

East Devon Local Plan 2020-2040

Preferred Options consultation draft

Sustainability Appraisal report



November 2022

East Devon – an outstanding place

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1 Introduction

East Devon Local Plan 2020-2040

- 1.1 A review of the East Devon Local Plan 2013-2031 (adopted in January 2016) concluded that an update of this Plan was required.¹ Therefore, East Devon District Council is working on a revised Local Plan, currently envisaged to cover the period from 1 April 2020 to 31 March 2040. The Local Plan will show how East Devon will develop in the future and provide policies which will guide decisions on whether or not planning applications are granted. It will address development needs for housing, employment, and related development, supporting high quality new development in appropriate locations; whilst also conserving and enhancing the natural and historic environment.

Sustainability Appraisal and Strategic Environmental Assessment

- 1.2 Sustainability Appraisal (SA) is a systematic process that must be carried out alongside preparation of the Local Plan.² The role of SA is to promote sustainable development by assessing how the Local Plan, when judged against reasonable alternatives, will help to achieve environmental, economic and social objectives. SA aims to make the Local Plan more sustainable by identifying the plan's significant effects and ways of minimising its negative effects.
- 1.3 SA incorporates the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004,³ commonly referred to as the 'Strategic Environmental Assessment (SEA) Regulations'. Government guidance provides clarity on the need for SA and SEA in relation to plan preparation;⁴ as does practice advice.⁵ Guidance notes that SA should focus on what is needed to assess the likely significant effects of the Plan, not all effects. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan.⁶

¹ East Devon Local Plan 2013-31 review assessment: [e-devon-lp-review_pas-toolkit-part-1-local-plan-review.pdf](https://www.eastdevon.gov.uk/e-devon-lp-review_pas-toolkit-part-1-local-plan-review.pdf) ([eastdevon.gov.uk](https://www.eastdevon.gov.uk)) ; and Form & content checklist: [e-devon-lp-review_pas-toolkit-part-2-local-plan-contentdocx.pdf](https://www.eastdevon.gov.uk/e-devon-lp-review_pas-toolkit-part-2-local-plan-contentdocx.pdf) ([eastdevon.gov.uk](https://www.eastdevon.gov.uk))

² Planning and Compulsory Purchase Act 2004, Section 19: [Planning and Compulsory Purchase Act 2004](https://www.legislation.gov.uk/ukpga/2004/24/part_1/chapter_1/section_19) ([legislation.gov.uk](https://www.legislation.gov.uk))

³ The Environmental Assessment of Plans and Programmes Regulations 2004: [The Environmental Assessment of Plans and Programmes Regulations 2004](https://www.legislation.gov.uk/uksi/2004/1633/contents/make) ([legislation.gov.uk](https://www.legislation.gov.uk))

⁴ Planning practice guidance, SA and SEA: [Strategic environmental assessment and sustainability appraisal - GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/364812/Strategic_environmental_assessment_and_sustainability_appraisal_-_GOV.UK.pdf) (www.gov.uk)

⁵ SEA – Improving the effectiveness and efficiency of SEA/SA for land use plans, RTPI, 2018: [RTPI | Strategic Environmental Assessment: SEA/SA for Land Use Plans](https://www.rtpi.org.uk/publications/strategic-environmental-assessment-sea-sa-for-land-use-plans)

⁶ Planning practice guidance, Reference ID: 11-009-30140306: [Strategic environmental assessment and sustainability appraisal - GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/364812/Strategic_environmental_assessment_and_sustainability_appraisal_-_GOV.UK.pdf) (www.gov.uk)

