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Sustainability Appraisal Addendum for East Devon's Local Plan

Additional Options

Prepared by LUC
February 2015

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Introduction

- 1.1 East Devon District Council submitted its Local Plan to the Secretary of State for examination in August 2013. Initial examination hearings for the Local Plan took place in February and March 2014, following which the Inspector suspended the examination process and requested that the Council undertake some further evidence gathering. This included the preparation of an up-to-date assessment of housing need. The additional technical assessment work requested by the Inspector is now nearing completion and has resulted in the Council identifying a number of options for potential policy changes to the Local Plan as submitted.
- 1.2 The Local Plan was subject to Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) throughout its preparation, in line with the requirements of the SEA Directive, culminating in the SA Report (November 2012) submitted alongside the Local Plan in August 2013. The additional options which have now been identified following the initial examination hearings are also required to be subject to SA, which is the purpose of this SA addendum. A number of other minor changes to the Local Plan are also being considered by the Council; however this SA addendum is concerned only with those options for more significant changes.
- 1.3 As this SA addendum supplements the SA work presented in the full SA Report, it does not need to address all of the requirements of the SEA Directive again (**Table 1.1** in the 2012 SA Report signposts where each of the requirements of the SEA Regulations has been met in that report).

Additional options

- 1.4 The additional options that the Council has identified and which have been subject to SA relate to the following themes:
 - The distribution strategy for additional housing required.
 - The strategy for allocating housing development at the district's villages.
 - The provision of sites for Gypsies and Travellers.
- 1.5 The options for allocating housing development at the district's villages and for the provision of Gypsy and Traveller sites are not linked to the requirement for additional housing; rather they relate to the overall approach taken in the Local Plan.
- 1.6 In addition, the Council is considering changing the start date of the Local Plan to 2013 (to align with the Strategic Housing Market Assessment) and extending the end date to 2031 or 2033. This change cannot be subject to SA in the same way as a policy option; however it must be considered in terms of its implications for the timescales over which the potential effects of the Local Plan would occur.
- 1.7 The Council has indicated that any additional housing required due to the up-to-date assessment of housing need would be allocated at sites that have already been through the SA process as part of the preparation of the Local Plan, but which are not currently included in the Plan as submitted. Should additional site options come forward, these will need to be subject to SA using the same methodology that was applied during the earlier SA work for the residential sites.

Methodology

- 1.8 The additional options that have been identified by the Council have been subject to SA using the same methodology that has been used throughout the SA process for the Local Plan, as described in detail in the SA Report for the Proposed Submission version of the Local Plan (November 2012).
- 1.9 The likely effects of each option on each of the 20 SA objectives in East Devon's SA framework have been assessed and are presented in detailed SA matrices which can be found in **Appendix 1**. Colour coded scores have been used to identify likely significant effects, as shown below:

Figure 1: Key to SA Scores

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

- 1.10 As the options are currently high level, further SA work will be required at such time as they may be worked up into detailed proposed changes to the Local Plan.

SA findings

Proposed change to start and end date of the Local Plan

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

Distribution of additional homes

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

- Option D: Not plan to meet additional housing requirements.

Summary of SA findings for the options

- 1.14 The likely effects of the four options for the distribution of additional housing on the 20 SA objectives are described in **Appendix 1** (Table A1) and summarised below in **Table 1** (**Figure 1** above provides a key for the scores/colour coding used). In general, the likely sustainability effects of locating all or most of the additional housing development at the West End (Option A) are more positive than for the other options. This is because new jobs, services and facilities are proposed to be densely concentrated in that area (and already exist in adjacent Exeter City), and co-location of jobs and homes should help to reduce journey distances (through providing scope for people to choose to live close to where they work) and increase potential for the use of sustainable transport links. Significant positive effects are therefore likely to result from Option A in relation to SA objectives 2: **access to services**, 4: **health**, 7: **cultural, social and leisure provision**, 12: **sustainable transport**, 14: **greenhouse gas emissions** and 18: **employment**. For all of those SA objectives, Option B may have minor positive effects as it would still result in around half of the additional development being located at the West End. Minor negative effects are likely to result from Option C. Under Option C most of the additional housing development would be outside of the West End and therefore less well connected in terms of jobs, services and facilities, and journeys may be longer and more likely to be undertaken by car. Option D would have negligible effects on these SA objectives as the additional housing would not be developed.
- 1.15 Options A, B and C are all expected to have significant positive effects on SA objective 1: **housing**, as under any of these options the additional housing required to meet East Devon’s objectively assessed need would be provided. Even if the 4,000 additional homes were all or almost all located at the West End (Option A), approximately 50% of the homes already provided for would still be distributed at the towns and villages across the rest of East Devon, meaning that new homes would still be provided in all parts of the district. It is also assumed that all qualifying housing developments (noting changes in Planning Guidance in respect of five and 10 dwelling thresholds for affordable housing) would incorporate the 25%/50% affordable housing levels. Under Option D a significant negative effect on SA objective 1 is likely as the objectively assessed housing needs of East Devon District (within the context of overall SHMA provision and requirements and final SHMA conclusions) would not be met and there is likely to be a significant housing shortage in the district over the Local Plan period. This approach would also lead to higher levels of commuting into and out of the district as people working in East Devon may be forced to live elsewhere; therefore significant negative effects are also likely for Option D in relation to SA objectives 12: **sustainable transport** and 14: **greenhouse gas emissions**. Option D could have a significant negative effect on matching levels of jobs with the economically active workforce (SA objective 18: **employment**) as the limited housing supply could mean that people move away from East Devon, potentially resulting in a reduced local workforce.
- 1.16 The likely effects of Options A, B and C are uncertain for SA objectives 3: **education**, 8: **historic environment**, 9: **landscape**, 11: **biodiversity** and 15: **flooding** as these issues would not be affected by the overall spatial distribution of the additional housing, they would need to be determined once specific locations have been identified. For all of these SA objectives, Option D is likely to have a negligible effect as the additional housing development which could affect the objectives would not take place.
- 1.17 None of the options for the distribution of additional housing would directly influence SA objectives 5: **crime** or 20: **encourage investment**; therefore all options would have a negligible effect.
- 1.18 Option A could have a significant negative effect on SA objective 6: **noise** as it would involve the additional housing being developed in the West End where there is a higher concentration of sensitive receptors that could be affected, particularly during the construction phase. However, this is uncertain and would depend on the exact location of development in relation to sensitive receptors and on the use of good practice construction techniques. Options B and C could both have minor negative effects as, although there are still likely to be some negative effects in relation to noise, where development takes place away from the West End there are likely to be fewer sensitive receptors within close proximity. Option D would have a negligible effect as it would not result in additional development which could otherwise increase noise levels.

- 1.19 All three of the options that would result in the development of additional housing (A, B and C) could have potential minor negative effects on SA objective 10: **amenity and local character** as the extra population growth may result in effects such as increased vehicle traffic which can adversely affect local amenity. However, such effects will depend on factors such as the scale and precise location of each development site and the availability of public transport links/other works to help mitigate any such increases in traffic. Option D would have a negligible effect as it would not result in additional development that could otherwise affect local amenity and environmental character.
- 1.20 There may be negative effects on SA objective 13: **air, soil and water** in relation to all four of the options. The development of an additional 4,000 homes (under Options A, B and C) could have a negative effect on soil quality; however this will depend on the specific location of the additional residential development, which is uncertain at this stage. The extent to which development may impact on water quality will depend on currently unknown factors such as the capacity for local sewage treatment works to cope with the additional demand from an extra 4,000 new homes; however additional runoff from hard surfacing is likely to have a negative impact to some degree. An increase in air pollution is also likely to result from higher levels of traffic in and around the district, particularly where housing is focussed outside of the West End where journeys to work are likely to be longer for many people. Therefore, potential but uncertain negative effects are identified for Options A, B and C and the effect could be significant for Option C. Under Option D, while additional housing development which could affect air, soil and water would not take place, there may be still be an increase in air pollution as people who work in East Devon may be unable to live close to their place of work and journeys are likely to be longer and more likely to be undertaken by car. A minor negative effect is therefore likely for that option.
- 1.21 The efficient consumption of **energy** (SA objective 16) will depend largely on the levels of energy production and consumption within new development, rather than on its spatial location. Although the development of 4,000 additional homes will inevitably lead to higher energy consumption overall, there may also be good opportunities for incorporating renewable energy production into new developments, particularly considering that Strategy 33 in the submitted Local Plan endorses renewable energy generation across the district. As such, the likely effects are mixed for Options A, B and C. Option D would have a negligible effect as additional development, which could affect energy efficiency, would not occur.
- 1.22 The wise use of **waste** resources and the reduction of waste production and disposal (SA objective 17) will also not be affected by the spatial location of the additional housing development; instead it will be determined by waste management practices within the development. It can be assumed that additional housing development will result in increased waste production, although new development may provide good opportunities for establishing more sustainable waste management practices and the re-use of materials. As such, mixed effects are likely for Options A, B and C. Option D would have a negligible effect as additional development, which could affect levels of waste generation and waste management practices, would not occur.

Table 1: Summary of SA findings for the options for the distribution of additional housing

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

Distribution of development at the villages

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

Summary of SA findings for the options

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

however the approach could have a detrimental effect on existing rural services, preventing population growth from ensuring the smaller villages' ongoing viability. A mixed effect is therefore likely overall for Option C.

