundaries	Amended wording in relation to Neighbourhood Plans and ‘outside of boundaries’ policy provision.	No change to SA findings – the proposed wording changes to the policy do not affect the SA findings set out in the October 2012 SA Report.
Strategy 7 – Development in the Countryside	Policy now states that development in the countryside will only be permitted where it is in accordance with either Local Plan or Neighbourhood Plan policy (the policy did not previously refer to Neighbourhood Plans, only the Local Plan).	No change to SA findings – the proposed change is a minor wording amendment reflecting the fact that a number of Neighbourhood Plans are being prepared in East Devon.
Strategy 8 - Development in Green Wedges	No changes proposed.	N/A – no changes to policy are proposed.
Strategy 9 - Major Development at East Devon’s West End	The residential site allocation North of Blackhorse/Redhayes (Tithebarn) is now referred to as ‘North of Blackhorse/Redhayes (Tithebarn Green/Mosshayne) to reflect the	The amendment to the residential site allocation North of Blackhorse/Redhayes is addressed in detail under Strategy 13 (the policy through which the site is allocated) and the change to the wording in this summary policy is made to

Policy number and title (reflecting Proposed Changes where relevant)	Summary of proposed changes to Local Plan policy	Implications of changes for SA findings as set out in the October 2012 SA Report and updated in the July 2013 SA Addendum
	<p>amended area of the site.</p> <p>Addition of statement that <i>'funding contributions will be sought from all developments in the West End to secure implementation of integrated transport and infrastructure provision' text at end of policy'.</i></p>	<p>reflect that. The SA findings for this policy do not change as the policy as a whole still delivers extensive development within the West End and the detailed effects of the individual allocations are addressed under the more specific policies.</p> <p>The additional wording relating to transport and infrastructure provision means that the previously uncertain effect on SA objective 2: community services is now minor positive as there is more certainty about the provision of infrastructure to support the residential development. The mixed (minor positive and minor negative) effect that was previously identified in relation to SA objective 12: sustainable transport remains unchanged as the additional wording reinforces the minor positive part of the effect.</p>
<p>Strategy 10 - Green Infrastructure in East Devon's West End</p>	<p>Expansion of 'conserve and enhance heritage assets' to include 'and their setting' at clause (f).</p> <p>Additional paragraph added to the policy, stating that Habitats Regulations-related mitigation measures will need to accord with measures in the South-east Devon European Site Mitigation Strategy. It is also stated that SANGS should dovetail with wider green infrastructure policies where possible and be compatible with neighbouring authorities' plans. The functionality of any potential SANGS and its contribution to the avoidance of a likely significant effect must be clearly demonstrated.</p>	<p>No change to SA findings – the amendment to clause (f) reinforces the already significant positive effect on SA objective 8: historic environment that was identified in the July 2013 SA Addendum.</p> <p>The additional test relating to mitigation measures to avoid likely significant effects on European sites reinforces the significant positive effect already identified in relation to SA objective 11: biodiversity.</p>
<p>Strategy 11 - Integrated Transport and Infrastructure Provision at East Devon's West End</p>	<p>Removal of the word 'affordable; from the description of transport infrastructure to be provided at the West End.</p> <p>Removal of final sentence from the policy</p>	<p>No change to SA findings – the removal of the text relating to transport and infrastructure provision does not affect the SA findings as the policy still makes reference to the provision of an integrated sustainable transport network and health and education provision. Therefore, the significant</p>

Policy number and title (reflecting Proposed Changes where relevant)	Summary of proposed changes to Local Plan policy	Implications of changes for SA findings as set out in the October 2012 SA Report and updated in the July 2013 SA Addendum
	<p>stating that funding contributions will be sought from all developments in the West End to secure implementation of integrated transport and infrastructure provision.</p>	<p>positive effects that were previously identified in relation to SA objectives 2: community services and 12: sustainable transport remain unchanged.</p> <p>The other amendment is a minor wording change and does not affect the SA findings.</p>
<p>Strategy 12 - Development at Cranbrook</p>	<p>Reference to eco-town standards removed from policy.</p> <p>Dates referred to in policy amended to reflect new plan period (up to 2031 instead of 2006 to 2026).</p> <p>Number of homes to be provided at Cranbrook increased to around 6,300 from 6,000. Peak build rate changed from 'up to 500' homes a year to '500 homes a year'.</p> <p>Amount of employment land to be provided at Cranbrook increased to 18.4ha from 15ha and text added to state that it will provide a range of business spaces suitable for growing businesses.</p> <p>Text added to state that the town centre will be a focal point of retail, business and leisure activities.</p> <p>Reference added to the provision of leisure and health facilities as well as social, community and education facilities.</p> <p>Amendment to clause 5 to refer to the district heating system as 'existing'.</p> <p>Reference to the provision of high speed broadband added to clause 5.</p> <p>Removal of paragraph referring to the likely</p>	<p>The removal of the reference to eco towns standards reflects recent changes to Government policy and does not affect the SA findings as other clauses in the policy still refer to issues such as sustainable transport and energy efficiency.</p> <p>The change in the period of time covered by the policy means that the effects previously identified would occur over a slightly later time period, i.e. up to 2031 as opposed to 2026.</p> <p>The slightly increased housing and employment land figures for Cranbrook reinforce the already significant positive effects on SA objective 1: housing, SA objective 18: employment and SA objective 20: encourage investment that were identified in the October 2012 SA Report. The area of land allocated for housing and employment is unchanged (the sites allocated were subject to appraisal and the findings reported in the July 2013 SA Addendum).</p> <p>The additional wording relating to the provision a range of business spaces and the ambitions for the town centre also reinforces the already significant positive effect on SA objective 20: encourage investment.</p> <p>The addition of leisure to the range of facilities to be provided reinforces the already significant positive effect on SA objective 2: community services identified in the SA Report.</p> <p>The addition of reference to the provision of health facilities in clause 4 means that the previously uncertain minor positive effect on SA objective 4: health is no longer</p>

Policy number and title (reflecting Proposed Changes where relevant)	Summary of proposed changes to Local Plan policy	Implications of changes for SA findings as set out in the October 2012 SA Report and updated in the July 2013 SA Addendum
	<p>direction of growth for Cranbrook during the 2026 to 2031 period and removal of paragraph requiring applications for individual schemes to be compatible with the wider programme of works for the West End.</p> <p>Addition of new paragraph stating that development at Cranbrook will be phased and co-ordinated with infrastructure requirements, and that developments will need to accord with the forthcoming Cranbrook Plan which will be developed as a DPD.</p> <p>Reference added to the identification of land in the Cranbrook Plan for the further expansion of Cranbrook, to accommodate a further 1,550 houses and associated jobs, social, community and education facilities and infrastructure outside the designated Neighbourhood Areas of Rockbeare, Broadclyst and Clyst Honiton.</p>	<p>uncertain.</p> <p>The wording amendment in relation to district heating is made to update the policy and does not affect the SA findings.</p> <p>The added reference to the provision of high speed broadband reinforces the already significant positive effects on SA objectives 12: transport and 18: employment as good internet links will benefit home working and help to reduce the need to travel.</p> <p>The revised approach in the policy to Cranbrook expansion introduces more flexibility in terms of where future development may be located, as it could be within a broader location than the location previously indicated. However, the area within which development could take place is quite constrained by the presence of designated Neighbourhood Plan areas.</p> <p>It is not possible to assess in detail the effects of further development within the potential expansion area as effects will depend largely on the nature of the development and its specific location. It is assumed that any proposals for development within that area would be subject to detailed assessment against an updated baseline as they come forward.</p>
Strategy 13 - Development North of Blackhorse/Redhayes	<p>Housing number increased from 600 to 1,500 new homes.</p> <p>The residential site allocation North of Blackhorse/Redhayes (Tithebarn) is now referred to as 'North of Blackhorse/Redhayes (Tithebarn Green/Mosshayne) to reflect the</p>	<p>The increased housing figure and revised site area means that there are likely to be a number of changes to the SA findings – a revised SA matrix for Strategy 13 is shown in Appendix 2 of this SA Addendum, along with a revised SA matrix for the site allocation².</p>

² As described in the July 2013 SA Addendum, all site options considered for allocation in the Local Plan were subject to SA based on their boundaries only, separately to the appraisal of the wider policies in which they were allocated. Therefore, the SA matrices for both the Blackhorse site allocation and the wider appraisal of Strategy 13 in its entirety have both been updated. The updated site appraisal is based on the same assumptions used previously, as set out in Appendix 5 in the October 2012 SA Report.

Policy number and title (reflecting Proposed Changes where relevant)	Summary of proposed changes to Local Plan policy	Implications of changes for SA findings as set out in the October 2012 SA Report and updated in the July 2013 SA Addendum
	amended area of the site.	
Strategy 14 - Development of an Urban Extension at Pinhoe	<p>Removal of reference to 800 homes being provided – policy now does not include a housing figure.</p> <p>Removal of paragraph relating to land within the allocated area that already has planning permission.</p>	<p>No change to SA findings – the policy still provides for the development of new homes to meet the updated assessment of local need, although the total housing figure for the urban extension (as updated and set out in Strategy 2) is no longer repeated in the policy. The removal of the paragraph relating to the land within the allocated area that already has planning permission reflects the fact that the existing planning permission is now taken into account in the figures set out in Strategy 2. Therefore, the likely significant positive effect on SA objective 1: housing that was previously identified in the SA Report remains unchanged.</p>
Strategy 15 - Intermodal Interchange	Addition of extra text relating to the designated railhead safeguarded area.	<p>The previously negligible effect on SA objective 7: cultural, social and leisure provision is now likely to be minor positive as the policy now makes reference to the safeguarded area being used for informal open space/recreational use until such time as it is used for a railhead. This effect would therefore be experienced in the short term.</p>
Strategy 16 – Exeter Science Park	Removal of policy in its entirety.	<p>The removal of this policy from the Local Plan reflects the fact that the site now has planning permission and would mean that the effects associated with the policy that were identified in the October 2012 SA Report would no longer be expected to occur as a result of the Local Plan. Likely significant positive effects had been identified in relation to SA objectives 18: employment and 20: encourage inward investment, and a significant negative effect was identified in relation to SA objective 19: viability and vitality of towns. A number of minor effects, both positive and negative, were also associated with the policy. However, the development of the Science Park is still going ahead separately from the Local Plan; therefore the same effects are still likely to occur but are not directly associated</p>

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		with the Local Plan.
Strategy 17 - Future Development of Exeter International Airport	Policy now seeks to prevent development near Exeter Airport where users of such developments could be adversely affected by noise.	The amendment to the policy could result in housing or other development near to the airport being restricted. Therefore, the previously negligible effect on SA objective 1: housing is now a potential minor negative effect. However, the SA Report previously identified a likely significant negative effect on SA objective 6: noise as a result of noise creation from the expansion of the airport. Therefore, the additional criterion which seeks to protect sensitive receptors from the impacts of noise means that the likely effect on SA objective 6 is now minor rather than significant negative.
Strategy 18 - Future Development of Exeter Airport Business Park	No changes proposed.	N/A – no changes to policy are proposed.
Strategy 19 – Skypark Business Park	Removal of policy in its entirety.	The removal of this policy from the Local Plan reflects the fact that the site now has planning permission and would mean that the effects associated with the policy that were identified in the October 2012 SA Report would no longer be expected to occur as a result of the Local Plan. Likely significant positive effects had been identified in relation to SA objectives 18: employment and 20: encourage inward investment, and a significant negative effect was identified in relation to SA objective 19: viability and vitality of towns. A number of minor effects, both positive and negative, were also associated with the policy that would be removed. However, the Skypark Business Park is still being developed separately to the Local Plan process; therefore, the same effects are still likely to occur but are not directly associated with the Local Plan.
Strategy 20 – Development at Axminster	Removal of reference to provision of 1.050 new homes through strategic allocations and the	The policy still provides for the development of new homes to meet the updated assessment of local need, although the total housing figure for Axminster (as updated and set out in

Policy number and title (reflecting Proposed Changes where relevant)	Summary of proposed changes to Local Plan policy	Implications of changes for SA findings as set out in the October 2012 SA Report and updated in the July 2013 SA Addendum
	<p>'build-out' of existing commitments.</p> <p>Removal of reference to providing 8 hectares of employment land' – no employment land figure now referred to in this part of the policy.</p> <p>Removal of reference to the North-South relief road being 'developer funded'.</p> <p>'Strategic Land Allocations' at Axminster now referred to as 'Land Allocations'.</p> <p>Removal Cloakham Lawns residential site allocation.</p> <p>Addition of 'around' to '650 new homes' allocated at site to the north and east of the town.</p> <p>Additional information provided about the north south relief road, stating that it will link Chard Road (A358) to Lyme Road (B261).</p> <p>New text allocating employment land (a total of 1.05ha) at Land at Millwey Rise Industrial Estate.</p> <p>New paragraph added to policy relating to the need to protect water quality in the River Axe and to comply with the interim Diffuse Water Pollution Plan.</p>	<p>Strategy 2) is no longer repeated in the policy. The removal of Cloakham Lawns residential site allocation reflects the fact that it has planning permission and is now taken into account in the updated housing figures set out in Strategy 2. Therefore, the likely significant positive effect on SA objective 1: housing that was previously identified in the SA Report remains unchanged. However, the effects of the Cloakham Lawns site allocation (as set out in Appendix 7 in the SA Report) would no longer occur as a result of the Local Plan, although the development is still being progressed separately from the Local Plan process.</p> <p>Similarly, the policy still provides for the development of employment land, including 8ha at the land allocation north and east of the town. The allocation of 1.05ha of employment space at Land at Millwey Rise Industrial Estate which has been newly added to this policy was already in the Local Plan, as part of the now removed policy E1. Therefore, the likely minor positive effects on SA objective 18: employment and 20: encourage investment that were identified in the SA Report remain unchanged. The effects of the employment site allocation at Land at Millwey Rise Industrial Estate remain as set out in Appendix 7 of the SA Report.</p> <p>The additional paragraph relating to the protection of water quality in the River Axe should provide additional mitigation for the potential significant negative effect on SA objective 13: water quality that was previously identified in the SA Report. Therefore, the previously uncertain significant negative effect on SA objective 13 is reduced to an uncertain minor negative effect.</p> <p>The other proposed changes are minor amendments to the policy wording and do not affect the SA findings.</p>

