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Sustainability Appraisal of the East Devon Local Plan Publication Draft

Non-Technical Summary

Prepared by LUC
November 2012

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Planning & EIA
Design
Landscape Planning
Landscape Management
Ecology
Mapping & Visualisation

LUC BRISTOL
14 Great George Street
Bristol BS1 5RH
Tel: 0117 929 1997
Fax: 0117 929 1998
bristol@landuse.co.uk

Offices also in:
London
Glasgow
Edinburgh



FS 566056
EMS 566057

Land Use Consultants Ltd
Registered in England
Registered number: 2549296
Registered Office:
43 Chalton Street
London NW1 1JD

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Introduction

- 1.1 This Sustainability Appraisal Report (Non-Technical Summary) relates to the new East Devon Local Plan, which is being produced by East Devon District Council (EDDC). The Local Plan sets out the long-term spatial vision and objectives for the District and the policies that are required to deliver that vision over the period up to 2031.
- 1.2 EDDC previously started working on a Local Development Framework (LDF) Core Strategy to replace the existing Local Plan which was adopted in 2006, but following recent changes to national planning policy the Council has decided to switch to the production of a new Local Plan instead of the Core Strategy. However, the work that was undertaken in relation to the Core Strategy has been drawn on heavily in compiling the Publication Draft Local Plan.
- 1.3 Plans and strategies such as the East Devon Local Plan are subject to a process called Sustainability Appraisal (SA), which assesses the potential impacts of a plan on social, economic, and environmental issues. East Devon District Council has commissioned independent consultants (LUC) to carry out SA of the emerging Local Plan on its behalf. This Non-Technical Summary relates to the full SA Report for the Publication Draft Local Plan (November 2012), and should be read alongside those two documents.

The New Local Plan

- 1.4 Part 1 of the new Local Plan (Publication Draft) sets out policies (referred to as '**strategies**') for development in the District up until 2031 within the following themes:
 - Spatial Strategy
 - Development of **East Devon's West End**
 - Strategies for Axminster, Budleigh Salterton, Exmouth, Honiton, Ottery St Mary, Seaton and Sidmouth (a number of these strategies include specific site allocations for residential, employment and mixed-use development)
 - Smaller Towns, Villages and Countryside
 - Ensuring We Have Thriving Communities
 - Climate Change
 - Our Outstanding Natural and Built Environment
 - Delivery and Infrastructure Provision
- 1.5 The strategic policies in Part 1 of the new Local Plan are broadly very similar to **the 'Preferred Approaches' that were set out in the** latest version of the Core Strategy (October 2010).
- 1.6 Part 2 of the Local Plan then presents policies for the management of development, within the following themes:
 - Design Standards
 - The Natural and Built Environment
 - New Residential Development
 - Employment, Economic Development, Retail and Tourism
 - Recreation and Community Facilities
 - Transportation and Communications
- 1.7 The development management policies were not previously included in the Preferred Approaches version of the Core Strategy, and have been brought forward into the new Local Plan from the existing Local Plan (2006), with amendments being made to the policies where appropriate.

- 1.8 Part 3 of the new Local Plan provides guidance relating to Neighbourhood Planning, and includes one overarching Neighbourhood Planning Policy.

Sustainability Appraisal

- 1.9 EDDC is required by law to carry out Sustainability Appraisal and Strategic Environmental Assessment (SEA) of the emerging new Local Plan, and has appointed LUC to undertake this on its behalf. The Government recommends that these two requirements are met through one integrated process, referred to as Sustainability Appraisal (or SA).
- 1.10 The purpose of SA is to promote sustainable development through the better integration of sustainability considerations into the preparation and adoption of plans. It should be viewed as an integral part of good plan making, involving ongoing iterations to identify and report on the potential social, economic and environmental effects of the plan and the extent to which sustainable development is expected to be achieved.
- 1.11 This Non-Technical Summary relates to the SA Report for the Publication Draft version of the new East Devon Local Plan (November 2012). The SA Report has been produced alongside the emerging Local Plan (previously the Core Strategy) in order to provide sustainability guidance during its development.
- 1.12 SA must be conducted in accordance with Government guidance, and must meet the requirements of the European Strategic Environmental Assessment Directive¹. A description of the method used in carrying out the SA of the East Devon Local Plan is set out below.

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

- 1.13 The SA process started in 2008 with EDDC producing a Generic SA Scoping Report for all of East Devon's Local Development Framework documents, including the Core Strategy (which has now been replaced by the new Local Plan). The Scoping Report decided what the SA should cover by reviewing a wide range of relevant policy documents (including international, national and local policies), and by examining data and information to help identify what the key sustainability issues are in East Devon District currently and likely future trends.
- 1.14 The Scoping Report was issued in December 2008 for consultation with various stakeholders including the three statutory consultees for SEA - Natural England, the Environment Agency and English Heritage. Comments received from the consultations were analysed by EDDC and amendments were made to the Scoping Report as necessary.
- 1.15 LUC was commissioned in September 2009 by EDDC to undertake an evaluation of the LDF Scoping Report that the Council had produced and to complete the remainder of the SA process on behalf of the Council. The evaluation process was documented in an Evaluation Report (October 2009). No major issues were identified in relation to the Scoping Report that could not be addressed later in the SA process, aside from the need to ensure that there is a clear link between the baseline information and the SA Objectives. Some additional work was carried out in order to strengthen the key sustainability issues identified and to help demonstrate this link, and this work was undertaken prior to commencing the SA of the Issues and Options version of the Core Strategy, in order to ensure that the assessment was fully informed by a robust scoping report.
- 1.16 The tasks that were originally undertaken in relation to the SA Scoping Report have been updated where necessary throughout the SA process for the East Devon Core Strategy and new Local Plan, in order that the policy context and baseline information remain up-to-date.

¹ European Directive 2001/42/EC 'on the assessment of the effects of certain plans and programmes on the environment'.

Stage B: Developing and refining alternatives and assessing their effects, and Stage C: Assessing the effects of the Local Plan and preparing the Sustainability Appraisal Report

- 1.17 Developing options for a plan is an iterative process usually involving a number of consultations with public and stakeholders. The SA can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan. The options/reasonable alternatives for East Devon's Core Strategy and subsequent Local Plan included potential strategic areas for new housing and employment development, as well as alternative policy approaches, and there have been a number of stages in developing and refining the plan options as described below. A summary of the findings of the sustainability appraisal of the various reasonable alternatives considered for the East Devon Local Plan is provided further ahead in this Non-Technical Summary.

SA of the Core Strategy Issues and Options 2008-2009

- 1.18 East Devon District Council began to look at alternative ways to address issues in the District in 2008 and produced an Issues and Options version of the Core Strategy in 2008. These alternative options were subject to the SA process and the results of the appraisal were fed back to the team developing the Core Strategy to help improve its sustainability effects.
- 1.19 LUC conducted a workshop in December 2009 with EDDC officers and members, in order to discuss the SA process and the findings to date. The outcomes of the workshop then fed into the finalised SA report² for the Issues and Options version of the Core Strategy.

SA of the Preferred Approaches of the Core Strategy 2010-2011

- 1.20 Having taken on board the consultation responses received in relation to the Issues and Options version of the Core Strategy and the findings of the SA, EDDC prepared the "Preferred Approaches" version of the Core Strategy (date), which were those options that EDDC considered to be the right ones to help deliver the Core Strategy. The Preferred Approaches were subject to SA and reported in an updated SA Report³, and the findings were taken into account when developing the next iteration of the Plan.

SA of the Consultation Draft of the new Local Plan 2011-2012

- 1.21 Following the production of the Preferred Approaches version of the Core Strategy, East Devon District Council made the decision to pursue the production of a new Local Plan. The outcomes of the Preferred Approaches consultation and the SA work undertaken in relation to that document helped to inform the production of a Consultation Draft of the new Local Plan, which was published for consultation between December 2011 and January 2012.
- 1.22 During the consultation period, the Consultation Draft of the new Local Plan was subject to SA and the findings of the appraisal were reported to the Council in the form of an SA summary note, outlining the key findings and recommendations. This, along with the outcomes of the public consultation, helped to inform the production of the next iteration of the new Local Plan, the Proposed Submission Draft.

SA of the Proposed Submission Draft Local Plan (May-July 2012)

- 1.23 The Council produced the Proposed Submission Draft Local Plan in May 2012, and the SA work that had been carried out in relation to the 2011 Consultation Draft Local Plan was updated to reflect the changes made to the policies in both Parts 1 and 2 of the plan. The findings were described in an updated version of the SA report which was sent to the Council in June 2012, but which was not published.
- 1.24 During the SA work on that version of the Local Plan, the SA team advised EDDC that in order to meet the legal requirements for the SA, it was necessary to consider whether there were any alternative approaches to the proposed development management policies in Part 2 of the plan. EDDC officers, with assistance from LUC, identified where reasonable alternatives to the

² Interim Sustainability Appraisal of the East Devon Core Strategy Issues and Options Consultation Document. Prepared for east Devon District Council by Land Use Consultants, June 2010.

³ East Devon Core Strategy Preferred Approaches Consultation Sustainability Appraisal. Prepared for East Devon District Council by Land Use Consultants, September 2010.

development management policies exist, and these were appraised for any likely significant sustainability effects, with the findings being incorporated in a further update of the SA report (which was still draft at this stage).

SA of the Publication Draft Local Plan (August-November 2012)

- 1.25 As a result of the SA work and some recommendations made by **East Devon's Development Management Committee** in summer 2012, the Council made a small number of changes to the Proposed Submission Draft Local Plan which led to the production of the Publication Draft Local Plan (November 2012). This Non-Technical Summary accompanies the full SA Report for that document.
- 1.26 In addition to the strategic and development management policies, the specific site allocations included in the Local Plan have now also been subject to SA, along with the reasonable alternatives that were considered by EDDC.

Stage D: Consultation on the Local Plan and on the Sustainability Appraisal Report

- 1.27 The 2010 SA Report that was prepared for the Preferred Approaches version of the Core Strategy has been updated to reflect the change from Core Strategy to a new Local Plan, including the ongoing development of policies within the document, and to fully describe all stages of the SA process that have been undertaken to date. The likely significant sustainability effects of the new Local Plan (both positive and negative) are clearly laid out within the SA report and recommendations about the implementation of the plan are made. Details of any potential mitigation measures that may be necessary are also set out. This Non-Technical Summary accompanies the full SA Report, and both documents will be published alongside the Publication Draft of the new Local Plan as it undergoes a consultation period, during which the statutory consultees and members of the public will again be invited to make comment on the emerging plan.
- 1.28 Following the consultation on the Publication Draft version of the new Local Plan, any changes that EDDC proposes to make to the Local Plan policies will be reviewed, to determine whether the changes will make the policies significantly different to those that have already been appraised. Depending on the extent of any changes made to the policies, they will be re-appraised against the SA framework and either an annex to the SA report or a revised SA report will be produced (this will be a further iteration of Stages B-D in the SA process).

Stage E: Monitoring the significant effects of implementing the Local Plan

- 1.29 Proposals for monitoring the sustainability effects of the new Local Plan are set out Section 6 of the full SA Report and are summarised further ahead in this Non-Technical Summary.

Policy Context

- 1.30 There are potentially a large number of plans and programmes that are relevant to the preparation of the East Devon Local Plan. In particular, the Local Plan must adhere to the new National Planning Policy Framework (NPPF) which has recently replaced the suite of Planning Policy Statements and Planning Policy Guidance.
- 1.31 The Local Plan should provide a spatial expression of other plans and programmes where relevant, to assist in their implementation. It must also conform to environmental protection legislation and the sustainability objectives established at an international, national and regional level. In line with the requirements of the SEA Regulations, relevant international, national, regional, sub-regional and local plans have been reviewed in detail in relation to their objectives, targets and indicators and their implications for the Local Plan and the Sustainability Appraisal. The full review can be seen in Appendix 1 of the full SA Report.
- 1.32 The most significant development in terms of the policy context for the Local Plan has been the recent publication of the NPPF. The NPPF is intended to streamline national planning policy, having reduced over a thousand pages of policy down to around 50 pages. The new East Devon Local Plan must be consistent with the requirements of the NPPF, which sets out information about the purposes of local plan-making. It states that:

"Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in this Framework, including the presumption in favour of sustainable development."

- 1.33 The NPPF also **requires Local Plans to be 'aspirational but realistic'**. This means that opportunities for appropriate development should be identified in order to achieve net gains in terms of sustainable social, environmental and economic development; however significant adverse impacts in any of those areas should not be allowed to occur.
- 1.34 The NPPF requires local planning authorities to set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:
- the homes and jobs needed in the area;
 - the provision of retail, leisure and other commercial development;
 - the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
 - the provision of health, security, community and cultural infrastructure and other local facilities; and
 - climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.
- 1.35 In addition, Local Plans should:
- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;
 - be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;
 - be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;
 - indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
 - allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
 - identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
 - identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
 - contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.

Baseline Information and Key Sustainability Issues

- 1.36 In line with the requirements of the SEA Regulations, consideration has been given to the current state of the environment in East Devon District. The detailed baseline information is provided in Appendix 2 of the full SA Report, and has been regularly updated by EDDC throughout the SA process in order to ensure that it remains up-to-date. That information enabled the key sustainability issues for East Devon to be identified, in order to develop a locally appropriate SA framework for appraising the emerging Local Plan policies. The key sustainability issues that have been identified from the baseline information are presented within the themes below.

Healthy and Prosperous Communities

Housing

- 1.37 House prices in East Devon are very high in relation to wages, which are lower than the national average. This issue is compounded by a limited supply of affordable housing in the District - The Housing Market Assessment update report predicted a need for 1,184 affordable dwellings over the forward looking five years from 2011⁴. This was almost exactly the same as the figure of 1,243 reported in the equivalent 2007 study⁵ undertaken by the same consultancy firm, ORS.
- 1.38 The average household size in East Devon is smaller than the national average at 2.08 persons per dwelling and is continuing to fall.
- 1.39 There are high levels of home ownership in the District (77.5%) and only 9.8% of the population lives in social rented dwellings.

Social Inclusiveness

- 1.40 In the more remote rural areas and small towns of East Devon, geographical isolation and dependence on low value and seasonal work are key contributing factors to deprivation. However, in those rural areas with easy commuting and access to centres of employment, deprivation levels tend to be far lower.
- 1.41 Market and coastal towns are of particular importance in East Devon in terms of serving their resident communities and the wider surrounding areas.

Population and Health

- 1.42 The East Devon population was predicted in 2005 to rise at a rate of around 1% per year up to 2029. This would indicate a District-wide population of around 160,000 people by 2029, in comparison to 129,800 in 2005⁶. This data was further updated in a report by Roger Tym and Partners advising on 2008 ONS data that advises of a projected East Devon population of 156,700 residents in 2026 and 163,100 in 2031⁷.
- 1.43 East Devon is characterised by an elderly population profile, particularly in the coastal towns. Around 29.5% of the population is retired, compared to 17.3% across England overall (2012 population estimates show 28.4% of the population as being aged 65 or over).
- 1.44 The District has a generally low population density; however there is significant variation between the rural and urban areas of East Devon in this sense.
- 1.45 The vast majority of people in East Devon are white (97.% compared with 87% across Britain overall).

Settlement 'Liveability'

- 1.46 East Devon experiences low crime rates but despite this there is a high fear of crime, particularly threats such as drug and alcohol abuse, domestic violence and anti-social behaviour.
- 1.47 Index of multiple deprivation data shows East Devon to have generally low levels of deprivation compared to the UK as a whole, although employment and income deprivation scores for the District are comparatively poor.
- 1.48 Relatively low overall deprivation levels for East Devon hide pockets of deprivation, for example-in parts of Exmouth in the south west of the District.

Environmental Protection and Enhancement

Built Heritage and Landscape

- 1.49 Around 66% of the District is covered by two AONB designations – East Devon and the Blackdown Hills. In addition, a very small part of the Dorset AONB falls in the District.

⁴ See - http://www.eastdevon.gov.uk/plg_lp_shmaupdate11.pdf

⁵ See - http://www.eastdevon.gov.uk/plg_lp_shmaeastdevon07.pdf

⁶ ONS Mid-Year Population Estimates 2005

⁷ See http://www.eastdevon.gov.uk/plg_lp_edhousingstudy.pdf

- 1.50 There are two main landscape area types in the District. The Devon Redlands Joint Character Area has been described as 'neglected' and the Blackdown Hills as 'maintained'⁸.
- 1.51 There is significant archaeological heritage within East Devon, both land and shore-based. There are 132 Scheduled Monuments in East Devon and 3,077 listed buildings (this represents one for every 43.06 people). Most are privately owned residential buildings and most are in good condition, although a significant minority have defects and show signs of deterioration.
- 1.52 Recent housing developments have often been unsympathetic to local vernacular styles and materials, for example the bungalows built in coastal towns. In Honiton and Exmouth, where residential growth has been particularly substantial, a large number of newer properties can be seen to pay little respect to traditional local styles.

Biodiversity

- 1.53 East Devon is a district of significant biodiversity and nature conservation value - there are 24 SSSIs, four SACs and two SPAs, as well as a number of non-designated sites which hold high ecological value, including broadleaved woodland, rivers and streams and maritime cliffs and slopes.
- 1.54 The District is a nationally important area for winter roosting bird species in areas such as the Axe and Exe Estuaries.

Air, Soil and Water Quality

- 1.55 A number of potentially significant sources of air pollution exist in and around East Devon, including Exeter International Airport, industrial sites in bordering authorities, petrol stations and road traffic on the M5 motorway and the local road network. There is one Air Quality Management Area (AQMA) which runs along the High Street through Honiton.
- 1.56 East Devon has limited pockets of contaminated land as the District has not had a history of intensive urban growth or industrialisation. The percentage of housing built on previously developed land in East Devon has generally increased over recent years, but with development Cranbrook on a greenfield site now started, and with it likely to account for a significant proportion of new homes being built in the years ahead, the expectation is of a shift towards more greenfield development.