Background to this report

- 1.4 This SA report relates to the East Devon Local Plan 2020-2040 Preferred Options consultation draft⁷ (November 2022), and should be read in conjunction with that document. This SA report is published for consultation alongside the Local Plan, from Monday 7 November 2022 to Sunday 15 January 2023. Comments can be submitted via our website at [Draft Local Plan Consultation - East Devon](#) or via email to planningpolicy@eastdevon.gov.uk. Comments can also be made by post to Planning Policy, East Devon District Council, Blackdown House, Border Road, Heathpark Industrial Estate, Honiton, EX14 1EJ.
- 1.5 This chapter has introduced the SA process and how it relates to the emerging East Devon Local Plan 2020-2040. The remaining chapters cover the following:
- **Chapter 2 Methodology** describes the approach to carrying out SA of the Local Plan
 - **Chapter 3 Sustainability context** summarises the relationship between the Local Plan and other relevant plans, policies and programmes; outlines the characteristics of East Devon; and identifies the key sustainability issues.
 - **Chapter 4 Appraisal findings of Topic-based Policies and Reasonable Alternatives** presents the SA findings of the Preferred Options consultation draft policies and reasonable alternatives (excluding sites)
 - **Chapter 5 Appraisal findings of Sites and Reasonable Alternatives** contains the SA findings of the sites and reasonable alternatives considered in preparing the Preferred Options consultation draft
 - **Chapter 6 Next steps** sets out the future stages of the SA and Local Plan preparation
 - **Appendix One:** Draft Scoping Report summary of consultation responses and Council response
 - **Appendix Two:** Relevant Plans, Policies and Programmes
 - **Appendix Three:** Baseline information
 - **Appendix Four:** Sites SA framework
 - **Appendix Five:** Appraisal matrices of Policies and Reasonable Alternatives
 - **Appendix Six:** Appraisal matrices of Preferred sites and Reasonable Alternatives