Policy number and title (reflecting Proposed Changes where relevant)	Summary of proposed changes to Local Plan policy	Implications of changes for SA findings as set out in the October 2012 SA Report and updated in the July 2013 SA Addendum
Strategy 21 - Budleigh Salterton	<p>Removal of reference to allocations being made for 110 new homes.</p> <p>Removal of reference to existing planning permission at Land Adjacent to and North of Greenway Road and removal of references to residential allocations being made in policy H1 within the Development Management Policies section of the Local Plan.</p> <p>Removal of reference to allocation for residential development at Land North East of Deepways.</p>	<p>The policy still provides for the development of new homes to meet the updated assessment of local need, although the total housing figure for Budleigh Salterton (as updated and set out in Strategy 2) is no longer repeated in the policy. The removal of the residential allocation at Land North East of Deepways reflects the fact that it has planning permission and is now taken into account in the updated housing figures set out in Strategy 2. The same applies to the existing planning permission at Land Adjacent to and North of Greenway Road. Therefore, the likely significant positive effect on SA objective 1: housing that was previously identified in the SA Report remains unchanged. However, the effects of the Land North East of Deepways site allocation (as set out in Appendix 7 in the SA Report) would no longer occur as a result of the Local Plan, although the development is still being progressed separately from the Local Plan process.</p>
Strategy 22 - Development at Exmouth	<p>Removal of reference to land being allocated for 700 homes.</p> <p>Addition of cross reference to policy TC8 within clause 5b.</p> <p>Addition of text relating to habitat mitigation and the need to refer to the Habitat Regulations Assessment of the Exmouth Town Centre and Seafront Masterplan where development could adversely affect the Exe Estuary.</p> <p>'Strategic land allocations' are now referred to as 'land allocations'.</p> <p>Removal of reference to Liverton phase 2 (within clause b), which already had planning permission.</p> <p>Removal of residential allocation at Littleham</p>	<p>The policy still provides for the development of new homes to meet the updated assessment of local need, although the total housing figure for Exmouth (as updated and set out in Strategy 2) is no longer repeated in the policy. Therefore, the significant positive effect on SA objective 1: housing identified in the SA Report remains unchanged.</p> <p>The removal of the residential allocation at Littleham Plumb Park reflects the fact that it has planning permission and is now taken into account in the updated housing figures set out in Strategy 2. The same applies to the removal of the reference to Liverton Phase 2.</p> <p>The Land South of Redgate employment site (0.5ha) was previously allocated in policy E1 and has been moved into this policy but the effects of the allocation (as set out in Appendix 7 of the SA report) remain unchanged, as do the likely minor positive effects on SA objectives 18:</p>

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	<p>Plumb Park.</p> <p>Addition of reference to development of supermarket.</p> <p>New text allocating 0.5ha of employment development at land south of Redgate.</p>	<p>employment and 20: encourage investment that were associated with this policy.</p> <p>The added reference to a supermarket being provided reinforces the already minor positive effect on SA objective 2: community services that was identified in the SA Report as part of an overall mixed effect.</p> <p>The new text relating to the protection of the Exe Estuary provides additional mitigation for potential impacts on this European designated site; therefore the potential but uncertain significant negative effect on SA objective 11: biodiversity that was identified in the SA Report is now an uncertain minor negative effect.</p>
Strategy 23 - Development at Honiton	<p>Removal of reference to 450 new homes being provided in the built-up area boundary of Honiton.</p> <p>Removal (from clause 1) of reference to land being allocated at Ottery Moor Lane and a reserve site at west of Hayne Lane.</p> <p>Removal (from clause 2) of reference to 15ha of employment land being allocated.</p> <p>'strategic land allocations' now referred to as 'land allocations'.</p> <p>New text allocating land at Heathpark Industrial Estate for 3.2ha of employment land.</p> <p>Removal of reserve site allocation west of Hayne Lane.</p>	<p>The policy still provides for the development of new homes to meet the updated assessment of local need, although the total housing figure for Honiton (as updated and set out in Strategy 2) is no longer repeated in the policy. The removal of reference to the Ottery Moor Lane residential site from Clause 1 is to avoid repetition with the later part of the policy. Therefore, the significant positive effect on SA objective 1: housing identified in the SA Report remains unchanged.</p> <p>Similarly, although the policy no longer refers to the amount of employment land being allocated, the policy now provides for an increased amount of employment development. Therefore, the likely significant positive effect on SA objective 18: employment and the likely minor positive effect on SA objective 20: encourage investment remain unchanged.</p> <p>The Heathpark Industrial Estate employment site (3.2ha) was previously allocated in policy E1 and has been moved into this policy but the effects of the allocation (as set out in Appendix 7 of the SA report) remain unchanged, as do the likely positive effects on SA objectives 18: employment and</p>

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		<p>20: encourage investment that were associated with this policy.</p> <p>The reserve site allocation west of Hayne Lane is removed from the policy as it now has planning permission, which is reflected in the overall housing figures in Strategy 2.</p> <p>Therefore, the effects of the Hayne Lane site allocation (as set out in Appendix 7 in the SA Report) would no longer occur as a result of the Local Plan, although the development is still being progressed separately from the Local Plan process.</p>
Strategy 24 - Development at Ottery St Mary	<p>Removal of reference to provision of 300 new homes.</p> <p>Removal of reference to allocation of 2.2ha of employment land.</p> <p>Removal of Island Farm strategic land allocation.</p> <p>New text allocating 2.2ha of employment land at Finnimore Industrial Estate.</p>	<p>The policy still provides for the development of new homes to meet the updated assessment of local need, although the total housing figure for Ottery St Mary (as updated and set out in Strategy 2) is no longer repeated in the policy. The removal of the Island Farm residential site from the policy reflects the fact that the site now has planning permission, which is taken into account in the overall housing figures in Strategy 2. Therefore, the significant positive effect on SA objective 1: housing identified in the SA Report remains unchanged. The effects of the Island Farm site allocation (as set out in Appendix 7 in the SA Report) would no longer occur as a result of the Local Plan, although the development is still being progressed separately from the Local Plan process.</p> <p>Similarly, although the total employment land allocation is no longer set out in this policy, it still provides for the development of 2.2ha of employment land at Ottery St Mary; therefore the likely minor positive effects on SA objectives 18: employment and 20: encourage investment remain unchanged.</p> <p>The Finnimore Industrial Estate employment site (2.2ha) was previously allocated in policy E1 and has been moved into this policy but the effects of the allocation (as set out in</p>

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		Appendix 7 of the SA report) remain unchanged, as do the likely minor positive effects on SA objectives 18: employment and 20: encourage investment that were associated with this policy.
Strategy 25 - Development at Seaton	<p>Removal of reference to allocation for 125 new homes.</p> <p>Removal of reference to there being a 25 home windfall allowance (this is a now a 'small' allowance).</p> <p>Addition of statement that the provision of new community sport and leisure facilities will be encouraged.</p> <p>'Strategic land allocations' are now referred to as 'land allocations'.</p> <p>Removal of allocation for mixed use development as part of the regeneration area.</p> <p>New allocation for 30 new homes on land north of Rowan Drive (sites E007 and E008), to replace the earlier reference to housing allocation sites E006, E007 and E008 providing for 50 new homes.</p> <p>Removal of reserve site allocation at land east of the Harepath Road/Fosseway site.</p>	<p>The policy still provides for the development of new homes to meet the updated assessment of local need, although the total housing figure for Seaton (as updated and set out in Strategy 2) is no longer repeated in the policy. Therefore, the significant positive effect on SA objective 1: housing identified in the SA Report remains unchanged.</p> <p>The removal of the mixed use site as part of the regeneration area reflects the fact that the site now has planning permission, which is taken into account in the overall housing figures in Strategy 2. The effects of the site allocation (as set out in Appendix 7 in the SA Report) would therefore no longer occur as a result of the Local Plan, although the development is still being progressed separately from the Local Plan process.</p> <p>Similarly, E006 has been removed from the allocation as it already has planning permission (the other parts of the allocation (E007 and E008) would still be developed). In addition, the reserve site allocation at land east of the Harepath Road/Fosseway site has been removed as it is no longer needed. Therefore, the effects associated with residential site E006 and the reserve site allocation at land east of the Harepath Road/Fosseway site as set out in Appendix 7 of the SA Report would no longer occur (although the development of E006 is again progressing separately to the Local Plan).</p> <p>The land north of Rowan Drive residential site allocation was previously allocated in policy H1 and has been moved into this policy but the effects of the allocation (as set out in</p>

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		<p>Appendix 7 of the SA report) remain unchanged.</p> <p>The additional wording in relation to the provision of new community sport and leisure facilities reinforces the already significant positive effect on SA objective 2: community services as identified in the SA Report.</p>
Strategy 26 - Development at Sidmouth	<p>Removal of reference to 100 new homes being allocated and removal of reference to allocations being made in policy H1.</p> <p>Removal of reference to provision of 5ha of employment land (only 0.5ha is now allocated through the policy).</p> <p>Removal of reference to employment land allocation at land north of Sidford being made in the Development Management policies section of the Local Plan – this allocation has been entirely deleted from the plan.</p> <p>Removal of reference to land allocations providing for 100 dwellings being made through the Development Management Policies section of the Local Plan.</p> <p>Addition of four site allocations for development: Land at Current Council Office Site (residential), Land at Current Manstone Depot (residential), Land at Port Royal Site (residential) and Land at Alexandria Industrial Estate (employment).</p>	<p>The policy still provides for the development of new homes to meet the updated assessment of local need, although the total housing figure for Sidmouth (as updated and set out in Strategy 2) is no longer repeated in the policy. Therefore, the significant positive effect on SA objective 1: housing identified in the SA Report remains unchanged.</p> <p>Reference to the total employment land allocation is removed and the policy now makes provision for significantly less employment land – only 0.5ha at one site allocation.</p> <p>The likely minor positive effect on SA objective 18: employment previously identified in the October 2012 SA Report remains although this is now uncertain as the reduced employment allocation may mean that housing and employment provision are out of balance in Sidmouth. The effect on SA objective 20: encourage investment was previously a potential minor positive effect but was uncertain due to the use of the wording ‘up to 5ha of employment land’. As the policy now makes a clear allocation but only for 0.5ha, the uncertainty remains.</p> <p>The removal of references to the Development Management Policies section of the plan reflect the fact that allocations previously set out in policies H1 and E1 have been moved into this policy, with the exception of the Land North of Sidford, as described below.</p> <p>The three residential site allocations now set out in the policy (Land at Current Council Office Site, Land at Current Manstone Depot and Land at Port Royal Site) were previously allocated in policy H1 but have been moved into</p>

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		<p>this policy. Therefore, the effects of the site allocations (as set out in Appendix 7 of the SA Report) remain unchanged.</p> <p>The employment site allocation now set out in the policy (Land at Alexandria Industrial Estate) was previously allocated in policy E1 but has been moved into this policy. Therefore, the effects of the site allocation (as set out in Appendix 7 of the SA Report) remain unchanged.</p> <p>The removal of the employment site allocation at Land North of Sidford (previously included in policy E1) from the plan in its entirety means that the effects of that allocation, as set out in Appendix 7 of the SA Report, would no longer occur.</p>
New Policy – Re-development of Redundant Offices Complex at Winslade Park	Entirely new policy allocating land at the southern side of Clyst St Mary village for 150 dwellings and 0.7ha of employment land for office use.	This is a new policy which has not previously been subject to SA. An appraisal matrix has been prepared and can be found in Appendix 2 of this SA Addendum.
New Policy – Development at Uplyme	Entirely new policy relating to the long term growth of Uplyme and Lyme Regis.	This is a new policy which has not previously been subject to SA. An appraisal matrix has been prepared and can be found in Appendix 2 of this SA Addendum.
Strategy 27 - Development at the Small Towns and Larger Villages	<p>Deletion of the policy as it stood and replacement with new wording.</p> <p>Policy now identifies settlements that will have a Built-up Area Boundary that will be designated in the East Devon Village DPD, but will not have land specifically allocated for development. Policy also refers to the need for communities to bring forward other development proposals through Neighbourhood Plans. The replacement policy no longer makes specific allocations for the level of growth at named small towns and villages.</p>	This policy has been completely revised and rewritten; therefore a replacement SA matrix has been prepared and can be found in Appendix 2 of this SA Addendum.

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Strategy 28 - Sustaining and Diversifying Rural Enterprises	No changes proposed.	N/A – no changes to policy are proposed.
Strategy 29 - Promoting Opportunities for Young People	Minor wording amendments that do not affect the meaning of the policy.	No change to SA findings - the proposed changes to the policy do not affect the SA findings set out in the October 2012 SA Report.
Strategy 30 – Inward Investment, Communication Links and Local Benefits	Minor wording amendments that do not affect the meaning of the policy.	No change to SA findings - the proposed changes to the policy do not affect the SA findings set out in the October 2012 SA Report and updated in the July 2013 SA Addendum.
Strategy 31 - Future Job and Employment Land Provision	Policy wording relating to the incorporation of live-work units is slightly more flexible, stating that applicants 'will be encouraged' to incorporate 10% live work units, rather than presenting this as a requirement. The same flexibility is introduced in relation to provision for home working.	No change to SA findings – the flexibility that has been added into the policy could mean that some of the positive effects previously associated with the policy would be less certain. However, even taking into account the changes, the policy still goes a long way towards encouraging the co-location of residential and employment development; therefore the SA scores set out in the October 2012 SA Report remain unchanged.
Strategy 32 - Resisting Loss of Employment, Retail and Community Sites and Buildings	Text setting out the criteria for granting permission for change of use has expanded and includes a wider range of considerations including the need to protect the quality of the locality. Additional information added about the type of sites that are covered by this policy.	The previously negligible effect on SA objective 10: amenity is now likely to be minor positive as the policy allows for change of use where employment activities would harm local amenity. The previously negligible effect on SA Objective 8: historic assets is now likely to be minor positive as the policy allows for change of use where this would safeguard a listed building to which current uses are detrimental.
Strategy 33 - Promotion of Tourism in East Devon	No changes proposed.	N/A – no changes to policy are proposed.
Strategy 34 - District Wide Affordable Housing Provision Targets	Rewording of text to stipulate that 25% of new homes should be the target for affordable	The fact that the 25% affordable housing figure is now presented as a target rather than a minimum requirement means that the previously significant positive effect on