Transport

- 1.57 Car use for travelling to and from work is marginally higher in East Devon than across England as a whole and public transport use is significantly lower.
- 1.58 Although many residents have good access to transport links, particularly in the western part of the District which lies at a strategic transport node, there are rural parts of East Devon which are accessed by remote lanes and have very poor public transport services.
- 1.59 Improvements to Junction 29 of the M5 are required and currently underway as a result of new developments planned in the western part of East Devon, such as a new community at Cranbrook, a new terminal for Exeter Airport and the expansion of Skypark, in order to accommodate increasing volumes of traffic.

Resource Consumption and Climate Change

Energy Consumption

- 1.60 Devon currently receives around 1.8% of its energy supply from renewable sources, mainly methane gas from landfill and small hydro schemes.
- 1.61 High renewables targets were set by the now abolished South West RSS. There is significant scope within East Devon for small-scale community based energy production and combined heat and power (CHP) schemes.

Waste

- 1.62 Household waste levels in East Devon are increasing year on year whilst landfill capacity in the District is becoming depleted.

⁸ Countryside Quality Counts – Tracking Changes in the Character of the English Landscape 1999-2003.

1.63 There is an ongoing drive to increase levels of recycling and composting.

Climate Change

1.64 The biggest contributors to CO₂ emissions in East Devon are the road transport and domestic sectors at 36.8% and 35.8% respectively. Across the South West overall, the top two contributors are the industry and commercial sector and domestic sectors, at 36.1% and 32.8% respectively.

1.65 Per capita CO₂ production is high in the East Devon District (8.4 tonnes) compared with Exeter (5.7 tonnes) but is similar to the regional average of 8.2 tonnes. This is characteristic of a predominantly rural area with a high reliance on road transport.

1.66 Incidences of flooding in East Devon are expected to increase with projected sea level rises and the onset of wetter winters. Areas of land classified as Flood Zones 2 and 3 are identified around all of the main rivers in the District as well as many of their tributaries.

Economic Growth, Education and Employment

Economic Growth

1.67 Although the percentage of people in East Devon with no qualifications is lower than the national average, there are fewer people than average with higher level qualifications, indicating that the East Devon population has lower average qualification levels than the UK as a whole.

1.68 There is a high demand for development land to serve the sub-regional role of Exeter, affecting planning policy and land allocations in East Devon.

1.69 Unemployment in East Devon is currently running at 7% of the economically active population. This is marginally better than the national average of 8%. However, whilst unemployment in Exeter, Devon, the South West and Great Britain as a whole has peaked and begun to drop, in East Devon, it has continued to rise steeply (from just over 3% in 2009 to 7% in 2010).

1.70 A high proportion of jobs in the District are in the tourism sector, which is often poorly paid seasonal work with limited opportunities for training and progression (16% of jobs in Devon overall are related to tourism).

1.71 Many of the better paid residents of East Devon commute to jobs beyond the District boundary, particularly in Exeter.

Evolution without the Plan

1.72 The SEA Regulations require that consideration is given to the likely evolution of the environment in the Plan area if the Local Plan were not to be implemented. This information is set out in **Table 1** below.

Table 1: The Likely Evolution of East Devon without Implementation of the Local Plan

Current Trend	Likely Evolution without the Local Plan
Healthy and Prosperous Communities	
House prices are high in proportion to wages and there is a lack of affordable housing	An ongoing lack of affordable housing would lead to many people (e.g. first time buyers and lower paid workers) increasingly being priced out of the market and the population profile of the District may become distorted (potentially even more dominated by richer/elderly people). This may have secondary effects on the economy reducing the District's ability to attract key workers in particular.
Many people in more rural parts of the District	High levels of commuting may lead to smaller

Current Trend	Likely Evolution without the Local Plan
are geographically isolated and employment opportunities are limited.	towns and villages increasingly becoming 'dormitories' and becoming less viable, whilst road traffic would remain high with the associated impacts on air pollution etc. This may also exacerbate the ageing population profile of the District as young people move outside the District to find work.
The population profile of East Devon includes a higher than average proportion of elderly people.	Without the availability of employment opportunities and affordable housing in the more rural parts of East Devon, the small towns are likely to see a continuation of this trend.
Environmental Protection and Enhancement	
Levels of private car use are high and levels of public transport are significantly lower than the national average.	Ongoing poor provision and use of public transport may cause the more rural parts of the District to become increasingly isolated in terms of access to employment opportunities and community services and facilities, whilst high car use will increase levels of air pollution and noise disturbance.
Resource Consumption and Climate Change	
Household waste levels are increasing and landfill capacity is becoming depleted.	There is an existing drive to increase levels of recycling and composting within the District and shift in general public opinion towards recycling, should help levels to increase over the coming years. However the infrastructure to support this change may come under strain.
Incidences of flooding are expected to increase as a result of climate change.	Development already situated in areas of high flood risk, e.g. around the main rivers and their tributaries, would be likely to experience increasing problems with flooding and the associated social and economic problems. Existing developments in such areas may reduce in value due to these issues.
Economic Growth, Education and Employment	
A high proportion of employment opportunities in the District are in the tourism sector which is generally poorly paid and low-skilled.	The tourism industry would be likely to remain one of the key employers within East Devon District, which leaves the District vulnerable to any structural changes in the economy.
Many of the better paid residents of East Devon commute to jobs outside of the District boundary, particularly in Exeter.	Ongoing limited employment opportunities within East Devon would mean that commuting levels are likely to remain high, with the associated issues surrounding congestion and air pollution.

Method and Sustainability Appraisal Framework

- 1.73 The review of other policies, plans and programmes and baseline data helped identify key sustainability issues for East Devon District, as described above. These key sustainability issues, and input from stakeholders, provided the basis for developing a set of SA objectives. The SA objectives, which have been the main tool used at each stage of the SA for assessing the likely effects of the options and draft policies in the Core Strategy/Local Plan, are set out in **Table 2** below.

Table 2: SA Framework for the East Devon Local Plan

SA Objectives
1. To ensure everybody has the opportunity to live in a decent home.
2. To ensure that all groups of the population have access to community services.
3. To provide for education, skills and lifelong learning to: i. meet the needs of the local population, and ii. meet local employment needs
4. To improve the population's health
5. To reduce crime and fear of crime.
6. To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution.
7. To maintain and improve cultural, social and leisure provision.
8. To maintain and enhance built and historic assets.
9. To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon.
10. To maintain the local amenity, quality and character of the local environment.
11. To conserve and enhance the biodiversity of East Devon.
12. To promote and encourage non-car based modes of transport and reduce journey lengths.
13. To maintain and enhance the environment in terms of air, soil and water quality.
14. To contribute towards a reduction in local emissions of greenhouse gases.
15. To ensure that there is no increase in the risk of flooding.
16. To ensure energy consumption is as efficient as possible.
17. To promote wise use of waste resources whilst reducing waste production and disposal.
18. To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce.
19. To maintain and enhance the vitality and viability of the Towns of East Devon.
20. To encourage and accommodate both indigenous and inward investment.

Use of the SA Framework

- 1.74 Within the assessment tables of the potential sustainability effects of the Local Plan policies, symbols and colour-coding have been used against each SA objective to show whether an effect is likely to be significant, positive or negative, or uncertain, as follows:

Table 3 Key to SA scores

Symbol	Effect
++	Significant positive effect
+	Minor positive effect
0	Negligible effect
-	Minor negative effect
--	Significant negative effect
?	Uncertain effect

- 1.75 The potential effects of the Local Plan need to be determined and their significance assessed, which requires a series of judgments to be made. Attempts have been made to differentiate between the most significant effects and other more minor effects through the use of the symbols shown above. The dividing line in making a decision about the significance of an effect is often quite small. Where either ++ or -- has been used to distinguish significant effects from more minor effects (+ or -), this is because the effect of the policy in question on an SA objective is considered to be of such magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that SA objective.
- 1.76 The SEA Regulations require consideration of whether the potential effects predicted are likely to be secondary, cumulative, synergistic, short, medium or long-term, permanent or temporary. Where relevant, reference has been made to effects being either direct or indirect, the latter is **taken to cover 'secondary' effects**. Cumulative effects refer to the potential to increase overall effects due to adding one effect onto another. The cumulative effects of the Local Plan policies have been considered in **Section 5** of the full SA Report and are described further ahead in this Non-Technical Summary. Consideration is also given to the timescales over which effects are likely to occur.

Alternative Options

- 1.77 The SEA Regulations require explanation of the reasons for choosing the policies in the Local Plan rather than the reasonable alternatives which must also be considered. This information is summarised below. When developing the range of options to be considered, full recognition must be given to any geographical, technological and financial constraints that exist, in order to help **determine if the options are 'reasonable'**.

Issues and Options stage (2008-2009)

- 1.78 EDDC produced a Core Strategy Issues and Options Consultation Report in 2008 which was subject to public consultation between December 2008 and February 2009. The report presented the draft spatial vision and overarching objectives for East Devon, outlined the issues identified as being of particular local importance and considered a range of options for how these may be addressed. In addition, the Council prepared and published a further Issues and Options consultation paper (November 2009) regarding an extra option for an urban extension to Exeter

at Redhayes/Blackhorse which had not been included in the original Issues and Options Consultation Report.

- 1.79 The alternatives that the Issues and Options Consultation Report addressed were all appraised where possible as part of the SA process (using the SA Framework developed at the scoping stage), although for some of the Core Strategy issues, alternative options were not specified. In such cases a short description of the potential sustainability effects of those issues was provided, based on the supporting text included in the Issues and Options report. The full appraisal of the Issues and Options was presented in the Initial SA Report (August 2010) and the findings were taken on board by the Council when developing the Preferred Approaches version of the Core Strategy (now replaced by the new Local Plan).
- 1.80 Overall, sustainability considerations were well presented in the supporting text of the Issues and Options Consultation Report. However, it was recognised that many of the likely sustainability effects would be more easily determined as more specific policies were developed from the options and taken forward to form the draft plan. The key conclusions resulting from the SA in relation to each issue and option were presented in the Initial SA Report for the Issues and Options version of the Core Strategy (August 2010– available from EDDC upon request) and are summarised in **Section 4** of the full SA Report.

Preferred Approach stage (2010-2011)

- 1.81 As described previously, the findings of the SA of the Issues and Options report contributed to the development of the Preferred Approaches version of the Core Strategy. That version of the Plan was subject to SA and the outcomes of that appraisal contributed to the development of the policies that are now set out in the emerging Local Plan, which has replaced the Core Strategy.
- 1.82 A number of recommendations were made in the SA Report for the Preferred Approaches version of the Core Strategy regarding amendments that could be made to the Plan in order to improve its sustainability effects, several of which related to the need for an overarching development management policy to be included in the Plan. Now that it has been restructured to also include a whole section of development management policies (Part 2 of the Local Plan), this issue has been addressed.
- 1.83 Other recommendations made by the SA Report at the Preferred Approaches stage are summarised below. Note that policy references refer to those used in the Preferred Approaches document.
- Where housing development is proposed, it should be consistently stated that community services/facilities will be provided to support the growing population, and it would be beneficial to make clear which services this will include.
 - Where developments are located in small communities and services are provided in existing key service centres, there should be a requirement for the impact on transport requirements and community viability to be addressed.
 - The proposals relating to green infrastructure and open space provision should make reference to the need to ensure that such spaces are designed and located in a way that will minimise any potential security concerns for users.
 - The Preferred Approaches relating to sustainable development (CS3) should include reference to maximising the proportion of development that takes place on previously developed land, and the use of previously developed buildings.
 - Preferred Approach CS7 should be amended to focus more strongly on the expansion and increased use of sustainable transport methods, and to make less of an allowance for continued car use.
 - The proposal for development at Axminster should make specific reference to the need to protect water quality at the River Axe, within the Environment section of the Preferred Approach.
 - **The importance of the natural stores of organic carbon present in the District's heathland, pasture and woodland soils and in timber vegetation should be stated in Section 16 of the Core Strategy with specific reference in CS33.**

- The Preferred Approaches could be strengthened by stating explicitly within more of the spatial options that renewable energy will be incorporated into the development planned.
- More recognition could be made within the Preferred Approaches of the potential benefits that can be achieved through employment provision in terms of education and skills development, for example within CS24 (future job and employment land provision) some reference could be made to the provision of work-based training opportunities.

Current stage – new Local Plan (2011-2012)

- 1.84 Part 1 of the Local Plan consists of strategic policies which have been developed from the Preferred Approaches set out in the last iteration of the Core Strategy. The strategic policies presented in the Consultation Draft Local Plan (December 2011) were developed taking into consideration the consultation responses received and the SA work carried out in relation to the Preferred Approaches. The strategic policies now presented in the Publication Draft Local Plan (November 2012) have been amended slightly to take into account consultation responses received and the SA work that was undertaken in relation to the Consultation Draft Plan and the interim Proposed Submission Draft (May 2012).

Development Management Policies

- 1.85 **In trying to meet the Government’s requirements for the new Local Plan, Part 2 of the Local Plan** comprises development management policies which have been taken from the adopted East Devon Local Plan (2006) (these policies were not previously included in the early iterations of the Core Strategy). The suite of development management policies presented in the Consultation Draft Local Plan (December 2011) were subject to consultation and the responses received, as well as the SA work that was undertaken in relation to the Consultation Draft Local Plan, have fed into the development of the development management policies now set out in the Publication Draft Local Plan (November 2012).
- 1.86 As these development management policies are generally criteria-based, and must comply with national policy, in many cases no reasonable alternatives have been identified. However, in order to ensure that the requirements of the SEA Regulations have been met, and reasonable alternatives considered, EDDC officers, with assistance from LUC, identified where reasonable alternatives to the development management policies exist. Further work to appraise alternative approaches to the development management policies has also been carried out prior to the Publication Draft consultation. This work is presented in full in **Appendix 4** of the full SA Report and is summarised below.
- 1.87 Three of the development management policies that were included in Part 2 of the 2011 Consultation Draft Local Plan have now been moved into the Strategic Policy section of Part 1. These are now referred to as Strategy 6: Development within Built-Up Area Boundaries, Strategy 7: Development in the Countryside, and Strategy 8: Development in Green Wedges. The alternatives identified for these three policies have been appraised within their relevant SA matrix in **Appendix 3** of the full SA Report. In summary, the alternative policy approaches would have generally similar, but less pronounced sustainability effects than the three Strategies, and are not considered to be more sustainable than the current wording of those Strategies in the Proposed Submission Draft Local Plan.
- 1.88 For three of the development management policies (RC5, RC6 and RC7) no reasonable alternatives were identified because the NPPF requires local planning authorities to “plan positively for the provision of shared space and community facilities”, and these policies address this requirement. Therefore, it would not be a reasonable alternative approach to remove these policies from the Local Plan.
- 1.89 In the case of 41 of the development management policies (e.g. DM Policies EN1, TC2 and E19, the only alternative would be to not have the specific policy in the Local Plan and to instead rely on national policy. Where this is the case, the likely sustainability effects of taking that approach (i.e. not having the development management policy in the Local Plan) have been described (see **Appendix 4** in the full SA Report). In some of these cases (for example in relation to emissions to air and water from development), national regulations and standards would still apply, which would mean that the sustainability effects of not having the policy would be broadly unchanged.

However, the effects may be less pronounced if these emissions were referred to in the Local Plan policies, as a Local Plan policy may be better able to address specific local circumstances.

- 1.90 In the case of the other 33 policies (e.g. DM Policies D1, D4 and TC1), reasonable alternatives other than simply relying on national policy were able to be identified – these mainly comprised policy approaches that were either more or less stringent than the development management policy as currently drafted, for example where a policy quantifies a proportion or size of development that is to be allowed in particular circumstances. Where this is the case, the likely sustainability effects of changing these standards have been described (see **Appendix 4** in the full SA Report). In general, the likely SA effects would be either more or less pronounced depending on whether the identified standards were to be made more stringent or relaxed.
- 1.91 Most of the identified reasonable alternatives for the 77 development management policies were not considered to be more appropriate in sustainability terms for inclusion in the Local Plan than the Part 2 policies currently included. However, the two alternatives for Policy H7: Sites for gypsies and travellers (prepare a specific SPD for these sites or allocate specific sites on the Proposals Map) may be more likely to result in significant positive effects on homes, community services, health and amenity than the current policy as they will reflect and respond to specific local circumstances, and give more certainty to the provision of these sites. However, no recommendation has been made in the SA to adopt either of these two alternatives, as it is recognised that these approaches have not been taken due to an assessment by the Council that shows a low need for gypsy and traveller sites within the District. It is also recognised that resource constraints at EDDC would not currently allow either of the two alternative options to be pursued.

Site Specific Allocations

- 1.92 The latest version of the new Local Plan (the Publication Draft version, November 2012) includes a number of specific site allocations for different types of development (residential, employment and mixed-use) within the Strategies for Axminster, Exmouth, Honiton, Ottery St Mary and Seaton in Part 1 of the Plan and within policies E1 and H1 in Part 2 of the Plan. These sites have been subject to SA, along with all reasonable alternative site options identified by EDDC during preparation of the Local Plan, in line with the requirements of the SEA Regulations. The findings of the appraisal of allocated sites and reasonable alternatives are summarised in **Chapter 6** of the full SA Report and further ahead in this non-technical summary.
- 1.93 The site options that have been assessed are those that featured in the 2011 and/or 2012 Strategic Housing Land Availability Assessment (SHLAA) exercise and/or were submitted as proposed development sites when the Local Plan (formerly the Core Strategy) was consulted on previously. In a limited number of other cases, sites that EDDC was aware of as having development potential were also included. EDDC chose to look at as many reasonable site choices as possible (where they were supported by a land owner/agent aspiration to see development occur).