⁷ Prepared under Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

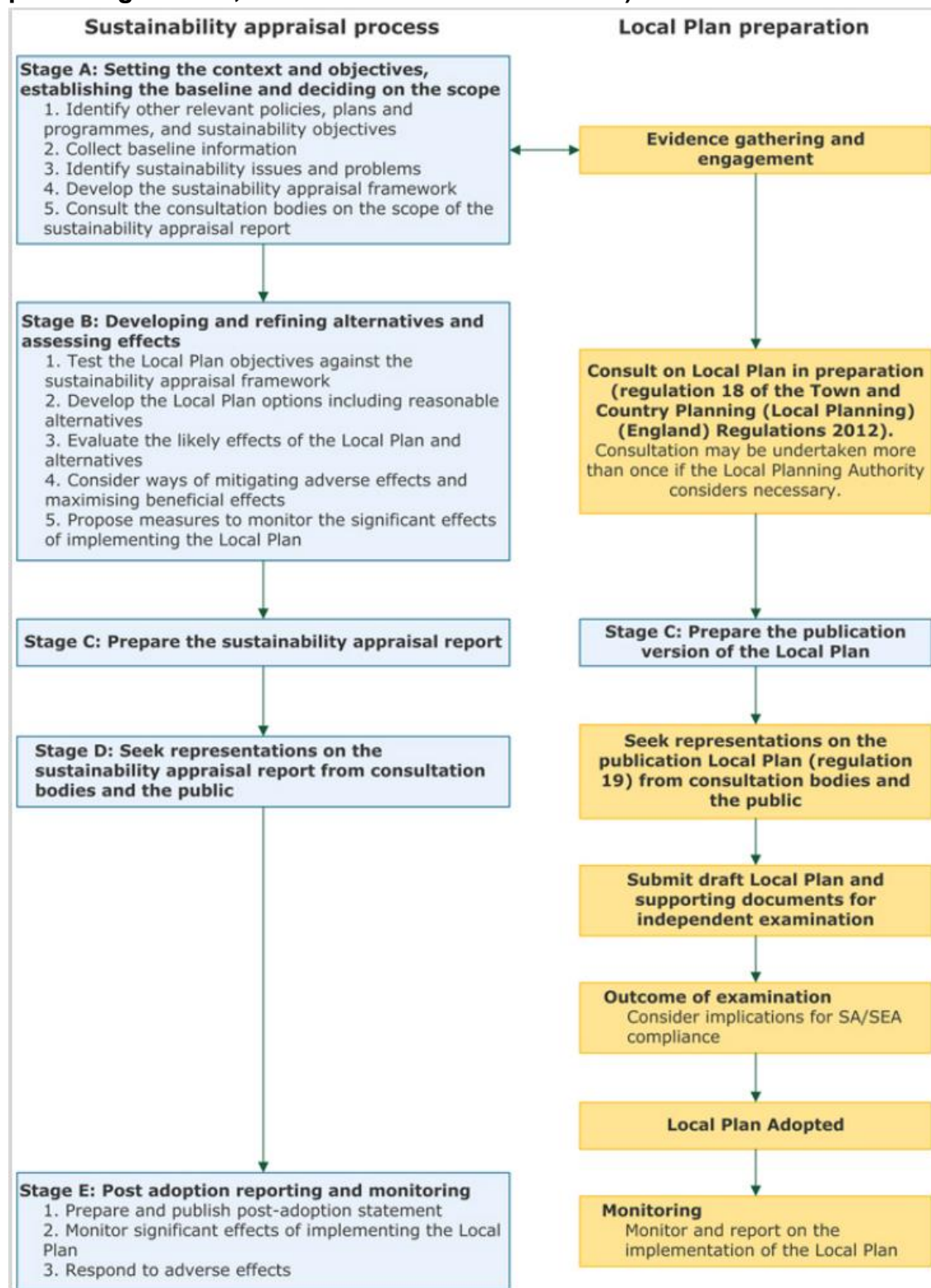
2 Methodology

- 2.1 The approach to undertaking SA of the Local Plan is based upon legal requirements, Government guidance, and good practice. SA is integral to preparation of the Local Plan – it tells the story of how decisions have been made on the Local Plan, and how they have been informed by environmental and sustainability concerns.
- 2.2 Figure 2.1 on the following page shows the five stages of the SA process, from A to E, and its relationship with Local Plan preparation. This SA report has been prepared alongside the Local Plan Preferred Options consultation draft (regulation 18), so represents Stage B in the SA process.
- 2.3 The sections below describe the approach that has been taken to the SA of the Local Plan to date, at Stages A and B, along with information on the future requirements of the process at Stages C, D and E.

Stage A: Scoping

- 2.4 The Scoping Report identifies the scope and level of detail of the information to include in the SA report. It set the context, objectives and approach of the SA; identifying relevant environmental, economic and social issues and objectives. Scoping helps to ensure that the SA process is proportionate and relevant to the plan being assessed.
- 2.5 Consultation on the Draft Scoping Report took place from 18 January to 15 March 2021, receiving a total of 12 responses. A series of amendments were made to the Draft Scoping Report as a result of consultation, such as referencing more policy documents; updating and adding to the baseline information; highlighting additional sustainability issues; and amending some of the sustainability objectives. A final Scoping Report was produced in November 2021. Appendix One contains a summary of the consultation responses, and how they were addressed in revising the Scoping Report.

Figure 2.1: Sustainability Appraisal process and Local Plan preparation (from Planning practice guidance, Reference ID: 11-013-20140306)



SA Framework

- 2.6 A key output of the Scoping Report is the SA framework of objectives and factors to consider when appraising the Local Plan (figure 2.2) which provides the basis by which the sustainability effects of the Local Plan will be described, evaluated, and options compared.