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	<p>housing, as opposed to a minimum.</p> <p>The policy now specifies the West End development sites which are classed as 'major'.</p> <p>Addition of text to clarify that the target for 50% affordable homes applies to all areas that do not come under the 25% classification.</p> <p>Additional text stating that where a proposal does not meet the targets set out in the policy it will be necessary to submit evidence to demonstrate why provision is not viable or otherwise appropriate.</p> <p>Additional text requiring evidence to be provided to explain where a proposal does not meet the affordable housing requirements set out in the policy.</p> <p>Additional text to explain the thresholds at which this policy shall apply and how they link to Government policy/guidance.</p> <p>Additional minor amendments to policy wording that do not affect the meaning of the policy.</p>	<p>SA objective 1: housing is now uncertain. The other changes to the policy wording are minor clarifications and do not affect the SA findings that were set out in the October 2012 SA Report.</p>
<p>Strategy 35 – Exception Mixed Market and Affordable Housing At Villages, Small Towns and Outside Built-up Area Boundaries</p>	<p>Amendments to policy title to reflect the increased scope of the policy, which now also covers villages and small towns.</p> <p>Amendments to policy text to reflect the revised scope of the policy.</p> <p>Additional detail provided about the criteria that will be used to determine that occupants of housing have a 'local connection'.</p>	<p>No change to SA findings. While the policy has been significantly reworded, the overall intention of the policy remains very similar and it makes broadly the same provisions in terms of where rural housing will be permitted and who can occupy it. Therefore, there would be no changes to the SA findings as set out in the October 2012 SA Report.</p>
<p>Strategy 36 - Life time (accessible and</p>	<p>Rewording of policy sub-titles and minor text amendments that do not affect the meaning of</p>	<p>The proposed wording amendments mean that flexibility has been built into the policy, so where it is not financially</p>

Policy number and title (reflecting Proposed Changes where relevant)	Summary of proposed changes to Local Plan policy	Implications of changes for SA findings as set out in the October 2012 SA Report and updated in the July 2013 SA Addendum
adaptable) Homes and Care/Extra Care Homes	<p>the policy.</p> <p>Addition of caveat relating to cases where it is not possible to meet Lifetime Homes standards.</p> <p>Addition of text to explain where care homes will be acceptable.</p>	<p>viable, homes meeting lifetime homes standards may not be provided. Therefore, the previously significant positive effects on SA objectives 1: housing and 4: health are now uncertain.</p>
Strategy 37 - Community Safety	No changes proposed.	N/A – no changes to policy are proposed.
Strategy 38 - Sustainable Design and Construction	<p>Developers will be 'encouraged' rather than 'expected to' meet the requirements of the policy.</p> <p>Removal of clause relating to the need to address cumulative effects in the Design and Access Statement.</p> <p>Rewording of text to acknowledge that CSH or BREEAM standard shall be used until national standards are adopted. Removal of text requiring assessment of smaller developments where it is viable to do so, and replacement with requirement for developments smaller than the specified thresholds to meet BREEAM 'very good' standards.</p> <p>Proposals for water harvesting and sustainable waste management are encouraged but are no longer a material consideration.</p>	<p>The proposed changes to the policy wording mean that the policy wording is generally less strong, and standards may be less likely to be met. Therefore, the likely significant and minor positive effects identified for this policy are now uncertain – this is the case for the significant positive effects on SA objective 14: greenhouse gas emissions, 15: flooding, 16: energy efficiency and 17: waste, as well as the minor positive effects on SA objectives 1: housing, 6: noise, 8: historic environment, 11: biodiversity and 13: air, soil and water quality.</p>
Strategy 39 - Renewable and Low Carbon Energy Projects	Minor formatting change, with no change to the policy wording.	No change to SA findings – the proposed minor formatting changes to the policy do not affect the SA findings set out in the October 2012 SA Report.
Strategy 40 - Decentralised Energy Networks	Addition of text requiring specific provision for decentralised energy systems to be made at three named site allocations.	No change to SA findings – naming the three strategic sites where provision should be made for decentralised energy networks reinforces the already significant positive effects

Policy number and title (reflecting Proposed Changes where relevant)	Summary of proposed changes to Local Plan policy	Implications of changes for SA findings as set out in the October 2012 SA Report and updated in the July 2013 SA Addendum
		identified in relation to SA objectives 14: reduce greenhouse gas emissions and 16: energy efficiency. Those site allocations were already included in the Local Plan and were subject to SA in the October 2012 SA Report.
Strategy 41 - Allowable Solutions	No changes proposed.	N/A – no changes to policy are proposed.
Strategy 42 - Green Infrastructure Provision and Strategy	Removal of policy in its entirety.	The removal of this policy from the Local Plan would mean that the effects associated with the policy that were identified in the October 2012 SA Report and updated in the July 2013 SA Addendum would no longer be expected to occur. Likely significant positive effects had been identified in relation to SA objectives 4: health, 7: cultural, social and leisure provision, 10: amenity and environmental character, 11: biodiversity 12: sustainable transport and 13: air, soil and water, as well as a number of minor positive effects. No significant negative effects were associated with the policy that would be removed.
Strategy 43 - Open Space Standards	<p>Significant rewording of the part of the policy relating to developer contributions for open space.</p> <p>Additional text added, setting out thresholds for on-site open space provision.</p> <p>Reference to the provision of off-site open space through CiL has been added to the policy.</p> <p>Text added to the policy, specifying that most types of open space must not be located within flood zone 2.</p> <p>Fixed sports facilities have been added to the table setting out open space standards, along with a small number of clarifications relating to the various types of open space and what they</p>	No change to SA findings – the changes to the policy reinforce the already minor positive effects that were identified in the October 2012 SA Report in relation to SA objectives 4: health, 7: cultural, social and leisure provision, 8: historic assets, 9: landscape character, 10: amenity, 11: biodiversity, 13: air, soil and water quality and 15: flooding.

Policy number and title (reflecting Proposed Changes where relevant)	Summary of proposed changes to Local Plan policy	Implications of changes for SA findings as set out in the October 2012 SA Report and updated in the July 2013 SA Addendum
	include.	
Strategy 44 - Undeveloped Coast and Coastal Preservation Area	No changes proposed.	N/A – no changes to policy are proposed.
Strategy 45 - Coastal Erosion	Minor wording amendments that do not affect the meaning of the policy.	No change to SA findings – the proposed minor wording changes to the policy do not affect the SA findings set out in the October 2012 SA Report.
Strategy 46 - Landscape Conservation and Enhancement and AONBs	Policy wording amended so that the council will only accept <u>major</u> proposals in AONBs whereby it can be demonstrated that development cannot be accommodated elsewhere – this statement previously applied to all development.	No change to SA findings – while the part of the policy relating to development proposals in the AONB no longer refers to all developments, overall the policy goes a long way towards protecting the quality and character of East Devon’s landscape. Therefore, the significant positive effect that was previously identified in relation to SA objective 9: landscape remains unchanged.
Strategy 47 - Nature Conservation and Geology	Addition of text in relation to the implementation of the South-East Devon European Site Mitigation Strategy.	No change to SA findings – the additional text reinforces the already significant positive effect identified in relation to SA objective 11: biodiversity.
Strategy 48 - Local Distinctiveness in the Built Environment	No changes proposed.	N/A – no changes to policy are proposed.
Strategy 49 – The Historic Environment	No changes proposed.	N/A – no changes to policy are proposed.
Strategy 50 - Infrastructure Delivery	Minor amendment to policy wording - loss of amenity or resource present on a development site should be replaced by facilities that are ‘at least’ equal value, as opposed to ‘equal or greater’ value.	No change to SA findings – the proposed minor wording changes to the policy do not affect the SA findings set out in the October 2012 SA Report.
D1 - Design and Local Distinctiveness	Removal of introductory text relating to the benefits of sustainable design. Minor wording amendments that do not affect	No change to SA findings – the additional criterion that has been added to the policy reinforces the already significant positive effect identified for this policy in relation to SA objective 10: amenity. The other changes are minor

Policy number and title (reflecting Proposed Changes where relevant)	Summary of proposed changes to Local Plan policy	Implications of changes for SA findings as set out in the October 2012 SA Report and updated in the July 2013 SA Addendum
	<p>the meaning of the policy.</p> <p>Additional criterion added to policy, requiring proposals to mitigate adverse impacts both during and after construction.</p>	<p>wording amendments and again do not affect the SA findings set out in the October 2012 SA Report.</p>
D2 - Landscape Requirements	<p>Minor wording amendment that does not affect the meaning of the policy.</p>	<p>No change to SA findings - the proposed changes to the policy do not affect the SA findings set out in the October 2012 SA Report.</p>
D3 - Trees and Development Sites	<p>The council is now seeking to ensure that there is no net loss of the <u>quality</u> of trees and hedgerows as opposed to no total net loss.</p> <p>Other changes are minor wording amendments that do not affect the meaning of the policy.</p>	<p>No change to SA findings – the minor wording change in relation to trees and hedgerows reinforces the already minor positive effect identified for this policy in relation to SA objective 11: biodiversity. The other changes are minor wording amendments and do not affect the SA findings set out in the October 2012 SA Report.</p>
D4 - Applications for Display of Advertisements	<p>No changes proposed.</p>	<p>N/A – no changes to policy are proposed.</p>
D5 - Advertisements within Areas of Special Control of Advertisements and Advance Advertisement Signs	<p>Removal of text in its entirety.</p>	<p>The removal of this policy from the Local Plan would mean that the effects associated with the policy that were identified in the October 2012 SA Report would no longer be expected to occur. No likely significant effects, either positive or negative, had been identified in relation to any of the SA objectives.</p>
D6 – Locations without Access to Natural Gas	<p>No changes proposed.</p>	<p>N/A – no changes to policy are proposed.</p>
D7 – Agricultural Buildings and Development	<p>Clarity added – rather than ‘development in the countryside’ the policy clearly states what type of buildings it is applicable to.</p> <p>Policy now only extends to large scale buildings in relation to the need for a waste management plan.</p>	<p>No change to SA findings. The amendments to the criterion relating to when a waste management plan is required do not affect the minor positive effect on SA objective 17: waste that was previously identified. Other proposed changes are minor amendments to policy wording that again do not affect the SA findings.</p>
D8 – Re-use of Rural Buildings Outside of	<p>Criteria a, b and c now only apply to residential</p>	<p>The additional wording relating to sites being close to</p>

Policy number and title (reflecting Proposed Changes where relevant)	Summary of proposed changes to Local Plan policy	Implications of changes for SA findings as set out in the October 2012 SA Report and updated in the July 2013 SA Addendum
Settlements	<p>schemes and not all schemes.</p> <p>Addition of clause c) in relation to development being located close to accessible services.</p> <p>Policy now only requires provision for barn owls in barn conversions where they are within 1km of sightings or signs of activities.</p>	<p>accessible services means that the previously negligible effect on SA objective 2: community services would now be minor positive.</p> <p>The amended wording relating to barn owl provision does not affect the already minor positive effect identified in the October 2012 SA Report.</p>
EN1 - Land of Local Amenity Importance	No changes proposed.	N/A – no changes to policy are proposed.
EN2 - The Valley Parks in Exmouth	No changes proposed.	N/A – no changes to policy are proposed.
EN3 - Land at the Byes in Sidmouth	No changes proposed.	N/A – no changes to policy are proposed.
EN4 - Protection of Local Nature Reserves, County Wildlife Sites and County Geological Sites:	No changes proposed.	N/A – no changes to policy are proposed.
EN5 - Wildlife Habitats and Features	No changes proposed.	N/A – no changes to policy are proposed.
EN6 - Nationally and Locally Important Archaeological Sites	No changes proposed.	N/A – no changes to policy are proposed.
EN7 - Proposals Affecting Sites which may potentially be of Archaeological Importance	Policy amended to refer only to sites of potential archaeological importance, and not any heritage assets and their settings.	No change to SA findings – while the scope of the policy has changed, it will still have a significant positive effect on SA objective 8: historic assets in relation to the protection of archaeological assets.
EN8 - Extension, Alteration or Change of Use of Buildings of Special Architectural and Historic Interest	<p>Rewording of policy title.</p> <p>Policy rewritten to provide protection to all heritage features and their settings, and not just listed buildings.</p>	No change to SA findings – the proposed changes reinforce the already significant positive effect on SA objective 8: historic assets that was identified in the October 2012 SA Report.
EN9 - Development Affecting a Designated Heritage Asset or Loss of a Building or Structure	<p>Rewording of policy title.</p> <p>Additional wording added to policy, stating that</p>	No change to SA findings – the proposed changes reinforce the already potential significant positive effect on SA

Policy number and title (reflecting Proposed Changes where relevant)	Summary of proposed changes to Local Plan policy	Implications of changes for SA findings as set out in the October 2012 SA Report and updated in the July 2013 SA Addendum
that makes a Positive Contribution to a Conservation Area	development that would enhance the character and setting of heritage assets will be favourably considered.	objective 8: historic assets that was identified in the October 2012 SA Report. The effect is still uncertain as the part of the policy wording which indicates that the demolition of a listed building could be permitted in certain circumstances remains unchanged.
EN10 - Preservation and Enhancement of Conservation Areas	<p>Rewording of policy title.</p> <p>The focus of the policy has been narrowed so that the wording relates only to Conservation Areas and not the setting of heritage assets.</p> <p>Additional text added stating that the demolition of buildings that make a positive contribution to the setting of a Conservation Area would be against policy EN9.</p>	While the scope of the policy has changed to cover Conservation Areas only, it would now go even further towards protecting Conservation Areas. This reinforces the already significant positive effect on SA objective 8: historic assets identified in the July 2013 SA Addendum.
EN11 - Demolition of Unlisted Buildings in Conservation Areas	Removal of policy in its entirety.	The removal of this policy from the Local Plan would mean that the effects associated with the policy that were identified in the October 2012 SA Report would no longer be expected to occur . Likely significant positive effects had been identified in relation to SA objectives 9: landscape character and 10: amenity and environmental quality as well as a number of minor effects, both positive and negative. No significant negative effects were associated with the policy that would be removed.
EN12 - Development Affecting Parks and Gardens of Special Historic Interest	Removal of policy in its entirety.	The removal of this policy from the Local Plan would mean that the effects associated with the policy that were identified in the October 2012 SA Report would no longer be expected to occur . No likely significant effects, either positive or negative, had been identified in relation to any of the SA objectives.
EN13 - Development on High Quality	No changes proposed.	N/A – no changes to policy are proposed.