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

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

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

Table 2: Summary of SA findings for the options for the distribution of development at the villages

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

Provision for Gypsies and Travellers

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

Summary of SA findings for the options

- 1.37 The likely effects of the four options on the 20 SA objectives are described in **Appendix 1** (Table A1) and summarised below in **Table 3 (Figure 1)** earlier in this document provides a key for the scores/colour coding used). In general, the likely sustainability effects of making provision for Gypsies and Travellers on larger scale housing allocations sites (Option B) are more positive than for the other options. This is because larger-scale housing sites are more likely to incorporate services, facilities and public transport links, which Gypsy and Traveller residents will be able to make use of. The closer proximity of jobs, services and facilities may also mean that journeys are shorter and are more likely to be undertaken on foot or by bicycle. Significant positive effects are therefore likely to result from Option B in relation to SA objectives 2: **access to services**, 3: **education**, 4: **health**, 12: **sustainable transport**, 14: **greenhouse gases** and 18: **employment**. Option C is expected to have minor positive effects on these SA objectives as, although smaller housing sites are less likely to incorporate services, sustainable transport links and employment opportunities within the sites themselves, it is assumed that accessibility considerations would have been taken into account when allocating the sites. The effects of Option D on these SA objectives are uncertain and would depend on the location of the dedicated sites for Gypsies and Travellers and their proximity to services, facilities, public transport links and employment opportunities. However, assuming that sustainability considerations are fully taken into account during the selection of sites for allocation, then it may be that potential negative effects can be avoided, while more positive effects could be achieved.
- 1.38 Option A is likely to have the most negative effects out of the options, as it would not make any provision for Gypsy and Traveller sites in East Devon. Option A would have a significant negative effect on SA objective 1: **housing** as not making land allocations for Gypsy and Traveller sites would mean that the identified need for sites would not be met. However, significant positive effects are likely for all of the other three options as they all involve allocating sites to meet local need.
- 1.39 Option A could also have minor negative effects on SA objectives 2: **access to services**, 3: **education**, 4: **health**, 8: **historic environment**, 9: **landscape** and 10: **amenity and local character** because if no provision were made in East Devon to meet the need for Gypsy and Traveller sites this may lead to the formation of unauthorised camps. In comparison to formally allocated sites which have been subject to SA, such camps may be located in areas where access to community services, education and health facilities is poor, and they may be inappropriately located in terms of their impacts on the landscape, local character and heritage features.
- 1.40 As Option A would not result in the development of Gypsy and Traveller sites negligible effects are expected on SA objectives 6: **noise**, 11: **biodiversity**, 13: **air, soil and water**, 14: **greenhouse gases**, 15: **flooding**, 16: **energy**, 17: **waste** and 19: **vitality and viability of towns**. The effects of Options B, C and D on several of these SA objectives are uncertain as they would depend on the specific location of Gypsy and Traveller sites, regardless of whether they are allocated within large or small housing sites, or as stand-alone Gypsy and Traveller sites. However, Options B and C could have minor negative effects on SA objective 6: **noise** as they would involve development taking place within housing sites where, depending on the timing of the housing development and the Gypsy and Traveller sites, other residents may be affected by construction noise. Options B, C and D may all have minor negative effects on SA objective 13: **air, water and soil** as the development of Gypsies and Traveller sites either alongside residential sites (Options B and C) or individually (Option D) could have a negative impact on soil quality; however this will depend on the specific location of the development and the extent to which it is on previously developed land, which is uncertain at this stage.

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

Table 3: Summary of SA findings for the options for the provision of Gypsy and Traveller accommodation

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

Next steps

- 1.43 The SA findings for these additional options should be taken into account by the Council as it decides which to take forward into proposed policy changes to the submitted Local Plan. Until the evidence gathering work (including production of the updated SHMA) is complete there is some uncertainty about the work that the Council will need to undertake and the timescales over which plan production will be able to proceed.
- 1.44 Once more detailed proposed changes to policies have been developed by the Council, further SA work will be required, at which point there may be more certainty with regards to the potential effects, as the proposed changes will include more detail and may be more spatially specific than the current high level options. Depending on the extent of the changes made to the plan, these may be most appropriate addressed through the production of an SA Addendum which can be published alongside the proposed changes to the Local Plan during the consultation period.

LUC
February 2015

Appendix 1

Detailed SA Matrices for the Additional Options

Table A1: SA of options for distributing the additional residential development required

SA objectives	Option A: All or almost all concentrated at the West End	Option B: Evenly spread across West End and elsewhere	Option C: Concentrated mainly outside of the West End	Option D: Not plan to meet additional housing requirements	Justification
1: To ensure everybody has the opportunity to live in a decent home	++	++	++	--	<p>The provision of around 4,000 extra homes (in addition to the 15,000 already provided for in the Local Plan as submitted) is likely to have a significant positive effect on ensuring that everybody has the opportunity to live in a decent home, regardless of the spatial distribution of the additional homes, as it will ensure that the overall housing figure for East Devon reflects the objectively assessed housing needs of the district. Even if the 4,000 additional homes are all or almost all located at the West End (Option A), approximately 50% of the 15,000 homes already provided for would still be distributed at the towns and villages across the rest of East Devon, meaning that new homes would still be provided in all parts of the district. It is also assumed that all housing developments would incorporate at least 25% affordable housing in accordance with Strategy 34 in the submitted Local Plan. Therefore, a significant positive effect on this SA objective is likely under Options A, B and C.</p> <p>Under Option D a significant negative effect is likely as the objectively assessed housing needs of East Devon District (within the context of overall SHMA provision and requirements and final SHMA conclusions) would not be met and there is likely to be a significant housing shortage in the district over the Local Plan period.</p>
2: To ensure that all groups of the population have access to community services	++?	+?	-?	0	<p>Locating all or almost all of the additional housing at the West End (Option A) would mean that its residents would be located within reasonable proximity of the services and facilities that are concentrated more heavily in that area. A significant positive effect is therefore likely. However, there is some uncertainty attached as it will be necessary to ensure that the services required to support the higher level of housing provision in that area are provided to avoid existing</p>

SA objectives	Option A: All or almost all concentrated at the West End	Option B: Evenly spread across West End and elsewhere	Option C: Concentrated mainly outside of the West End	Option D: Not plan to meet additional housing requirements	Justification
					<p>services, or those planned on the basis of the lower housing figure, becoming overloaded.</p> <p>Under option B, a minor positive effect is likely as some of the additional housing would still be located at the West End where levels of access to services are likely to be good. The rest of the housing would be distributed elsewhere in East Devon and effects on accessibility would depend largely on whether the housing is at the main towns or in more rural areas. The potential minor positive effect is therefore uncertain.</p> <p>For the same reason, the likely effects of Option C are uncertain as effects will depend largely on where outside of the West End the housing is provided in relation to existing services and facilities. However, a potential minor negative effect is identified as the additional housing would not be located near to the concentration of services and facilities that are located within and near to the West End. Again, it will be necessary to ensure that an appropriate level of community services and facilities are provided to support the additional housing planned, and to avoid services and facilities in the towns and rural areas becoming overloaded.</p> <p>Option D would not have a direct effect on access to community services.</p>
3: To provide for education, skills and lifelong learning to meet the needs of the local population and meet local employment needs	?	?	?	0	<p>The effects of the options for distributing the additional 4,000 homes within East Devon on education will depend largely on the proximity of housing developments to existing schools and whether there is capacity at those schools to accommodate the increased demand. Capacity issues have not been assessed through this work. Uncertain effects are therefore identified for Options A, B and C.</p> <p>Option D would not have a direct effect on education.</p>

SA objectives	Option A: All or almost all concentrated at the West End	Option B: Evenly spread across West End and elsewhere	Option C: Concentrated mainly outside of the West End	Option D: Not plan to meet additional housing requirements	Justification
4: To improve the population's health	+++	+?	-?	0	<p>The two options that involve focussing development at the West End (Options A and B) could have a positive effect on health as a result of more people being able to walk and cycle to work and for other journeys, as the housing would be closer to the main concentration of jobs, services and facilities in the district. The potential positive effect is significant where all or almost all of the additional housing would be delivered in the West End (Option A). Conversely, focussing development mainly outside of the West End could have a minor negative effect as people are more likely to use cars rather than walking and cycling as average journeys may be longer.</p> <p>The effects of the options for distributing the additional 4,000 homes within East Devon on health will also depend on the proximity of housing developments to existing healthcare facilities such as doctors' surgeries and whether there is capacity at those facilities to accommodate the increased demand, which cannot be determined at this stage. Uncertain effects are therefore identified for Options A, B and C. However, it is noted that very few of the rural villages in East Devon have healthcare facilities such as doctors' surgeries.</p> <p>Option D would not have a direct effect on health.</p>
5: To reduce crime and fear of crime	0	0	0	0	None of the options are likely to have a direct effect on crime and fear of crime.
6: To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution	--?	-?	-?	0	It is possible that Options A, B and C would have a negative effect on this objective as the development of an additional 4,000 new homes may result in an increase in noise levels, particularly during the construction phase. The potential negative effect may be significant under Option A as the development would be all or almost all focussed in the West End where there are likely to be more sensitive receptors within close proximity due to the denser development in that area. However, the potential negative effects are uncertain for all three options

SA objectives	Option A: All or almost all concentrated at the West End	Option B: Evenly spread across West End and elsewhere	Option C: Concentrated mainly outside of the West End	Option D: Not plan to meet additional housing requirements	Justification
					<p>and would depend on the exact location of the development and on the presence of sensitive receptors, as well as the use of good practice construction techniques.</p> <p>Option D would have a negligible effect as it would not result in additional development that could otherwise affect noise levels.</p>
7: To maintain and improve cultural, social and leisure provision	+++	+?	-?	0	<p>Locating all or almost all of the additional housing at the West End (Option A) would mean that its residents would be located within reasonable proximity of the cultural, social and leisure facilities that are concentrated more heavily in that area. A significant positive effect is therefore likely. However, there is some uncertainty attached as it will be necessary to ensure that the facilities required to support the higher level of housing provision in that area are provided to avoid existing facilities, or those planned on the basis of the lower housing figure, becoming overloaded.</p> <p>Under option B, a minor positive effect is likely as some of the additional housing would still be located at the West End where levels of access to cultural, social and leisure facilities are likely to be good. The rest of the housing would be distributed elsewhere in East Devon and effects would depend largely on whether the housing is at the main towns or in more rural areas where access to cultural, social and leisure facilities may be more limited. The potential minor positive effect is therefore uncertain.</p> <p>For the same reason, the likely effects of Option C are uncertain as effects will depend largely on where outside of the West End the housing is provided in relation to existing cultural, social and leisure facilities. However, a potential minor negative effect is identified as the additional housing would not be located near to the concentration of facilities that are located within and near to the West End. Again, it will be necessary to ensure that an appropriate level of</p>