Potential Effects of the Policies in the Publication Draft of the new Local Plan

What are the sustainability effects of the Local Plan likely to be?

- 1.94 There is much to welcome in the Local Plan (Publication Draft) and implementation of its policies is likely to have a largely positive effect on sustainability issues in the District. The potential effects of each of the policies in the Local Plan on each of the SA Objectives are summarised in **Figures 1 and 2** below (using the symbols and colour coding referred to in Table 3 above).

Figure 1: Summary of SA Scores for Strategic Policies (Part 1 of the Local Plan)

SA Objectives	Strategic Policies																																																						
	1	2	3	4	5	5B	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50				
1: Decent homes	++?	++	++	0	0	0	+/-?	-?	-?	++	0	0	++	++	++	0	0	0	0	0	++	++	++	++	++	++	++	++	++	0	0	0	0	0	0	0	++	+	++	0	+	0	0	0	0	0	0	0	0	0	-?	0			
2: Community services	+/-?	+/-?	++	++	0	?	+/-?	-?	-?	?	0	++	++	++	++	0	0	0	0	0	0	+	?	+/-?	+	-?	++	++	+	0	0	0	0	++	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
3: Education and skills	+/-?	+	++	++	0	0	+/-?	0	0	+	0	+	++	+	++	0	+	+	+	+	+	?	+	+/-?	+	+	+	+	+	+	+	+	+	0	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	+	+			
4: Health	0	0	++	+	+	+	+/-	0	0	+	++	++	+	+	+	0	0	-	-	0	+/-	?	+/-	+/-?	+	+	+	+	0	0	0	+	+	0	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	+				
5: Crime	0	0	0	0	+/-?	0	0	0	0	0	+/-?	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
6: Noise	-?	-	-	-	0	+	-?	0	0	-	+/-?	+	-?	-?	-?	-?	-?	-	-?	-?	-	-?	-	-	-	-	-	-	-	0	0	-?	-?	0	-?	0	-	-	+	+	0	0	0	0	0	0	0	0	0	0	-?				
7: Cultural, social and leisure provision	0	?	++	++	+	+	+/-	+/-?	+/-?	?	++	++	++	++	++	0	+	0	0	+	+	?	+	+/-?	+	+	+	+	0	0	0	0	++	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	++	+				
8: Historic assets	+/-?	+/-?	?	+/-?	+	0	+	+	+	?	+	?	+/-?	+/-?	+/-?	-?	0	0	+/-?	0	+/-	+/-?	?	+/-?	+/-?	+	++/-?	+	+	0	0	0	0	0	+/-?	0	+	+	+	+	-?	-?	+	0	+	0	+/-	+	0	++	++	0			
9: Landscape Character	?	+/-?	++	-?	+	0	+	++	++	-?	++	+	-?	-?	-?	-?	-?	0	?	-?	-?	+	-?	+/-	-	-?	+	?	++	0	0	0	0	0	+/-?	0	-	+/-?	-?	0	-?	-?	+	+	+	++	+/-?	++	+	++	0	0			
10: Amenity/local environment	-?	-?	+/-	+/-?	++	+	+/-?	++	++	-	++	+	-?	-?	-?	-?	-?	-	-	-?	-?	-?	-?	0	-?	-?	+	-?	+	0	-?	-?	0	+/-?	0	-	0	+	0	-?	-?	+	++	+	++	+/-?	++	0	++	++	-?				
11: Biodiversity	?	-?	++	-?	++	0	+	+	+	-?	++	+/-?	-?	-?	-?	?	?	-?	?	?	+/-?	?	-?	+	-?	-?	-?	?	-?	0	0	0	0	+/-?	0	-?	?	-?	0	0	0	0	0	0	0	0	0	0	0	0	+				
12: Sustainable transport	+	+/-?	0	++	+	++	0	+	+	+	+/-	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++		
13: Air, soil and water quality	-	+/-?	+	+/-?	0	+	+	+	+	-?	++	++	+/-?	+/-?	+/-?	+/-?	+/-?	-	?	+/-?	-?	?	-?	-?	-?	-?	-?	-?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
14: Greenhouse gases	+/-	+/-	++	+/-	+	+/-?	+	+	+/-	+	++/-	+/-	+/-	+/-	++/-?	+/-?	-	+/-?	+/-?	+/-	+/-?	+/-	-/+	+/-?	-/+	-/+	-/+	-/+	-/+	+	0	0	+	+	-?	0	+/-	+/-	0	++	++	++	++	+	0	0	0	0	0	0	0	0			
15: Flood risk	?	+/-	++	?	+	0	+	0	0	+/-?	++	0	+/-?	+/-?	+/-?	+/-?	0	+/-?	-	+/-	+/-?	+/-?	+/-	+	+/-?	+/-?	+/-?	+/-?	-?	0	0	0	0	0	+/-?	0	+/-	+/-?	0	++	0	0	0	0	+	+	+	+	+	+	+	-?			
16: Energy efficiency	+/-	+/-	++	?	0	0	0	0	0	+/-	0	+/-	+/-	++/-	+/-	+/-?	+/-?	+/-	+/-	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	0			
17: Waste reduction	+/-	+/-	++	?	0	0	+	0	0	+/-	0	-?	+/-	+/-	+/-	-?	-?	+/-	+/-	-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	0		
18: Employment	++	++	++	++	0	0	+/-?	-	-?	++	0	0	++	+/-?	+	+	++	+	+	++	+	+	++	+	++	+	++	+	+	++	+	++	+	++	+	++	+	++	+	++	+	++	+	++	+	++	+	++	+	++	+	++	+	++	
19: Vitality and viability of towns	+/-	++	+	++	0	0	+/-?	+/-?	+	-	0	0	+/-	+/-	+/-	0	-	-	-	-	++	+	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	
20: Encourage investment	+	++	0	+	0	0	+/-?	-	-	++	-/+	-/+	++	0	+	+	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	-?

Figure 2: Summary of SA Scores for the Development Management Policies (Part 2 of the Local Plan) and the Neighbourhood Planning Policy (Part 3 of the Local Plan)

	SA Objectives																			
	1: Decent homes	2: Community Services	3: Education and skills	4: Health	5: Crime	6: Noise	7: Cultural, social and leisure provision	8: Historic assets	9: Landscape character	10: Amenity/ local environment	11: Biodiversity	12: Sustainable transport	13: Air, soil and water	14: Greenhouse gas emissions	15: Flood risk	16: Energy consumption	17: Waste reduction	18: Employment	19: Vitality and viability of towns	20: Encourage investment
Development Management Policies																				
D1: Design and local distinctiveness	+/-	0	0	0	+?	0	+	+	++	++	+	0	0	+	+	+	0	0	0	0
D2: Landscape requirements	-?	0	0	0	+?	0	0	0	++	++	++	0	0	0	+	0	0	0	0	0
D3: Trees and development sites	-?	0	0	0	0	0	0	+	+	+	+	0	0	0	+?	0	0	0	0	0
D4: Applications for display of advertisements	0	0	0	0	0	0	0	0	+	+	0	0	0	0	0	0	0	0	0	-?
D5: Advertisements within Areas of Special Control of Advertisements and Advance Advertisement Signs	0	0	0	0	0	0	0	0	+	+	0	0	0	0	0	0	0	0	0	-?
D6: Locations without access to natural gas	+?	0	0	0	0	0	0	0	0	0	0	0	+	+	0	0	0	0	0	0
D7: Agricultural buildings and development	0	0	0	0	0	+	0	0	+	+	+	+	+	+	0	0	+	0	0	0
D8: Re-use of rural buildings outside of settlements	+/-	0	0	0	0	0	0	+	+	+	+?	+	0	0	0	0	0	0	0	0
EN1: Land of local amenity importance	-?	+?	-?	-?	0	0	0	0	++	++	0	0	0	0	0	0	0	-?	0	0
EN2: The Valley Parks, Exmouth	-?	-?	-?	+	0	0	+?	0	+?	+?	0	+?	0	0	0	0	0	-?	0	0
EN3: Land at the Bays in Sidmouth	-?	-?	-?	-?	0	0	+	0	+?	+	+	+?	+	0	0	0	0	-?	0	0
EN4: Protection of Local Nature Reserves, County Wildlife Sites and County Geological Sites	-?	-?	-?	-?	0	0	-?	0	+	+	++	0	0	0	0	0	0	-?	0	0
EN5: Wildlife habitats and features	-?	-?	-?	-?	0	0	-?	0	+	+	++	0	0	0	0	0	0	-?	0	0
EN6: Nationally and locally important	-?	-?	-?	-?	0	0	-?	+	+	0	0	0	0	0	0	0	0	-?	0	0
EN7: Proposals affecting sites which	-?	-?	-?	-?	0	0	-?	+	+	0	0	0	0	0	0	0	0	-?	0	0
EN8: Extension, alteration or change of use of buildings of special architectural and historic interest	-?	-?	-?	-?	0	0	-?	++	0	0	0	0	0	0	0	0	0	-?	0	0
EN9: Demolition of a listed building	-?	-?	-?	-?	0	0	-?	++?	0	+	0	0	0	0	0	0	0	-?	0	0
EN10: Preservation and enhancement of conservation areas	-?	-?	-?	-?	0	0	-?	+	++	++	+	0	0	0	0	0	0	-?	0	0
EN11: Demolition of unlisted buildings	-?	-?	-?	-?	0	0	-?	+	++	++	+	0	0	0	0	0	0	-?	0	0
EN12: Development affecting parks and gardens of special historic	-?	-?	-?	-?	0	0	-?	+	+	+	+	0	+	0	0	0	0	-?	0	0
EN13: Development on high quality agricultural land	-?	-?	-?	-?	0	0	-?	0	+	+	+	0	++	0	+?	0	0	-?	0	0
EN14: Control of pollution	?	?	?	?	0	+	+	?	0	+	+	+	++	+	0	0	0	-?	0	0
EN15: Environmental Impacts, Nuisance and Detriment to Health	-?	-?	-?	+	0	+	-?	0	+	+	+	0	+	+	0	0	0	-?	0	0
EN16: Contaminated land	+/-	+/-	0	+	0	0	0	0	0	+	+?	0	+	0	0	0	0	+/-	0	0
EN17: Notifiable installations	-?	-?	-?	+	0	0	-?	0	0	0	0	0	0	0	0	0	0	-?	0	-?
EN18: Maintenance of water quality and quantity	+/-	+/-	0	+	0	0	0	0	0	+	+?	0	++	0	+	0	0	+/-	0	0
EN19: Adequacy of foul sewers and adequacy of sewage treatment system	+/-	+/-	0	+	0	0	0	0	0	+	+?	0	++	0	+	0	0	+/-	0	0
EN20: Private sewage treatments works	-?	?	?	+	0	0	0	0	0	+	+?	0	+	0	+	0	0	-?	0	0
EN21: River and coastal flooding	-?	-?	-?	-?	0	0	-?	0	+	+	+	0	+	0	++	0	0	-?	0	0
EN22: Surface runoff implications of new development	-?	-?	-?	-?	0	0	-?	0	+	+	0	0	+	0	+	0	0	-?	0	0
EN23: Coastal erosion and surface water runoff	-?	-?	-?	-?	0	0	-?	+	+	+	0	0	+	0	+	0	0	-?	0	0
EN24: Coastal defence schemes	0	0	0	0	0	0	0	+	+	+	0	0	+	0	0	0	0	0	0	0
EN25: Development affected by coastal change	+?	+?	+?	+?	+?	0	+?	0	+?	+?	+?	0	0	0	0	0	0	+?	0	0
H1: Residential land allocation	++	0	0	0	0	0	0	+?	+?	0	+?	+?	0	0	0	0	0	+?	0	0
H2: Range and mix of new housing development	+	0	0	+?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+?	0
H3: Conversion of existing dwellings	+	0	0	0	0	0	0	0	0	+	0	+?	0	0	+	0	-?	0	0	0
H4: Dwellings for persons employed in agriculture or forestry	+/-	0	0	0	0	0	0	0	+	+?	+?	0	+?	0	+?	0	0	0	0	0
H5: Occupancy conditions on agricultural/forestry dwellings	-	0	0	0	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0
H6: Replacement of existing dwellings in the countryside	+	0	0	0	0	0	0	0	+	+	+?	0	0	0	+?	0	0	0	0	0
H7: Sites for gypsies and travellers	+?	+?	0	+?	0	0	0	0	+?	+?	0	0	0	0	0	0	0	0	0	0
E1: Provision of employment land	0	0	0	0	0	0	0	+?	+?	+?	+?	+?	0	0	0	0	0	++	+	++
E2: Employment generating development in built-up areas	0	+?	0	0	0	-?	+?	+	+	+	+	+	-?	-?	0	0	0	++	0	0
E3: Safeguarding employment land and premises	-?	+?	+?	+?	0	0	+?	+	0	0	0	0	0	0	0	0	0	++	+?	+?
E4: Rural diversification	-?	0	0	0	0	+	0	+	+	+	+	+	++	0	+	0	0	+?	0	0
E5: Small-scale economic development in rural areas	0	0	0	0	0	0	0	+	++	++	+	+	0	0	0	0	0	+	0	0
E6: New employment provision in association with residential development	+/-	+?	+?	+?	0	0	+?	0	0	0	0	0	0	0	0	0	0	++	?	-?
E7: Extensions to existing employment sites	-?	+?	+?	+?	0	0	+?	+	+	+	+	+	0	+	0	+	0	++	+	+
E8: Agricultural development and succession housing	+	0	0	0	0	0	0	0	+?	0	0	0	+	0	0	0	0	+	0	0
E9: Town centre shopping areas	-?	+	0	0	0	+?	+	0	0	+?	+?	0	0	0	0	0	+?	+	++	+
E10: Primary shopping frontages	-?	+	0	0	0	+?	+	0	0	+?	+?	+?	0	0	0	0	+?	+	++	+
E11: Large stores and retail related uses in area centres	+/-	+/-	0	0	0	0	+/-	0	0	+	+?	+?	0	0	0	0	0	+/-	++	+/-
E12: Neighbourhood centres and	+/-	+	0	0	0	+?	0	0	0	+?	0	+?	0	0	0	0	0	+	+	0
E13: Use of upper floors in shopping developments	+	+	0	0	0	0	+	0	0	+	0	+?	0	0	0	0	0	+	+	0
E14: Change of use of village shops or services	-?	++	+	+	0	0	+	+?	0	+?	0	0	0	0	0	0	0	+?	0	0
E15: Retail developments in rural areas outside built up area boundaries	0	-	0	0	0	0	0	0	+	+	0	-?	0	-?	0	0	0	-	+	-

	1: Decent homes	2: Community Services	3: Education and skills	4: Health	5: Crime	6: Noise	7: Cultural, social and leisure provision	8: Historic assets	9: Landscape character	10: Amenity/ local environment	11: Biodiversity	12: Sustainable transport	13: Air, soil and water	14: Greenhouse gas emissions	15: Flood risk	16: Energy consumption	17: Waste reduction	18: Employment	19: Vitality and viability of towns	20: Encourage investment
Development Management Policies																				
E16: Proposals for holiday or overnight accommodation and associated facilities	0	+	0	0	0	0	+	0	+	+	0	+/-?	-?	+/-?	0	-?	-?	+	+	+
E17: Principal holiday accommodation areas	-?	-?	-?	-?	0	0	0	0	0	0	0	0	0	0	0	0	0	+/-?	0	+/-?
E18: Loss of holiday accommodation	-?	-?	-?	-?	0	0	+	0	0	0	0	0	0	0	0	0	0	0	+/-?	0
E19: Holiday accommodation parks	0	+	0	0	0	+/-?	0	0	+	+	+	-?	+/-?	-?	-?	-?	-?	+	+	+
E20: Provision of visitor attractions	0	0	0	0	0	+	+	+	+	+	+	+	+/-?	+	+	-?	-?	+	+	+
RC1: Retention of land for sport and recreation	0	0	0	+	0	0	+	+	+	+	+	0	+	0	+	0	0	0	0	0
RC2: Open space, sports facilities and parks	0	0	0	+	0	+	+	+	+	+	+	+/-?	+	+/-?	+	0	0	0	0	0
RC3: Allotments	0	0	0	+	0	0	+	+	+	+	+	+	+	+	0	+	0	0	0	0
RC4: Recreation facilities in the countryside and on the coast	0	0	0	+	0	0	+	+	+	+	+	-?	-?	-?	-?	-?	-?	+	0	+
RC5: Community buildings	0	+	0	+	0	0	+	0	-?	-?	0	0	-?	0	-?	-?	-?	+	+/-?	-?
RC6: Local community facilities	0	+	+	+	0	+	+	0	+	+	0	+	+/-?	+	-?	0	0	0	0	0
RC7: Shared community facilities	0	+	+	+	0	+	+	0	0	+	0	0	+	+	+	+	+	0	+	0
TC1: Telecommunications	0	0	0	0	0	+	0	+	+	+	+	0	0	0	0	0	0	0	0	0
TC2: Accessibility of new development	0	0	0	+	0	+	0	0	0	+	0	+	+	+	0	0	0	+	0	0
TC3: Traffic management schemes	0	0	0	+	0	+	0	0	0	+	0	+/-?	+	+/-?	0	0	0	+	0	+
TC4: Footpaths, bridleways and cycleways	0	0	0	+	0	+	0	0	0	+	0	+	+	+	0	0	0	+	0	0
TC5: Safeguarding disused railway	0	0	0	+	0	+	+	0	0	+	0	+	+	+	0	0	0	0	0	0
TC6: Park and ride and park and share/change	0	0	0	0	0	+	0	0	+	+	0	+	+/-?	+	-?	+	0	+	+	+
TC7: Adequacy of road network and site access	0	0	0	0	0	-?	0	0	-?	-?	0	-?	-?	-?	0	0	0	+	+	+
TC8: Safeguarding of land required for highway and access improvements	0	0	0	0	0	0	0	0	0	0	0	+/-	+/-	+/-	0	0	0	0	0	0
TC9: Parking provision in new development	0	0	0	+/-?	0	+/-?	0	0	0	+/-?	0	+/-?	+/-?	+/-?	0	+	0	0	0	0
TC10: Rear servicing of shopping/commercial development	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	-?
TC11: Roadside service facilities	0	+	0	0	0	0	0	0	+	+	0	0	-?	0	-?	0	0	0	0	0
TC12: Aerodrome Safeguarded Areas and Public Safety Zone	-?	-?	-?	-?	0	0	-?	0	0	0	0	0	0	0	0	0	-?	0	0	0
NP1: Neighbourhood Planning Policy	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?