Policy number and title (reflecting Proposed Changes where relevant)	Summary of proposed changes to Local Plan policy	Implications of changes for SA findings as set out in the October 2012 SA Report and updated in the July 2013 SA Addendum
Agricultural Land		
EN14 - Control of Pollution	<p>Minor wording amendments that do not affect the meaning of the policy.</p> <p>Addition of 'odour' to the list of issues covered by the policy.</p>	<p>No change to SA findings – the addition of odour to the issues covered by the policy reinforces the already minor positive effect on SA objective 10: amenity that was identified in the October 2012 SA report.</p>
EN15 - Environmental Impacts, Nuisance and Detriment to Health	<p>Removal of policy in its entirety.</p>	<p>The removal of this policy from the Local Plan would mean that the effects associated with the policy that were identified in the October 2012 SA Report would no longer be expected to occur. A likely significant positive effect had been identified in relation to SA objective 4: health as well as a number of minor effects, both positive and negative. No likely significant negative effects were associated with the policy that would be removed.</p>
EN16 – Contaminated Land	<p>No changes proposed.</p>	<p>N/A – no changes to policy are proposed.</p>
EN17 - Notifiable Installations	<p>No changes proposed.</p>	<p>N/A – no changes to policy are proposed.</p>
EN18 - Maintenance of Water Quality and Quantity	<p>No changes proposed.</p>	<p>N/A – no changes to policy are proposed.</p>
EN19 - Adequacy of Foul Sewers and Adequacy of Sewage Treatment System	<p>Addition of text stating that developments that involve private sewage facilities will not be permitted unless ground conditions are satisfactory and the plot is a sufficient size to provide an adequate subsoil drainage system or an alternative treatment system.</p>	<p>No change to SA findings – the proposed change reinforces the already significant positive effect identified in relation to SA objective 13: air, soil and water quality.</p>
EN20 - Private Sewage Treatment Works	<p>Removal of policy in its entirety.</p>	<p>The removal of this policy from the Local Plan would mean that the effects associated with the policy that were identified in the October 2012 SA Report would no longer be expected to occur. No likely significant effects, either positive or negative, had been identified in relation to</p>

Policy number and title (reflecting Proposed Changes where relevant)	Summary of proposed changes to Local Plan policy	Implications of changes for SA findings as set out in the October 2012 SA Report and updated in the July 2013 SA Addendum
		any of the SA objectives.
EN21 - River and Coastal Flooding	No changes proposed.	N/A – no changes to policy are proposed.
EN22 Surface Run-Off Implications of New Development	<p>The policy now also covers implications for coastal erosion.</p> <p>Policy now includes a requirement for the long-term maintenance of remedial measures for surface water run-off.</p> <p>Reference to SuDS has been rearranged into a new clause, stating that all major developments or schemes of more than 10 dwellings should involve the management of surface water by SuDS.</p>	The additional and revised wording in this policy would mean that the minor positive effect on SA objective 15: flood risk is now significantly positive.
EN23 - Coastal erosion and surface water run-off:	Policy removed in its entirety.	The removal of this policy from the Local Plan would mean that the effects associated with the policy that were identified in the October 2012 SA Report would no longer be expected to occur. No likely significant effects, either positive or negative, had been identified in relation to any of the SA objectives.
EN24 - Coastal Defence Schemes	Policy removed in its entirety.	The removal of this policy from the Local Plan would mean that the effects associated with the policy that were identified in the October 2012 SA Report would no longer be expected to occur. No likely significant effects, either positive or negative, had been identified in relation to any of the SA objectives.
EN25 – Development Affected by Coastal Change	Minor wording amendments that do not affect the meaning of the policy.	No change to SA findings - the proposed changes to the policy do not affect the SA findings set out in the October 2012 SA Report.

Policy number and title (reflecting Proposed Changes where relevant)	Summary of proposed changes to Local Plan policy	Implications of changes for SA findings as set out in the October 2012 SA Report and updated in the July 2013 SA Addendum
H1 - Residential Land Allocation	Removal of policy in its entirety.	The removal of this policy from the Local Plan would mean that the effects associated with the policy that were identified in the October 2012 SA Report would no longer be expected to occur . A likely significant positive effect had been identified in relation to SA objective 1: housing as well as a number of minor positive effects. However, housing allocations are now made within the strategic policies for each town as relevant, and these have been updated to remove sites that now have planning permission and to reflect the latest housing figures. The effects of the changes to allocations are described elsewhere in this table in relation to the relevant strategic policies.
H2 - Range and Mix of New Housing Development	Policy now 'encourages' developers to provide 10% of plots for sale to small builders instead of making this a requirement.	No change to SA findings - the proposed changes to the policy do not affect the SA findings set out in the October 2012 SA Report.
H3 - Conversion of Existing Dwellings and Other Buildings to Flats	Requirement for developments to be well served by public transport has been changed to a requirement that they are located close to services and facilities. Reference to bicycle storage has been added to the policy.	The removal of the reference to public transport means that the potential minor positive effect on SA objective 12: sustainable transport is no longer likely to result from that part of the policy. However, the addition of reference to the provision of bicycle storage means that the potential minor positive effect remains unchanged overall. In addition, the previously negligible effect on SA objective 4: health is now likely to be minor positive as the policy may now encourage more people to cycle.
H4 - Dwellings for Persons Employed in Rural Businesses	Policy wording amended at clause 3 to clarify that the need for a financial assessment applies to temporary dwellings only. Other minor amendment to text is made but the policy meaning is unchanged.	No change to SA findings - the proposed changes to the policy do not affect the SA findings set out in the October 2012 SA Report.
H5 - Occupancy Conditions on Rural Workers	No changes proposed.	N/A – no changes to policy are proposed.

Policy number and title (reflecting Proposed Changes where relevant)	Summary of proposed changes to Local Plan policy	Implications of changes for SA findings as set out in the October 2012 SA Report and updated in the July 2013 SA Addendum
Dwellings		
H6 - Replacement of Existing Dwellings in the Countryside	The criteria requiring the replacement dwelling to be on or adjacent to the footprint of the existing dwelling has been extended to also allow for replacement dwellings that are elsewhere within the curtilage of the existing dwelling in certain circumstances.	No change to SA findings - the proposed changes to the policy do not affect the SA findings set out in the October 2012 SA Report.
H7 - Sites for Gypsies and Travellers	<p>Removal of criterion relating to sites being outside of Areas of Outstanding Beauty, green wedges or designated conservation sites.</p> <p>The criteria relating to proven local need now only applies to proposals outside built up area boundaries.</p> <p>Addition of criteria requiring consideration to be given to the cumulative impacts of new sites where existing sites are not able to be expanded.</p>	<p>No change to SA findings. The removal of the criterion relating to sites being outside of Areas of Outstanding Beauty or green wedges could mean that the uncertain minor positive effect on the landscape that was previously identified is less likely to occur; however another criterion in the policy still requires developments to have no significant adverse impact on the appearance or character of the landscape; therefore the effect remains unchanged.</p> <p>The requirement for consideration to be given to the cumulative effects of nearby sites reinforces the already potential minor positive effect identified for SA objective 10: amenity and local environment.</p> <p>Other proposed changes to the policy are minor and again do not affect the SA findings.</p>
E1 - Provision of Employment Land	Removal of policy in its entirety.	<p>The removal of this policy from the Local Plan would mean that the effects associated with the policy that were identified in the October 2012 SA Report would no longer be expected to occur. Likely significant positive effects had been identified in relation to SA objectives 18: employment and 20: encourage investment, as well as a number of minor positive effects.</p> <p>However, most of the allocations previously set out in this policy have been moved into the relevant strategies for each town, as described elsewhere in this table; therefore the</p>

Policy number and title (reflecting Proposed Changes where relevant)	Summary of proposed changes to Local Plan policy	Implications of changes for SA findings as set out in the October 2012 SA Report and updated in the July 2013 SA Addendum
		effects of those allocations as set out in Appendix 7 of the SA Report would still occur. The only allocation which has been removed from the plan is the employment allocation at Land North of Sidford, Sidmouth; therefore the effects previously associated with that allocation (described in Appendix 7 of the SA Report) would no longer occur . Significant positive effects had been identified in relation to SA objectives 4: health and 14: greenhouse gas emissions, while significant negative effects had been identified in relation to SA objectives 8: historic environment, 9: landscape and 15: flood risk.
E2 - Employment Generating Development in Built-Up Areas	No changes proposed.	N/A – no changes to policy are proposed.
E3 - Safeguarding Employment Land and Premises	Removal of policy in its entirety.	The removal of this policy from the Local Plan would mean that the effects associated with the policy that were identified in the October 2012 SA Report and updated in the July 2013 SA Addendum would no longer be expected to occur . A likely significant positive effect had been identified in relation to SA objective 18: employment as well as a number of minor effects, both positive and negative.
E4 - Rural Diversification	Final criterion in the policy has been amended to apply only to buildings within 1km of sightings of barn owls or signs of their activity.	No change to SA findings - the additional wording relating to the protection of barn owls reinforces the already minor positive effect on SA objective 11: biodiversity that was identified in the October 2012 SA Report. The likely effect was classed as minor rather than significant at that time as the wording in the policy related only to the one species, and this remains the case.
E5 - Small Scale Economic Development in Rural Areas	Policy removes the requirement for development on greenfield land to not exceed 0.25ha in size, but instead includes a general requirement for it to relate well in scale and	The wording change in relation to development on greenfield land and the additional wording relating to the removal of permitted development rights do not affect the SA findings.

Policy number and title (reflecting Proposed Changes where relevant)	Summary of proposed changes to Local Plan policy	Implications of changes for SA findings as set out in the October 2012 SA Report and updated in the July 2013 SA Addendum
	<p>form and sustainability terms to nearby villages and surrounding areas.</p> <p>An additional criterion has been added to the policy requiring the local highway network to be capable of accommodating the forecast increase in traffic (established by a Traffic Assessment).</p> <p>Additional wording added to policy relating to the removal of permitted development rights.</p>	<p>The additional criterion relating to the capacity of the highway network means that the previously negligible effect on SA objective 13: air, soil and water is now likely to be minor positive.</p>
E7 - Extensions to Existing Employment Sites	<p>Policy now applies outside of built up area boundaries regardless of whether sites are at or near occupancy.</p> <p>Removal of reference to 80% of site being built and occupied – replaced with a more general reference to it being at or near full occupancy.</p> <p>Policy removes the limit of 10% expansion of existing employment sites but rather states that a ‘small’ expansion will be permitted where this is proportionate to the scale and function of the existing site.</p> <p>Reference to incorporation of renewable energy generation is made more flexible, now being ‘encouraged’ rather than referring to requirements.</p> <p>Addition of text relating to the removal of permitted development rights.</p>	<p>The changes to the policy wording reinforce the already significant positive effect on SA objective 18: employment and the minor positive effect on SA objective 20: encourage investment.</p> <p>The minor positive effect on SA objective 16: energy efficiency is now uncertain as the policy wording is more flexible and there is less certainty that renewable energy generation will be incorporated into employment sites.</p> <p>The additional wording relating to the removal of permitted development rights does not affect the SA findings set out in the October 2012 SA Report and updated in the July 2013 SA Addendum.</p>
E8 - Agricultural Development and Succession Housing	Policy removed in its entirety.	<p>The removal of this policy from the Local Plan would mean that the effects associated with the policy that were identified in the October 2012 SA Report would no longer be expected to occur. No likely significant effects, either positive or negative, were expected to result from the policy although minor positive effects were identified in</p>

Policy number and title (reflecting Proposed Changes where relevant)	Summary of proposed changes to Local Plan policy	Implications of changes for SA findings as set out in the October 2012 SA Report and updated in the July 2013 SA Addendum
		relation to SA objectives 1: housing, 9: landscape character, 13: air, soil and water and 18: employment.
E9 - Town Centre Vitality and Shopping Areas	Addition of criteria stating that change of use will not be permitted unless the building or site in question has been marketed for at least 12 consecutive months without interest.	No change to SA findings - the proposed changes to the policy do not affect the SA findings set out in the October 2012 SA Report.
E10 - Primary Shopping Frontages	Addition of criteria stating that the change of use of ground floor of existing shops will not be permitted unless it has been demonstrated that there is no longer a need for retail use and that site has been marketed for at least 12 consecutive months without interest.	No change to SA findings - the proposed changes to the policy do not affect the SA findings set out in the October 2012 SA Report.
E11 - Large Stores and Retail Related Uses in Town Centre Areas Area Centres	Rewording of policy title. Text added relating to the removal of permitted development rights.	No change to SA findings - the proposed changes to the policy do not affect the SA findings set out in the October 2012 SA Report.
E12 - Neighbourhood Centres and Shops	Minor formatting change, no change to policy wording.	N/A – no changes to policy wording are proposed.
E13 - Use of Upper Floors in Shopping Developments	No changes proposed.	N/A – no changes to policy are proposed.
E14 - Change of Use of Village Shops or Services	No changes proposed.	N/A – no changes to policy are proposed.
E15 - Retail Development in Rural Areas outside Built-up Area Boundaries Villages	Rewording of policy title. Policy wording has been amended to be more flexible, referring to preferred targets rather than minimum thresholds for the various policy criteria.	No change to SA findings. A minor positive effect was already identified in relation to SA objective 19: vitality and viability of the towns, as well as a minor negative effect in relation to SA objective 20: encourage inward investment. These effects related to the fact that the policy would restrict the circumstances in which retail development could be located in rural areas. Although the policy wording is now

Policy number and title (reflecting Proposed Changes where relevant)	Summary of proposed changes to Local Plan policy	Implications of changes for SA findings as set out in the October 2012 SA Report and updated in the July 2013 SA Addendum
		slightly more flexible, the overall intention of the policy remains the same and the likely effects identified were not significant. Therefore, the proposed changes would not affect the SA findings set out in the October 2012 SA Report.
E16 - Proposals for Holiday or Overnight Accommodation and Associated Facilities	Removal of cross reference to policy D10.	No change to SA findings - the proposed change to the policy does not affect the SA findings set out in the October 2012 SA Report.
E17 - Principal Holiday Accommodation Areas	Addition of text which states that change of use will not be permitted unless it is demonstrated that there is no need for the accommodation use and that the building or site has been marketed for at least 12 consecutive months without interest.	No change to SA findings - the proposed changes to the policy do not affect the SA findings set out in the October 2012 SA Report.
E18 - Loss of Holiday Accommodation	Addition of text which states that change of use will not be permitted unless it is demonstrated that there is no need for the accommodation use and that the building or site has been marketed for at least 12 consecutive months without interest.	No change to SA findings - the proposed changes to the policy do not affect the SA findings set out in the October 2012 SA Report.
E19 - Holiday Accommodation Parks	No changes proposed.	N/A – no changes to policy are proposed.
E20 - Provision of Visitor Attractions	No changes proposed.	N/A – no changes to policy are proposed.
RC1 - Retention of Land for Sport and Recreation	No changes proposed.	N/A – no changes to policy are proposed.
RC2 – New Open Space, Sports Facilities and Parks	No changes proposed.	N/A – no changes to policy are proposed.
RC3 – Allotments	No changes proposed.	N/A – no changes to policy are proposed.