Figure 2.2: Sustainability Appraisal Framework

Sustainability objective	Factors to consider	SEA Topics covered
1. Biodiversity To conserve and enhance the habitat and wildlife of our natural environment.	- Natural habitats and biodiversity; flora and fauna - Recreational and leisure opportunities compatible with conservation, and creation of multi-functional green infrastructure - Ensure current, and potential future, habitat connectivity is not compromised - Possible impact pathways between policy proposals and habitats and species impacted - Deliver biodiversity net gain	- Biodiversity, fauna, flora. - Population/ human health (recreation).
2. Landscape To conserve and enhance the special qualities and distinctive character of our landscapes, undeveloped coast and seascape	- Landscapes - including AONBs and landscape character. - Coast. - Seascape character	- Landscape. - Water (coast).
3. Historic and built environment To conserve and enhance our heritage assets and promote high quality design and accessibility in new development	- Conservation of heritage assets World Heritage Site, Registered Parks and Gardens and locally listed heritage assets within their setting, including Listed Buildings, Conservation Areas, Archaeological sites, Scheduled Monuments, the World Heritage Site, Registered Parks and Gardens and locally listed heritage assets - Sustain the historic environment and promote local character and distinctiveness by conserving and enhancing the significance of heritage assets and their settings and creating high quality new settlements, townscapes, developments, built environment and public realm. - Concerns around heritage at risk. - Public enjoyment of the historic environment	- Cultural heritage. - Population.
4. Climate change and carbon emissions	Development that minimises the need to travel by providing access to public transport, cycle	- Air. - Climatic factors.

Sustainability objective	Factors to consider	SEA Topics covered
To minimise greenhouse gas emissions.	- and walking links to help reduce use of private car. • Energy efficient developments and buildings, which make the best use of renewable and low carbon energy generation. • Multi-use green infrastructure which supports or creates transport networks. • Potential for more home working.	
5. Climate change adaption To adapt to the possible effects of climate change.	• Flood risk and the threat to people and property and coastal change and adaptation. • Heat, drought and extreme storms that will stress both the natural and built environments.	• Climatic factors.
6. Land resources To utilise our land resources efficiently and minimise their loss or degradation.	• Soil quality. • Avoid the loss of best and most versatile agricultural land • Safeguard mineral resources. • Reuse of previously developed land. • Contaminated land. • Minimise waste (reuse, recycle, recover).	• Soil. • Material assets (land, minerals).
7. Water resources To utilise our water resources efficiently and minimise their loss or degradation.	• Water quality and quantity.	• Water.
8. Homes To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure to meet East Devon's needs.	• Supply of housing (accommodating population growth and changes in household composition). • Housing mix (tenure and size). • Housing delivery and diversity of supply (e.g. Registered Provider affordable, volume builder and small builder open market, custom and self-build). • Housing affordability.	• Population.
9. Health and well-being To support healthy, safe and active communities where people have access to attractive and functional recreation spaces	• Cycle and walking networks. • Open space and green infrastructure in new developments and existing settlements. • Public recreation, play and leisure opportunities. • Avoid adverse impacts on the quality and extent of existing green infrastructure assets that have a recreational function • Social deprivation. • Air quality, noise and light pollution.	• Population. • Human health. • Air

Sustainability objective	Factors to consider	SEA Topics covered
	• Safe and secure environment with reduced fear of crime.	
10. Access to services To provide accessible and attractive services and community facilities for all ages and interests.	• Access to area wide services (nursery and pre-school, primary, secondary, further and higher education; healthcare; etc.). • Community facilities (local shops, meeting venues, public houses, places of worship). • Cultural buildings and facilities (e.g. libraries, museums, cinemas). • Access to high speed broadband.	• Population. • Human health.
11. Jobs and employment To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity.	• Employment land supply to cater for businesses of all sizes. • Mix of employment offer. • Productivity of local economy and access to labour supply. • Access to education and skills training. • Protect existing tourism businesses and offer.	• Population. • Material assets.
12. Town centres To safeguard and strengthen the vitality and viability of town centres.	• Diverse city and town centre economy. • Strengthen and safeguard the vitality and viability of centres. • Impact of new development on existing centres. • Access to existing centres.	• Population.
13. Connectivity and transport To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within and beyond East Devon.	• Access to services – links between homes, services and businesses by active modes of transport (e.g. cycling and walking). • Access to public transport (e.g. distance to and frequency of bus and rail services). • Car reliance and use. • Access to local road network. • Impact on Strategic Road Network. • Reduction in congestion.	• Air. • Climatic factors. • Population/ material assets (in terms of benefits for economy).