- 1.95 A summary description of the SA findings for the Local Plan (Publication Draft) strategic and development management policies taken together is set out below in relation to each SA objective, with the SA objectives grouped into the same themes under which the Key Sustainability Issues were set out earlier in this Non-Technical Summary, i.e.:
- Healthy and Prosperous Communities
 - Environmental Protection and Enhancement
 - Resource Consumption and Climate Change
 - Economic Growth, Education and Employment
- 1.96 Note that the effects of the specific site allocations that are included within the strategies for Axminster, Honiton, Ottery St Mary, Exmouth and Seaton and within policies E1 and H1 are summarised separately, further ahead in this document.

Healthy and Prosperous Communities

Relevant SA objectives

- 1. To ensure everybody has the opportunity to live in a decent home.
- 2. To ensure that all groups of the population have access to community services.
- **4. To improve the population's health**
- 5. To reduce crime and fear of crime
- 7. To maintain and improve cultural, social and leisure provision

Objective 1: To ensure everybody has the opportunity to live in a decent home

Strategic Policies

- 1.97 The strategic policies are generally anticipated to have a positive impact on this objective, with most of the policies that were identified as having a potential effect being scored as either positive or significant positive. This is mainly attributed to the provision made within the Local Plan for large-scale housing development across the District (particularly through Strategies 20-26 which allocate specific sites for housing development in the towns of East Devon).
- 1.98 As noted earlier in this NTS, the limited availability of affordable housing is a key sustainability issue in the District. The issue is addressed in Strategy 34: District Wide Affordable Housing Provision Targets which specifies that a certain proportion of all new housing developments must be affordable. The housing development proposed under other policies is scored in light of this requirement - the fact that a reasonable proportion of all of the new housing will be affordable, and therefore accessible to a larger proportion of the local population, adds to the positive effects expected in relation to housing provision sought in the Local Plan.
- 1.99 The extent to which satisfactory levels of affordable housing can be delivered, and indeed the total level of house building being achieved, will depend on economic growth being maintained. The strength of national and regional recovery from the current recession will be a key factor which is outside the control of the Council.
- 1.100 Although a number of the strategic policies are not expected to affect this objective, four were considered likely to have a negative effect – Strategy 7: Development in the Countryside, Strategy 8: Development in Green Wedges, Strategy 44: Undeveloped Coast and Coastal Prevention Areas, and Strategy 49: The Built Heritage and Building Conservation. In these cases the negative effect is based on the likelihood that the strategies may prove somewhat restrictive for developers and make it more difficult to get applications for housing development approved in certain areas.

Development Management Policies

- 1.101 A large number of the development management policies are likely to have a negative impact on this objective, as they may prove to be restrictive for developers, and therefore discourage housing development within the District.

1.102 However, a few of the policies are anticipated to have a positive effect on SA objective 1, in particular H1: Residential Land Allocation, which is likely to have a significant positive effect due to the provisions it makes for new housing development throughout the District (note that the specific site allocations have been subject to SA separately from the policy as a whole, see **Chapter 6**). In addition, Policy H2: Range and Mix of New Housing Development ensures a mix of dwelling sizes in larger developments which will help to ensure that an appropriate range of housing types is available for all sectors of the population. No significant negative effects on this objective have been identified in relation to any of the development management policies.

Summary of Effects on SA Objective 1

1.103 Overall, considering the cumulative effects of all the strategic and development management policies together, a mixed (significant positive with minor negative) effect is likely for SA objective 1: To ensure everybody has the opportunity to live in a decent home, as shown in the table below. In relation to the other considerations required by the SEA Regulations, the effects of the Local Plan on ensuring everybody has the opportunity to live in a decent home are likely to be direct, occurring locally within the district and have a high probability of occurring. Effects of the Local Plan on this objective are likely to be long-term, ongoing and permanent.

SA Objective 1: To ensure everybody has the opportunity to live in a decent home						
Score	Direct / indirect	Geographical Scale	Probability	Duration	Frequency	Reversibility
++/-	Direct	Local	High	Long-term	Ongoing	Permanent

Recommendations and Mitigation

1.104 No specific recommendations or mitigation measures are made with particular reference to SA objective 1.

Objective 2: To ensure that all groups of the population have access to community services

Strategic Policies

1.105 The majority of the strategic policies that are expected to affect this objective are likely to result in either positive or significant positive effects. This is due to the broad provision made throughout the Local Plan for the development of services and facilities to support the population growth that will result from the housing development planned. In some cases, residential development is provided for (e.g. in Budleigh Salterton) without explicitly stating which facilities will be developed to support the growing population at that location. In such cases, it may be possible that certain existing services will become overloaded (issues such as this that are associated with specific site allocations have been considered separately in the appraisal of site options, as discussed in the next section of this NTS). However, all the strategic policies are scored in the light of Strategy 4 in the Local Plan, which aims to achieve balanced communities, including through the provision of social and community facilities to support housing development.

1.106 It should be recognised that, in rural districts such as East Devon, there is a tension between planning to concentrate development of services at key centres, often the market towns, and the dispersed provision of services in small communities. Whereas the concentration of services in key centres may be more economically efficient, it increases the travel requirements of rural residents and can contribute to declining economic and social self-containment and viability of small communities. Strategy 4 implies that services will be delivered 'in situ' alongside housing development. Where this is not the case for small housing developments that may be planned for in some of the more isolated communities (such as for the provision of health centre and secondary school places which are likely to be located in key centres), it is important that consideration is given to the transport implications and impacts on the viability of existing locally provided services.

1.107 A small number of the strategies could result in mixed effects due to uncertainties about whether the development proposed in a particular location will lead to the provision of services and

facilities to support the growing population, or whether it may lead to existing facilities becoming overloaded. Four of the strategies were identified as possibly resulting in a minor negative effect – Strategy 7: Development in the Countryside, Strategy 8: Development in Green Wedges, Strategy 24: Development at Ottery St. Mary, and Strategy 44: Undeveloped Coast and Coastal Prevention Area. The potential negative effects were mainly due to the potential for development (including that of community services) to be restricted due to protection of other assets (e.g. the countryside, coast), protection from flooding (at Ottery St. Mary) or containing development e.g. through the Green Wedges.

Development Management Policies

- 1.108 There are four development management policies where a significant positive impact is anticipated for community services in the District because they directly support the provision of new community facilities for a growing population. These are E14: Change of use of Village Shops and Services, RC5: Community Buildings, RC6: Local Community Facilities and RC7: Shared Community Facilities.
- 1.109 There are however, a number of the development management policies that are expected to have a negative effect on the objective. These are mainly the policies that relate to the protection of the environment, and the criteria that result in their potentially restrictive nature may discourage development of community facilities.

Summary of Effects on SA Objective 2

- 1.110 Overall, by considering strategic and development management policies together, a generally positive effect is expected for SA objective 2: to ensure that all groups of the population have access to community services, as shown in the table below. In relation to the other considerations required by the SEA Regulations, the effects of the Local Plan on ensuring that all groups of the population have access to community services are likely to be direct, occurring locally within the district and have a high probability of occurring. Effects of the Local Plan on this objective are likely to be long-term, ongoing and permanent.

SA Objective 2: To ensure that all groups of the population have access to community services						
Score	Direct / indirect	Geographical Scale	Probability	Duration	Frequency	Reversibility
+	Direct	Local	High	Long-term	Ongoing	Permanent

Recommendations and Mitigation

- 1.111 No specific recommendations are made with particular reference to this SA objective.

Objective 4: To improve the population’s health

Strategic Policies

- 1.112 The effects of the strategic policies on **the local population’s** health are mixed, with the majority being either positive or significantly positive due to the measures included in the Local Plan that will result in improved provision of greenspace for recreation and amenity, such as the green infrastructure proposals included in Strategies 42 and 43. Significant physical and mental health benefits are associated with the availability and accessibility of space for outdoor exercise and recreation. In addition, the provision of community services (included in the Strategies relating to the towns in the District) to support the growing population should include healthcare facilities such as GP surgeries. However, this is not made explicit within all such policies and the types of community services to be provided/enhanced should be made clear, at least in the supporting text for the policies.
- 1.113 However, where policies were considered likely to result in an increase in road traffic or other sources of noise and air pollution, potential negative effects on health have been identified. In particular, the development proposed around the Exeter Airport area of the West End may have

adverse effects as the proposals focus solely on commercial development and do not include any form of development which may help to mitigate the potential health impacts. The negative impacts arising from increased traffic are likely to be felt more widely in the District along transport corridors, particularly the M5 and A30.

- 1.114 Where the strategic policies make provision for development, but do not specify whether the services to support the growing population will include healthcare facilities, the potential for either positive or negative effects has been highlighted. If new services are provided, positive effects would result; however if not, existing services may become overloaded, resulting in negative effects.

Development Management Policies

- 1.115 The effects of development management policies on health in the District are mixed. The majority of policies that would result in a potential effect include restrictions on the development of facilities, which could potentially include healthcare facilities. This may have a negative effect on health; however there is uncertainty regarding to what extent this would affect overall healthcare provision in the District.
- 1.116 The development management policies, however, do support the provision of open space through policies such as RC1: Retention of Land for Sport and Recreation and RC2: Open Space, Sports Facilities and Parks, and these are considered to have a positive effect on this objective. A significant positive effect is likely to result from policy EN15: Environmental Impacts, Nuisance and Detriment to Health, which seeks to protect local people’s health from development that would increase pollution, noise, odour or nuisance.

Summary of Effects on SA Objective 4

- 1.117 Overall, by considering strategic and development management policies together, a mixed effect is likely for SA objective 4: to improve the **population’s health**, as shown in the table below. In relation to the other considerations required by the SEA Regulations, the effects of the Local Plan on improving the population’s health are likely to be direct, occurring locally within the district and more widely throughout the south west region, and have a high probability of occurring. Effects of the Local Plan on this objective are likely to be long-term, ongoing and permanent.

SA Objective 4: To improve the population’s health						
Score	Direct / indirect	Geographical Scale	Probability	Duration	Frequency	Reversibility
+/-	Direct	Local / regional	High	Long-term	Ongoing	Permanent

Recommendations and Mitigation

- 1.118 The following actions and amendments are recommended in order to improve the overall effects of the policies on this objective:
- Where housing development is proposed in the strategic policies and it is stated that community services/facilities will be provided to support the growing population, it would be beneficial to specify in all cases whether this will include healthcare facilities.

Objective 5: To reduce crime and fear of crime

Strategic Policies

- 1.119 Very few of the strategic policies were considered to have an effect on this objective; aside from the potential benefit that development and increased prosperity generally may have in terms of improved prosperity and therefore reduced crime. However, this is an indirect effect which cannot be assumed. Strategy 37: Community Safety was considered likely to have a direct significant positive impact on this objective, as the overarching purpose of the policy is to reduce **crime and the fear of crime within East Devon’s communities.**

- 1.120 The other proposals that may affect this objective mainly relate to the provision of greenspace and the fact that, **dependent on the design of open spaces, people's perceptions of their safety** and vulnerability to crime may be affected. This issue is not mentioned within these policies, and it should be recognised that the design of greenspaces is of great importance in determining the likely effects of its provision, particularly in relation to the issue of crime and fear of crime.

Development Management Policies

- 1.121 Very few of the development management policies were considered to have a direct effect on this objective. Policy D2: Landscape Requirements supports the incorporation of crime prevention measures into the design of new developments, while policy D1: Design and Local Distinctiveness is likely to have a significant positive effect because it specifies that green infrastructure and open spaces should be designed and located in a way that will minimise any potential security concerns for users.

Summary of Effects on SA Objective 5

- 1.122 Overall, by considering strategic and development management policies together, a minor positive effect is likely in relation to SA objective 5: to reduce crime and fear of crime, as shown in the table below. In relation to the other considerations required by the SEA Regulations, the effects of the Local Plan on improving crime and the fear of crime are likely to be direct, occurring locally within the district, and have a high probability of occurring. Effects of the Local Plan on this objective are likely to be long-term, ongoing and permanent.

SA Objective 5: To reduce crime and fear of crime						
Score	Direct / indirect	Geographical Scale	Probability	Duration	Frequency	Reversibility
+	Mostly indirect/ Direct (Strategy 37 and policy D1)	Local	High	Long-term	Ongoing	Permanent

Recommendations and Mitigation

- 1.123 The following action was recommended during the SA of the Proposed Submission Draft Local Plan (May 2012) in order to improve the overall effects of the policies on this objective:
- Policy D1 could be strengthened by specifically recognising that green infrastructure and open spaces should be designed and located in a way that will minimise any potential security concerns for users. For example, such spaces should be appropriately lit (although this will need to be planned with due regard to tranquillity and biodiversity concerns).
- 1.124 This recommendation has now been addressed in the Publication Draft Local Plan and no further specific recommendations are made with particular reference to this SA objective.

Objective 7: To maintain and improve social, cultural and leisure provision

Strategic Policies

- 1.125 A large number of positive and significant positive effects have been identified in relation to this objective. The strategic policies in general place a strong emphasis on ensuring that the large-scale housing development planned is accompanied by services and facilities to support the growing population, and this is taken to include leisure and recreation facilities. In addition, the **improvement of the District's green infrastructure offering (see Strategy 10 and Strategy 42)** should go some way towards ensuring that the growing population has access to open space for undertaking leisure and recreation activities.
- 1.126 No negative or significant negative impacts in relation to this objective were considered likely to arise from any of the strategic policies, although a small number of potentially mixed effects were identified where policies could be seen as potentially restrictive to development that could relate to social, cultural and leisure provision. However, in all such cases positive effects were also possible due to the provisions made in the policies for enhancing the natural environment which is an important leisure and recreation asset in the District.

Development Management Policies

- 1.127 A large number of positive and significant positive effects have been identified from the development management policies in relation to this objective. Five policies are anticipated to have a significant positive effect, by providing for recreation land and facilities (Strategies E20, RC1, RC2, RC3, and RC4).
- 1.128 Some of the policies relating to environmental protection are likely have a negative effect on this objective by restricting development and therefore discouraging potential investment in leisure provision. However, these effects are outweighed by the many positive effects identified.

Summary of Effects on SA Objective 7

- 1.129 Overall, by considering strategic and development management policies together, a significant positive effect is likely in relation to SA objective 7: to maintain and improve social, cultural and leisure provision, as shown in the table below. In relation to the other considerations required by

the SEA Regulations, the effects of the Local Plan on this objective are likely to be direct, occurring locally within the district, and have a high probability of occurring. Effects of the Local Plan on this objective are likely to be long-term, ongoing and permanent.

SA Objective 7: To maintain and improve social, cultural and leisure provision

Score	Direct / indirect	Geographical Scale	Probability	Duration	Frequency	Reversibility
++	Direct	Local	High	Long-term	Ongoing	Permanent

Recommendations and Mitigation

1.130 No specific recommendations are made with particular reference to this SA objective.

Environmental Protection and Enhancement

Relevant SA Objectives

- 6. To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution.
- 8. To maintain and enhance built and historic assets.
- 9. To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon.
- 10. To maintain the local amenity, quality and character of the local environment.
- 11. To conserve and enhance the biodiversity of East Devon.
- 12. To promote and encourage non-car based modes of transport and reduce journey lengths.
- 13. To maintain and enhance the environment in terms of air, soil and water quality.
- 15. To ensure that there is no increase in the risk of flooding.

Objective 6: To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution

Strategic Policies

- 1.131 The majority of the strategic policies are likely to have a negative effect on this objective. Large-scale development across the District is proposed in the Local Plan, and development of this type will inevitably increase noise levels, particularly during construction, and is likely to lead to an increase in traffic volumes and associated noise levels in both the short and long-term, particularly where development is proposed in the more rural areas of the District where public transport availability is limited. Note that the noise-related impacts of specific site allocations within the strategic policies have been considered separately in the appraisal of site options, as discussed in the next section of this NTS - issues such as noise from construction and the impacts on new residents of noise from existing main roads near to the proposed development sites are considered.
- 1.132 Strategy 17, which is likely to result in increased air traffic in and out of Exeter International Airport, is likely to have particularly significant negative effects on noise levels in the District, especially affecting the West End of the District and locations beneath flight paths.
- 1.133 The noise pollution arising from the dualled A30 west of Honiton has proved a significant local issue in the past. The proposed development in the West End is likely to increase traffic, emphasising the need for best practice in road design and materials to be used to mitigate increased volumes.

1.134 A very small number of potential positive effects are associated with this objective, namely a potential reduction in noise from anti-social behaviour resulting from Strategy 37: Community Safety and a potential reduction in car use as a result of Strategy 11: Integrated Transport and Infrastructure Provision at East Devon’s West End. In addition, Strategy 38: Sustainable Design and Construction now states that the potential noise impacts arising from developments – both during construction and after – should be mitigated (reflecting a previous SA recommendation).

Development Management Policies

1.135 A large number of the development management policies are not expected to have an effect on this SA objective, as most relate to criteria for development rather than making provision for new development which would lead to noise from construction and increased vehicle traffic.