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RC4 - Recreation Facilities in the Countryside and on the Coast	No changes proposed.	N/A – no changes to policy are proposed.
RC5 - Community Buildings	No changes proposed.	N/A – no changes to policy are proposed.
RC6 - Local Community Facilities	No changes proposed.	N/A – no changes to policy are proposed.
RC7 - Shared Community Facilities	No changes proposed.	N/A – no changes to policy are proposed.
TC1 – Telecommunications	<p>Minor wording amendment that does not affect the meaning of the policy.</p> <p>Removal of the criterion relating to there being an identified need for telecommunications infrastructure in the local area.</p>	No change to SA findings - the proposed changes to the policy do not affect the SA findings set out in the October 2012 SA Report.
TC2 - Accessibility of New Development	No changes proposed.	N/A – no changes to policy are proposed.
TC3 - Traffic Management Schemes	No changes proposed.	N/A – no changes to policy are proposed.
TC4 - Footpaths, Bridleways and Cycleways	No changes proposed.	N/A – no changes to policy are proposed.
TC5 - Safeguarding Disused Railway Lines	No changes proposed.	N/A – no changes to policy are proposed.
TC6 - Park and Ride and Park and Share/Change	No changes proposed.	N/A – no changes to policy are proposed.
TC7 - Adequacy of Road Network and Site Access	No changes proposed.	N/A – no changes to policy are proposed.
TC8 - Safeguarding of Land Required for Highway and Access Improvements	<p>Policy now seeks to protect heritage and landscape assets as well as natural heritage assets.</p> <p>Removal of three access improvement</p>	The additional text relating to the protection of heritage assets and the landscape means that the previously negligible effects on SA objectives 8: historic assets and 9: landscape character are now likely to be minor positive. The likely effects of the policy on the other SA

Policy number and title (reflecting Proposed Changes where relevant)	Summary of proposed changes to Local Plan policy	Implications of changes for SA findings as set out in the October 2012 SA Report and updated in the July 2013 SA Addendum
	proposals.	objectives are unchanged.
TC9 - Parking Provision in New Development	No changes proposed.	N/A – no changes to policy are proposed.
TC10 - Rear Servicing of Shopping/Commercial Development	No changes proposed.	N/A – no changes to policy are proposed.
TC11 - Roadside Service Facilities	No changes proposed.	N/A – no changes to policy are proposed.
TC12 – Aerodrome Safeguarded Areas and Public Safety Zones	Addition of text to policy aiming to ensure that development near airports does not affect air safety or prevent further expansion of Exeter Airport.	The additional text seeking to avoid new development that might prevent future development or expansion at Exeter airport means that the previously negligible effect on SA objective 20: encourage investment is now likely to be minor positive. This is because the revised policy will ensure that investment associated with the airport site is not prevented as a result of other development nearby. The likely effects of the policy on the other SA objectives are unchanged.
NP1 – Neighbourhood Planning in East Devon	No changes proposed.	N/A – no changes to policy are proposed.

Appendix 2

SA matrices for the new and significantly revised Local Plan policies

Strategy 13: Development of Land North of Blackhorse/Redhayes

SA Objective	SA Score	Justification
1: To ensure everybody has the opportunity to live in a decent home	++	The strategy is likely to have a significant positive effect on this objective as it allows for the provision of 1,500 new homes on the Land North of Blackhorse/Redhayes, of which some (although the proportion is not specified) will be affordable.
2: To ensure that all groups of the population have access to community services	++	Significant effects on this objective area likely to result from the strategy as it allows for mixed use development at the Land North of Blackhorse/Redhayes which will include social and community facilities which will be easily accessible to all residents.
3: To provide for education, skills and lifelong learning to meet the needs of the local population and meet local employment needs	+	Positive effects on this objective are likely to result from the strategy as it allows for mixed use development at the Land North of Blackhorse/Redhayes which will include education facilities that will be easily accessible to all residents.
4: To improve the population's health	+?	The strategy places emphasis on encouraging walking and cycling which should have a positive impact on the health of local people. In addition, the development north of Blackhorse is to be mixed use, incorporating easily accessible community services and facilities which is taken to include health services, although this is not specified. The likely effect of the strategy is therefore positive but uncertain, because if adequate health services are not provided to support the growing population the existing services may become overloaded.
5: To reduce crime and fear of crime	0	The strategy is not considered likely to have an effect on this objective. Development should be planned in a way that reduces people's fear of crime.
6: To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution	-?	The large number of new homes and other development proposed to the north of Blackhorse means that development is likely to take place on a phased basis; therefore residents of new homes may potentially be disturbed by ongoing development in close proximity to their homes. This effect is only expected to be relatively short-term however.
7: To maintain and improve cultural, social and leisure provision	++	Significant positive effects on this objective area likely to result from the strategy as it allows for mixed use development at the land north of Blackhorse, including social and community facilities which will be easily accessible to all residents.
8: To maintain and enhance built and historic assets	+/-?	The development planned north of Blackhorse may have an adverse impact on the setting of historic assets such as listed buildings, although this will depend on the location of any such assets and on the nature and design of the development that takes place. However, the development may have a positive impact on the overall quality of the built environment, as the new buildings are likely to be of a high quality. As such, the

SA Objective	SA Score	Justification
		potential effects are mixed and are at present uncertain.
9: To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon	-?	The large-scale development planned at the land north of Blackhorse may have an adverse effect on the surrounding landscape, depending on factors such as the topography of the land and the visibility of the development.
10: To maintain the local amenity, quality and character of the local environment	-?	The large-scale development planned at the land north of Blackhorse may have an adverse effect on local amenity by increasing the level of vehicle traffic and general human activity in the area. The creation of a large new settlement may also impact on the character of the surrounding area.
11: To conserve and enhance the biodiversity of East Devon	-?	The effects of this strategy on biodiversity will depend on the proximity of the development to any particular biodiversity assets. The East Devon Pebblebed Heaths SAC, the East Devon Heaths SPA and the Exe Estuary SPA/Ramsar site are all located within reasonable proximity of the land north of Blackhorse and there is the potential for large-scale development in the area to cause disturbance to these sites e.g. through increased vehicle traffic and recreation pressure. In addition, there may be further adverse impacts affecting non-designated sites, for example habitat fragmentation caused by development.
12: To promote and encourage non-car based modes of transport and reduce journey lengths	++	The strategy states that there will be an emphasis on encouraging walking and cycling through the provision of accessible routes, and the location of the development close to the main urban area of Exeter means that public transport use may be relatively more feasible here than elsewhere in the District. In addition, the provision of community services and facilities within the new development should have the effect of reducing the need to travel elsewhere for shops etc.
13: To maintain and enhance the environment in terms of air, soil and water quality	+/--?	The large-scale development to the north of Blackhorse appears to be proposed on mainly greenfield land; therefore a significant negative impact on soil quality is possible. The likely effects on water quality will depend largely on the capacity for local sewage treatment works to cope with the additional demand placed by the new development, something which is currently unknown. However, the emphasis that the strategy places on sustainable modes of transport means that positive effects are likely in relation to air quality. Overall, the likely effects on this objective are therefore mixed (minor positive and significant negative) but uncertain.
14: To contribute towards a reduction in local emissions of greenhouse gases	+/-	The strategy states that there will be an emphasis on encouraging walking and cycling through the provision of accessible routes, and the location of the land north of Blackhorse close to the main urban area of Exeter means that public transport use may be relatively more feasible here than elsewhere in the District. As such, private car use may be less widespread, indicating positive effects on this objective. In addition, the development is planned as low or zero carbon. However, development of this scale will inevitably result in an increase in greenhouse gas emissions; therefore the overall effect is likely to be mixed.

SA Objective	SA Score	Justification
15: To ensure that there is no increase in the risk of flooding	+/--?	Although development of this scale on what appears to be largely greenfield land may increase the proportion of impermeable land in the surrounding area and therefore have a significant negative effect on flood risk, the strategy states that the development will be built to high quality standards of design, and it is anticipated that this would include measures such as SUDS. However this is not explicitly stated, therefore the potential effect is mixed (minor positive and significant negative) but is at present uncertain.
16: To ensure energy consumption is as efficient as possible	++/-	The efficient consumption of energy will depend largely on the levels of energy production and consumption within new development, rather than on its spatial location. Although development on the scale set out in this strategy will inevitably lead to higher energy consumption overall, there may also be good opportunities for incorporating renewable energy production into new developments, particularly considering that strategy 33 endorses renewable energy generation across the District, and given that the strategy states that low and zero carbon development standards will be met through a heat and energy network. As such, the likely effects are mixed.
17: To promote wise use of waste resources whilst reducing waste production and disposal	+/-	The wise use of waste resources and the reduction of waste production and disposal will not be affected by the spatial location of development; instead it will be determined by waste management practices within the development. It can be assumed that additional development will result in increased waste production, although new development may provide good opportunities for establishing more sustainable waste management practices and the re-use of materials. As such, mixed effects are likely.
18: To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce	+/-?	The strategy does not make provision for new employment land; therefore it may be that residents of the 1,500 new homes will seek employment elsewhere, with associated negative effects on the East Devon economy and longer distance commuting. However, the Land North of Blackhorse is just to the east of the Science Park site in the West End; therefore residents may well seek employment within all the new employment facilities there. In addition, the construction of 1,500 new homes will provide employment opportunities in that the construction sector but only for the short-term and only during the latter part of the plan period when this development is scheduled to progress. The likely effects on this SA objective are therefore mixed and currently uncertain.
19: To maintain and enhance the vitality and viability of the Towns of East Devon	+/--	The strategy includes measures to ensure that the development should itself be created as a viable settlement, e.g. providing services and facilities in a new neighbourhood centre. However, creating a new urban area in the west of the District, in close proximity to Exeter and the surrounding urban fringe, may have a significant negative effect on the towns in the east of the District as it focuses major development and population growth away from these towns, contributing to a continuing focus of development activity in the west of the District. The strategy even states that a proportion of the residents would commute into Exeter city for work. As such, the overall effects on this objective are likely to be mixed (minor positive and significant negative).

SA Objective	SA Score	Justification
20: To encourage and accommodate both indigenous and inward investment	0	The strategy does not make provision for new employment land; therefore no direct effect on this objective is expected.

Land North of Blackhorse/Redhayes (Tithebarn Green/Mosshayne)

SA Objective	SA Score	Justification
1: To ensure everybody has the opportunity to live in a decent home	++	All of the potential residential sites are expected to have positive effects on this objective, due to the nature of the proposed development. As this site is large (over 60ha), a significant positive effect is likely.
2: To ensure that all groups of the population have access to community services	+?	This site is within walking distance (600m) of an existing community hall (scout hut) to the west. It is recognised that new community services and facilities would be provided as part of any strategic development to take place at Blackhorse, within the mixed-use development proposed. Therefore, an overall uncertain minor positive effect is likely until more detail is known about the number and range of new services and facilities to be provided.
3: To provide for education, skills and lifelong learning to meet the needs of the local population and meet local employment needs	+/-?	The effects of mixed-use development on this objective will depend on the availability of school and college places to serve the growing population, which will depend in part on whether new places are provided as part of the new development, which is unknown at this stage. Effects will also depend on the proximity of sites to existing schools and colleges, although there are uncertainties as the effects will depend on there being capacity at those schools and colleges to accommodate new pupils. Proximity has been considered in terms of schools and colleges being within walking distance from potential new housing sites, but it is recognised that given the rural nature of East Devon, many sites may not be within walking distance of schools and colleges. While many school students may be driven to school, or possibly even drive themselves, it would be more sustainable if new housing sites were within easy access of public transport options to reach schools. However, it cannot be determined for each site whether there is an appropriate bus service to individual schools or colleges within the District. The effects on lifelong learning cannot be determined because the courses offered at different schools and other community facilities are unknown. This site is not within walking distance of any existing schools or colleges; therefore an uncertain minor negative effect on this objective is likely in relation to education. However, the fact that the site is proposed for mixed-use development, which will also include employment provision, means that there may be new opportunities for work-based training and skills development. While the overall site is large (over 60ha) it is not known how much of the site might be used for employment development. Therefore, an overall mixed and uncertain effect is likely.
4: To improve the population's health	+?	There is a public right of way running through the site (Broad Clyst Footpath 61) and the site is within walking distance of other footpaths. The site is not currently within walking distance of any existing open space, or healthcare services and facilities, but new community facilities (which may include open spaces, and doctors' surgeries etc.) will be provided as part of the new mixed-use development proposed at

SA Objective	SA Score	Justification
		Blackhorse. Therefore, an overall minor positive effect is likely although there is some uncertainty attached.
5: To reduce crime and fear of crime	0	The effects of new housing and employment development on levels of crime and fear of crime will depend on factors such as the incorporation of green space within the development sites which, depending on design and the use of appropriate lighting, could have an effect on perceptions of personal safety, particularly at night. However, such issues will not be influenced by the location of development sites (rather they will be determined through the detailed proposals for each site) and so the effects of all of the potential site options on this SA objective will be negligible (0).
6: To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution	-?	This site is within approximately 250m of the A30 to the south, and is within 1.5km of Exeter Airport. Therefore, development of the site for residential and employment purposes could mean that new residents and employees are adversely affected by road and aircraft noise. This site also has a small number of sensitive receptors in close proximity, mainly to the south on Blackhorse Lane, which could be affected by increased noise levels in the surrounding area, both during development and in the longer-term as a result of increased vehicle traffic. However, effects relating to noise are currently uncertain as the impacts will depend on factors such as hours of site operation and it is expected that site operators would limit the potential nuisance of construction activities by employing good practice construction techniques. Overall, an uncertain minor negative effect is therefore likely on this objective.
7: To maintain and improve cultural, social and leisure provision	+?	There is a public right of way within the site and is within walking distance (600m) of a community hall (scout hut) to the west. It is also recognised that new cultural, social and leisure facilities are likely to be provided as part of the mixed-use development at Blackhorse. Therefore, a minor positive but uncertain effect is expected for this SA objective, but with delivery of new facilities, the positive effect may be significant.
8: To maintain and enhance built and historic assets	-?	This site is within 1km of 10 Grade II listed buildings to the north, south and east, although none are within 250m. Sowton Conservation Area, which includes a number of these listed buildings, is also within 1km to the south. Therefore, development could have potentially minor negative effects on those assets and their settings. However, details regarding the potential for impacts on the setting of individual historic assets cannot be determined at this strategic level of assessment. This would be determined once more specific proposals (including any potential mitigation and enhancement measures) are developed and submitted as part of a planning application. An uncertain minor negative effect is therefore currently expected in relation to this objective.
9: To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon	--	As this site would involve large-scale development (over 60ha) taking place on greenfield land, a significant negative effect is expected in relation to this objective, even though the site is more than 1km from the nearest AONB.
10: To maintain the local amenity, quality and character of the local environment	-?	Residential development on this site could have adverse impacts on the character of the local environment as development would involve development on greenfield land. However, the effects of new housing development on this SA objective will depend largely on factors which are not influenced by the location of the development, such as the design of the housing and the incorporation of open space/green