SA objectives	Option A: All or almost all concentrated at the West End	Option B: Evenly spread across West End and elsewhere	Option C: Concentrated mainly outside of the West End	Option D: Not plan to meet additional housing requirements	Justification
					<p>cultural, social and leisure facilities are provided to support the additional housing planned, and to avoid facilities in the towns and rural areas becoming overloaded.</p> <p>Option D would not have a direct effect on cultural, social and leisure provision.</p>
8: To maintain and enhance built and historic assets	?	?	?	0	<p>The development of an extra 4,000 homes, in addition to the 15,000 that are already included in the submitted Local Plan, could enhance the overall quality of the built environment, as new buildings and sites are likely to be developed to a high standard. However, such large-scale development also has the potential to compromise the quality and setting of historic assets such as listed buildings, although this will be determined by the specific location of the additional housing to be developed in relation to such assets; something that is not yet known. As such, the potential effects of Options A, B and C are currently uncertain.</p> <p>Option D would have a negligible effect as it would not result in additional housing development that could otherwise affect the built and historic environment.</p>
9: To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon	?	?	?	0	<p>The development of an extra 4,000 homes, in addition to the 15,000 that are already included in the submitted Local Plan, could affect the landscape character of the District; however effects will depend to a large extent on factors such as the topography of the land and the screening potential at individual development sites which is unknown at present. In addition, the effect of the options on the wise use of land will depend largely on the extent to which previously developed brownfield sites are used for the additional housing development, which is also unknown at this time. As such, the potential effects of Options A, B and C are all currently uncertain. However, it is noted that there is a very limited supply of previously developed land in East Devon and that, regardless of the spatial distribution strategy followed, development is likely to</p>

SA objectives	Option A: All or almost all concentrated at the West End	Option B: Evenly spread across West End and elsewhere	Option C: Concentrated mainly outside of the West End	Option D: Not plan to meet additional housing requirements	Justification
					<p>be predominantly on greenfield sites.</p> <p>Option D would have a negligible effect as it would not result in additional development that could otherwise affect the landscape or the wise use of land.</p>
10: To maintain the local amenity, quality and character of the local environment	-?	-?	-?	0	<p>The development of an additional 4,000 homes in East Devon could have an adverse effect on local amenity as the extra population growth (on top of that already likely to occur from Strategy 1 in the Local Plan as submitted) may result in effects such as increased vehicle traffic. However, such effects will depend on factors such as the scale and precise location of each development site and the availability of public transport links to help mitigate any such increases in traffic. A potential but uncertain minor negative effect is therefore likely for Options A, B and C.</p> <p>Option D would have a negligible effect as it would not result in additional development that could otherwise affect local amenity and environmental character.</p>
11: To conserve and enhance the biodiversity of East Devon	?	?	?	0	<p>The effects of the development of an additional 4,000 homes on biodiversity will depend largely on the specific location of the additional residential development and whether development sites overlap with sites of biodiversity value. The likely effects of Options A, B and C on this SA objective are therefore uncertain.</p> <p>Option D would have a negligible effect as additional development which could affect biodiversity would not occur.</p>
12: To promote and encourage non-car based modes of transport and reduce journey lengths	++	+	-	--	<p>Focussing all or almost all of the additional housing development at the West End would mean that there are likely to be good opportunities for people to make use of sustainable transport links rather than relying on private car use. Under Option A, the overall proportion of the new housing to be provided at the</p>

SA objectives	Option A: All or almost all concentrated at the West End	Option B: Evenly spread across West End and elsewhere	Option C: Concentrated mainly outside of the West End	Option D: Not plan to meet additional housing requirements	Justification
					<p>West End would increase and a significant positive effect is likely.</p> <p>Under Option B, development would be evenly spread between the West End and other parts of the district where access to sustainable transport links is likely to be more limited and journey times may be longer to access the jobs, services and facilities which are mainly focussed in the West End. A minor rather than significant positive effect is therefore likely for that option.</p> <p>Under Option C, a minor negative effect may occur as most of the additional housing (and therefore a higher proportion of the total housing provision) would be located outside of the West End where there are likely to be fewer opportunities to walk or cycle and where public transport links are likely to be more limited. As a large amount of the district's existing and future jobs are to be focussed in the West End there may be higher levels of commuting by car, and those that commute in to Exeter city are likely to have longer journeys.</p> <p>If the additional housing need isn't met (Option D) there is likely to be a significant negative effect as people who work in East Devon may be unable to live close to their place of work and journeys are likely to be longer and more likely to be undertaken by car.</p>
13: To maintain and enhance the environment in terms of air, soil and water quality	-?	-?	--?	-	<p>The development of an additional 4,000 homes could have a negative effect on soil quality; however this will depend on the specific location of the additional residential development and the extent to which it is on previously developed land, which is uncertain at this stage. However, it is noted that there is a very limited supply of previously developed land in East Devon and that, regardless of the spatial distribution strategy followed, development is likely to be predominantly on greenfield sites. In addition, soil sealing and compaction is likely to become an issue during both the construction phase and once developments are built, with potential impacts on water infiltration and quality.</p>

SA objectives	Option A: All or almost all concentrated at the West End	Option B: Evenly spread across West End and elsewhere	Option C: Concentrated mainly outside of the West End	Option D: Not plan to meet additional housing requirements	Justification
					<p>The extent to which development may impact on water quality will depend on currently unknown factors such as the capacity for local sewage treatment works to cope with the additional demand from an extra 4,000 new homes on top of the 15,000 included in the submitted Local Plan; however additional runoff from hard surfacing is likely to have a negative impact to some degree. An increase in air pollution is also likely to result from higher levels of traffic in and around the district, particularly where housing is focussed outside of the West End where journeys to work are likely to be longer for many people. Therefore, potential but uncertain negative effects are identified for Options A, B and C and the effect could be significant for Option C.</p> <p>Under Option D, while additional housing development which could affect air, soil and water would not take place, there may be still be an increase in air pollution as people who work in East Devon may be unable to live close to their place of work and journeys are likely to be longer and more likely to be undertaken by car. A minor negative effect is therefore likely.</p>
14: To contribute towards a reduction in local emissions of greenhouse gases	++	+	-	--	<p>Focussing all or almost all of the additional housing development at the West End (Option A) would mean that there are likely to be good opportunities for people to make use of sustainable transport links rather than relying on private car use, thereby reducing greenhouse gas emissions. Under that option, the overall proportion of the new housing to be provided at the West End would increase and a significant positive effect is likely.</p> <p>Under Option B development would be evenly spread between the West End and other parts of the district where access to sustainable transport links is likely to be more limited and journey times may be longer to access the jobs, services and facilities which are mainly focussed in the West End. A minor rather than significant positive effect is therefore likely.</p>

SA objectives	Option A: All or almost all concentrated at the West End	Option B: Evenly spread across West End and elsewhere	Option C: Concentrated mainly outside of the West End	Option D: Not plan to meet additional housing requirements	Justification
					<p>Under Option C, a minor negative effect may occur as most of the additional housing (and therefore a higher proportion of the total housing provision) would be located outside of the West End and is likely to offer fewer opportunities to walk or cycle and may be less well connected by public transport. As the majority of jobs are focussed in the West End there may be higher levels of commuting, with the associated greenhouse gas emissions, and those that commute in to Exeter are likely to have longer journeys.</p> <p>If the additional housing need isn't met (Option D) there is likely to be a significant negative effect as people are more likely to end up living and working further apart and journeys are likely to be longer resulting in increased greenhouse gas emissions from transport. While a lower overall amount of housing development might result in lower greenhouse gas emissions from development within East Devon, the additional housing demand will still need to be met somewhere and there may be more pressure for development (with the associated greenhouse gas emissions) in neighbouring districts.</p>
15: To ensure that there is no increase in the risk of flooding	?	?	?	0	<p>The development of 4,000 additional homes within East Devon may increase the flood risk if the area of impermeable land is significantly increased; however if the majority of the additional development takes place on previously developed land this may not be an issue. This cannot be assessed until the specific location of additional housing developments is known. However, it is noted that there is a very limited supply of previously developed land in East Devon and that, regardless of the spatial distribution strategy followed, development is likely to be predominantly on greenfield sites. In addition, there may be opportunities for the additional new development to incorporate flood prevention measures such as SUDS, to help reduce localised flooding. As such, the likely effects on this objective are at present uncertain for Options A, B and C and will depend on the specific design and location of the additional housing development. Option D</p>

SA objectives	Option A: All or almost all concentrated at the West End	Option B: Evenly spread across West End and elsewhere	Option C: Concentrated mainly outside of the West End	Option D: Not plan to meet additional housing requirements	Justification
					would have a negligible effect as additional development, which could affect flood risk, would not occur.
16: To ensure energy consumption is as efficient as possible	+/-	+/-	+/-	0	The efficient consumption of energy will depend largely on the levels of energy production and consumption within new development, rather than on its spatial location. However, it is noted that there is an existing combined heat and power plant serving Cranbrook which could provide specific opportunities in terms of its potential expansion or nearby development. Although the development of 4,000 additional homes will inevitably lead to higher energy consumption overall, there may also be good opportunities for incorporating renewable energy production into new developments, particularly considering that Strategy 33 in the submitted Local Plan endorses renewable energy generation across the district. As such, the likely effects are mixed for Options A, B and C. Option D would have a negligible effect as additional development, which could affect energy efficiency, would not occur.
17: To promote wise use of waste resources whilst reducing waste production and disposal	+/-	+/-	+/-	0	The wise use of waste resources and the reduction of waste production and disposal will not be affected by the spatial location of the additional housing development; instead it will be determined by waste management practices within the development. It can be assumed that additional housing development will result in increased waste production, although new development may provide good opportunities for establishing more sustainable waste management practices and the re-use of materials. As such, mixed effects are likely for Options A, B and C. Option D would have a negligible effect as additional development, which could affect levels of waste generation and waste management practices, would not occur.
18: To maintain sustainable growth of	++	+	-	--	Focussing the additional housing development all or almost all in the West End (under Option A) would mean that residents would have convenient access to