1.136 However, a significant positive effect has been identified in relation to policy EN14: Control of Pollution as this policy specifically addresses the issue of noise pollution by stating that developments which will have an unacceptable impact in this sense will not be permitted. This policy should help to mitigate some of the construction noise impacts likely to arise from implementation of the strategic policies.

1.137 In addition, a number of minor positive effects have been identified, particularly in relation to the policies associated with recreation and community facilities and transport and communications. These positive effects are mainly associated with measures that will reduce vehicle traffic on the District’s roads (e.g. by increasing sustainable transport provision) or that will reduce the extent of new development in close proximity to sensitive receptors.

Summary of Effects on SA Objective 6

1.138 Overall, by considering strategic and development management policies together, a minor negative effect is likely in relation to SA objective 6: to reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution, as shown in the table below. In relation to the other considerations required by the SEA Regulations, the effects of the Local Plan on noise levels are likely to be direct, occurring locally within the district, and have a high probability of occurring. Effects of the Local Plan on this objective are likely to be both short and long-term, ongoing and permanent.

SA Objective 6: To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution						
Score	Direct / indirect	Geographical Scale	Probability	Duration	Frequency	Reversibility
-	Direct	Local	High	Both short-term (noise from construction) and long-term (noise from increased vehicle traffic).	Ongoing	Permanent

Recommendations and Mitigation

1.139 The following action was recommended during the SA of the Proposed Submission Draft Local Plan (May 2012) in order to improve the overall effects of the policies on this objective:

- Strategy 38 which relates to sustainable construction could be expanded into a more overarching development management policy, to include the requirement (amongst others) to mitigate any potential noise impacts arising from developments, both during the construction phase and after.

1.140 This recommendation has now been addressed in the Publication Draft Local Plan and no further specific recommendations are made with particular reference to this SA objective.

Objective 8: To maintain and enhance built and historic assets

Strategic Policies

- 1.141 Most of the strategic policies are likely to have either mixed or positive effects on the built and historic environment in East Devon. Where negative effects are likely these are mainly attributed to the fact that development may infringe on the setting of assets such as listed buildings, but until the precise location, nature and design of each development proposal comes forward at the planning application stage, this potential negative effect cannot be predicted with more certainty, and a positive effect may be achieved through innovative design or replacing/improving an unattractive development currently affecting the setting of historic assets. Potential effects on the historic assets of the East Devon towns through development of the site allocations in Strategies 20-26 and policies E1 and H1 have been considered in Chapter 6. However, the overall quality of the built environment should be generally enhanced by the development of new housing, employment land and other facilities, as new development should be of a high quality and should conform to the requirements of the other policies in the Local Plan that are associated with high quality design and construction.
- 1.142 Strategies 48: Local Distinctiveness in the Built Environment and 49: The Built Heritage and Building Conservation are likely to have significant positive effects, as they relate directly to the built and/or historic environment and have an overarching aim of ensuring that development within the District conserves and enhances such assets.

Development Management Policies

- 1.143 A large number of the development management policies are not likely to have an effect on this objective; however where effects have been identified, these are all either positive or significantly positive. Policies EN6-EN9 are all likely to have significant positive effects as they all relate directly to the protection of historic assets including archaeological sites and listed buildings. A number of other positive effects are identified, mainly where the protection of the historic environment is included as a criterion within policies that set out considerations for new development.

Summary of Effects on SA Objective 8

- 1.144 Overall, by considering strategic and development management policies together, a minor positive effect is likely in relation to SA objective 8: To maintain and enhance built and historic assets, as shown in the table below. In relation to the other considerations required by the SEA Regulations, the effects of the Local Plan on built and historic assets are likely to be direct, occurring locally within the district, and have a high probability of occurring. Effects of the Local Plan on this objective are likely to be long-term, ongoing and permanent.

SA Objective 8: To maintain and enhance built and historic assets						
Score	Direct / indirect	Geographical Scale	Probability	Duration	Frequency	Reversibility
+	Direct	Local	High	Long-term	Ongoing	Permanent

Recommendations and Mitigation

- 1.145 No specific recommendations are made with particular reference to this SA objective.

Objective 9: To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon

Strategic Policies

- 1.146 A number of potential significant negative effects are associated with this objective, including in relation to Strategy 9: Major Development at East Devon’s West End, which proposes large-scale development in a relatively small area outside of the existing built up area on the west of Exeter,

which will have an impact on landscape character. Strategy 22: Development at Exmouth and Strategy 23: Development at Honiton both direct development in and around these towns towards the East Devon AONB; therefore potential significant negative effects are also associated with these policies. The locations of the individual site allocations set out in the strategic policies in relation to the AONBs in East Devon have been considered separately in the appraisal of site options, as discussed in the next section of this NTS. It was, shown that a fairly high number of proposed development sites have the potential to affect the quality and character of these designated landscapes, particularly at Honiton and Budleigh Salterton.

- 1.147 Minor negative impacts are also associated with a number of other proposals, although many of these scores are uncertain due to a lack of information available at this stage about the extent of development which is likely to take place on greenfield land. When this is made clearer at the planning application stage, the likely effects of these development locations on promoting the conservation of land will become clearer.
- 1.148 A small number of the strategic policies (e.g. Strategies 7 and 8) have the specific purpose of conserving and enhancing the landscape of East Devon and are therefore expected to result in significant positive effects as well as helping to mitigate some of the effects of new development across the District. In addition, Strategy 3 now requires developers to maximise the proportion of their developments that take place on previously developed land (reflecting a previous SA recommendation).

Development Management Policies

- 1.149 Almost all of the effects identified in relation to this SA objective are either positive or significantly positive, due to the measures included within the development management policies to protect and enhance the high quality landscape of East Devon. In particular, policy D2: Landscape Requirements addresses this issue directly.
- 1.150 However, a small number of potentially minor negative effects have been identified, in relation to policies RC5: Community Buildings and TC7: Adequacy of Road Network and Site Access. Under policy RC5, community facilities may be allowed to be developed outside of built up area boundaries which could potentially have a negative effect on the landscape and local character. TC7 allows for potential improvements to the highways network which could have a negative impact on the appearance of the landscape although this is uncertain without more information about the nature and location of any such development that may come forward.

Summary of Effects on SA Objective 9

- 1.151 Overall, by considering strategic and development management policies together, a mixed (both positive and negative) effect is likely in relation to SA objective 9: to promote the conservation and wise use of land and protect and enhance the landscape character of East Devon, as shown in the table below. In relation to the other considerations required by the SEA Regulations, the effects of the Local Plan on the use of land and landscape character are likely to be direct, occurring locally within the district, and have a high probability of occurring. Effects of the Local Plan on this objective are likely to be long-term, ongoing and permanent.

SA Objective 9: To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon						
Score	Direct / indirect	Geographical Scale	Probability	Duration	Frequency	Reversibility
+/-	Direct	Local	High	Long-term	Ongoing	Permanent

Recommendations and Mitigation

- 1.152 The following action was recommended during the SA of the Proposed Submission Draft Local Plan (May 2012) in order to improve the overall effects of the policies on this objective:

- The strategic policy relating to sustainable development (Strategy 3) should include reference to maximising the proportion of development that takes place on previously developed land, and the use of previously developed buildings.

1.153 This recommendation has now been addressed in the Publication Draft Local Plan and no further specific recommendations are made with particular reference to this SA objective.

Objective 10: To maintain the local amenity, quality and character of the local environment

Strategic Policies

1.154 A large number of the strategic policies are considered likely to have a negative impact on local amenity, mainly as a result of increased traffic movements and a general increase in noise and activity due to the large-scale development proposed across the District through the policies, although some of these effects will be temporary as only associated with construction periods.

1.155 However, a number of the proposals that are associated with landscape enhancement and green infrastructure provision should have significant positive effects on this objective, enhancing the open and rural character of the District and providing high quality greenspace for amenity use.

1.156 In addition, significant positive effects are likely in relation to Strategy 5B which now specifically addresses the environmental impacts of transport (reflecting a previous SA recommendation). It requires new development to incorporate proposals for encouraging the use of transport modes with low environmental impacts such as walking and cycling and the use of public transport.

Development Management Policies

1.157 Almost all of the effects identified in relation to this SA objective are either positive or significantly positive, due to the measures included within the development management policies to protect and enhance the character of the local environment. Many of the effects are broadly very similar to those relating to SA objective 9 above (landscape). As is the case for that objective, a small number of potentially minor negative effects have been identified, in relation to policies RC5: Community Buildings and TC7: Adequacy of Road Network and Site Access. Under policy RC5, community facilities may be allowed to be developed outside of built up area boundaries which could potentially have a negative effect on local character. TC7 allows for potential improvements to the highways network which could have a negative impact on the amenity and appearance of the local environment although this is uncertain without more information about the nature and location of any such development that may come forward.

Summary of Effects on SA Objective 10

1.158 Overall, by considering strategic and development management policies together, a mixed (both positive and negative) effect is likely in relation to SA objective 10: to maintain the local amenity, quality and character of the local environment, as shown in the table below. In relation to the other considerations required by the SEA Regulations, the effects of the Local Plan on local amenity and environmental quality are likely to be direct, occurring locally within the district, and have a high probability of occurring. Effects of the Local Plan on this objective are likely to be both short and long-term, ongoing and permanent.

SA Objective 10: To maintain the local amenity, quality and character of the local environment

Score	Direct / indirect	Geographical Scale	Probability	Duration	Frequency	Reversibility
+/-	Direct	Local	High	Both short-term (disturbance to local amenity from construction and traffic) and long-term (changes to quality or character of local environment).	Ongoing	Permanent

Recommendations and Mitigation

- 1.159 The following action was recommended during the SA of the Proposed Submission Draft Local Plan (May 2012) in order to improve the overall effects of the policies on this objective:
- A policy should be included in the Core Strategy making reference to sustainable transport provision across the whole District, rather than just in the West End (Strategy 11). Reducing vehicle traffic on the roads of East Devon, particularly **the smaller 'B' roads and rural lanes**, would help to preserve and enhance local amenity.

1.160 This recommendation has now been addressed in the Publication Draft Local Plan and no further specific recommendations are made with particular reference to this SA objective.

Objective 11: To conserve and enhance the biodiversity of East Devon

Strategic Policies

- 1.161 The likely effects of the strategic policies on biodiversity are mixed, with those policies that are directly intended to conserve and enhance the environment being associated with significant positive effects, as well as those providing for green infrastructure. Even where biodiversity is not the direct focus of a proposal, enhancement of the environment generally can often have associated indirect benefits for biodiversity; for example the provision of green infrastructure may improve habitat connectivity and prevent fragmentation as a result of urbanisation.
- 1.162 However, a number of the proposals direct large-scale development in the vicinity of designated nature conservation sites, particularly in the West End where sites such as the East Devon Pebblebed Heaths SAC and East Devon Heaths SPA are within fairly close proximity of strategic development sites. Although the biodiversity impacts of the plan extend well beyond impacts on designated sites, it is important to note the proximity of development to these sites, which is being considered in more detail through the Habitats Regulations Assessment (HRA). The proximity of sites that are allocated for development in the strategic policies to biodiversity designations have been considered separately in the appraisal of site options, as discussed in the next section of this NTS. The latest available HRA work, the 2010 HRA Screening Report, identified the potential for significant effects on any of the European sites within East Devon⁹ in relation to physical damage/loss of habitat, due to the scale of development proposed throughout

⁹ River Axe SAC, Sidmouth to West Bay SAC, Beer Quarry and Caves SAC, East Devon Pebblebed Heaths SAC, East Devon Heaths SPA, Dawlish Warren SAC and the Exe Estuary SPA/Ramsar Site.

the District. Potential effects in relation to air quality were also identified at **Bracket's Coppice** SAC and South Hams SAC. However, it was also noted that a number of the policies that were included in that version of the Core Strategy (before it was replaced by the emerging Local Plan) should provide some mitigation for the potential effects identified (e.g. Preferred Approach CS30 which has now been developed into Strategy 42). Further HRA work on the current version of the Local Plan is being undertaken separately.

Development Management Policies

- 1.163 The majority of the effects that have been identified from the development management policies are positive, due to the measures included in the policies to ensure biodiversity benefits either directly (e.g. including impacts on biodiversity as a criterion to be considered in new development proposals) or indirectly (e.g. by encouraging the inclusion of green infrastructure and open space within development proposals).
- 1.164 However, a small number of potential negative effects have been identified in relation to policies E9-E13 due to the development that may result from these policies, which could potentially have a negative impact on biodiversity. However, these impacts are uncertain at this stage without more information regarding the location and nature of any development proposals.

Summary of Effects on SA Objective 11

- 1.165 Overall, by considering strategic and development management policies together, a mixed (both positive and negative) effect is likely in relation to SA objective 11: to conserve and enhance the biodiversity of East Devon, as shown in the table below. In relation to the other considerations required by the SEA Regulations, the effects of the Local Plan on local biodiversity are likely to be direct, occurring locally within the district (as well as nationally and internationally where designated sites and species are affected), and have a high probability of occurring. Effects of the Local Plan on this objective are likely to be both short and long-term, ongoing and permanent.

SA Objective 11: To conserve and enhance the biodiversity of East Devon						
Score	Direct / indirect	Geographical Scale	Probability	Duration	Frequency	Reversibility
+/-	Direct	Local (or national/international where designated sites of national or international importance are adversely affected).	High	Long-term	Ongoing	Permanent

Recommendations and Mitigation

- 1.166 No specific recommendations are made with particular reference to this SA objective.

Objective 12: To promote and encourage non-car based modes of transport and reduce journey lengths

Strategic Policies

- 1.167 In general, the strategic policies make strong provision for public transport development and use, for example through Strategy 11: Integrated Transport and Infrastructure Provision at **East Devon's West End**. The policies which propose development towards the West of the District, or within existing urban areas, are likely to have generally positive effects on this objective due to the more extensive opportunities that are likely to be available for making short journeys (e.g. to work, shops, community facilities etc.) by means other than private cars. The appraisal of the site specific allocations in the strategic policies (summarised separately in the next section of this NTS) found that they are generally within close proximity of public transport links and many have nearby walking and cycle paths which can be used by residents and employees at the sites. In addition, Strategy 5B now specifically addresses sustainable transport (reflecting a previous SA

recommendation), requiring development to incorporate proposals for encouraging walking and cycling and requiring development to be located in areas that enable the use of public transport.

- 1.168 However, a small number of policies could result in development in rural areas, where private car use is likely to remain high as the only feasible form of day-to-day transport. Due to the rural nature of much of East Devon District, it is essential that public transport infrastructure and services are provided to match the growing population, in order to avoid increasing congestion and air pollution as a result of ever increasing private car use.
- 1.169 As noted earlier, the location of new service and employment places in key centres such as market towns to provide for small scale development planned in surrounding villages is likely to increase the need for car travel from these villages.

Development Management Policies

- 1.170 The effects of the development management policies on this SA objective are very mixed. A number of positive effects are identified, in particular in relation to policies TC2 and TC4-6, which encourage the use of sustainable transport modes by addressing the issues of access and infrastructure provision. A large number of minor positive effects are also likely, where policies steer development to locations that would be more likely to be well-served by public transport infrastructure.
- 1.171 However, a number of potential negative effects have also been identified where policies may encourage development in rural parts of the District which may necessitate high levels of car use (due to the relatively poor public transport provision in those areas).

Summary of Effects on SA Objective 12

- 1.172 Overall, by considering strategic and development management policies together, a mixed (both positive and negative) effect is likely in relation to SA objective 12: to promote and encourage non-car based modes of transport and reduce journey lengths, as shown in the table below. In relation to the other considerations required by the SEA Regulations, the effects of the Local Plan on sustainable transport are likely to be direct, occurring locally within the district, and have a high probability of occurring. Effects of the Local Plan on this objective are likely to be long-term, ongoing and permanent.

SA Objective 12: To promote and encourage non-car based modes of transport and reduce journey lengths						
Score	Direct / indirect	Geographical Scale	Probability	Duration	Frequency	Reversibility
+/-	Direct	Local	High	Long-term	Ongoing	Permanent

Recommendations and Mitigation

- 1.173 As above, for SA objective 10, the following action was recommended during the SA of the Proposed Submission Draft Local Plan (May 2012) in order to improve the overall effects of the policies on this objective:
- A policy should be included in the Core Strategy making reference to sustainable transport provision across the whole District, rather than just in the West End (Strategy 11). Reducing vehicle traffic on the roads of East Devon, particularly the smaller 'B' roads and rural lanes, would help to preserve and enhance local amenity.
- 1.174 This recommendation has now been addressed in the Publication Draft Local Plan and no further specific recommendations are made with particular reference to this SA objective.

Objective 13: To maintain and enhance the environment in terms of air, soil and water quality

Strategic Policies

- 1.175 The strategic policies are likely to have a very mixed range of effects on this objective, given that the effects are largely dependent on the precise location of the development proposed and on the

characteristics and vulnerabilities of that site and surrounding area. Two significant negative impacts were identified, resulting from: the proposal for development at Axminster (Strategy 20) in close proximity to the River Axe, which is designated as a Site of Special Scientific Interest (SSSI) and which is particularly vulnerable to water pollution; and from the proposal for development at Exmouth (Strategy 22), as it is close to the Exe Estuary SPA/Ramsar site, which could be adversely affected by water pollution. However, both of these strategies now make reference to the need to conserve water quality (reflecting a previous SA recommendation).

- 1.176 It is possible that development on greenfield land will lead to soil compaction, which also accounts for a number of the potential negative effects identified.

Development Management Policies

- 1.177 The majority of the effects associated with the development management policies are positive or significantly positive, particularly in relation to EN13: Development on High Quality Agricultural Land and EN14: Control of Pollution, as these policies specifically address the issues of soil quality and pollution prevention. Similar significant positive effects are also associated with policies EN18: Maintenance of Water Quality and Quantity and EN19: Adequacy of Foul Sewers and Adequacy of Sewage Treatment Systems.
- 1.178 However, potential minor negative effects are associated with a number of the development management policies that may result in development (albeit of a small, localised nature, e.g. RC5: Community Buildings and E16: Proposals for Holiday or Overnight Accommodation and Associated Facilities), particularly where this may come forward on greenfield land where high quality soil is more likely to be affected.