SA Objective	SA Score	Justification
		infrastructure within the new development, which are uncertain at this stage (as they will be determined through the detailed proposals for each site at the planning application stage). Therefore, the potential negative effect is currently uncertain.
11: To conserve and enhance the biodiversity of East Devon	0?	As the site is more than 1km from any local, national or international biodiversity designation, a negligible effect on biodiversity is likely to result from the development of this site for residential use. However, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate design may even result in beneficial effects.
12: To promote and encourage non-car based modes of transport and reduce journey lengths	+/-	The site is not within walking distance (600m) of a town centre. However, the site is within close proximity of bus stops to the south on Blackhorse Lane that could be used by new residents to access the town centre and other destinations further afield; therefore the overall effect on this objective is expected to be mixed.
13: To maintain and enhance the environment in terms of air, soil and water quality	--	As this site option involves development on land that is almost all high quality agricultural land (Grade 1) there will be a significant negative effect on preserving soil quality. In terms of air quality, the site is not within an Air Quality Management Area (AQMA), indicating that there are no serious existing local air quality problems that may be compounded by development. Water quality will depend, in the longer term, on securing effective sewage treatment works provision to accommodate demand from new housing and employment development. An overall significant negative effect on this SA objective is therefore likely.
14: To contribute towards a reduction in local emissions of greenhouse gases	++	While new housing and employment development will inevitably lead to an increase in greenhouse gas emissions (both through emissions from buildings and the increased vehicle traffic associated with population growth), the location of individual development sites will not have an effect on levels of energy consumption and the potential for renewable energy use. These factors would be influenced more by the specific design and construction methods used, and whether renewable energy infrastructure is to be incorporated in the development, which will not be known until planning applications come forward. However, the site is proposed for mixed-use (housing and employment) development, meaning that high levels of out-commuting by car may be avoided, and there are bus stops to the south of the site on Blackhorse Lane that could be used by new residents to access employment opportunities, services and facilities further afield. Therefore, a significant positive effect is likely on this objective.
15: To ensure that there is no increase in the risk of flooding	--	While it is recognised that new development in any location may offer good opportunities to incorporate SuDS, development of new housing on greenfield land would increase the area of impermeable surfaces and could therefore increase overall flood risk, particularly where the sites are large in size or are within high risk flood zones. This site is on greenfield land, and a large area in the north of the site is within flood zones 2 and 3; therefore a significant negative effect on this objective is likely.
16: To ensure energy consumption is as efficient as possible	0	While all new residential development will inevitably involve an increase in energy consumption, new development may offer good opportunities for incorporating renewable energy generation and it is assumed that new houses will be built to high standards of energy efficiency (in accordance with Strategy 38: Sustainable Design and Construction in the emerging Local Plan). However, the effects of new housing on efficient energy consumption will not be determined by the location of new housing development; therefore the effect of all of the proposed residential sites on this SA objective will be negligible.
17: To promote wise use of waste	--	All new residential development will inevitably involve an increase in waste generation, regardless of the

SA Objective	SA Score	Justification
resources whilst reducing waste production and disposal		location, particularly where sites are large in size. However, new developments may offer good opportunities for incorporating sustainable waste management practices. As this proposed development site is large (over 60ha) and is on greenfield land where there may be fewer opportunities for using existing buildings and materials than there would be on brownfield land, it is likely to have a significant negative effect on this objective.
18: To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce	++?	The provision of new employment land as part of a mixed-use development is likely to have a positive effect on this objective by ensuring that new job opportunities are provided to match the population growth that will result from housing development through this and other Local Plan policies. Mixed-use sites such as this will have particularly positive effects as housing and employment land will be allocated alongside one another, making the job opportunities easily accessible for local people. Larger sites will provide particular opportunities for accommodating investment, and therefore are assumed to have a significant positive effect on this objective. As this site is large in size (over 60ha) a significant positive effect is likely, although there is some uncertainty attached as it is not currently clear how much of the site would be used for employment development as opposed to housing and other uses.
19: To maintain and enhance the vitality and viability of the Towns of East Devon	-	The development of a significant number of new homes as well as new employment land at this site north of Blackhorse could have a negative effect on the vitality and viability of the towns of East Devon, by focussing new development in the West End around the edge of Exeter.
20: To encourage and accommodate both indigenous and inward investment	++?	All of the sites that could be used for employment development are expected to have positive effects on this objective, as they will provide sites for businesses to locate within East Devon. Larger sites will provide particular opportunities for accommodating investment, and therefore are assumed to have a significant positive effect. As this site is large in size (over 60ha) a significant positive effect is likely, although there is some uncertainty attached as it is not currently clear how much of the site would be used for employment development as opposed to housing and other uses.

New policy: Re-development of Redundant Offices Complex at Winslade Park and Land Adjoining Clyst St Mary

SA Objective	SA Score	Justification
1: To ensure everybody has the opportunity to live in a decent home	+	The policy allocates 150 dwellings at this site; therefore a minor positive effect is likely.
2: To ensure that all groups of the population have access to community services	+	The site is located within fairly close proximity of the West End and Exeter where there is a high concentration of services and facilities. In addition, there is a church within the middle of the proposed development area and a village hall within 550m to the north. A minor positive effect is therefore likely.
3: To provide for education, skills and lifelong learning to meet the needs of the local population and meet local employment needs	-?	Effects on this objective will depend largely on the capacity of nearby schools to accommodate new pupils which is not known. However, there are no existing schools within walking distance (600m of the site) and a potential minor negative effect is therefore likely.

SA Objective	SA Score	Justification
4: To improve the population's health	+	There are no healthcare facilities within walking distance of the site, although there is a public footpath running through the site and a large area of open space adjacent to the west. A minor positive effect on this SA objective is therefore likely.
5: To reduce crime and fear of crime	0	The strategy is not expected to have a direct effect on this SA objective.
6: To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution	--?	The western part of the site is within approximately 30m of the A376 which may mean that residents and employees in that part of the site are negatively affected by road noise. In addition there are a large number of sensitive receptors in adjacent Clyst St Mary which may be adversely affected by noise during the construction phase. However, this effect would be short term and temporary. An overall significant negative effect on this objective may therefore occur.
7: To maintain and improve cultural, social and leisure provision	+	The site is within walking distance of open space and a village hall; therefore a minor positive effect on this objective is likely.
8: To maintain and enhance built and historic assets	--?	There are seven listed buildings within the site itself as well as several others within 1km; therefore development of this site may have a significant negative effect on cultural heritage. However, details regarding the potential for impacts on the setting of individual historic assets cannot be determined at this strategic level of assessment. This would be determined once more specific proposals (including any potential mitigation and enhancement measures) are developed and submitted as part of a planning application.
9: To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon	+	The development planned at Winslade Park would be on brownfield land and the site is more than 250m from the nearest AONB. Therefore, a minor positive effect on this SA objective is likely.
10: To maintain the local amenity, quality and character of the local environment	0	The redevelopment planned at Winslade Park would be on brownfield land; therefore a negligible effect on this SA objective is likely.
11: To conserve and enhance the biodiversity of East Devon	0?	As the site is more than 1km from any local, national or international biodiversity designation, a negligible effect on biodiversity is likely to result from the development of this site for residential use. However, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate design may even result in beneficial effects.
12: To promote and encourage non-car based modes of transport and reduce journey lengths	+/-	The site is within 600m of three bus stops, one of which is within the site itself; however it is more than 600m from a town centre. Therefore, a mixed effect is likely overall.

SA Objective	SA Score	Justification
13: To maintain and enhance the environment in terms of air, soil and water quality	0	The site lies mainly on grade 3 agricultural land although a small area in the north is on grade 1 land. However, the site is on previously developed land which would be redeveloped; therefore a negligible effect is likely. The site is not within or adjacent to an AQMA.
14: To contribute towards a reduction in local emissions of greenhouse gases	++	There are three bus stops within 600m of the site, including one within the site itself. In addition, the site is proposed for both residential and employment uses which may offer residents the opportunity to live and work in close proximity. An overall significant positive effect is therefore likely.
15: To ensure that there is no increase in the risk of flooding	-	A small part of this site in the south lies within flood zone 3; however the site is on brownfield land. Therefore, development here is likely to have a minor negative effect on flood risk.
16: To ensure energy consumption is as efficient as possible	0	While all new residential development will inevitably involve an increase in energy consumption, new development may offer good opportunities for incorporating renewable energy generation and it is assumed that new houses will be built to high standards of energy efficiency (in accordance with Strategy 38: Sustainable Design and Construction in the emerging Local Plan). However, the effects of new housing on efficient energy consumption will not be determined by the location of new housing development; therefore the effect of all of the proposed residential sites on this SA objective will be negligible.
17: To promote wise use of waste resources whilst reducing waste production and disposal	0	The effects of the policy on this SA objective will depend largely on onsite waste management practices. However, the redevelopment of an existing site may mean that there are opportunities to reuse existing materials and a negligible effect is likely overall.
18: To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce	+	The policy allocates 0.7ha of employment land for B1 office uses at this site; therefore a minor positive effect is likely. Co-locating the employment land with residential development will help to match levels of jobs with the economically active workforce. While some of the redevelopment would involve replacing office buildings with residential properties the offices are redundant and have been unsuccessfully marketed; therefore no detrimental effect on employment is likely to result.
19: To maintain and enhance the vitality and viability of the Towns of East Devon	-	The location of this site, close to the West End of East Devon is likely to have a minor negative effect on the vitality and viability of the towns as it will contribute to drawing development and activity away towards the West End.
20: To encourage and accommodate both indigenous and inward investment	+	The policy allocates 0.7ha of employment land for B1 office uses at this site; therefore a minor positive effect is likely.

New policy: Development at Uplyme

SA Objective	SA Score	Justification
1: To ensure everybody has the opportunity to live in a decent home	+?	The policy could have a positive effect on this objective, if the joint evidence gathering results in housing development coming forward at Uplyme.
2: To ensure that all groups of the population have access to community services	+?	The policy could have a positive effect on this objective, if the joint evidence gathering results in the development of new community services and facilities coming forward at Uplyme.
3: To provide for education, skills and lifelong learning to meet the needs of the local population and meet local employment needs	+?	The policy could have a positive effect on this objective, if the joint evidence gathering results in employment development coming forward at Uplyme which may offer opportunities for work-based training. Alternatively, positive effects on education may result if new housing development at Uplyme were to stimulate the expansion of schools there, although this is again uncertain.
4: To improve the population's health	0	The policy is not considered likely to have an effect on this objective.
5: To reduce crime and fear of crime	0	The policy is not considered likely to have an effect on this objective.
6: To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution	-?	Development at Uplyme may result in noise affecting existing sensitive receptors; however this would be a temporary short-term effect and would depend on the proximity of any future development to existing homes and other sensitive receptors. Therefore, a potential but uncertain minor negative effect is identified.
7: To maintain and improve cultural, social and leisure provision	+?	The policy could have a positive effect on this objective, if the joint evidence gathering results in the development of new cultural, social or leisure provision at Uplyme.
8: To maintain and enhance built and historic assets	-?	Development at Uplyme may result in negative effects on heritage features there; however this is uncertain depending on the location and nature of any future development which is not yet known. Therefore, a potential but uncertain minor negative effect is identified.
9: To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon	?	Effects on this objective are uncertain and would depend on the location of any development coming forward at Uplyme, in particular whether it is on greenfield or brownfield land, which is not yet known.
10: To maintain the local amenity, quality and character of the local environment	-?	Development at Uplyme may result in negative effects on local amenity; however this would depend on the nature and specific location of the development. Effects on character are uncertain as they would depend largely on the design of the development as well as its nature and location. Therefore, a potential but uncertain minor negative effect is identified.

SA Objective	SA Score	Justification
11: To conserve and enhance the biodiversity of East Devon	-?	Development at Uplyme may result in negative effects on biodiversity sites and features there; however this is uncertain depending on the location and nature of any future development which is not yet known. Therefore, a potential but uncertain minor negative effect is identified.
12: To promote and encourage non-car based modes of transport and reduce journey lengths	+/-?	Depending on the nature of any future development at Uplyme there may be a minor positive effect on sustainable transport as a result of people being able to access services closer to home; however if new development comprises residential development only there may be a minor negative effect as people are likely to drive to access services and facilities in the larger towns.
13: To maintain and enhance the environment in terms of air, soil and water quality	?	Effects on this objective are uncertain and would depend on the nature and location of any development coming forward at Uplyme, as well as factors such as the capacity of sewage treatment works to accommodate any new development.
14: To contribute towards a reduction in local emissions of greenhouse gases	+/-?	Depending on the nature of any future development at Uplyme there may be a minor positive effect on reducing transport-related emissions as a result of people being able to access services closer to home; however if new development comprises residential development only there may be a minor negative effect as people are likely to drive to access services and facilities in the larger towns.
15: To ensure that there is no increase in the risk of flooding	?	Effects on this objective are uncertain and would depend on the location of any development coming forward at Uplyme, in particular whether it is on greenfield or brownfield land, which is not yet known.
16: To ensure energy consumption is as efficient as possible	?	Effects on this objective are uncertain and would depend on the design of any future development at Uplyme, e.g. whether or not it could incorporate renewable energy generation, and on the onsite practices used.
17: To promote wise use of waste resources whilst reducing waste production and disposal	-?	Any future development at Uplyme is likely to result in an increase in waste generation although this is uncertain as it will depend on the nature and scale of the development.
18: To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce	?	Effects on this objective are uncertain and would depend on the nature of the development proposed and whether it could create an imbalance between housing and jobs in the area.
19: To maintain and enhance the vitality and viability of the Towns of East Devon	0	The policy is not considered likely to have an effect on this objective.
20: To encourage and accommodate both indigenous and inward investment	+?	The policy could have a positive effect on this objective, if the joint evidence gathering results in employment development coming forward at Uplyme.