SA objectives	Option A: All or almost all concentrated at the West End	Option B: Evenly spread across West End and elsewhere	Option C: Concentrated mainly outside of the West End	Option D: Not plan to meet additional housing requirements	Justification
employment for East Devon, to match levels of jobs with the economically active workforce					<p>the substantial number of job opportunities that are to be focussed in that area, as well as in Exeter City. A significant positive effect is therefore likely in relation to Option A, and a minor positive effect is likely in relation to Option B. Concentrating most development outside of the West End (Option C) could have a minor negative effect on this SA objective as people are likely to have more limited access to employment opportunities, particularly people without a car.</p> <p>Not meeting the additional housing requirement (Option D) could have a significant negative effect on matching levels of jobs with the economically active workforce as the limited housing supply could mean that people move away from East Devon, potentially resulting in a reduced local workforce.</p>
19: To maintain and enhance the vitality and viability of the Towns of East Devon	-	+?	++?	-	<p>Under Option A, a smaller proportion of the total housing development in East Devon would take place at the seven main towns, which could have a negative effect on the vitality and viability of the towns by drawing more activity out to the West End. Residents in this area are more likely to use Exeter as their local centre for services, shopping etc. which may have a negative effect on the vitality and viability of the small towns elsewhere in the District.</p> <p>The likely effects of Options B and C will depend to some extent on how much of the development outside of the West End takes place at the seven main towns as opposed to the rural areas. However, even where housing is in the rural areas residents may be more likely to make use of the towns for services, facilities and shopping which would increase their viability and vitality. Therefore, both options are likely to have positive effects and the effect may be significant where most of the additional housing is outside of the West End (Option C).</p> <p>Option D would have a minor negative effect on this SA objective as the potential positive effects of additional housing development and the associated</p>

SA objectives	Option A: All or almost all concentrated at the West End	Option B: Evenly spread across West End and elsewhere	Option C: Concentrated mainly outside of the West End	Option D: Not plan to meet additional housing requirements	Justification
					population growth within and near to the seven towns would not occur.
20: To encourage and accommodate both indigenous and inward investment	0	0	0	0	None of the options are likely to have a direct effect on this SA objective.

Table A2: SA of options for distributing development at the villages

SA objectives	Option A: Retain BUABs and housing numbers set out in Strategy 27	Option B: Retain settlement BUABs in Strategy 27 but do not allocate housing	Option C: Remove BUAB from all the settlements in Strategy 27 and have nil or limited rural development	Option D: Assess settlements in Strategy 27 using specified criteria establishing whether they should retain their BUAB	Option E: Look to key villages to accommodate substantial levels of residential development	Justification
1: To ensure everybody has the opportunity to live in a decent home	+/-?	+?/-?	--	+	+?	<p>These options relate to the distribution of housing at the villages rather than the overall amount of housing to be provided within the district; therefore none of the options would affect whether the required level of housing in East Devon is delivered. Instead, the options will influence the ability of people in different parts of the district to access the new housing by determining its geographical location.</p> <p>Option A involves retaining the villages' Built-up Area Boundaries (BUABs) and housing development would be set at an additional 5% growth at each village. This approach is inflexible and doesn't allow for specific local needs at particular to be addressed when determining the allocations. While the housing numbers set out in Strategy 27 reflect the current total housing figure for the district, it is noted that they may be amended to reflect a higher overall housing allocation, depending on the approach taken to distributing any additional housing. As the option would spread housing development across a large number of villages, it would ensure that new housing (which is assumed to include affordable housing in line with other Local Plan policies) would be available to people in a wide range of locations. A mixed effect is therefore expected on this SA objective for Option A overall.</p>

SA objectives	Option A: Retain BUABs and housing numbers set out in Strategy 27	Option B: Retain settlement BUABs in Strategy 27 but do not allocate housing	Option C: Remove BUAB from all the settlements in Strategy 27 and have nil or limited rural development	Option D: Assess settlements in Strategy 27 using specified criteria establishing whether they should retain their BUAB	Option E: Look to key villages to accommodate substantial levels of residential development	Justification
						<p>Option B involves retaining the villages' BUABs but not allocating specific housing numbers. This means that, while development is likely to be distributed broadly across the district, there would be less certainty about the delivery of housing in rural areas to meet local needs. The option would not plan positively for development and allocations would not be set out to explicitly meet the District's housing requirement. As such, a potential but uncertain minor positive and a potential but uncertain minor negative effect are both identified for Option B (mixed effects overall).</p> <p>Option C would remove BUABs from all settlements identified in Strategy 27 resulting in nil or limited housing development at the villages. As a result, development would be focussed in the main towns of the District and rural housing needs are less likely to be met. In particular, there may not be opportunities to deliver affordable housing in rural areas where prices are often highest. As such, a significant negative effect is likely in relation to Option C.</p> <p>Under Option D, villages would be assessed using specific criteria establish to determine whether they should retain their BUAB. This would allow for development at the some of the villages and would ensure that housing is located in the most appropriate locations, although smaller villages with fewer services and facilities or less good public transport links may not receive any or as much new</p>

SA objectives	Option A: Retain BUABs and housing numbers set out in Strategy 27	Option B: Retain settlement BUABs in Strategy 27 but do not allocate housing	Option C: Remove BUAB from all the settlements in Strategy 27 and have nil or limited rural development	Option D: Assess settlements in Strategy 27 using specified criteria establishing whether they should retain their BUAB	Option E: Look to key villages to accommodate substantial levels of residential development	Justification
						<p>housing. An overall minor positive effect is therefore likely.</p> <p>Under Option E, housing would be delivered in rural areas although it is likely to be heavily focussed in smaller number of key villages and would not be as geographically dispersed as under other options. A minor rather than significant positive effect is therefore likely.</p>
2: To ensure that all groups of the population have access to community services	+/-	+/-	++/-	++	+	<p>These options will affect access to services by influencing where new housing is located and therefore how easily residents will be able to reach services and facilities.</p> <p>Option A involves spreading housing fairly evenly between the villages, meaning that existing services and facilities at each village are less likely to over-burdened as the level of housing development at each village will be fairly small. However, although all of the villages named in Strategy 27 have a reasonable range of community services, this approach of a blanket 5% additional housing growth at each village does not tailor the level of development to the level of community services available to support a growing population. Ease of access to services and facilities from each village is also not taken into consideration. As such, the option may result in an inappropriate scale of development coming forward at some villages. As such a mixed effect is expected on this SA objective for Option A (minor positive and significant negative).</p> <p>Option B is also likely to result in a spread of development between</p>

SA objectives	Option A: Retain BUABs and housing numbers set out in Strategy 27	Option B: Retain settlement BUABs in Strategy 27 but do not allocate housing	Option C: Remove BUAB from all the settlements in Strategy 27 and have nil or limited rural development	Option D: Assess settlements in Strategy 27 using specified criteria establishing whether they should retain their BUAB	Option E: Look to key villages to accommodate substantial levels of residential development	Justification
						<p>the villages, meaning that services and facilities are unlikely to become over-burdened. It is more flexible and does not allocate specific levels of housing at each village, which might allow for factors such as access to services to steer development to the most appropriate locations. However, as development would not be positively planned for, inappropriate levels of windfall housing development may occur at some villages that do not have suitable access to community services to support population growth. A mixed effect is therefore expected on this SA objective for Option B (minor positive and minor negative).</p> <p>Option C would limit rural development and therefore direct housing development to the main towns of the District where there tend to be a wider range of services and facilities in close proximity. Services at these locations may be more able to accommodate population growth without becoming overloaded as they are likely to be of a larger size. People without cars are more likely to be able reach services and facilities on foot and a significant positive effect is therefore likely. However, directing development away from the villages could mean that small rural services become unviable through a lack of population growth in the area, particularly if young families are unable to access affordable rural housing. Opportunities to increase the viability of rural services and transport links would also be lost, resulting in a minor negative effect and a mixed effect overall.</p>

SA objectives	Option A: Retain BUABs and housing numbers set out in Strategy 27	Option B: Retain settlement BUABs in Strategy 27 but do not allocate housing	Option C: Remove BUAB from all the settlements in Strategy 27 and have nil or limited rural development	Option D: Assess settlements in Strategy 27 using specified criteria establishing whether they should retain their BUAB	Option E: Look to key villages to accommodate substantial levels of residential development	Justification
						<p>Option D involves assessing the villages named in Strategy 27, considering the services and facilities available there, to establish whether they should retain their BUAB and thus whether housing development would be suitable at each location. This should result in development being focussed where an appropriate range of community services is accessible and therefore a significant positive effect is expected on this SA objective.</p> <p>Option E would focus development in a small number of key villages. These villages are likely to be selected on the basis of accessibility to services, among other factors, and the larger proportion of population growth in those villages could stimulate the provision of new services and facilities. However, the potential benefits of development at other villages, such as supporting small rural services and potentially stimulating the provision of new ones, would not occur. An overall minor rather than significant positive effect on this SA objective is therefore likely.</p>
3: To provide for education, skills and lifelong learning to meet the needs of the local population and meet local employment needs	+/-?	+/-?	+/-	+	+	<p>These options will affect education by influencing where new housing is located and therefore how easily residents will be able to reach schools and colleges.</p> <p>Option A involves spreading housing fairly evenly between the villages meaning that existing schools at each village are less likely to over-burdened as the level of housing development at each village</p>

SA objectives	Option A: Retain BUABs and housing numbers set out in Strategy 27	Option B: Retain settlement BUABs in Strategy 27 but do not allocate housing	Option C: Remove BUAB from all the settlements in Strategy 27 and have nil or limited rural development	Option D: Assess settlements in Strategy 27 using specified criteria establishing whether they should retain their BUAB	Option E: Look to key villages to accommodate substantial levels of residential development	Justification
						<p>will be fairly small. Population growth in the smaller villages may help to support small village primary schools and maintain their viability, so existing and new residents do not have to travel further afield. However, the approach of a blanket 5% additional housing growth at each village does not tailor the level of development to local circumstances, taking factors such as school capacity and distances into consideration. As such the inflexible nature of a 5% additional housing growth level at each location may result in an inappropriate level of development coming forward at some villages. As such a mixed effect is expected on this SA objective for Option A. The potential minor negative effect is uncertain as it would depend on whether additional school places are provided as part of any new housing development.</p> <p>Option B is also likely to result in a spread of development between the villages, meaning that individual schools are unlikely to become over-burdened. It is more flexible and does not allocate specific levels of housing at each village, which might allow for factors such as access to school places to steer development to the most appropriate locations. However, as development would not be positively planned for, inappropriate levels of windfall housing development may occur at some villages that do not have suitable access to schools to support population growth. A mixed effect is therefore expected on this SA objective for Option B (minor positive and minor negative). The potential minor negative effect is</p>