Summary of Effects on SA Objective 13

- 1.179 Overall, by considering strategic and development management policies together, a mixed (both positive and negative) effect is likely in relation to SA objective 13: to maintain and enhance the environment in terms of air, soil and water quality, as shown in the table below. In relation to the other considerations required by the SEA Regulations, the effects of the Local Plan on air, soil and water quality are likely to be direct, occurring locally within the district, and have a high probability of occurring. Effects of the Local Plan on this objective are likely to be long-term, ongoing and permanent.

SA Objective 13: To maintain and enhance the environment in terms of air, soil and water quality

Score	Direct / indirect	Geographical Scale	Probability	Duration	Frequency	Reversibility
+/-	Direct	Local	High	Long-term	Ongoing	Permanent

Recommendations and Mitigation

- 1.180 The following action was recommended during the SA of the Proposed Submission Draft Local Plan (May 2012) in order to improve the overall effects of the policies on this objective:

- The policies for development at Axminster and Exmouth should make specific reference to the need to protect water quality at the River Axe and the Exe Estuary designated sites, within the Environment sections of the policies.

- 1.181 This recommendation has now been addressed in the Publication Draft Local Plan and no further specific recommendations are made with particular reference to this SA objective.

Objective 15: To ensure that there is no increase in the risk of flooding

Strategic Policies

- 1.182 In a large number of cases, the policies are expected to result in mixed effects on flood risk as development overall will increase the area of land in the District which is impermeable, having a potential adverse effect on increasing run-off and risk of flooding. However, new developments should offer good opportunities for incorporating measures such as SUDS which will help to

reduce the flood risk, particularly in areas that have experienced significant flooding on more than one occasion in recent years, such as the low lying parts of Ottery St Mary and Feniton. The proximity of the specific site allocations made through the strategic policies to areas of high flooding risk have been considered separately in the appraisal of site options, as discussed in the next section of this NTS.

- 1.183 All development will take place in the context of the overarching sustainable development policy (Strategy 3), which makes specific mention of the need to mitigate the risk of flooding, now also requiring developers to reduce the risk of flooding by incorporating measures such as sustainable drainage systems into new development (reflecting a previous SA recommendation).

Development Management Policies

- 1.184 Most of the development management policies are not expected to have a direct effect on this objective, although where effects are identified, they are mainly positive. In particular, policies EN18: Maintenance of Water Quality and Quantity and EN21: River and Coastal Flooding are likely to have significant positive effects as they directly address this issue. A number of the other development management policies include flood risk in the criteria to be considered for the new development proposed in the policy.
- 1.185 However, a small number of minor negative effects have also been identified, all of which relate to the policies associated with employment, economic development, retail and tourism; recreation and community facilities or transportation and communication. The development that is likely to come forward under these policies could have an adverse impact on flood risk as a result of an increase in the extent of impermeable surface, but this is uncertain due to the lack of precise information about the nature and design of any such development, as well as its precise location in relation to areas of higher flood risk.

Summary of Effects on SA Objective 15

- 1.186 Overall, by considering strategic and development management policies together, a mixed (both positive and negative) effect is likely in relation to SA objective 15: to ensure that there is no increase in the risk of flooding, as shown in the table below. In relation to the other considerations required by the SEA Regulations, the effects of the Local Plan on flood risk are likely to be direct, occurring locally within the district, and have a high probability of occurring. Effects of the Local Plan on this objective are likely to be long-term, ongoing and permanent.

SA Objective 15: To ensure that there is no increase in the risk of flooding						
Score	Direct / indirect	Geographical Scale	Probability	Duration	Frequency	Reversibility
+/-	Mostly Indirect	Local	High	Long-term	Ongoing	Permanent

Recommendations and Mitigation

- 1.187 The following action was recommended during the SA of the Proposed Submission Draft Local Plan (May 2012) in order to improve the overall effects of the policies on this objective:
- Strategy 3: Sustainable Development could be strengthened by making specific reference to reducing the risk of flooding by incorporating measures such as sustainable drainage systems.
- 1.188 This recommendation has now been addressed in the Publication Draft Local Plan and no further specific recommendations are made with particular reference to this SA objective.

Resource Consumption and Climate Change

Relevant SA Objectives

- 14. To contribute towards a reduction in local emissions of greenhouse gases.
- 16. To ensure energy consumption is as efficient as possible.

- 17. To promote wise use of waste resources whilst reducing waste production and disposal.

Objective 14: To contribute towards a reduction in local emissions of greenhouse gases

Strategic Policies

- 1.189 The likely impacts of the strategic policies on this objective are generally very mixed and are strongly associated with vehicle traffic generation. Where new housing or employment development is proposed within or near the key centres, e.g. in close proximity to the urban fringe around Exeter, there may be relatively good opportunities for public transport use, whereas development in more rural areas is likely to encourage the continued and increasing use of private cars, which would lead to higher greenhouse gas emissions.
- 1.190 Strategy 17: Future Development of Exeter Airport, which endorses the expansion of Exeter International Airport, may have particularly significant negative effects on this objective, due to the high level of greenhouse gas emissions from aircraft. In contrast, the proposals which endorse sustainable design and construction measures and renewable energy use within the District (Strategies 3 and 38-41) are expected to have significant positive effects on reducing levels of greenhouse gas emissions.
- 1.191 Although the District contains no deep organic soils that are an important international store of carbon (such as the peat deposits found on Dartmoor), it is likely that the shallower peat soils found on the pebble bed heaths, the organic matter present in the soils under permanent pasture and ancient woodland, and the timber in woodlands and hedgerows, represent locally significant stores of carbon. Section 17 of the Local Plan (Climate Change) now makes reference to the benefits provided by, and need to conserve, these environmental resources (reflecting a previous SA recommendation).

Development Management Policies

- 1.192 A large number of the development management policies are not expected to have an effect on this objective, including most of the policies associated with design standards and the natural and built environment. Where effects have been identified in those areas, they are minor positive effects where policies aim to increase the generation and use of renewable energy in new developments.
- 1.193 A wider mixture of minor positive and minor negative effects has been identified in relation to the policies associated with employment, economic development, retail and tourism, recreation and community facilities and transportation and communications. In general, where development could result from those development management policies which would increase vehicle traffic or the broad extent of development, potential negative effects have been highlighted. However, where policies aim to increase renewable energy production within new development (e.g. Strategy E7) or focus development in more easily accessible locations where opportunities for the use of sustainable transport are likely to be higher, positive impacts are likely.

Summary of Effects on SA Objective 14

- 1.194 Overall, by considering strategic and development management policies together, a mixed (both positive and negative) effect is likely in relation to SA objective 14: to contribute towards a reduction in local emissions of greenhouse gases, as shown in the table below. In relation to the other considerations required by the SEA Regulations, the effects of the Local Plan on greenhouse gas emissions are likely to be direct, occurring locally within the district, and have a high probability of occurring. Effects of the Local Plan on this objective are likely to be long-term, ongoing and permanent.

SA Objective 14: To contribute towards a reduction in local emissions of greenhouse gases						
Score	Direct / indirect	Geographical Scale	Probability	Duration	Frequency	Reversibility
+/-	Direct	Local/ International	High	Long-term	Ongoing	Permanent

Recommendations and Mitigation

1.195 The following actions were recommended during the SA of the Proposed Submission Draft Local Plan (May 2012) in order to improve the overall effects of the policies on this objective:

- Although Strategies 9 and 10 make mention of sustainable transport provision in the West End, an overarching policy should be included within the Local Plan relating to improving sustainable transport provision across the entire District. It is particularly important to address this issue due to the rural nature of the District, and the relatively poor public transport links currently in place across much of East Devon
- **The importance of the natural stores of organic carbon present in the District's heathland, pasture and woodland soils and in timber vegetation should be recognised in Sections 17 or 18 of the Local Plan.**

1.196 These recommendations have now been addressed in the Publication Draft Local Plan and no further specific recommendations are made with particular reference to this SA objective.

Objective 16: To ensure energy consumption is as efficient as possible

Strategic Policies

- 1.197 A large number of the strategic policies are expected to result in mixed effects as, although development in general will inevitably result in increased energy usage, new developments may offer good opportunities for incorporating renewable energy generation.
- 1.198 Strategies 3 and 38-41, which endorse renewable energy development and promote sustainable design and construction methods, should have a significant positive effect on this objective.

Development Management Policies

- 1.199 A large number of the development management policies, in particular those relating to design standards and the natural and built environment are not likely to have any effect on this SA objective. However, a number of minor negative effects have been identified in relation to policies associated with employment, economic development, retail and tourism and recreation and community facilities, mainly associated with new development that could result from the policies and the associated inevitable increase in energy consumption resulting from occupancy and operation of new buildings etc.
- 1.200 A small number of minor positive effects have also been identified where development management policies directly endorse energy efficiency measures in new developments.

Summary of Effects on SA Objective 16

- 1.201 Overall, by considering strategic and development management policies together, a mixed (both positive and negative) effect is likely in relation to SA objective 16: to ensure energy consumption is as efficient as possible, as shown in the table below. In relation to the other considerations required by the SEA Regulations, the effects of the Local Plan on efficient energy consumption are likely to be direct, occurring locally within the district, and have a high probability of occurring. Effects of the Local Plan on this objective are likely to be long-term, ongoing and permanent.

SA Objective 16: To ensure energy consumption is as efficient as possible						
Score	Direct / indirect	Geographical Scale	Probability	Duration	Frequency	Reversibility
+/-	Direct	Local	High	Long-term	Ongoing	Permanent

Recommendations and Mitigation

1.202 The following actions were recommended during the SA of the Proposed Submission Draft Local Plan (May 2012) in order to improve the overall effects of the policies on this objective:

- The Local Plan policies could be strengthened by stating explicitly within more of the strategic policies that renewable energy will be incorporated into the development planned.

- Strategy 3 (Sustainable Development) makes reference to the need to reduce fossil fuel use; and this could be amended to ensure that an explicit reference to renewable energy development is included.

1.203 While the recommendation for Strategy 3 has been addressed in the Publication Draft Local Plan, the recommendation regarding references to renewable energy remains valid.

Objective 17: To promote wise use of waste resources whilst reducing waste production and disposal

Strategic Policies

- 1.204 A large number of the strategic policies are expected to result in mixed effects, as although development in general is likely to result in increased waste production, new developments may offer improved opportunities for incorporating waste reduction measures and for the provision of recycling facilities.
- 1.205 Strategies 3 and 38, which set out measures for sustainable development and sustainable design and construction, should have a significant positive effect on this objective, as waste minimisation and re-use comprise an important component of taking a sustainable approach to design and construction. In addition, Strategy 38 requires that housing developments meet at least Level 4 from the Code for Sustainable Homes from 2013. Level 4 requires new homes to have a site **waste management plan in place during the home’s construction, adequate** space for waste storage during its use, as well as providing recycling capacity either inside or outside the home. No other significant impacts on this objective have been identified through the appraisal.

Development Management Policies

- 1.206 A large number of the development management policies, in particular those relating to design standards and the natural and built environment are not likely to have any effect on this SA objective. However, a number of minor negative effects have been identified in relation to policies associated with employment, economic development, retail and tourism and recreation and community facilities, mainly associated with new development that could result from the policies and the associated potential increase in waste generation.
- 1.207 A small number of minor positive effects have also been identified where policies encourage resource efficiency, e.g. the sharing of community facilities (policy RC7) or food growing which will help to reduce packaging waste (policy RC3). However, none of these impacts are likely to be significant.

Summary of Effects on SA Objective 17

1.208 Overall, by considering strategic and development management policies together, a mixed (both positive and negative) effect is likely in relation to SA objective 17: to promote wise use of waste resources whilst reducing waste production and disposal, as shown in the table below. In relation to the other considerations required by the SEA Regulations, the effects of the Local Plan on waste management are likely to be direct, occurring locally throughout the district, and have a high probability of occurring. Effects of the Local Plan on this objective are likely to be long-term (from 2013), ongoing and permanent.

SA Objective 17: To promote wise use of waste resources whilst reducing waste production and disposal						
Score	Direct / indirect	Geographical Scale	Probability	Duration	Frequency	Reversibility
+/-	Direct	Local (District-wide)	High	Long-term (from 2013)	Ongoing	Permanent

Recommendations and Mitigation

1.209 No specific recommendations are made with particular reference to this SA objective.

Economic Growth, Education and Employment

Relevant SA Objectives

- 3. To provide for education, skills and lifelong learning to meet the needs of the local population and meet local employment needs
- 18. To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce.
- 19. To maintain and enhance the vitality and viability of the Towns of East Devon.
- 20. To encourage and accommodate both indigenous and inward investment.

Objective 3: To provide for education, skills and lifelong learning to meet the needs of the local population and meet local employment needs

Strategic Policies

- 1.210 A large number of the strategic Local Plan policies are not considered likely to affect this objective, but where effects are identified, they are generally positive or significantly positive. In most cases, the positive effects are associated with increased employment provision, and therefore a likely increase in the available opportunities for work-based training and skills development, rather than with the direct provision of school and college places. Strategy 31: Future Job and Employment Land Provision now makes particular reference to the opportunities for employers to provide work-based training opportunities (reflecting a previous SA recommendation).

Development Management Policies

- 1.211 None of the development management policies associated with design standards or residential development are likely to have an effect on this objective. However, a large number of potentially minor negative effects have been identified in relation to the policies associated with the natural and built environment. This is mainly because the policies include criteria aimed to protect the natural and built environment which could result in restrictions being placed on economic development and therefore the associated education and learning opportunities. As with the strategic policies, the effects are more to do with the extent of employment provision, and therefore the likely effects on opportunities for work-based training and skills development, rather than with education provision.
- 1.212 Most of the policies relating to employment, economic development, retail and tourism and recreation and community facilities are likely to have negligible effects on this objective; however a number of minor positive have been identified where policies aim to safeguard land for employment sites or extend existing sites, or where they will lead to the provision of employment opportunities in conjunction with new housing development.
- 1.213 The effects of most of the transport and communications policies on this SA objective are almost all negligible; however one minor negative effect has been identified in relation to policy TC12, which could potentially restrict development (including economic development which would otherwise provide employment opportunities) within aerodrome safeguarding areas and public safety zones.

Summary of Effects on SA Objective 3

- 1.214 Overall, by considering strategic and development management policies together, a minor positive effect is likely in relation to SA objective 3: to provide for education, skills and lifelong learning to meet the needs of the local population and meet local employment needs, as shown in the table below. In relation to the other considerations required by the SEA Regulations, the effects of the Local Plan on education and skills are likely to be direct, occurring locally throughout the district, and have a high probability of occurring. Effects of the Local Plan on this objective are likely to be long-term, ongoing and permanent.

SA Objective 3: To provide for education, skills and lifelong learning to meet the needs of the local population and meet local employment needs

Score	Direct / indirect	Geographical Scale	Probability	Duration	Frequency	Reversibility
+	Direct	Local	High	Long-term	Ongoing	Permanent

Recommendations and Mitigation

- 1.215 The following actions were recommended during the SA of the Proposed Submission Draft Local Plan (May 2012) in order to improve the overall effects of the policies on this objective:
- Where housing development is proposed and it is stated that community services/facilities will be provided to support the growing population, it should be made consistently clear where this will include education facilities such as additional school and college places.
 - More recognition could be made within the policies of the potential benefits that can be achieved through employment provision in terms of education and skills development, for example within Strategy 31: Future Job and Employment Land Provision, some reference could be made to the provision of work-based training opportunities.

1.216 These recommendations have now been addressed in the Publication Draft Local Plan and no further specific recommendations are made with particular reference to this SA objective.

Objective 18: To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce

Strategic Policies

- 1.217 The strategic Local Plan policies overall are likely to have a large number of positive effects on this objective, as provision is made for a large number of jobs to support population growth, with these opportunities being reasonably well spread across the District rather than being focussed only in the West End. The proximity of the employment site allocations made through the strategic policies to existing and future residential development in East Devon has been considered separately in the appraisal of site options, as discussed in the next section of this NTS.
- 1.218 However, two of the strategic policies (Strategies 7: Development in the Countryside and 8: Development in Green Wedges) could have a minor negative effect on this objective, as the restrictions that they place on development could potentially restrict economic growth and therefore employment opportunities.

Development Management Policies

- 1.219 None of the development management policies associated with design standards are likely to have an effect on this objective. A large number of potentially minor negative effects have been identified in relation to the policies associated with the natural and built environment, the majority of which are again related to the restrictions that the policies may put on economic development and therefore the associated employment opportunities in the District.
- 1.220 Most of the policies associated with new residential development are not expected to affect this objective, although one of the policies (H1: Residential Land Allocation) may have a minor positive effect because the policy encourages mixed-use residential and employment development on some of the allocated sites.
- 1.221 A large number of minor positive, and some significant positive effects, are associated with the policies relating to employment, economic development, retail and tourism, as the nature of these policies means that they aim to achieve economic development and employment benefits. In particular, significant positive effects are associated with policies E2, E3, E6 and E7 as they relate specifically to enhancing employment opportunities in the District. Most of the transportation and communications policies will have no effect on this SA objective.

Summary of Effects on SA Objective 18

- 1.222 Overall, by considering strategic and development management policies together, a minor positive effect is likely in relation to SA objective 18: to maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce, as shown in the table below. In relation to the other considerations required by the SEA Regulations, the effects of the Local Plan on employment are likely to be direct, occurring locally throughout the district, and have a high probability of occurring. Effects of the Local Plan on this objective are likely to be long-term, ongoing and permanent.