2.7 The SA framework has been refined to make it more relevant and effective for the consideration of site options by adding standards and thresholds to each SA objective to better determine the nature and significance of effects. This makes clear where assumptions have been made, and should ensure that a consistent and comparative appraisal of site options is carried out. Appendix Four sets out how the SA framework will be applied to the assessment of sites, by providing significance criteria for each objective, that should be considered alongside the factors included in figure 2.2 above.

Stage B: Developing and refining alternatives/options and assessing effects

2.8 Developing options for a plan is an iterative process, usually involving a number of consultations with the public and stakeholders. Consultation responses and the SA can help to identify where there may be other “reasonable alternatives” to be considered when preparing a local plan. Note that the words “alternatives” and “options” are used interchangeably, and mean the same thing.

2.9 The SEA Regulations⁸ state:

“The (environmental or SA) report shall identify, describe and evaluate the likely significant effects on the environment of—

- (a) implementing the plan or programme; and*
- (b) reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme.”*

2.10 Essentially, the SA report must state for each set of alternatives:

- a) What reasonable alternatives have been identified and on what basis?
- b) How they have been assessed and compared (including how sustainability issues have been considered)?
- c) What are the preferred alternatives and why they are preferred over other alternatives?⁹

2.11 It is worth highlighting that only “likely significant effects” must be identified, not all possible effects. Schedule 1 of the SEA Regulations sets out the general criteria of significance, which have been considered in the approach to assessing likely significant effects:

- The magnitude of the plan’s effects, including the degree to which the plan sets a framework for projects and influences other plans, and environmental problems relevant to the plan
- The sensitivity of the receiving environment, including the value and vulnerability of the area, exceeded environmental quality standards, and effects on designated areas or landscapes

⁸ The Environmental Assessment of Plans and Programmes Regulations 2004, Regulation 12(2): [The Environmental Assessment of Plans and Programmes Regulations 2004 \(legislation.gov.uk\)](https://www.legislation.gov.uk/uksi/2004/1632/contents/making)

⁹ SEA – Improving the effectiveness and efficiency of SEA/SA for land use plans, RTPI, 2018: [RTPI | Strategic Environmental Assessment: SEA/SA for Land Use Plans](#)

- Effect characteristics, including probability, duration, frequency, reversibility, cumulative effects, transboundary effects, risks to human health or the environment, and the magnitude and spatial extent of the effects.

- 2.12 It should also be noted that any alternatives/options considered in preparing the Local Plan need to be “reasonable”. Although “reasonable alternative” is not defined in the SEA Directive, from which SEA is originally required, European Commission guidance¹⁰ considers an alternative to be a different way of fulfilling the objectives of the plan, which should be realistic, and falls within the legal and geographic competence of the authority. The SEA regulations (quoted above) state that reasonable alternatives must take into account the objectives and the geographical scope of the plan. Government guidance states that *“reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made.”*¹¹
- 2.13 This means that alternatives that are not reasonable do not need to be subject to appraisal. Some examples of unreasonable alternatives include policy options that do not meet the objectives of the Local Plan or national policy (e.g. the National Planning Policy Framework), or development site options that are unavailable or undeliverable.
- 2.14 It also needs to be recognised that the SA/SEA findings are not the only factors taken into account when determining which options to take forward in a plan. Indeed, there will often be an equal number of positive or negative effects identified for each option, such that it is not possible to ‘rank’ them based on sustainability performance in order to select an option. Factors such as consultation responses, deliverability, and conformity with national policy will also be taken into account by plan-makers when selecting preferred options.
- 2.15 The key shown below (figure 2.3) will be used to evaluate the likely SA effects of policy and site options for each SA objective. This gives an indication of the potential scale of impact that may arise for each objective. Commentary will identify the likely significant effects, and will justify the ‘score’.

Figure 2.3: SA significance key

The policy/option/site is likely to have...	
++	a major positive effect overall in contributing towards the achievement of the objective.

¹⁰ Implementation of Directive 2001/42 on the assessment of the effects of certain plans and programmes on the environment, European Commission, 2003.