SA objectives	Option A: Retain BUABs and housing numbers set out in Strategy 27	Option B: Retain settlement BUABs in Strategy 27 but do not allocate housing	Option C: Remove BUAB from all the settlements in Strategy 27 and have nil or limited rural development	Option D: Assess settlements in Strategy 27 using specified criteria establishing whether they should retain their BUAB	Option E: Look to key villages to accommodate substantial levels of residential development	Justification
						<p>uncertain as it would depend on whether additional school places are provided as part of any new housing development.</p> <p>Option C would limit rural development and therefore direct housing development to the main towns of the District where schools and colleges are more likely to be in close proximity. Schools and colleges at these locations may be more able to accommodate population growth without becoming overloaded as they are likely to be of a larger size. However, directing development away from the villages could mean that small rural schools become unviable through a lack of population growth in the area, particularly if young families are unable to access affordable rural housing. Opportunities to increase the viability of rural schools would also be lost, resulting in a minor negative effect and a mixed effect overall.</p> <p>Option D involves assessing the villages named in Strategy 27, considering the services and facilities (taken to include schools) available there, to establish whether they should retain their BUAB and thus whether housing development would be suitable at each location. This should result in development being focussed where an appropriate range of community services, including schools, is accessible and therefore a positive effect is expected on this SA objective.</p> <p>Option E would focus development in a small number of key villages.</p>

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						<p>These villages are likely to be selected on the basis of accessibility to schools, among other factors, and the larger proportion of population growth in those villages could stimulate the provision of new schools/school places. However, the potential benefits of development at other villages, such as supporting small rural schools, would not occur. An overall minor positive effect on this SA objective is therefore likely.</p>
4: To improve the population's health	-	-?	+	+/-	+/-	<p>The options for housing development at the villages can affect health in terms of both access to healthcare facilities and the extent to which people will be able to walk and cycle for day-to-day journeys.</p> <p>Option A would result in a geographical spread of development across the District, meaning that any existing healthcare facilities at individual villages are less likely to be overburdened. However, the small level of population growth at each village means that housing development is less likely to stimulate the provision of new facilities, and the location of housing at smaller villages in particular means that access to doctor's surgeries etc. may be difficult, particularly for those without a car. In addition, day to day journeys are less likely to be able to be undertaken on foot or by bicycle as journeys are likely to be longer as jobs, services and facilities are generally less easily accessible in the smaller villages. An overall minor negative effect on this SA objective is therefore likely.</p> <p>Option B would also result in a spread of development between the</p>

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						<p>villages although without allocating specific levels of housing there is less certainty about how the development would be spread and how this may impact on capacity at healthcare facilities. As with option A, housing development would take place at villages of varying sizes and at smaller villages in particular, levels of access to healthcare facilities may be poor and opportunities to walk and cycle for day to day journeys may be limited. A minor negative effect is therefore expected on this SA objective although there is some uncertainty, depending on the eventual spread of housing development between the villages.</p> <p>Option C would limit rural housing development and steer development instead to the main towns of the District where people are likely to have a wider range of healthcare facilities within closer proximity, and where opportunities to walk or cycle to reach jobs, services and facilities may be better. However, it is noted that potential opportunities to support rural healthcare facilities such as doctor's surgeries would be lost. An overall minor rather than significant positive effect is therefore likely</p> <p>Option D involves assessing the villages named in Strategy 27, considering the services and facilities (taken to include healthcare facilities) available there, to establish whether they should retain their BUAB and thus whether housing development would be suitable at each location. This should result in development being focussed</p>

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						<p>where an appropriate range of community services, including healthcare facilities, is accessible and therefore a positive effect is expected on this SA objective. However, development would still be taking place in rural areas, where opportunities to walk and cycle may be limited; therefore the overall effect is likely to be mixed.</p> <p>Option E would focus development in a small number of key villages. These villages are likely to be selected on the basis of accessibility to facilities such as doctor's surgeries, among other factors, and the larger proportion of population growth in those villages could stimulate the provision of new healthcare facilities. However, development would still be taking place in rural areas, where opportunities to walk and cycle may be limited; therefore the overall effect is likely to be mixed.</p>
5: To reduce crime and fear of crime	0	0	0	0	0	None of the options are likely to have a direct effect on crime and fear of crime.
6: To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution	-?	-?	--?	-?	-?	It is possible that all of the options would have a negative effect on this objective as the development of housing in the District may result in an increase in noise levels, particularly during the construction phase. The potential negative effect may be significant under Option C as the development is likely to be mostly focused in the main towns of East Devon where there are more sensitive receptors within close proximity. However, the potential negative effects are uncertain for all five options and would depend on the

SA objectives	Option A: Retain BUABs and housing numbers set out in Strategy 27	Option B: Retain settlement BUABs in Strategy 27 but do not allocate housing	Option C: Remove BUAB from all the settlements in Strategy 27 and have nil or limited rural development	Option D: Assess settlements in Strategy 27 using specified criteria establishing whether they should retain their BUAB	Option E: Look to key villages to accommodate substantial levels of residential development	Justification
						precise location of the development and on the presence of sensitive receptors.
7: To maintain and improve cultural, social and leisure provision	+/-	+/-	++/-	++	+	<p>These options will affect access to cultural, social and leisure facilities by influencing where new housing is located and therefore how easily residents will be able to reach such facilities.</p> <p>Option A involves spreading housing fairly evenly between the villages, meaning that existing cultural, social and leisure facilities at each village are less likely to over-burdened as the level of housing development at each village will be fairly small. However, although all of the villages named in Strategy 27 have a reasonable range of community services, this approach of a blanket 5% additional housing growth at each village does not tailor the level of development to the level of cultural, social and leisure facilities available to support a growing population. Ease of access to such facilities from each village is also not taken into consideration. As such, the option may result in an inappropriate scale of development coming forward at some villages. As such a mixed effect is expected on this SA objective for Option A (minor positive and significant negative).</p> <p>Option B is also likely to result in a spread of development between the villages, meaning that cultural, social and leisure facilities are unlikely to become over-burdened. It is more flexible and does not</p>

SA objectives	Option A: Retain BUABs and housing numbers set out in Strategy 27	Option B: Retain settlement BUABs in Strategy 27 but do not allocate housing	Option C: Remove BUAB from all the settlements in Strategy 27 and have nil or limited rural development	Option D: Assess settlements in Strategy 27 using specified criteria establishing whether they should retain their BUAB	Option E: Look to key villages to accommodate substantial levels of residential development	Justification
						<p>allocate specific levels of housing at each village, which might allow for factors such as access to cultural, social and leisure facilities to steer development to the most appropriate locations. However, as development would not be positively planned for, inappropriate levels of windfall housing development may occur at some villages that do not have suitable access to cultural, social and leisure facilities to support population growth. A mixed effect is therefore expected on this SA objective for Option B (minor positive and minor negative).</p> <p>Option C would limit rural development and therefore direct housing development to the main towns of the District where there tend to be a wider range of cultural, social and leisure facilities in close proximity. Facilities at these locations may be more able to accommodate population growth without becoming overloaded as they are likely to be of a larger size. People without cars are more likely to be able reach cultural, social and leisure facilities on foot and a significant positive effect is therefore likely. However, directing development away from the villages could mean that small rural facilities become unviable through a lack of population growth in the area, particularly if young families are unable to access affordable rural housing. Opportunities to increase the viability of rural facilities would also be lost, resulting in a minor negative effect and a mixed effect overall.</p>

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						<p>Option D involves assessing the villages named in Strategy 27, considering the services and facilities available there, to establish whether they should retain their BUAB and thus whether housing development would be suitable at each location. This should result in development being focussed where an appropriate range of cultural, social and leisure facilities is accessible and therefore a significant positive effect is expected on this SA objective.</p> <p>Option E would focus development in a small number of key villages. These villages are likely to be selected on the basis of accessibility to cultural, social and leisure facilities, among other factors, and the larger proportion of population growth in those villages could stimulate the provision of new facilities. However, the potential benefits of development at other villages, such as supporting small rural facilities and potentially stimulating the provision of new ones, would not occur. An overall minor rather than significant positive effect on this SA objective is therefore likely.</p>
8: To maintain and enhance built and historic assets	?	?	?	?	?	<p>The impacts of development of new housing, under any of the options for the distribution of development between the villages, could offer potential scope to enhance the quality of the built environment if development is undertaken to a high standard and where sensitive to the landscape, heritage and environmental setting. However, new development also has the potential to compromise the quality and setting of historic assets such as listed</p>

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						buildings and conservation areas (of which there are 33 in the District). Such effects will be determined by the specific location of housing development in relation to heritage assets; something that is not yet known. As such, the likely effects of all options are currently uncertain.
9: To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon	?	?	?	?	?	The options for distributing housing development at the villages could affect the landscape character of the District; however such effects will depend to a large extent on factors such as the topography of the land and the screening potential at individual development sites which is unknown at present. In addition, the effect of the options on the wise use of land will depend largely on the extent to which previously developed brownfield sites are used, which is also unknown at this time. However, it is noted that there is a very limited supply of previously developed land in East Devon and that, regardless of the spatial distribution strategy followed, development is likely to be predominantly on greenfield sites. As such, the potential effects of all of the options are currently uncertain.
10: To maintain the local amenity, quality and character of the local environment	?	?	?	?	?	The development of housing at the villages could have an adverse effect on local amenity as the increase in population may result in effects such as increased vehicle traffic. However, the effects on this objective will depend on factors such as the scale and precise location of each development site and the availability of public