Strategy 27: Development at the Small Towns and Larger Villages

SA Objective	SA Score	Justification
1: To ensure everybody has the opportunity to live in a decent home	+	The policy allows for residential development in some of the smaller settlements across East Devon, some of which will be affordable, thereby increasing the amount of people who will be able to access it. In addition, new build housing should be of a high standard. A positive effect is therefore likely although this is not considered likely to be significant due to the relatively small numbers of dwellings likely to be involved.
2: To ensure that all groups of the population have access to community services	+	The policy identifies a built up area boundary for select towns and villages which offer a range of accessible services and facilities which would therefore be able to be used by new residents, including those without access to a car. A minor positive effect is therefore likely.
3: To provide for education, skills and lifelong learning to meet the needs of the local population and meet local employment needs	+?	The policy identifies a built up area boundary for select towns and villages which offer a range of accessible services and facilities – this is taken to include schools although this is not specified. It is also not known whether capacity exists at schools in the named towns and villages to accommodate new pupils. A potential but uncertain minor positive effect is therefore identified.
4: To improve the population's health	+	The policy identifies a built up area boundary for select towns and villages which offer a range of accessible services and facilities – this is taken to include healthcare facilities although this is not specified. In addition, locating new housing in villages where there are services and facilities means that people are more likely to walk and cycle to reach shops etc. rather than needing to drive to larger settlements further away. A minor positive effect is therefore likely although this is uncertain.
5: To reduce crime and fear of crime	0	The policy is not considered likely to have any direct effect on this objective.
6: To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution	-?	Development within the towns and villages named in the strategy may create noise disturbance for local residents during the construction phase, and any increase in vehicle traffic may also increase noise levels. However, the development is likely to be small-scale and effects would depend on its precise location in relation to sensitive receptors.
7: To maintain and improve cultural, social and leisure provision	+	The policy identifies a built up area boundary for select towns and villages which offer a range of accessible services and facilities which would therefore be able to be used by new residents, including those without access to a car – this is taken to include cultural, social and leisure facilities. A minor positive effect is therefore likely.
8: To maintain and enhance built and historic assets	+/-?	The development resulting from this strategy is likely to be mainly infill development, which may enhance the overall quality of the built environment of the named settlements, as new development is likely to be of a high quality. However, there may also be negative effects on nearby heritage features depending on the exact location and design of any development coming forward. An overall mixed effect is therefore

SA Objective	SA Score	Justification
		identified, and is currently uncertain.
9: To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon	?	Development resulting from this strategy is likely to be mainly infill development or the reuse of existing buildings, meaning that positive effects on the wise use of land are likely to result. The impacts of the development on the landscape character will depend on factors such as the design and screening potential of new developments, and on the scale of such development. As this is only likely to be small, minor impacts are most likely but it is currently uncertain whether these may be positive or negative.
10: To maintain the local amenity, quality and character of the local environment	-?	The development that might result from this strategy could have a minor negative impact on local amenity, due to increased noise during construction or an increase in vehicle traffic. However, effects on the character of the local environment will depend largely on the design of individual developments, which is not currently known.
11: To conserve and enhance the biodiversity of East Devon	?	The likely effect of the development that may result from this policy on biodiversity will depend largely on the proximity of development sites to biodiversity assets; however this is unknown until the specific sites for development come forward at a later stage.
12: To promote and encourage non-car based modes of transport and reduce journey lengths	+/-	The policy identifies a built up area boundary for select towns and villages which offer a range of accessible services and facilities which means that people may be able to walk or cycle for some day to day journeys rather than needing to drive to settlements further afield. However, it is recognised that, as development would take place in generally rural areas, car use is likely to remain high generally. As such, mixed effects are considered likely overall.
13: To maintain and enhance the environment in terms of air, soil and water quality	+/-?	The fact that most of the development that might result from this policy is likely to be infill or the reuse of existing buildings means that there should be positive impacts in terms of preserving soil quality. Air quality may be adversely affected by any increase in vehicle movements as a result of the new developments, although this is likely to be a very minor effect due to the small scale of the development proposed and the fact that the settlements included in the policy are identified because they offer a range of accessible services and facilities. Mixed effects are therefore likely overall.
14: To contribute towards a reduction in local emissions of greenhouse gases	+/-	The policy identifies a built up area boundary for select towns and villages which offer a range of accessible services and facilities which means that people may be able to walk or cycle for some day to day journeys rather than needing to drive to settlements further afield. This could have a positive effect on reducing emissions from transport. However, it is recognised that, as development would take place in generally rural areas, car use is likely to remain high generally. As such, mixed effects are considered likely overall.
15: To ensure that there is no increase in the risk of flooding	-?	The effect of the policy on the risk of flooding will depend on the exact location of the development to take place in relation to areas of high flood risk. New development in the named towns and villages may have

SA Objective	SA Score	Justification
		some impact in terms of reducing the permeability of the land; however it is likely to be largely infill development and the reuse of existing buildings, therefore this effect should be either negligible or very minor, particularly considering the likely small scale of the development and the fact that new developments may offer good opportunities for the use of SUDS.
16: To ensure energy consumption is as efficient as possible	+/-?	The efficient consumption of energy will depend largely on the levels of energy production and consumption within new development, rather than on its spatial location. Although any new development may lead to higher energy consumption overall, there may also be good opportunities for incorporating renewable energy production into new developments. As such, the likely effects are mixed and uncertain.
17: To promote wise use of waste resources whilst reducing waste production and disposal	+/-?	The wise use of waste resources and the reduction of waste production and disposal will not be affected by the spatial location of development; instead it will be determined by waste management practices within each settlement. It can be assumed that additional development will result in increased waste production, although new development may provide good opportunities for establishing more sustainable waste management practices and the re-use of materials. As such, mixed effects are likely but are currently uncertain.
18: To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce	0	The policy is not considered likely to have an effect on this objective.
19: To maintain and enhance the vitality and viability of the Towns of East Devon	+	Development in the named towns and villages included in this strategy should have a positive impact on the vitality and viability of the larger towns nearest to them by increasing visitor numbers and the number of people using the towns for facilities etc. on a regular basis.
20: To encourage and accommodate both indigenous and inward investment	0	The policy is not considered likely to have an effect on this objective.

Appendix 3

Summary of SA findings for the options considered by the Council for the Proposed Changes

SA findings for the options considered by the Council for the Proposed Changes

Proposed change to start and end date of the Local Plan

- 1.36 The Council is considering the option of changing the start date of the Local Plan from 2006 to 2013, and the end date from 2026 to 2031. While this would not affect the findings of the earlier SA work in terms of the nature of the likely effects that the Local Plan would have on the SA objectives, the timescales over which those effects would be experienced would change in accordance with the revised plan period.
- 1.37 The revised start date for the Local Plan would bring it into line within the updated Strategic Housing Market Assessment (SHMA). This would ensure that the likely significant positive effects of the Local Plan that were identified in the 2012 SA Report in relation to SA objective 1: housing would still occur, as the housing provision made in the Local Plan would reflect the latest evidence regarding levels of need over the period during which the Plan would be implemented. In addition, any potential extension of the end date of the plan would spread its sustainability effects over a longer time period. The implications of the revised housing figure resulting from the updated SHMA are considered separately below.

Distribution of additional homes

- 1.38 The Council has identified four alternative options for the distribution of additional homes that the Strategic Housing market Assessment (SHMA) work may show are required in East Devon. Extra homes are additional to the approximate level of 15,300 homes that form existing commitments and predictions for development (including future windfalls) already provided for in the submitted Local Plan or with permission across the period of 2013-2026. The spatial distribution for the 15,300 homes would not change (i.e. as set out in Strategies 1 and 2 in the Local Plan) though any extra homes on top of this would be affected by alternative/additional spatial distribution strategies. At this stage, a figure of 4,000 extra homes over the 2013 to 2031 period is tested, although this figure may need to be refined or revised in response to the final SHMA findings. The four alternative options for their distribution are:
- Option A: Concentrate all or the vast majority of the additional housing provision at the West End with some potential scope for sites that whilst not 'at' the West End are physically very close to and well related to Exeter.
 - Option B: More evenly spread extra development across the West End and the rest of East Devon.
 - Option C: Concentrate the bulk of development in the rest of East Devon and not at the West End.
 - Option D: Not plan to meet additional housing requirements.

Summary of SA findings for the options

- 1.39 The likely effects of the four options for the distribution of additional housing on the 20 SA objectives are summarised below in **Table A1**. In general, the likely sustainability effects of locating all or most of the additional housing development at the West End (Option A) are more positive than for the other options. This is because new jobs, services and facilities are proposed to be densely concentrated in that area (and already exist in adjacent Exeter City), and co-location of jobs and homes should help to reduce journey distances (through providing scope for people to choose to live close to where they work) and increase potential for the use of sustainable transport links. Significant positive effects are therefore likely to result from Option A in relation to SA objectives 2: **access to services**, 4: **health**, 7: **cultural, social and leisure provision**, 12: **sustainable transport**, 14: **greenhouse gas emissions** and 18: **employment**. For all of those SA objectives, Option B may have minor positive effects as it would still result in around half of the additional development being located at the West End. Minor negative effects are likely to result from Option C. Under Option C most of the additional housing development would be outside of the West End and therefore less well connected in terms of jobs, services and

facilities, and journeys may be longer and more likely to be undertaken by car. Option D would have negligible effects on these SA objectives as the additional housing would not be developed.

- 1.40 Options A, B and C are all expected to have significant positive effects on SA objective 1: **housing**, as under any of these options the additional housing required to meet East Devon's objectively assessed need would be provided. Even if the 4,000 additional homes were all or almost all located at the West End (Option A), approximately 50% of the homes already provided for would still be distributed at the towns and villages across the rest of East Devon, meaning that new homes would still be provided in all parts of the district. It is also assumed that all qualifying housing developments (noting changes in Planning Guidance in respect of five and 10 dwelling thresholds for affordable housing) would incorporate the 25%/50% affordable housing levels. Under Option D a significant negative effect on SA objective 1 is likely as the objectively assessed housing needs of East Devon District (within the context of overall SHMA provision and requirements and final SHMA conclusions) would not be met and there is likely to be a significant housing shortage in the district over the Local Plan period. This approach would also lead to higher levels of commuting into and out of the district as people working in East Devon may be forced to live elsewhere; therefore significant negative effects are also likely for Option D in relation to SA objectives 12: **sustainable transport** and 14: **greenhouse gas emissions**. Option D could have a significant negative effect on matching levels of jobs with the economically active workforce (SA objective 18: **employment**) as the limited housing supply could mean that people move away from East Devon, potentially resulting in a reduced local workforce.
- 1.41 The likely effects of Options A, B and C are uncertain for SA objectives 3: **education**, 8: **historic environment**, 9: **landscape**, 11: **biodiversity** and 15: **flooding** as these issues would not be affected by the overall spatial distribution of the additional housing, they would need to be determined once specific locations have been identified. For all of these SA objectives, Option D is likely to have a negligible effect as the additional housing development which could affect the objectives would not take place.
- 1.42 None of the options for the distribution of additional housing would directly influence SA objectives 5: **crime** or 20: **encourage investment**; therefore all options would have a negligible effect.
- 1.43 Option A could have a significant negative effect on SA objective 6: **noise** as it would involve the additional housing being developed in the West End where there is a higher concentration of sensitive receptors that could be affected, particularly during the construction phase. However, this is uncertain and would depend on the exact location of development in relation to sensitive receptors and on the use of good practice construction techniques. Options B and C could both have minor negative effects as, although there are still likely to be some negative effects in relation to noise, where development takes place away from the West End there are likely to be fewer sensitive receptors within close proximity. Option D would have a negligible effect as it would not result in additional development which could otherwise increase noise levels.
- 1.44 All three of the options that would result in the development of additional housing (A, B and C) could have potential minor negative effects on SA objective 10: **amenity and local character** as the extra population growth may result in effects such as increased vehicle traffic which can adversely affect local amenity. However, such effects will depend on factors such as the scale and precise location of each development site and the availability of public transport links/other works to help mitigate any such increases in traffic. Option D would have a negligible effect as it would not result in additional development that could otherwise affect local amenity and environmental character.
- 1.45 There may be negative effects on SA objective 13: **air, soil and water** in relation to all four of the options. The development of an additional 4,000 homes (under Options A, B and C) could have a negative effect on soil quality; however this will depend on the specific location of the additional residential development, which is uncertain at this stage. The extent to which development may impact on water quality will depend on currently unknown factors such as the capacity for local sewage treatment works to cope with the additional demand from an extra 4,000 new homes; however additional runoff from hard surfacing is likely to have a negative impact to some degree. An increase in air pollution is also likely to result from higher levels of traffic in and around the district, particularly where housing is focussed outside of the West End where journeys to work are likely to be longer for many people. Therefore, potential but

uncertain negative effects are identified for Options A, B and C and the effect could be significant for Option C. Under Option D, while additional housing development which could affect air, soil and water would not take place, there may be still be an increase in air pollution as people who work in East Devon may be unable to live close to their place of work and journeys are likely to be longer and more likely to be undertaken by car. A minor negative effect is therefore likely for that option.

- 1.46 The efficient consumption of **energy** (SA objective 16) will depend largely on the levels of energy production and consumption within new development, rather than on its spatial location. Although the development of 4,000 additional homes will inevitably lead to higher energy consumption overall, there may also be good opportunities for incorporating renewable energy production into new developments, particularly considering that Strategy 33 in the submitted Local Plan endorses renewable energy generation across the district. As such, the likely effects are mixed for Options A, B and C. Option D would have a negligible effect as additional development, which could affect energy efficiency, would not occur.
- 1.47 The wise use of **waste** resources and the reduction of waste production and disposal (SA objective 17) will also not be affected by the spatial location of the additional housing development; instead it will be determined by waste management practices within the development. It can be assumed that additional housing development will result in increased waste production, although new development may provide good opportunities for establishing more sustainable waste management practices and the re-use of materials. As such, mixed effects are likely for Options A, B and C. Option D would have a negligible effect as additional development, which could affect levels of waste generation and waste management practices, would not occur.

Table A1: Summary of SA findings for the options for the distribution of additional housing

Options	1: Housing	2: Access to services	3: Education	4: Health	5: Crime	6: Noise	7: Cultural, social and leisure provision	8: Historic environment	9: Landscape	10: Amenity and local character	11: Biodiversity	12: Sustainable transport	13: Air, soil and water	14: Greenhouse gases	15: Flooding	16: Energy efficiency	17: Waste	18: Employment	19: Vitality of towns	20: Encourage investment
A: Concentrate all or the majority of additional housing provision at the West End	++	++?	?	++?	0	--?	++?	?	?	-?	?	++	-?	++	?	+/-	+/-	++	-	0
B: More evenly spread extra development across the West End and the rest of East Devon	++	+	?	+	0	-?	+	?	?	-?	?	+	-?	+	?	+/-	+/-	+	+	0
C: Concentrate the bulk of development in the rest of East Devon and not at the West End	++	-?	?	-?	0	-?	-?	?	?	-?	?	-	--?	-	?	+/-	+/-	-	++?	0
D: Not plan to meet additional housing requirements	--	0	0	0	0	0	0	0	0	0	0	--	-	--	0	0	0	--	-	0

Distribution of development at the villages

- 1.48 The Council has identified five alternative options for the allocation of housing development at the district's villages. The five alternative options are:
- Option A: Retain settlement Built-up Area Boundaries (BUABs) in Strategy 27 and housing numbers.
 - Option B: Retain settlement BUABs in Strategy 27 but do not allocate housing.
 - Option C: Remove BUABs from all the settlements in Strategy 27 and have nil or limited rural development.
 - Option D: Assess the settlements in Strategy 27 using specified criteria establishing whether they should retain their BUAB.
 - Option E: Look to key villages to accommodate substantial levels of residential development.
- 1.49 Depending on which option is selected for the distribution of any additional housing required in East Devon (see previous section), the exact number of houses to be allocated at the villages may increase. The appraisal of these options therefore focuses on the overall principles of how development at the villages would be distributed, rather than the exact housing numbers.
- 1.50 It is not yet known exactly what criteria would be used under Option D to assess whether villages should retain their BUABs. However, for the purposes of the SA it is assumed that such criteria would cover issues including access to services and facilities including healthcare facilities and schools, and access to public transport links such as bus routes.