SA Objective 18: To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce

Score	Direct / indirect	Geographical Scale	Probability	Duration	Frequency	Reversibility
+	Direct	Local (District-wide)	High	Long-term	Ongoing	Permanent

Recommendations and Mitigation

- 1.223 No specific recommendations are made with particular reference to this SA objective.

Objective 19: To maintain and enhance the vitality and viability of the Towns of East Devon

Strategic Policies

- 1.224 The strategic policies that focus on developing East Devon’s West End are generally considered likely to have negative effects on the smaller towns of the District, particularly Strategies 9: Major Development at East Devon’s West End, 16: Exeter Science Park and 19: SkyPark Business Park. These policies will focus significant amounts of economic development in the West End, which will draw people and resources away from the smaller towns which lie further east and may leave them vulnerable to becoming ‘dormitory towns’, in which people live, but commute westwards for work and other activities.
- 1.225 However, the strategic policies that detail the development to be undertaken in the towns such as Exmouth, Honiton, Ottery St Mary, Seaton, Sidmouth, Budleigh Salterton and Axminster should have significant positive effects on this objective. As well as providing for housing development, the proposals set out a more rounded approach, with the provision of employment land and facilities to support the growing populations, and ensuring that the towns are able to retain a decent level of self-sufficiency (in terms of enabling residents to live and work in the same town). These issues were also considered in relation to the specific site allocations for each town, as discussed in the next section of this NTS.

Development Management Policies

- 1.226 A large number of the development management policies, including all of the policies associated with design standards and the natural and built environment, are expected to have no effect on this SA objective. Where effects have been identified, these are largely positive, in particular the policies associated with employment, economic development, retail and tourism. In particular, policies E9: Town Centre Shopping Areas, E10: Primary Shopping Frontages and E11: Large Stores and Retail-Related Uses in Area Centres are all likely to have a significant positive effect on this SA objective as they are all focussed on enhancing the quality of the District’s town centres and their service provision, which should help to maintain and enhance vitality and viability of the towns.
- 1.227 None of the development management policies are likely to have negative effects on this SA objective, although a small number of mixed effects have been identified. For example, policy E18: Loss of Holiday Accommodation will have a mixed effect as ongoing tourism in the towns which are listed in the policy will benefit the local economy and help to secure jobs; however if the change of use of holiday accommodation into uses such as affordable housing were to be permitted, there may be greater benefits to the vitality of these towns. Policy RC5: Community Buildings may also have mixed effects, as the provision of additional services and facilities could increase the viability of the District’s towns if the facilities are provided within those towns, but

where they are developed in villages, this may reduce the extent to which people use the towns for services and facilities.

Summary of Effects on SA Objective 19

- 1.228 Overall, by considering strategic and development management policies together, a mixed (both positive and negative) effect is likely in relation to SA objective 19: to maintain and enhance the vitality and viability of the Towns of East Devon, as shown in the table below. In relation to the other considerations required by the SEA Regulations, the effects of the Local Plan on the vitality and viability of the towns of East Devon are likely to be direct, occurring locally within the towns of the District, and have a high probability of occurring. Effects of the Local Plan on this objective are likely to be long-term, ongoing and permanent.

SA Objective 19: To maintain and enhance the vitality and viability of the Towns of East Devon						
Score	Direct / indirect	Geographical Scale	Probability	Duration	Frequency	Reversibility
+/-	Direct (Strategies for the East Devon Towns)/ Indirect (Strategies for West End)	Local (towns in the District)	High	Long-term	Ongoing	Permanent

Recommendations and Mitigation

- 1.229 No specific recommendations are made with particular reference to this SA objective.

Objective 20: To encourage and accommodate both indigenous and inward investment

Strategic Policies

- 1.230 The majority of the Preferred Approaches are likely to have either a positive or significant positive effect on this objective, as the Local Plan overall makes significant provision for employment land and other development that will increase the attractiveness of the District to investors.
- 1.231 However, a small number of the proposals that relate to conditions for development, for example requiring financial contributions towards green infrastructure or affordable housing provision, may have the opposite effect, making developers less inclined to invest in East Devon. However, it is likely that any such requirements will be on a par with those in place in other Districts, and the benefits of developing in East Devon should remain such that they outweigh any potential deterrents to investors.

Development Management Policies

- 1.232 A large number of the development management policies are not expected to have an effect on this objective; however where effects have been identified, there are a mixture of minor positive and minor negative effects.
- 1.233 Most of the policies associated with design standards and with the natural and built environment will have no effect, although potential minor negative effects are associated with policies D4: Applications for Display of Advertisements and D5: Advertisements within Areas of Special Control of Advertisements and Advance Advertisements Signs because the restrictions imposed by these policies could have a negative effect on local businesses.
- 1.234 A mixture of minor positive and minor negative effects are associated with the employment, economic development, retail and tourism and transportation and communication policies, due to the measures that they include to increase economic activity and encourage investment in the District, for example the measures associated with the provision of employment land and maintaining attractive and viable town centres that will be appealing for shops to locate in.

Summary of Effects on SA Objective 20

- 1.235 Overall, by considering strategic and development management policies together, a minor positive effect is likely in relation to SA objective 20: to encourage and accommodate both indigenous and inward investment, as shown in the table below. In relation to the other considerations required by the SEA Regulations, the effects of the Local Plan on encouraging investment are likely to be direct, occurring locally within the District, and have a high probability of occurring. Effects of the Local Plan on this objective are likely to be long-term, ongoing and permanent.

SA Objective 20: To encourage and accommodate both indigenous and inward investment

Score	Direct / indirect	Geographical Scale	Probability	Duration	Frequency	Reversibility
+	Direct	Local	High	Long-term	Ongoing	Permanent

Recommendations and Mitigation

- 1.236 No specific recommendations are made with particular reference to this SA objective.

Potential Effects of the Site Allocations in the Publication Draft of the New Local Plan

- 1.237 The allocations for employment, residential and mixed-use development sites at each town are shown on the proposals maps in the Local Plan and are made in the following policies:
- Exmouth – Strategy 22 and Policy E1
 - Honiton – Strategy 23 and Policy E1
 - Axminster – Strategy 20 and Policy E1
 - Ottery St Mary – Strategy 24 and Policies E1 and H1
 - Budleigh Salterton – Policy H1
 - Seaton – Strategy 25 and Policy H1
 - Sidmouth – Policies E1 and H1
- 1.238 In order to make sure that the appraisals of sites are consistent, detailed assumptions about potential sustainability impacts were developed and applied during the appraisal. The assumptions that were used for the appraisal of residential and employment sites can be found in **Appendix 5** in the full SA report.
- 1.239 In line with the requirements of the SEA Regulations, as well as the sites that have been allocated in the Publication Draft Local Plan, all of the reasonable alternative sites considered for allocation at each town in the Local Plan have also been subject to appraisal. The detailed appraisal matrices for the allocated sites and alternatives are presented in **Appendix 7** of the full SA report and the findings are summarised in detail in **Chapter 6** of that report. An audit trail is presented in **Appendix 6** of the full SA report, showing why the allocated sites were selected and which alternative sites were discounted by EDDC. Maps showing the locations of all of the sites that were subject to SA can also be found in **Appendix 6** of the full SA report.
- 1.240 **Tables 4-10** below present the SA scores for the site allocations in each of the towns of East Devon, and the findings are summarised further ahead in this section.

Table 4 Summary of Exmouth Site Appraisal Scores

SA Objective	W147	420b	W079	Waterfront sites	040(A)	3691	W007	W063	W074	W085	W111	W145	W146	W164	W211	W079	W202	W315	W317	W170	
	Allocated Sites					Alternative Sites															
1: Decent homes	++?	0	++	??	0	++	+	+	+	+	+	++	++	++	+	++	+	+	+	+	
2: Access to community services	0	-	++	++	+	0	+	0	-	-	-	-	0	+	0	++	0	-	++	++	
3: Education and skills	++?	+	++?	++?	+	??	??	??	-?	-?	??	??	++?	-?	??	++?	-?	-?	++/-?	++?	
4: Health	++	++	+	++?	++	+	++	+	+	+	+	+	++	+	+	+	+	+	+	++	
5: Crime	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
6: Noise	-?	0?	-?	--?	--?	-?	-?	-?	-?	-?	-?	-?	-?	--?	-?	-?	--?	-?	-?	--?	
7: Cultural, social and leisure provision	+	0	++?	++	0	+	++	+	??	+	+	+	+	+	+	++?	+	-?	++	++	
8: Historic assets	--?	-?	--?	--?	-?	-?	--?	-?	--?	--?	--?	--?	--?	--?	-?	--?	--?	--?	-?	--?	
9: Wise use of land and landscape character	+/-	-	--	--	-/+	--	+/-	+/-	+/-	+/-	+/-	--	--	--/+	+/-	--	+/-	+/-	+/-	+	
10: Quality and character of the local environment	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	0	0
11: Biodiversity	-?	0?	-?	--?	0?	--?	0?	-?	-?	0?	0?	--?	-?	-?	-?	-?	-?	-?	0?	--?	
12: Sustainable transport	+/-	+/-	+/-	++	+/-	+/-	+/-	+/-?	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-?	++
13: Air, soil and water quality	-	--	--	0	0	--	-	-	-	-	-	-	-	--	-	--	--	--	0	0	
14: Greenhouse gases	++	++	??	++	++	++	++	++	??	++	++	++	++	++	++	??	+	+	++	++	
15: Flooding	-	-	-	--	-	-	-	-	-	-	-	-	--	-	-	-	-	-	0	0	
16: Energy efficiency	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
17: Waste	--	-	--	--	-	--	-	-	-	-	-	--	--	--	-	--	-	-	0	0	
18: Employment	??	+	??	++	+	++	++	++	??	++	++	++	++	++	++	??	??	??	??	??	
19: Vitality and viability of the Towns of East Devon	++	+	++	++	+	++	+	+	+	+	+	++	++	++	+	++	+	+	+	+	
20: Encourage investment	0?	+	0	??	+	0	0	0	0	0	0	0	0	0	0	0	0	0	+/-?	0	

Table 5 Summary of Honiton Site Appraisal Scores

SA Objective	E164 E322 E321	E158A (Emp)	E158B	O11 (A, B C & D)	E156	E026	E212	E164	E321	E322	E174	E034	3054	E158A (Res)	E170	E167
	Allocated Sites				Alternative Sites											
1: Decent homes	+	0	++	0	+	+	+	+	+	+	+	+	+	++	++	++
2: Access to community services	++	-	0	-	0	0	++	++	++	++	0	-	-	0	-	0?
3: Education and skills	++?	++	-?	+	-?	-?	++?	++?	++?	++?	-?	-?	-?	-?	-?	-?
4: Health	+	+	+	+	+	+	+	+	+	+/-	+/-	-	-	+	-	+/-?
5: Crime	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6: Noise	--?	-?	--?	-?	--?	--?	-?	--?	--?	-?	--?	-?	--?	--?	--?	--?
7: Cultural, social and leisure provision	++?	0	+	0	+	+	++?	++?	++?	++?	+	-?	-	+	+	+
8: Historic assets	--?	--?	-?	--?	--?	-?	--?	--?	--?	--?	-?	-?	-?	--?	-?	--?
9: Wise use of land and landscape character	-	--	-	-	--	--	--	-	+/-	+	+/-	--	+/-	--	--	--
10: Quality and character of the local environment	-?	-?	-?	-?	-?	-?	-?	-?	0	0	-?	-?	0	-?	-?	-?
11: Biodiversity	0?	-?	-?	-?	--?	-?	0?	0?	0?	0?	-?	-?	-?	-?	0?	--?
12: Sustainable transport	++	+/-	+/-	+/-	+/-?	+/-?	+/-	++	++	++	++	+/-?	+/-	+/-	+/-	++/-
13: Air, soil and water quality	0	-	-	-	-	-	--	0	0	--	--	--	--	-	--	--
14: Greenhouse gases	++?	++	++?	++	++	+	+	++?	++?	++?	++?	+	+	++	+	++?
15: Flooding	-	-	-	--	-	-	-	-	0	0	-	-?	0	-	-	-
16: Energy efficiency	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17: Waste	-	--	--	-	-	-	-	-	0	0	-?	-?	-?	--	--	--
18: Employment	+	++	++	+	++	+	+	+	+/-?	+/-?	+	+	+	++	+	+
19: Vitality and viability of the Towns of East Devon	+	++	++	+	+	+	+	+	+	+	+	+	+	++	++	++
20: Encourage investment	0	++	0	+	0	0	0	0	0	0	0	0	0	0	0	0?

Table 6 Summary of Axminster Site Appraisal Scores

SA Objective	E057	E105	(015 (A & B)),	E057	E105	E133	E203	E208	E072	E100
	Allocated Sites			Alternative Sites						
1: Decent homes	++	++	0	++	++	+	++	+	+	+
2: Access to community services	++	++	-	++	++	-	-	-	-	0?
3: Education and skills	++?	++?	+	++?	++?	+	-?	+	-?	-?
4: Health	++	++?	++	++?	++?	+	+	+	+	+
5: Crime	0	0	0	0	0	0	0	0	0	0
6: Noise	--?	--?	-?	--?	--?	--?	--?	--?	-?	--?
7: Cultural, social and leisure provision	++	++?	0	++	++?	+	+	+	+	+
8: Historic assets	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?
9: Wise use of land and landscape character	+/-	+/-	+/-	+/-	+/-	-	--	--	+/-	+/-
10: Quality and character of the local environment	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?
11: Biodiversity	--?	--?	-?	--?	--?	-?	-?	--?	-?	--?
12: Sustainable transport	+	++/-	+	+	++	+	+	+	+	+
13: Air, soil and water quality	-	-	-	-	-	-	-	-	-	-
14: Greenhouse gases	++	++	++	++?	++	+	+	+	+	++
15: Flooding	--	-	-	--	-	-	--	--	-	-
16: Energy efficiency	0	0	0	0	0	0	0	0	0	0
17: Waste	--	--	-	--	--	-	--	-	-	-
18: Employment	++	++	+	++?	++	+	+	+	+	++
19: Vitality and viability of the Towns of East Devon	++	++	+	++	++	+	++	+	+	+
20: Encourage investment	+	+	+	+	+	0	0	0	0	+

Table 7 Summary of Ottery St Mary Site Appraisal Scores

SA Objective	C311	C141	(008 (A & B))	C202	C008	C040	C070	C107	C111	C310	C105	3046	C019	C049	C071	C141A	C141B
	Allocated Sites			Alternative Sites													
1: Decent homes	+	+	0	+	+	+	+	+	+	++	++	++	+	+	+	+	+
2: Access to community services	++	++	+	++	-	++	++	++	0	0	0	++	-	-	-	++	++
3: Education and skills	++?	+++?	+	+++?	++?	+++?	+++?	+++?	++?	++?	++?	+++?	-?	++?	-?	+++?	+++?
4: Health	++	++	++	+	+	+	+	+	++	++	++	++	+	+	+	++	+++?
5: Crime	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6: Noise	--?	--?	-?	-?	-?	-?	-?	-?	-?	0?	--?	-?	-?	0?	-?	--?	--?
7: Cultural, social and leisure provision	++	+++?	0	++	+	++	++	+	+	+	+	++	+	+	+	+++?	++
8: Historic assets	--?	--?	--?	--?	-?	-?	-?	-?	--?	--?	-?	-?	--?	-?	--?	--?	--?
9: Wise use of land and landscape character	+/-	+	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+
10: Quality and character of the local environment	-?	0	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	0	0
11: Biodiversity	0?	0?	0?	0?	0?	0?	0?	0?	0?	0?	0?	0?	0?	0?	0?	0?	0?
12: Sustainable transport	++	++	++	++	+/-?	++	++	++	+/-?	+/-?	+/-?	++	+/-?	+/-?	+/-?	++	++
13: Air, soil and water quality	-	0	-	--	--	--	--	--	-	-	-	--	-	--	-	0	0
14: Greenhouse gases	+++?	++	++	++	+	+++?	+++?	+++?	++	++	++	+++?	+	+	++	++	+++?
15: Flooding	-	-	--	-	-	-	-	-	-	-	-	-	--	-	--	-	-
16: Energy efficiency	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17: Waste	-	0	-	-	-	-	-	-	-	--	--	--	-	-	-	0	0
18: Employment	++	++	+	++?	++?	++?	++?	++?	++	++	++	++	++?	++?	++	+++?	++?
19: Vitality and viability of the Towns of East Devon	+	+	+	+	+	+	+	+	+	++	++	++	+	+	+	+	+
20: Encourage investment	++?	++?	+	0	0	0	0	0	0	0	0	0	0	0	0	++?	0

Table 8 Summary of Budleigh Salterton Site Appraisal Scores

SA Objective	C096	C056	C022	C046	C054	C096	C301	C306	C309
	Allocated Sites		Alternative Sites						
1: Decent homes	+	+	+	+	++	+	+	+	+
2: Access to community services	+	++	0	+	++	+	+	++	+
3: Education and skills	+?	+?	-?	+?	+?	+?	+?	-?	-?
4: Health	+	++?	+	+	+	+	+	+	+
5: Crime	0	0	0	0	0	0	0	0	0
6: Noise	-?	-?	-?	-?	--?	-?	-?	-?	-?
7: Cultural, social and leisure provision	++	++	++	++	++	++	++	++	++
8: Historic assets	-?	-?	--?	-?	--?	--?	--?	--?	--?
9: Wise use of land and landscape character	--	--	--	--	--	--	--	--	--
10: Quality and character of the local environment	-?	-?	-?	-?	-?	-?	-?	-?	-?
11: Biodiversity	-?	-?	--?	-?	--?	-?	-?	--?	--?
12: Sustainable transport	+/-	+/-	+/-	+/-	+/-?	+/-	+/-	+/-	+/-
13: Air, soil and water quality	--	-	--	--	--	--	--	0	--
14: Greenhouse gases	+	+	+	+	+	+	+	+?	+
15: Flooding	-	-	-	-	-	-	-	-	-
16: Energy efficiency	0	0	0	0	0	0	0	0	0
17: Waste	-	-	-	-	--	-	-	-	-
18: Employment	+?	+?	+?	+?	+?	+?	+?	+?	+?
19: Vitality and viability of the Towns of East Devon	+	+	+	+	++	+	+	+	+
20: Encourage investment	0	0	0	0	0	0	0	0	0