¹¹ Planning Practice Guidance Reference ID: 11-018-20140306: [Strategic environmental assessment and sustainability appraisal - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal)

+	a minor positive effect in contributing towards the achievement of the objective.
0	a negligible or no effect in contributing towards the achievement of the objective, or some positive and some negative impacts thus the balance overall is neutral.
-	a minor negative effect in contributing towards the achievement of the objective.
- -	a major negative effect in contributing towards the achievement of the objective.
?	an uncertain effect in contributing towards the achievement of the objective.
+ / -	a mixture of positive and negative effects in contributing towards the achievement of the objective.

2.16 Stage B of the process goes on to consider ways of mitigating likely significant adverse effects and maximising beneficial effects. Where a policy or site option concludes a positive effect against an objective, it should be considered whether this can be further enhanced by amending the policy or site option. If a negligible effect is identified, intervention that could result in positive effects should be noted if necessary. Mitigation measures such as amending, or even deleting, the policy/site option should be contemplated where likely significant adverse effects are found for an objective. The appraisal will note mitigation measures to address likely significant adverse effects and ways of maximising beneficial effects, and then highlight the likely post-mitigation effects. Some general mitigation measures for housing sites include:

- Large scale housing sites (such as new settlements and significant extensions to existing settlements) have potential to provide a mix of uses on-site, such as community facilities, employment land, a range of open space, and sustainable travel links. This will address adverse effects relating to access to services, for example.
- Smaller scale housing sites have less potential to provide a mix of uses, and are more likely to be solely residential, with less (if any) community facilities, employment land, and open space; and fewer sustainable travel links. These offer less potential to mitigate adverse effects relating to access to service, for example.

East Devon Local Plan 2020-2040 – Vision, Objectives and scope

2.17 In line with the guidance referenced above, any reasonable alternatives should be consistent with the Local Plan vision, objectives and scope. The Local Plan Preferred Options consultation draft vision has three priorities:

- **Better Homes and Communities** for all with a priority on the importance of good quality, affordable housing suitable in size and location
- **A Greener East Devon**, which prioritises issues arising from climate change and supports our natural environment

- **A Resilient Economy** bringing prosperity to the district.

2.18 A series of 11 objectives seek to deliver this vision and set the framework for plan policies:

- To encourage healthy lifestyles and living environments for all East Devon residents.
- To ensure all new development moves the district towards delivering net-zero carbon emissions by 2040 and that we adapt to the impacts of climate change.
- To provide high quality new homes to meet people's needs.
- To support business investment and job creation opportunities within East Devon and support a resilient economy.
- To promote the vitality of our town centres, encourage investment, greater flexibility and a wider range of activities to increase footfall and spend.
- To promote high quality beautiful development that is designed and constructed to meet 21st century needs.
- To conserve and enhance our outstanding built heritage.
- To protect and enhance our outstanding natural environment and support an increase in biodiversity.
- To prioritise walking, cycling and public transport and make provision for charging electric vehicles.
- To secure infrastructure needs at an appropriate time to support new development.
- To help support villages and protect and enhance facilities and services they offer.

2.19 These objectives have been tested against the SA framework – see chapter 4.

2.20 The geographic scope of the Local Plan relates to the East Devon district boundary. The plan is currently envisaged to cover the period of 2020 to 2040, but can look further ahead where large scale developments such as new settlements or significant extensions to existing villages and towns are planned, to take into account the likely timescale for delivery.

2.21 More specifically, the council has taken the following approach (figure 2.4) to identify reasonable alternatives when considering the allocation of development sites in the Local Plan – only sites that meet conditions a), b) and c) will be considered as a “reasonable alternative” and therefore subject to appraisal against the SA framework. As previously explained, standards and thresholds have been added to each SA objective to better determine the nature and significance of effects for site options (see Appendix Four).