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						transport links to help mitigate any such increases in traffic, rather than the overall distribution of housing between the villages. As such, an uncertain is identified for all options.
11: To conserve and enhance the biodiversity of East Devon	?	?	?	?	?	The effects of the options for distributing housing development at the villages will depend largely on the specific location of residential development sites and whether these overlap with sites of biodiversity importance. The likely effects of all identified options on this SA objective are therefore uncertain.
12: To promote and encourage non-car based modes of transport and reduce journey lengths	--	--	++	-/+?	-/+?	The options that involve housing development at the villages (A, B, D and E) are likely to mean that levels of car use are higher, particularly where development would be spread across the district including at smaller villages. Significant negative effects are therefore likely for Options A and B. Under Options D and E, housing development would be focussed at the villages that are considered to be most suitable to accommodate new development – the assessment of suitability is likely to consider accessibility issues and sustainable transport links. As housing would be focussed in a small number of key villages under Option E, the higher proportion of population growth may stimulate the provision of new bus links. Mixed effects are therefore likely overall for Options D and E although there is some uncertainty depending on which villages development is focussed at and their distance from the main towns

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						<p>and the West End.</p> <p>Under Option C, rural housing development would be limited and housing would instead be focussed at the towns where journeys are likely to be shorter and there are more likely to be opportunities to walk, cycle or use buses. A significant positive effect is therefore likely.</p>
13: To maintain and enhance the environment in terms of air, soil and water quality	-?	-?	+?	-/+?	-/+?	<p>The development of housing in the District could have a negative impact on soil quality in the area; however this will depend on the specific location of the residential development sites and whether they are on previously developed land, rather than the overall distribution of the housing. The extent to which development may impact on water quality will depend on currently unknown factors such as the capacity for local sewage treatment works to cope with the additional demand.</p> <p>An increase in air pollution is also likely to result from an increase in traffic in and around the district, particularly where development takes place at the smaller villages – a potential negative effect is therefore identified for Options A and B. Under Option C, development would be steered away from the rural areas and towards the main towns of East Devon where sustainable transport links are likely to be better and journey times shorter. Therefore, a minor positive effect is likely for that option.</p>

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						<p>Under Options D and E, development would still be focussed at villages where levels of car use are likely to be higher; however focussing more development at a smaller number of villages may result in the provision of new sustainable transport links such as bus services. Mixed effects are therefore likely overall for those two options although there is some uncertainty depending on which villages development is focussed at and how far they are from the West End and main towns.</p>
14: To contribute towards a reduction in local emissions of greenhouse gases	-	-	+	-/+?	-/+?	<p>While new housing development in any location will inevitably result in an increase in greenhouse gas emissions, the options for distributing housing development between the villages will affect this SA objective by influencing the likely extent of car use by new residents and the associated vehicular emissions.</p> <p>An increase in greenhouse gas emissions from traffic is particularly likely where development takes place at the smaller villages – a likely negative effect is therefore identified for Options A and B. Under Option C, development would be steered away from the rural areas and towards the main towns of East Devon where sustainable transport links are likely to be better and levels of car use (and associated emissions) lower. Therefore, a minor positive effect is likely for that option.</p> <p>Under Options D and E, development would still be focussed at villages where levels of car use are likely to be higher; however</p>

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						focussing more development at a smaller number of villages may result in the provision of new sustainable transport links such as bus services. Mixed effects are therefore likely overall for those two options although there is some uncertainty depending on which villages development is focussed at and how far they are from the West End and main towns.
15: To ensure that there is no increase in the risk of flooding	?	?	?	?	?	The effects of the options for distributing housing development at the villages will depend largely on the specific location of residential development sites in relation to areas of high flood risk. The likely effects of all identified options on this SA objective are therefore uncertain.
16: To ensure energy consumption is as efficient as possible	0	0	0	0	0	The efficient consumption of energy will depend largely on the levels of energy production and consumption within new development, rather than on its spatial location. Therefore, none of the options for distributing housing development between the villages will have a direct effect on this SA objective.
17: To promote wise use of waste resources whilst reducing waste production and disposal	0	0	0	0	0	The wise use of waste resources and the reduction of waste production and disposal will not be affected by the distribution of housing development between the villages; instead it will be determined by waste management practices within the development.

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18: To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce	-	-	+	+/-	+/-	<p>Option A would result in a wide geographic spread of development across the district, including at some villages which are located quite far away from the main job opportunities in the West End. Similarly, option B is likely to result in development at smaller villages in more rural locations, where people without cars may have more limited access to jobs. Both options could therefore have a negative effect on this SA objective.</p> <p>Option C involves removing BUABs from all of the villages identified in Strategy 27 and allowing for only limited rural development, which would effectively focus housing development in the main towns and in the West End of the District. This would result in residents having more convenient access to the substantial number of job opportunities that are to be focussed in that area, as well as in Exeter City to the west of East Devon. A positive effect is therefore likely in relation to Option C.</p> <p>Options D and E would involve assessing villages individually and establishing whether their BUABs should be retained or if they can be considered to key villages which are capable of accommodating substantial levels of residential development. As such, although these options would direct this development away from the main towns of the District where employment opportunities may be mainly focussed, villages could be assessed individually in terms of employment provision and proximity to other employment centres as</p>

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						well public transport links to decide whether this portion of the District's development should be located at these settlements. As such a mixed (minor positive and minor negative) effect is expected for Option D and Option E on this SA objective.
19: To maintain and enhance the vitality and viability of the Towns of East Devon	++	+/-	+/-	?	?	<p>The options for housing development at the villages will affect this SA objective by influencing the number of people living in the villages around the towns of East Devon, and therefore the number of people who are likely to make use of those towns for shops, services and facilities, thus influencing their vitality and viability.</p> <p>Under Option A, the retention of the villages' BUABs and housing allocations as set out in Strategy 27 would result in a broad geographical spread of housing development across the district due to the blanket 5% additional housing growth level proposed within each of the identified villages. This broad geographical spread of development would increase the population in all parts of the district and therefore around all of East Devon's towns, meaning that there are more people making use of services, facilities and shopping there, thus boosting their viability and vitality. As such a significant positive effect is expected on this SA objective.</p> <p>Option B would involve retaining the villages' BUABs; however no allocation for housing at each village would be made. This could mean that development is not spread between the villages, with some receiving much more or less new housing. Therefore, the</p>

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						<p>towns near to villages where more housing development takes place may benefit disproportionately, at the expense of others in terms of maintaining their vitality and viability. As such a mixed effect is expected on this SA objective.</p> <p>As Option C would remove BUABs from all of the settlements as identified in Strategy 27, resulting in significant restrictions on rural development, it is likely that development would instead be focussed in the towns and the West End of East Devon. While the provision of development in the towns would help to increase the vitality and viability of these settlements, development in the West End would mean that residents are more likely to use Exeter as their local centre for services, shopping etc. This may have a negative effect on the vitality and viability of the small towns elsewhere in the District. Similarly, restricting housing development at the villages would reduce the population of the rural areas around the towns that may make use of them for services and facilities. As such a mixed effect is expected on this SA objective overall.</p> <p>Option D and Option E involve focussing residential development at villages which are considered to be more suitable to accommodate development. The effects of these options on this SA objective are largely uncertain and will depend on the proximity of the villages where development is focussed to the towns of East Devon, and how much residents are therefore likely to make use of the towns.</p>

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20: To encourage and accommodate both indigenous and inward investment	0	0	0	0	0	None of the options for housing development at the villages are likely to have a direct effect on indigenous and inward investment in the District and thus therefore a negligible effect on this SA objective is expected.

Table A3: SA of options for provision for Gypsies and Travellers

SA objectives	Option A: To not make land allocations	Option B: Make provision on larger scale housing allocations sites	Option C: Make provision as part of smaller scale housing sites	Option D: Allocate dedicated sites for Gypsies and Travellers	Justification
1: To ensure everybody has the opportunity to live in a decent home	--	++	++	++	Under Option A a significant negative effect is likely on this SA objective given that the identified need for Gypsy and Traveller sites would not be met and the approach would lead to a shortage of suitable accommodation for these groups in East Devon. The allocation of sites for Gypsies and Travellers as part of either larger or smaller scale residential sites (Options B and C) or as dedicated Gypsy and Traveller sites (Option D) would all have a significant positive effect on this SA objective as these options would all help to meet the identified need.
2: To ensure that all groups of the population have access to community services	-?	++?	+?	?	<p>Not making land allocations for Gypsies and Travellers in East Devon (Option A) may result in the formation of unauthorised camps in the District as the identified need for Gypsy and Traveller sites in the district would not have been met. Such camps are likely to be less well-located in terms of access to services and facilities in comparison to a planned, authorised site which would have been subject to SA. A minor negative effect is therefore possible on this SA objective for Option A although this is uncertain depending on whether such unauthorised camps are in fact formed and where they might be located in relation to services and facilities.</p> <p>Making provision for Gypsy and Traveller sites at larger scale housing/mixed use sites (Option B) is expected to have a significant positive effect on this SA objective as it is likely that larger residential sites will incorporate services and facilities which residents of the Gypsy and Traveller sites would therefore have easy access to. The potential significant positive effect on this SA objective for Option B is</p>

SA objectives	Option A: To not make land allocations	Option B: Make provision on larger scale housing allocations sites	Option C: Make provision as part of smaller scale housing sites	Option D: Allocate dedicated sites for Gypsies and Travellers	Justification
					<p>currently uncertain until the exact location for the Gypsy and Traveller sites and their proximity to services and facilities is known.</p> <p>Option C would involve locating Gypsy and Traveller accommodation at smaller scale housing sites. While it is expected that these site allocations would have been made in areas which have good access to community services (which Gypsies and Travellers would also be able to reach), it is less likely that smaller residential sites would themselves incorporate a range of services and facilities. A potential minor positive effect is therefore identified for this SA objective from Option C although this is again uncertain until the exact location of the Gypsy and Traveller sites, and their proximity to services and facilities, is known.</p> <p>The likely effect on this SA objective of allocating dedicated sites for Gypsies and Travellers (Option D) is uncertain and will depend on the proximity of those sites to existing community services and facilities that residents can make use of. Although developing separate sites specifically dedicated to Gypsy and Traveller accommodation would mean that the new sites are not integrated with existing housing sites, which may include services and facilities, Gypsy and Traveller sites may still be situated in close proximity to other existing community services which residents can make use of.</p>
3: To provide for education, skills and lifelong learning to meet the needs of the local population and meet local employment needs	-?	++?	+?	?	<p>Not making land allocations for Gypsies and Travellers in East Devon (Option A) may result in the formation of informal unauthorised camps in the District. These camps may be less well-located in terms of access to schools and colleges in comparison to planned, authorised sites that have been subject to SA, therefore there may be a minor negative effect on this SA objective. This potential effect is currently</p>