Summary of SA findings for the options

- 1.51 The likely effects of the five options for the distribution of development at the villages on the 20 SA objectives are summarised below in **Table A2**. The options for the distribution of development at the villages are likely to have a wide range of positive and negative effects, reflecting the relative advantages and disadvantages of focussing more development in rural or urban areas. Options D and E perform slightly better than the other options overall, as there are more positive effects associated with those options (although most are minor). While there are a number of likely significant positive effects identified for Option C, there are some likely significant negative effects also associated with that option.
- 1.52 While none of the options would necessarily influence the total amount of housing to be developed in East Devon, the distribution of housing at the villages would influence the extent to which people in all parts of the district can access the new housing (which would include a proportion of affordable homes). It should be noted that any review of Built-up Area Boundaries could impact on scope for in-fill development. A removal of boundaries from some settlements in particular would reduce scope for infill development and this could result in some lowering of overall development levels unless compensated for elsewhere. Option C would have a significant negative effect on SA objective 1: **housing** as it would severely restrict residential development in rural areas, where affordable housing need tends to be highest due to generally higher property prices. Option A would have a mixed effect as, although it would spread housing development throughout the district, it does not allow for local need to be addressed when allocating housing provision at each village. Similarly, Option B would have mixed effects because, while development is likely to be distributed broadly across the district, there would be less certainty about the delivery of housing in rural areas to meet local needs. Option B would not plan positively for development and allocations would not be set out to explicitly meet the District's housing requirement. Options D and E would have minor positive effects as they both allow for more flexibility in addressing particular local needs, although under Option E in particular housing would not be as widely distributed.
- 1.53 Option D is likely to have significant positive effects on SA objectives 2: **access to services** and 7: **cultural, social and leisure provision** and a minor positive effect on SA objective 3: **education** because it allows for accessibility considerations to influence the distribution of housing. Option C would also have significant positive effects on SA objectives 2 and 7 and a minor positive effect on SA objective 3 as it would focus development in the towns and West End rather than the smaller villages, where access to services (including schools) is likely to be better; however the approach could have a detrimental effect on existing rural services, preventing

population growth from ensuring the smaller villages' ongoing viability. A mixed effect is therefore likely overall for Option C.

- 1.54 Options A and B could have minor negative effects on SA objective 4: **health** and significant negative effects on SA objective 12: **sustainable transport** as they would result in more development at smaller rural villages where opportunities to walk, cycle or use public transport are likely to be limited. Conversely, Option C would have positive effects as it would focus more housing in urban areas where journeys are likely to be shorter and public transport links better.
- 1.55 The effects of all of the options on SA objectives 8: **historic environment**, 9: **landscape**, 10: **amenity and local character** and 11: **biodiversity** are uncertain as they will depend on the specific housing sites that are developed, regardless of the overall spatial distribution of housing between the villages. Similarly, all of the options will have negligible effects on SA objectives 16: **energy efficiency** and 17: **waste** as these factors will not be influenced by the location of development. Instead, effects will be largely influenced by onsite practices although it is noted that energy efficiency measures and green energy production can be easier to deliver on larger sites.
- 1.56 Option A is likely to have a significant positive effect on SA objective 19: **vitality and viability of towns** because, while housing development would take place in the villages, residents would be likely to use the nearby towns for services and facilities. Spreading the housing development evenly throughout the villages would ensure that the benefits are experienced at all of the towns in the district. Option B could mean that development is not as evenly spread between the villages, with some receiving much more or less new housing. Therefore, the towns near to villages where more housing development takes place may benefit disproportionately at the expense of others in terms of maintaining their vitality and viability. As such a mixed effect is expected on this SA objective. Option C would also have mixed effects because, while housing development would be more likely to come forward in the towns, directly supporting their vitality and viability, development may also be steered to the West End. This would mean that residents are more likely to use Exeter as their local centre for services, shopping etc., having a negative effect on the vitality and viability of the small towns elsewhere in the District. Restricting housing development at the villages would also reduce the population of the rural areas around the towns that would make use of them for services and facilities. The effects of both Options D and E on SA objective 19: **vitality and viability of towns** are uncertain and will depend on the proximity of the villages where development is focussed to the towns of East Devon, and how much residents are therefore likely to make use of the towns.
- 1.57 None of the options are likely to affect SA objectives 5: **crime**, 15: **flooding** or 20: **encourage investment**; therefore negligible effects are likely in all cases.
- 1.58 It is possible that all of the options would have a negative effect on SA objective 6: **noise** as the development of housing may result in an increase in noise levels, particularly during the construction phase. The potential negative effect may be significant under Option C as the development is likely to be mostly focussed in the main towns of East Devon where there are more sensitive receptors within close proximity. However, the potential negative effects are uncertain for all five options and would depend on the precise location of the development and on the presence of sensitive receptors.
- 1.59 The options that involve housing development at the villages (A, B, D and E) are likely to mean that levels of car use are higher, particularly where development would be spread across the district including at smaller villages. Significant negative effects on SA objective 12: **sustainable transport** and minor negative effects on SA objectives 13: **air, soil and water** and 14: **greenhouse gases** are therefore likely for Options A and B. Under Options D and E, housing development would be focussed at the villages that are considered to be most suitable to accommodate new development – the assessment of suitability is likely to consider accessibility issues and sustainable transport links. As housing would be focussed in a small number of key villages under Option E, the higher proportion of population growth may stimulate the provision of new bus links/public transport or improved services; however such improvements could be dependent on higher extra levels of development to either fund provision and/or ensure additional patronage to justify extra provision. Mixed effects on SA objectives 12, 13 and 14 are therefore likely overall for Options D and E although there is some uncertainty depending on which villages development is focussed at and their distance from the main towns and the West End. Under

Option C, rural housing development would be limited and housing would instead be focussed at the towns where journeys are likely to be shorter and there are more likely to be opportunities to walk, cycle or use buses. A significant positive effect is therefore likely on SA objective 12, as well as minor positive effects on SA objectives 13 and 14.

- 1.60 The effects of the options on SA objective 18: **employment** are very mixed. Option A would result in a wide geographic spread of development across the district, including at some villages which are located quite far away from the main job opportunities in the West End, and Option B is also likely to result in development at smaller villages in more rural locations, where people without cars may have more limited access to jobs. Both options could therefore have a negative effect on SA objective 18. Option C would have a minor positive effect as it allows for only limited rural development, which would effectively focus housing development in the main towns and in the West End of the District where residents would have more convenient access to the substantial number of job opportunities in that area. Options D and E would involve assessing villages individually and establishing whether their BUABs should be retained or if they can be considered to key villages which are capable of accommodating substantial levels of residential development. As such, although these options would direct this development away from the main towns of the District where employment opportunities may be mainly focussed, villages could be assessed individually in terms of employment provision and proximity to other employment centres as well public transport links to decide whether this portion of the District's development should be located at these settlements. Mixed (minor positive and minor negative) effects are therefore expected for Option D and Option E on SA objective 18.

Table A2: Summary of SA findings for the options for the distribution of development at the villages

Options	1: Housing	2: Access to services	3: Education	4: Health	5: Crime	6: Noise	7: Cultural, social and leisure provision	8: Historic environment	9: Landscape	10: Amenity and local character	11: Biodiversity	12: Sustainable transport	13: Air, soil and water	14: Greenhouse gases	15: Flooding	16: Energy efficiency	17: Waste	18: Employment	19: Vitality of towns	20: Encourage investment
A: Retain settlement BUABs in Strategy 27 and housing numbers.	+/-?	+/--	+/-?	-	0	-?	+/--	?	?	?	?	--	-?	-	0	0	0	-	++	0
B: Retain settlement BUABs in Strategy 27 but do not allocate housing.	+?/-?	+/-	+/-?	-?	0	-?	+/-	?	?	?	?	--	-?	-	0	0	0	-	+/-	0
C: Remove BUABs from all the settlements in Strategy 27 and have nil or limited rural development.	--	++/-	+/-	+	0	--?	++/-	?	?	?	?	++	+	+	0	0	0	+	+/-	0
D: Assess the settlements in Strategy 27 using specified criteria establishing whether they should retain their BUAB.	+	++	+	+/-	0	-?	++	?	?	?	?	-/+?	-/+?	-/+?	0	0	0	+/-	?	0
E: Look to key villages to accommodate substantial levels of residential development.	+?	+	+	+/-	0	-?	+	?	?	?	?	-/+?	-/+?	-/+?	0	0	0	+/-	?	0

Provision for Gypsies and Travellers

- 1.61 The Council has identified four alternative options for making provision for Gypsy and Traveller accommodation. The four alternative options are:
- Option A: To not make land allocations.
 - Option B: Make provision on larger scale housing allocation sites.
 - Option C: Make provision as part of smaller scale housing sites.
 - Option D: Allocate dedicated sites for Gypsies and Travellers.

Summary of SA findings for the options

- 1.62 The likely effects of the four options on the 20 SA objectives are summarised below in **Table A3**. In general, the likely sustainability effects of making provision for Gypsies and Travellers on larger scale housing allocations sites (Option B) are more positive than for the other options. This is because larger-scale housing sites are more likely to incorporate services, facilities and public transport links, which Gypsy and Traveller residents will be able to make use of. The closer proximity of jobs, services and facilities may also mean that journeys are shorter and are more likely to be undertaken on foot or by bicycle. Significant positive effects are therefore likely to result from Option B in relation to SA objectives 2: **access to services**, 3: **education**, 4: **health**, 12: **sustainable transport**, 14: **greenhouse gases** and 18: **employment**. Option C is expected to have minor positive effects on these SA objectives as, although smaller housing sites are less likely to incorporate services, sustainable transport links and employment opportunities within the sites themselves, it is assumed that accessibility considerations would have been taken into account when allocating the sites. The effects of Option D on these SA objectives are uncertain and would depend on the location of the dedicated sites for Gypsies and Travellers and their proximity to services, facilities, public transport links and employment opportunities. However, assuming that sustainability considerations are fully taken into account during the selection of sites for allocation, then it may be that potential negative effects can be avoided, while more positive effects could be achieved.
- 1.63 Option A is likely to have the most negative effects out of the options, as it would not make any provision for Gypsy and Traveller sites in East Devon. Option A would have a significant negative effect on SA objective 1: **housing** as not making land allocations for Gypsy and Traveller sites would mean that the identified need for sites would not be met. However, significant positive effects are likely for all of the other three options as they all involve allocating sites to meet local need.
- 1.64 Option A could also have minor negative effects on SA objectives 2: **access to services**, 3: **education**, 4: **health**, 8: **historic environment**, 9: **landscape** and 10: **amenity and local character** because if no provision were made in East Devon to meet the need for Gypsy and Traveller sites this may lead to the formation of unauthorised camps. In comparison to formally allocated sites which have been subject to SA, such camps may be located in areas where access to community services, education and health facilities is poor, and they may be inappropriately located in terms of their impacts on the landscape, local character and heritage features.
- 1.65 As Option A would not result in the development of Gypsy and Traveller sites negligible effects are expected on SA objectives 6: **noise**, 11: **biodiversity**, 13: **air, soil and water**, 14: **greenhouse gases**, 15: **flooding**, 16: **energy**, 17: **waste** and 19: **vitality and viability of towns**. The effects of Options B, C and D on several of these SA objectives are uncertain as they would depend on the specific location of Gypsy and Traveller sites, regardless of whether they are allocated within large or small housing sites, or as stand-alone Gypsy and Traveller sites. However, Options B and C could have minor negative effects on SA objective 6: **noise** as they would involve development taking place within housing sites where, depending on the timing of the housing development and the Gypsy and Traveller sites, other residents may be affected by construction noise. Options B, C and D may all have minor negative effects on SA objective 13: **air, water and soil** as the development of Gypsies and Traveller sites either alongside residential sites (Options B and C) or individually (Option D) could have a negative impact on soil quality; however this will depend on the specific location of the development and the extent to which it is on previously developed land, which is uncertain at this stage.

- 1.66 All three of the options which would result in the provision of Gypsy and Traveller sites (Options B, C and D) in East Devon are expected to have mixed effects on SA objectives 10: **amenity and local character**, 16: **energy efficiency** and 17: **waste**. New development will inevitably result in an overall increase in energy use and waste generation; however new development may present opportunities to incorporate designs which encourage energy efficiency and establish more sustainable waste management practices. Similarly, there is potential for **amenity** (SA objective 10) to be affected both positively and negatively by the allocation of land for Gypsy and Traveller sites because, while such development may cause an increase in traffic, appropriately designed and located new development may also help to improve the quality and character of the surrounding area.
- 1.67 None of the options would directly affect SA objectives 5: **crime** or 20: **encourage investment**; therefore negligible effects are identified in all cases.

Table A3: Summary of SA findings for the options for the provision of Gypsy and Traveller accommodation

Options	1: Housing	2: Access to services	3: Education	4: Health	5: Crime	6: Noise	7: Cultural, social and leisure provision	8: Historic environment	9: Landscape	10: Amenity and local character	11: Biodiversity	12: Sustainable transport	13: Air, soil and water	14: Greenhouse gases	15: Flooding	16: Energy efficiency	17: Waste	18: Employment	19: Vitality of towns	20: Encourage investment
A: To not make land allocations.	--	-?	-?	-?	0	0	0	-?	-?	-?	0	0	0	0	0	0	0	0	0	0
B: Make provision on larger scale housing allocation sites.	++	++?	++?	++?	0	-?	+	?	?	+/-?	?	+++	-?	+++	?	+/-	+/-	+++	?	0
C: Make provision as part of smaller scale housing sites.	++	+	+	+	0	-?	+	?	?	+/-?	?	+	-?	+	?	+/-	+/-	+	?	0
D: Allocate dedicated sites for Gypsies and Travellers.	++	?	?	?	0	?	?	?	?	+/-?	?	-?	-?	-?	?	+/-	+/-	?	?	0