Figure 2.4: Site criteria to be considered as a reasonable alternative

Sifting criteria	Reason
a) Site is assessed as 'suitable, available and achievable' in the HELAA ¹²	To ensure only sites of a sufficient size ¹³ in an appropriate location and without significant constraints are considered for potential allocation.
b) Site is located: - within, or adjacent to, settlements in Tiers 1-4 of the settlement hierarchy (excluding Cranbrook¹⁴); or - adjoining another site that is adjacent to a settlement in Tiers 1-4, and is also well related to that settlement; or - as a freestanding new settlement or able to be part of a new settlement¹⁵; or - adjacent to Exeter or other development in the West End; or - adjacent to an existing business park (if proposed for employment use)	To reflect the settlement strategy in the emerging Local Plan 2020-2040.
c) Sites in criteria a) or b) that already have planning permission will not be considered	The Local Plan will not allocate sites that already have planning permission, as they are assumed to be deliverable.

2.22 The final part of Stage B is to identify measures to monitor the significant effects of implementing the Local Plan. This will enable any unforeseen adverse effects to be identified at an early stage and to enable appropriate remedial action.

¹² It is assumed that sites within 400m of the Pebblebed Heaths SAC will be ruled out as being unsuitable in the HELAA but, if not, such sites should be sifted out at Stage 2.

¹³ The HELAA site size thresholds are housing sites that can deliver at least five dwellings (gross) or 0.15 hectares in size; and employment sites of at least 0.25 hectares or 500 sq m of floor space.

¹⁴ Cranbrook is outside the scope of the Local Plan 2020-2040, as it is being addressed in the Cranbrook Plan, adopted in October 2022.

¹⁵ Small sites located in 'areas of search' for a new settlement will be taken forward to Stage 3 even if, in isolation, they are not assessed as suitable, available, achievable in the HELAA. This is because such sites may be able to contribute to larger sites that, together, deliver a new settlement.

Stage C: Prepare the SA report

- 2.23 The SA report at Stage C is the 'formal' version required under SEA Regulation 12. This will be prepared alongside the 'publication' version of the Local Plan.

Stage D: Consultation on the Local Plan and SA report

- 2.24 Consultation on the 'publication' Local Plan (regulation 19) will be carried out alongside the 'formal' SA report prepared at Stage C. This consultation is envisaged to take place in autumn 2023.
- 2.25 Following consultation at Stage D, the Local Plan, SA report and supporting documents (including the consultation responses) will be submitted to the Planning Inspectorate for independent Examination. Main modifications may be required to make the Local Plan 'sound', which could result in additional SA work if changes have not previously been assessed and are likely to give rise to significant effects. Upon receipt of a satisfactory Inspector's report, the Local Plan can be adopted.

Stage E: Post adoption reporting and monitoring

- 2.26 After adoption of the Local Plan, an SA post-adoption statement will be published to explain how sustainability implications have been integrated into the plan; how the SA report and consultation responses have been taken into account; and reasons for choosing the plan as adopted in light of the other reasonable alternatives.
- 2.27 In addition, the approach to monitoring the significant effects of the Local Plan should be finalised, with results to be included in the authority's Monitoring Report.

Difficulties encountered

- 2.28 As a large number of site options are considered in preparing a Local Plan, a general difficulty relating to the approach and ensuring site options are appraised in a consistent manner has been addressed by adding standards and thresholds to each SA objective, which are used in determining the nature and significance of site options.
- 2.29 The Covid-19 pandemic, starting from early 2020, can be expected to have short term as well as potentially long term impacts. At this stage there is uncertainty as what these impacts, especially over the long term, may prove to be. For example, at the height of the pandemic, most people were required to work from home, which reduced commuting – it appears that a hybrid option of part workplace based, part home working is most common at the time of writing, although it is uncertain as to whether this pattern will continue in the long term.
- 2.30 Distances to environmental constraints and community services and facilities reflect straight line distances 'as the crow flies', but it is acknowledged that other factors than distance are relevant, such as topography and safety for pedestrian/cyclists; and impact pathways for

biodiversity sites (e.g. watercourse, recreation route); and these 'barriers' have been noted where relevant.