SA objectives	Option A: To not make land allocations	Option B: Make provision on larger scale housing allocations sites	Option C: Make provision as part of smaller scale housing sites	Option D: Allocate dedicated sites for Gypsies and Travellers	Justification
					<p>uncertain depending on whether such unauthorised camps would in fact be formed, and on the location of any such camps in relation to exiting education facilities.</p> <p>Making provision for Gypsies and Travellers at larger scale housing/mixed use land allocations (Option B) could have a significant positive effect on this SA objective as it is considered likely that larger sites will incorporate education facilities as well as being located within close proximity of other education facilities. Gypsies and Travellers who are located at these sites would therefore have ease of access to these facilities. The potential significant positive effect on this SA objective recorded for Option B is currently uncertain given that the exact location of the Gypsy and Traveller sites is not yet known. Additionally access to the education system will be dependent upon the availability of school places at each location.</p> <p>Option C would involve locating Gypsy and Traveller accommodation at smaller scale housing allocation sites. While it is less likely that smaller sites would incorporate schools that Gypsy and Traveller residents would also be able to access, it is expected that these residential allocations would have been made in areas which have good access to schools. A potential minor positive effect on this SA objective is therefore recorded for this option although this is currently uncertain given that the exact location of the Gypsy and Traveller sites to be provided, and their proximity to schools, is not known. Additionally access to the education system will be dependent upon the availability of school places at each location.</p> <p>The likely effect on this SA objective of allocating dedicated sites for</p>

SA objectives	Option A: To not make land allocations	Option B: Make provision on larger scale housing allocations sites	Option C: Make provision as part of smaller scale housing sites	Option D: Allocate dedicated sites for Gypsies and Travellers	Justification
					Gypsies and Travellers (Option D) is uncertain and will depend on the proximity of those sites to existing schools that residents can make use of, and whether those schools have capacity. Although developing separate sites specifically dedicated to Gypsy and Traveller accommodation would mean that the new sites are not integrated with existing housing sites, which may include schools, Gypsy and Traveller sites may still be situated in close proximity to other schools which residents can make use of.
4: To improve the population's health	-?	++?	+?	?	<p>Not making land allocations for Gypsies and Travellers in East Devon (Option A) may result in the formation of informal unauthorised camps in the District. These camps may be less well-located in terms of access to healthcare facilities in comparison to planned, authorised sites which would have been subject to SA; therefore there may be a minor negative effect on this SA objective for Option A. The negative effect is currently uncertain depending on whether such unauthorised camps would in fact be formed, and on their location in relation to healthcare facilities.</p> <p>Allocating sites for Gypsies and Travellers at larger scale housing/mixed use land allocations (Option B) could have a significant positive effect on this SA objective as it is likely that larger residential sites might incorporate healthcare facilities that Gypsy and Traveller residents would therefore have easy access to. There may also be more opportunities for Gypsy and Traveller residents to undertake day-to-day journeys on foot or by bicycle (which would have health benefits) as larger sites are likely to incorporate services, facilities and/or employment opportunities within the sites. The potential significant positive effect on this SA objective recorded for Option B is currently uncertain until the exact location of the Gypsy and Traveller</p>

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					<p>sites is known.</p> <p>Option C would involve locating Gypsy and Traveller accommodation at smaller scale housing allocation sites. While it is less likely that smaller sites would incorporate healthcare facilities that Gypsy and Traveller residents would also be able to access, it is expected that these residential allocations would have been made in areas which have good access to doctors' surgeries etc. A potential minor positive effect on this SA objective is therefore recorded for this option although this is currently uncertain given that the exact location of the Gypsy and Traveller sites to be provided, and their proximity to healthcare facilities, is not known.</p> <p>The likely effect on this SA objective of allocating dedicated sites for Gypsies and Travellers (Option D) is uncertain and will depend on the proximity of those sites to existing healthcare facilities that residents can make use of. Although developing separate sites specifically dedicated to Gypsy and Traveller accommodation would mean that the new sites are not integrated with existing housing sites, which may include healthcare facilities, Gypsy and Traveller sites may still be situated in close proximity to other healthcare facilities which residents can make use of. The extent to which residents are able to walk and cycle will also depend largely on the locations of the Gypsy and Travellers sites which are not yet known.</p>
5: To reduce crime and fear of crime	0	0	0	0	None of the options for Gypsy and Traveller sites are likely to have a direct effect on crime and fear of crime.
6: To reduce noise levels and minimise exposure of	0	-?	-?	?	Option A would not result in the development of Gypsy and Traveller sites, which might otherwise have an effect on noise pollution in East

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people to unacceptable levels of noise pollution					<p>Devon. Therefore, a negligible effect is expected on this SA objective.</p> <p>Options B and C would involve making provision for Gypsy and Traveller accommodation within larger and smaller-scale housing sites. Developing Gypsy and Traveller sites within those residential areas may result in noise pollution during construction; therefore there may be a minor negative effect, although this is uncertain depending on whether the Gypsy and Traveller sites are developed at the same time or after the other residential development, i.e. once other residents are already living there.</p> <p>The effect of developing dedicated sites for Gypsies and Travellers on this SA objective is uncertain given that it is unknown at this stage if these allocations will be in close proximity to existing housing or other sensitive receptors.</p>
7: To maintain and improve cultural, social and leisure provision	0	+?	+?	?	<p>Not making land allocations for Gypsies and Travellers in East Devon (Option A) may result in the formation of unauthorised camps in the District as the identified need for Gypsy and Traveller sites in the district would not have been met. Such camps are likely to be less well-located in terms of access to cultural, social and leisure facilities in comparison to a planned, authorised site which would have been subject to SA. A minor negative effect is therefore possible on this SA objective for Option A although this is uncertain depending on whether such unauthorised camps are in fact formed and where they might be located in relation to cultural, social and leisure facilities.</p> <p>Making provision for Gypsy and Traveller sites at larger scale housing/mixed use sites (Option B) is expected to have a significant positive effect on this SA objective as it is likely that larger residential</p>

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					<p>sites will incorporate cultural, social and leisure facilities which residents of the Gypsy and Traveller sites would therefore have easy access to. The potential significant positive effect on this SA objective for Option B is currently uncertain until the exact location for the Gypsy and Traveller sites and their proximity to cultural, social and leisure facilities is known.</p> <p>Option C would involve locating Gypsy and Traveller accommodation at smaller scale housing sites. While it is expected that these site allocations would have been made in areas which have good access to cultural, social and leisure facilities (which Gypsies and Travellers would also be able to reach), it is less likely that smaller residential sites would themselves incorporate a range of cultural, social and leisure facilities. A potential minor positive effect is therefore identified for this SA objective from Option C although this is again uncertain until the exact location of the Gypsy and Traveller sites, and their proximity to cultural, social and leisure facilities, is known.</p> <p>The likely effect on this SA objective of allocating dedicated sites for Gypsies and Travellers (Option D) is uncertain and will depend on the proximity of those sites to existing cultural, social and leisure facilities that residents can make use of. Although developing separate sites specifically dedicated to Gypsy and Traveller accommodation would mean that the new sites are not integrated with existing housing sites, which may include cultural, social and leisure facilities, Gypsy and Traveller sites may still be situated in close proximity to other existing cultural, social and leisure facilities which residents can make use of.</p>

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8: To maintain and enhance built and historic assets	-?	?	?	?	<p>Not making land allocations for Gypsies and Travellers in East Devon (Option A) may result in the formation of informal unauthorised camps in the District as the identified need for accommodation would not be met. Such camps may be less well-located in terms of their proximity to and potential effects on historic assets (i.e. conservation areas or listed buildings), and may be less well integrated into the appearance of the built environment in comparison to formally allocated authorised sites which would have been through the SA process. The establishment of any such unauthorised camps in inappropriate locations may adversely impact upon historic assets and the wider built environment which would have a negative effect on this SA objective, although this is currently uncertain as it is not known if these camps would in fact be formed and where they would be located.</p> <p>The development of sites for Gypsies and Travellers within either large or small-scale residential sites, or as stand-alone sites specifically dedicated to accommodating Gypsies and Travellers, also has the potential to compromise the quality and setting of historic assets such as listed buildings and conservation areas as well as the wider built environment. However the impact of such development on this SA objective will be determined by the specific location of housing development in relation to such assets; something that is not yet known. As such, the potential effects of Options B, C and D are all currently uncertain.</p>
9: To promote the conservation and wise use of land and protect and	-?	?	?	?	<p>Not making land allocations for Gypsies and Travellers in East Devon (Option A) may result in the formation of informal unauthorised camps in the District. These camps may be located be on greenfield land or</p>

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enhance the landscape character of East Devon					could adversely impact upon the landscape character of East Devon depending on their location, which could have a minor negative effect on this SA objective although this is currently uncertain as it is not known if these camps would in fact be formed or whether they would be located in relation to East Devon's most sensitive landscapes (such as the East Devon AONB). The development of sites for Gypsies and Travellers within large or small-scale residential sites or as stand-alone sites specifically dedicated to accommodating Gypsies and Travellers also has the potential to affect the landscape character of the District; however such effects will depend to a large extent on factors such as the topography of the land and the screening potential at individual development sites which is unknown at present. In addition, the effect of the options on the wise use of land will depend largely on the extent to which previously developed brownfield sites are used for the development associated with accommodation for Gypsies and Travellers, which is also unknown at this time. However, it is noted that there is a very limited supply of previously developed land in East Devon and that, regardless of the spatial distribution strategy followed, development is likely to be predominantly on greenfield sites. As such, the potential effects of Options B, C and D are all currently uncertain.
10: To maintain the local amenity, quality and character of the local environment	-?	+/-?	+/-?	+/-?	Not making site allocations for Gypsies and Travellers in East Devon (Option A) may result in the formation of informal unauthorised camps in the District. These camps may have more negative impacts on amenity within the District in comparison to planned, authorised sites which would have been through the SA process with consideration given to issues such as additional traffic generation and the design and appearance of the sites. As such a minor negative effect may