Table 9 Summary of Seaton Site Appraisal Scores

SA Objective	118b	E171	E315	E007/8	E006	E309	E076	E007	E008	E103	E104	E088	E114	E315	E171	118B
	Allocated Sites					Alternative Sites										
1: Decent homes	0	+	+	+	+	+	+	+	+	+	+	+	0	+	++	0
2: Access to community services	-	++	++	-	0	-	-	-	-	-	-	++	+	++	+++?	-
3: Education and skills	+	++?	-?	-?	+++?	++?	-?	-?	-?	-?	++?	+++?	+	-?	++?	+
4: Health	++	+++?	+	+	+	+	+	+	+	+	+	++	++	+	+++?	++
5: Crime	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6: Noise	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?
7: Cultural, social and leisure provision	++?	++	++	+	+	+	+	+	+	+	+	++	0	++	++	++?
8: Historic assets	--?	--?	--?	-?	--?	-?	--?	-?	-?	--?	--?	-?	--?	--?	--?	--?
9: Wise use of land and landscape character	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-
10: Quality and character of the local environment	-?	0	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	0	-?
11: Biodiversity	--?	--?	--?	-?	-?	--?	-?	-?	-?	-?	-?	--?	--?	--?	--?	--?
12: Sustainable transport	+/-	++	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-
13: Air, soil and water quality	--	0	--	--	-	-	-	--	-	-	--	0	--	--	0	--
14: Greenhouse gases	++	++	++	++	++	+	+	++	++	++	++	++	++	++	++	++
15: Flooding	-	--	-	-	-	-	-	-	-	-	-	--	-	-	--	-
16: Energy efficiency	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17: Waste	-	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18: Employment	+	++?	++	++	++	++?	++?	++	++	++	++	++	+	++	++?	+
19: Vitality and viability of the Towns of East Devon	+	+	+	+	+	+	+	+	+	+	+	+	+	+	++	+
20: Encourage investment	+	++?	++?	0	0	0	0	0	0	0	0	0	+	0	++?	+

Table 10 Summary of Sidmouth Site Appraisal Scores

SA Objective	ED02	ED01	ED03	1967	(001 (A, B & C))	1967	C026	C053	C098	C102	C151	C335	ED02A	ED02B	3299	3602	C053
	Allocated Sites						Alternative Sites										
1: Decent homes	+	+	+	0	0	0	+	+	+	+	+	+	+	+	0	0	0
2: Access to community services	++	++	++	+	+	+	++	++	-	-	-	++	++	++	-	-	+
3: Education and skills	++?	++?	++?	+	+	+	??	??	-?	-?	-?	??	++?	++?	+	+	+
4: Health	++	++	++	++	++	++	++	++	+	+	+	++	++?	++	++	++	++
5: Crime	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6: Noise	--?	--?	--?	-?	--?	-?	--?	-?	--?	-?	-?	-?	--?	--?	-?	-?	0?
7: Cultural, social and leisure provision	++	++	++	0	0	0	++	++	+	+	+	++	++?	++	0	0	0
8: Historic assets	--?	--?	--?	--?	-?	--?	--?	-?	--?	--?	-?	--?	--?	--?	--?	--?	-?
9: Wise use of land and landscape character	+/-	+/-	+	--	-	--	--?	--	--?	--	--	--	+/-	+/-	--?	--	--
10: Quality and character of the local environment	0	0	0	-?	-?	-?	-?	-?	-?	-?	-?	-?	0	-?	-?	-?	-?
11: Biodiversity	-?	0?	--?	0?	0?	0?	0?	0?	-?	-?	-?	0?	-?	-?	-?	-?	0?
12: Sustainable transport	++	+/-	++	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-	+/-	++	++	+/-	+/-	+/-
13: Air, soil and water quality	0	0	0	-	0	-	-	-	-	-	-	-	0	0	-	-	-
14: Greenhouse gases	++	++	++	++	++	++	++	++	+	+	+	++	++	++	+	+	+
15: Flooding	0	0	-	--	-	--	--?	-	-	-	-	--	0	-	-	-	-
16: Energy efficiency	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17: Waste	0	0	0	-	-	-	-?	-	-?	-?	-?	-?	0	-?	-	-	-
18: Employment	++	++	++	+	+	+	++	++	??	??	??	++	??	??	+	+	+
19: Vitality and viability of the Towns of East Devon	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
20: Encourage investment	0	0	??	+	+	+	0	0	0	0	0	0	0	0	+	+	+

Healthy and Prosperous Communities

Relevant SA objectives

- 1. To ensure everybody has the opportunity to live in a decent home.
- 2. To ensure that all groups of the population have access to community services.
- **4. To improve the population's health**
- 5. To reduce crime and fear of crime
- 7. To maintain and improve cultural, social and leisure provision

- 1.241 The locations of particular site allocations will not affect levels of crime (SA objective 5); therefore all of the scores for that objective are negligible. However, the effects of the site allocations on the other objectives associated with healthy and prosperous communities are broadly positive in all seven of the towns, although with some individual exceptions. This is in part because of the nature of the development proposed – i.e. all of the residential and mixed use sites will have positive effects on housing (SA objective 1), although most will have minor rather than significant positive effects because most sites are less than 10ha in size.
- 1.242 The effects of the sites on access to services (SA objective 3), health (SA objective 4) and cultural, social and leisure provision (SA objective 7) depend in part on the provision of new community services and facilities within the new development proposed, which is in many cases uncertain due to a lack of detailed information about how the sites would be developed. However, where mixed-use development is planned for some of the site allocations, the effects on these objectives will generally be more positive as it is clear that new services and facilities will be provided to support the population growth associated with the residential development proposed, and as a result existing services should not become overloaded.
- 1.243 Effects on the social objectives also depend on the proximity of new sites to existing community services and facilities. Since the majority of the allocated and alternative site options are within well built up areas of the towns of East Devon, most have a reasonable selection of services and facilities within walking distance, such as schools, religious establishments, public open space and **doctor's surgeries**. This is particularly the case for the sites that are within larger towns such as Exmouth where the existing range of such facilities is generally better than in the smaller towns.

Environmental Protection and Enhancement

Relevant SA Objectives

- 6. To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution.
 - 8. To maintain and enhance built and historic assets.
 - 9. To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon.
 - 10. To maintain the local amenity, quality and character of the local environment.
 - 11. To conserve and enhance the biodiversity of East Devon.
 - 12. To promote and encourage non-car based modes of transport and reduce journey lengths.
 - 13. To maintain and enhance the environment in terms of air, soil and water quality.
 - 15. To ensure that there is no increase in the risk of flooding.
- 1.244 The effects of the sites (both allocated sites and reasonable alternatives) on the environmental objectives are generally much more varied than for the social and economic objectives, because effects depend on issues (such as proximity to sensitive receptors) which vary significantly between the sites. Due to the construction and transport likely to be associated with new development, most of the sites will have negative effects on noise (SA objective 6). There have also been a large number of negative effects identified in relation to soil quality (SA objective 13) and flooding (SA objective 15) where sites are within areas of high agricultural land quality or high flood risk zones. In Axminster, a particularly high proportion of the site options were within flood risk zones, as the River Axe runs through the town and so fairly large areas of the town are

classed as being at higher flood risk, in comparison to somewhere like Budleigh Salterton where no significant effects on that objective were identified.

- 1.245 All of the sites in Budleigh Salterton, as well as many of the sites in Exmouth, Honiton and Sidmouth were likely to have a significant negative effect on landscape character (SA objective 9) as they are within the East Devon AONB and so new development is considered likely to have a negative effect on the quality and character of the AONB. For the other towns (Ottery St Mary, Axminster and Seaton), the effects were broadly more positive because of the greater distance between those towns (and therefore the site options) and the nearest AONB.
- 1.246 The effects of the sites on historic assets (SA objective 8) were all either minor or significantly negative, due to the potential for development to affect the setting of nearby historic assets. In most cases, this was due to the proximity of listed buildings because of the high concentrations of listed buildings in the towns of East Devon. This was a particular issue in Axminster where all of the site options were likely to have a significant negative effect on the historic environment.
- 1.247 The effects of the sites on biodiversity (SA objective 11) were again broadly negative, due to the proximity of most of the site options to at least one designated conservation site. Particular negative effects were identified for the sites in Axminster, Budleigh Salterton and Sidmouth, because of the greater concentration of designated sites in those areas, some of which are at the European level.

Resource Consumption and Climate Change

Relevant SA Objectives

- 14. To contribute towards a reduction in local emissions of greenhouse gases.
 - 16. To ensure energy consumption is as efficient as possible.
 - 17. To promote wise use of waste resources whilst reducing waste production and disposal.
- 1.248 The effects of the site options on greenhouse gas emissions (SA objective 14) were mainly determined by the proximity of existing and potential residential and employment development to one another (so that opportunities for non-car based modes of transport might be greater) and on the availability of public transport links. All of the site options considered were within walking distance of at least one bus stop, with most having several in close proximity; however a fairly small proportion of residential sites were within walking distance of an employment site allocation (or vice versa).
- 1.249 None of the site allocations were considered to have an effect on energy efficiency (SA objective 16) as the location of individual sites will not affect this issue; rather it will be determined by the design of new buildings and the practices used on site.
- 1.250 Most of the sites will have either a minor or significant negative effect on waste (SA objective 17) as development (regardless of the location) is likely to lead to increased waste generation, and because most of the site options are on greenfield land, meaning that there are likely to be fewer opportunities to re-use existing buildings and materials than there might be on a brownfield site. A particularly high proportion of sites in Axminster and Exmouth were found to have significant negative effects on this objective as there was a fairly high number of site options that were larger sized sites on previously undeveloped land.

Economic Growth, Education and Employment

Relevant SA Objectives

- 3. To provide for education, skills and lifelong learning to meet the needs of the local population and meet local employment needs
- 18. To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce.
- 19. To maintain and enhance the vitality and viability of the Towns of East Devon.
- 20. To encourage and accommodate both indigenous and inward investment.

- 1.251 The effects of the sites on education and skills (SA objective 3) depend largely on the proximity of the sites to existing schools. Because most of the sites are well within existing urban areas, most are within walking distance of at least one school.
- 1.252 Due to the nature of development proposed, the sites that are for residential development only (most of the site options considered) would not affect employment provision (SA objective 18). However, the employment and mixed use sites would have positive effects, although the extent and significance of the positive effect is also influenced by proximity to residential development and transport links. In all cases, employment sites are within close proximity of bus stops to provide access from residential areas and many are also close to existing or proposed residential development and so would lead to significant positive effects.
- 1.253 Again, only the employment or mixed-use development site options would be expected to have an effect on encouraging investment (SA objective 20) so there are a large number of negligible effects identified. Almost all of the sites that would have an effect would have a minor rather than a significant positive effect, as the sites are smaller than 10ha, apart from one larger site in Honiton.

Summary

- 1.254 While there are many variations between the SA scores for the towns and for the individual site options within each town, in general the sites that have been allocated in the Local Plan have been found to have broadly similar or more positive sustainability effects than the alternative site options considered. However, it is important to note that the findings of the SA have not been the only consideration that has guided the allocation of sites in the Local Plan. In addition to the SA other work carried out by the Council has informed the selection of sites, such as a detailed landscape assessment in respect of possible site allocations in the AONBs. Technical constraints and other considerations have also informed site choices.
- 1.255 It should be recognised that the potential sustainability effects of each site presented in the detailed appraisal matrices in the full SA report and summarised in **Tables 4-10** above have been identified without taking into account the potential mitigation provided by other Local Plan policies. The implementation of the strategic and development management policies in the Local Plan should go a long way towards mitigating the potential negative effects identified for the allocated sites. In addition, individual detailed schemes at each of the allocated sites should be designed around overcoming the adverse issues that the SA has identified, as well as maximising the potential benefits.

Monitoring

- 1.256 The SEA Regulations require that monitoring is undertaken in relation to the significant effects of implementing the Plan in question. **Table 4** below sets out a number of suggested indicators for monitoring the potential significant sustainability effects of implementing the Local Plan. Note that the indicators proposed are included as suggestions at this stage, as it is recognised that many datasets may not be available for monitoring some of the sustainability effects of the Local Plan, and that the indicators included may change as EDDC finalises its monitoring framework. Monitoring of the sustainability effects of implementing the Plan should be undertaken as part of the monitoring that EDDC is required to carry out on how well the policies of the Plan are being implemented (reported on annually).

Table 4: Monitoring Indicators for the Proposed Submission Draft Local Plan

SA objectives for which potential significant effects have been identified	Proposed indicators
1. To ensure everybody has the opportunity to live in a decent home.	<ul style="list-style-type: none"> • Number of new homes built annually within the District. • Percentage of all new homes delivered in the District that are affordable.
2. To ensure that all groups of the population have access to community services.	<ul style="list-style-type: none"> • Amount of residential completions within 30 minutes public transport time of a GP, a hospital, a primary school, a secondary school, an employment centre and a major health centre.
3. To provide for education, skills and lifelong learning to: i. meet the needs of the local population, and ii. meet local employment needs	<ul style="list-style-type: none"> • Number of new work-based apprenticeships offered in the District annually. • Number of new school places created in the District annually.
4. To improve the population's health	<ul style="list-style-type: none"> • Average life expectancy in the District.
5. To reduce crime and fear of crime.	<ul style="list-style-type: none"> • Number of crimes reported annually in the District.
6. To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution.	<ul style="list-style-type: none"> • Number of noise pollution incidents reports annually.
7. To maintain and improve cultural, social and leisure provision.	<ul style="list-style-type: none"> • Percentage of eligible open spaces managed to green flag award standard.
8. To maintain and enhance built and historic assets.	<ul style="list-style-type: none"> • Number of heritage assets within the District on the 'Heritage at Risk Register'.
9. To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon.	<ul style="list-style-type: none"> • Percentage of new development taking place on brownfield land.
10. To maintain the local amenity, quality and character of the local environment.	<ul style="list-style-type: none"> • Number of complaints made to EDDC regarding noise pollution.
11. To conserve and enhance the biodiversity of East Devon.	<ul style="list-style-type: none"> • Change in areas and populations of biodiversity importance, including (i) change in priority habitats and species (by type); and (ii) change in areas designated for their intrinsic environmental value including sites of international, national, regional, sub-regional significance (changes arising from development, management and planning agreements, in hectares and numbers of priority species type).
12. To promote and encourage non-car based modes of transport and reduce journey lengths.	<ul style="list-style-type: none"> • Frequency of bus services in the District's villages.

SA objectives for which potential significant effects have been identified	Proposed indicators
13. To maintain and enhance the environment in terms of air, soil and water quality.	<ul style="list-style-type: none"> • Number of declared Air Quality Management Areas (AQMAs) in the District.
14. To contribute towards a reduction in local emissions of greenhouse gases.	<ul style="list-style-type: none"> • Renewable energy capacity installed by type.
15. To ensure that there is no increase in the risk of flooding.	<ul style="list-style-type: none"> • Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality.
16. To ensure energy consumption is as efficient as possible.	<ul style="list-style-type: none"> • Renewable energy capacity installed by type.
17. To promote wise use of waste resources whilst reducing waste production and disposal.	<ul style="list-style-type: none"> • Volume of waste generated in the District annually. • Percentage of waste generated in the District that is recycled.
18. To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce.	<ul style="list-style-type: none"> • Amount of land (defined by completed sqm gross floorspace) developed for employment by type. • Amount of employment land lost to residential development
19. To maintain and enhance the vitality and viability of the Towns of East Devon.	<ul style="list-style-type: none"> • Amount of completed retail development in town centres.
20. To encourage and accommodate both indigenous and inward investment.	<ul style="list-style-type: none"> • Amount of land (defined by completed SqM gross floorspace) developed for employment by type.

Conclusions

- 1.257 The Publication Draft of the new East Devon Local Plan is likely to have generally positive effects on the SA Objectives. There are relatively few adverse effects expected as a result of the policies in the Local Plan, with those that have been identified mainly relating to noise levels and the impacts of development on biodiversity interests within the District. Some caution is needed as there are still a number of policies with mixed or as yet uncertain effects and so the way in which the policies are implemented will be the key determinant of their eventual impacts.
- 1.258 While a range of both positive and negative effects have been identified in relation to the site allocations in the Local Plan, it is recognised that the likely effects of the allocated sites are broadly more favourable than the alternative sites considered. While there is some potential for negative effects from the development proposed (e.g. in relation to environmental considerations such as noise, landscape character and biodiversity), it is likely that such effects can be successfully mitigated through the appropriate implementation of other Local Plan policies.
- 1.259 A number of recommendations for amendments/additions to the Local Plan policies have been made throughout the SA process and the majority of these have been taken into account in the latest version of the Local Plan.

What are the next steps in the preparation of the Local Plan and its Sustainability Appraisal?

- 1.260 The SA Report will be published for consultation alongside the Local Plan (Publication Draft) between November 2012 and January 2013. East Devon District Council will be inviting consultation responses on the Local Plan and the SA Report which this Non-Technical Summary accompanies. Following the consultation, the Local Plan and SA Report will be revised as appropriate, taking into account the responses received.

Where can I find out more about the Sustainability Appraisal?

- 1.261 More detailed information about the SA process and its findings can be found in the full SA Report which is available from East Devon District Council, and on its website.

LUC

November 2012