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					<p>occur on this SA objective for Option A although this is currently uncertain as it is not known at this stage if these camps would be formed and where they would be located.</p> <p>The allocation of sites for Gypsies and Travellers within large or smaller-scale residential sites or as stand-alone sites specifically dedicated to accommodating Gypsies and Travellers has the potential to adversely affect local amenity and character as the increase in population may result in effects such as increased vehicle traffic. However, the effects on this objective will depend on factors such as the scale and precise location of the sites as well as the availability of public transport links to help mitigate any such increases in traffic. At the same time, well-located sites may help to improve the quality and character of the surrounding area, and co-locating Gypsy and Traveller sites with other residential development may help to reduce the impacts of traffic generation (as mixed-use sites may include shops, services and facilities that can be accessed on foot). As such, potential mixed (both positive and negative) uncertain effects are therefore identified for Options B, C and D.</p>
11: To conserve and enhance the biodiversity of East Devon	0	?	?	?	<p>As Option A would not result in the development of Gypsy and Traveller sites in East Devon a negligible effect is expected on this SA objective for this option.</p> <p>The development of sites for Gypsies and Travellers either within larger or smaller-scale residential sites or as stand-alone sites specifically dedicated to accommodating Gypsies and Travellers has the potential to affect biodiversity in the area. The effects of the development on biodiversity will however depend largely on the specific location of residential development sites and whether these</p>

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					overlap with sites of biodiversity importance, as well as on the design of sites and whether they incorporate biodiversity enhancements such as green infrastructure. The likely effects of Options A, B and C on this SA objective are therefore uncertain at this stage.
12: To promote and encourage non-car based modes of transport and reduce journey lengths	0	++?	+?	-?	<p>Option A would not result in any allocation of land for Gypsy and Traveller sites in East Devon and as such a negligible effect is expected on this SA objective.</p> <p>Allocating sites for Gypsies and Travellers within either large or smaller-scale housing sites (Options B and C) is likely to result in sites being well-located in terms of access to services and facilities, schools and job opportunities as well as sustainable transport links such as bus routes as these factors would have been considered in the allocation of residential site options. This ease of access may encourage and enable residents to walk or cycle for more journeys instead of travelling by car, and to use sustainable modes of transport. Gypsy and traveller allocations which are integrated with existing larger residential sites (Option B) are likely to have particularly good access to services, jobs and schools nearby as well as to be well-connected via sustainable transport as the design of larger sites may incorporate such features. A potential significant positive effect is therefore likely for Option B and a potential minor positive effect for Option C. In both cases the potential positive effects are uncertain as the exact location of these land allocations and their proximity to services, facilities and public transport links is unknown at this stage.</p> <p>Option D would involve developing stand-alone sites which would be dedicated to Gypsies and Travellers. Given that these sites would be</p>

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					<p>separate from existing residential/mixed use sites they are less likely to be located in very close proximity to existing services and transport links. Although these factors would be expected to be considered during the allocation of Gypsy and Traveller sites, the overall smaller population of the site would mean that new provision is less likely to be viable. Therefore, this option is likely to result in a greater increase in car journeys and a potential minor negative effect is therefore identified, although this is uncertain depending on the location of the sites allocated and their proximity to existing services and transport links.</p>
13: To maintain and enhance the environment in terms of air, soil and water quality	0	-?	-?	-?	<p>As additional development which could affect air, soil and water would not take place under Option A, a negligible effect on this SA objective is expected for this option.</p> <p>The development of Gypsies and Traveller sites in East Devon alongside residential sites (Options B and C) or individually (Option D) could have a negative impact on soil quality; however this will depend on the specific location of the development and the extent to which it is on previously developed land, which is uncertain at this stage. However, it is noted that there is a very limited supply of previously developed land in East Devon and that, regardless of the spatial distribution strategy followed, development is likely to be predominantly on greenfield sites. In addition, soil sealing and compaction is likely to become an issue during both the construction phase and once developments are built, with potential impacts on water infiltration and quality. The extent to which development may impact on water quality will depend on currently unknown factors such as the capacity for local sewage treatment works to cope with the</p>

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					additional demand; however additional runoff from hard surfacing is likely to have a negative impact to some degree. An increase in air pollution is also likely to result from an increase in traffic in and around the District, although it is noted that this may be less of an issue at Gypsy and Traveller sites which are located within residential site allocations due to the increased potential for services to be provided within walking distance and the provision of public transport links. Overall potential uncertain minor negative effects are identified for Options B, C and D.
14: To contribute towards a reduction in local emissions of greenhouse gases	0	++?	+?	-?	<p>Option A would not result in the development of sites for Gypsies and Travellers in East Devon; therefore a negligible effect on this SA objective is likely.</p> <p>Allocating Gypsy and Traveller sites within either large or smaller-scale housing sites (Options B and C) means that sites are likely to be in close proximity to existing services as well as public transport links, (it is assumed that these factors would have been considered during the allocation of the housing sites). This may result in a reduction in the number of car journeys being made by residents at these sites which in turn should contribute to a reduction in local emissions of greenhouse gases. As such a positive effect is expected on this SA objective for Option B and Option C. Given that larger housing sites are more likely to include provided public transport links and other services a significant positive effect is noted on this SA objective for Option B. The positive effect is uncertain in both instances as uncertain as the specific location of these sites in relation to existing services and public transport links is unknown.</p>

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					Option D would involve allocating dedicated sites for Gypsies and Travellers. Given that these sites would be separate from existing residential/mixed use allocations it is expected that they would be less likely to be located in close proximity to existing services and transport links. As such an increase in car journeys may therefore result under this option which could have a minor negative effect on this SA objective. This is uncertain, however, depending on the location of the sites.
15: To ensure that there is no increase in the risk of flooding	0	?	?	?	<p>Option A would have a negligible effect on this SA objective as additional development required to provide accommodation for Gypsies and Travellers, which could affect the risk of flooding East Devon, would not occur.</p> <p>The development of sites for Gypsies and Travellers in East Devon may increase the flood risk if the area of impermeable land is significantly increased; however if the majority of the additional development takes place on previously developed land this may not be an issue. However, it is noted that there is a very limited supply of previously developed land in East Devon and that, regardless of the spatial distribution strategy followed, development is likely to be predominantly on greenfield sites. In addition, there may be opportunities for the new development to incorporate flood prevention measures such as SUDS, to help reduce localised flooding as well as to locate sites outside of areas which are at high risk of flooding. As such, the likely effects on this objective are at present uncertain for Options B, C and D and will depend on the specific design and location of the Gypsy and Traveller sites.</p>
16: To ensure energy	0	+/-	+/-	+/-	The efficient consumption of energy will depend largely on the levels

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consumption is as efficient as possible					of energy production and consumption within new development, rather than on its spatial location. Although the development of sites for Gypsies and Travellers in East Devon will inevitably lead to higher energy consumption overall, there may also be good opportunities for incorporating renewable energy production into new developments, particularly considering that Strategy 33 in the submitted Local Plan endorses renewable energy generation across the district. In particular, Option B and Option C which involve allocating sites for Gypsies and Travellers at larger and smaller residential/mixed use sites may present some such opportunities for district heating etc. As such, the likely effects are mixed for Options B, C, and D. Option A would have a negligible effect as additional development would not occur given that it would not result in land allocations for Gypsies and Travellers.
17: To promote wise use of waste resources whilst reducing waste production and disposal	0	+/-	+/-	+/-	The wise use of waste resources and the reduction of waste production and disposal will not be affected by the spatial location of Gypsy and Traveller sites; instead it will be determined by waste management practices within any resulting development. It can be assumed development required to accommodate Gypsies and Travellers will result in increased waste production, although new development may provide good opportunities for establishing more sustainable waste management practices and the re-use of materials. As such, mixed effects are likely for Options B, C and D. Option A would have a negligible effect as additional development, which could affect levels of waste generation and waste management practices, would not occur.
18: To maintain sustainable growth of employment for East Devon, to match levels	0	++?	+?	?	Option A would not result in any allocation of land for Gypsies and Travellers and therefore a negligible effect is recorded for this SA objective.

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of jobs with the economically active workforce					<p>Allocating sites for Gypsies and Travellers at larger scale housing/mixed use land allocations (Option B) could have a significant positive effect on this SA objective as it is likely that larger residential sites might incorporate employment opportunities that Gypsy and Traveller residents would therefore have easy access to. The potential significant positive effect on this SA objective recorded for Option B is currently uncertain until the exact location of the Gypsy and Traveller sites, and their proximity to employment developments, is known.</p> <p>Option C would involve locating Gypsy and Traveller accommodation at smaller scale housing allocation sites. While it is less likely that smaller sites would incorporate employment opportunities that Gypsy and Traveller residents would also be able to access, it is expected that these residential allocations would have been made in areas which have good access to jobs. A potential minor positive effect on this SA objective is therefore recorded for this option although this is currently uncertain given that the exact location of the Gypsy and Traveller sites to be provided, and their proximity to employment opportunities, is not known.</p> <p>The likely effect on this SA objective of allocating dedicated sites for Gypsies and Travellers (Option D) is uncertain and will depend on the proximity of those sites to employment opportunities that residents can access. Although developing separate sites specifically dedicated to Gypsy and Traveller accommodation would mean that the new sites are not integrated with existing housing sites, which may include employment opportunities, Gypsy and Traveller sites may still be situated in close proximity to other existing employment sites which</p>

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19: To maintain and enhance the vitality and viability of the Towns of East Devon	0	?	?	?	<p>residents can access.</p> <p>Option A would not result in any allocation for Gypsy and Traveller sites in East Devon. As such it is expected to have a negligible effect on this SA objective.</p> <p>The likely effects of Options B, C and D on this objective will depend on whether the sites allocated (either as part of residential schemes or as stand-alone sites) are located at or near to the seven main towns of the District. As this is not yet known, the likely effects of all three options are currently uncertain.</p>
20: To encourage and accommodate both indigenous and inward investment	0	0	0	0	None of the options are likely to have a direct effect on indigenous and inward investment in the District and therefore a negligible effect on this SA objective is likely.