- 2.31 As post codes were not identified in the HELAA for all sites, and to ensure a proportionate approach, broadband speeds were not checked for each individual site. Instead, data at a middle super output area (MSOA) was used, broadly equivalent to the geographic area of a town.
- 2.32 Agricultural land that falls within Grades 1, 2 and 3a is defined as “best and most versatile” – where significant development of agricultural land is necessary, areas of poorer quality land should be preferred to those of higher quality. Whilst some areas in East Devon have been subject to further assessment that breaks down grade 3 into a and b, the vast majority of land has only been subject to strategic level assessment that does not distinguish between Grades 3a and 3b and is also subject to uncertainty with regards to other grades. Therefore, the effect of developing on agricultural land that has only be subject to strategic assessment is uncertain, particularly where it is classed as Grade 3.

3 Sustainability context

- 3.1 This chapter provides the sustainability context for development in East Devon. This includes the wider policy context, along with baseline information that presents the key characteristics of East Devon. The key sustainability issues are then identified along with commentary on likely evolution of East Devon without the Local Plan.

Policy context

- 3.2 To help establish the scope for the SA, it is important to understand the policy context within which the Local Plan is being prepared (Stage A1). A proportionate approach has been taken that focusses on key policy documents, consistent with Government guidance and practice advice. For example, information relating to waste and minerals planning will not be included within the scope of the Local Plan (other than in the context of how such issues could impact on other plan policy), as these matters are addressed through plans prepared by Devon County Council.
- 3.3 In the past, a wide range of laws originated from the EU relating to environmental issues. Following the UK's departure from the EU, from 1 January 2021 directly applicable EU law no longer applies to the UK and the UK is free to repeal law that has been transposed into UK law. Nevertheless, relevant EU legislation has still been referred to where UK legislation is yet to be amended.
- 3.4 Appendix Two identifies relevant plans, policies and programmes, and their implications for the Local Plan and SA.

Baseline information

- 3.5 It is important to have an understanding of the baseline i.e. “where we are now”, so that Local Plan strategy and policy choices can be informed by the current context in East Devon. This Stage A2 reflects on the current state of the environment, society and economy, and those characteristics which are most likely to be affected by a new Local Plan. This understanding allows us to not only consider the likely effects and impacts of the Local Plan but also to understand how it can make positive contributions in the future.
- 3.6 Appendix Three contains the baseline information.

Sustainability Issues and Problems

- 3.7 Setting out the policy context and baseline information enables the identification of sustainability issues and problems relevant to planning policy in East Devon. This represents Stage A3 of the SA process.¹⁶
- 3.8 The following table (figure 3.1) contains the key sustainability issues in the first column, and provides summary commentary in the second column. One of the tasks that needs to be undertaken in the SA work is a summary of the likely future trends in the absence of a new plan and relevant policy coverage. The final column provides a summary commentary and does so specifically in the context of possible outcomes of existing Local Plan policy becoming increasingly dated and of less relevance and therefore an inability to effectively manage future development. The concerns raised in the final column, in the absence of a Local Plan, could come about as a consequence of more speculative and ad-hoc planning applications that the Council may be less able to resist.

¹⁶ As required by Schedule 1, 1(c) and (d) of the SEA Regulations.

Figure 3.1: Key sustainability issues and problems, and likely future trends in the absence of a new Local Plan

Sustainability issue	Summary commentary	Likely future trends in the absence of a new Local Plan
Biodiversity	Whilst East Devon has highly impressive biodiversity resources, they are under ongoing threats and there is an international recognition of the importance of protecting the natural world. Through the new local plan, specifically in respect of impacts that could arise from development, there is the scope to offer greater protection and through new legal requirements to secure biodiversity enhancements. Development can be directed to areas of lesser sensitivity and avoid areas of greater sensitivity.	Regardless of there being a new local plan there are still legal considerations that apply to protection of the higher ranking wildlife sites. However, these most important sites would not benefit from the comprehensive overview that a new local plan can provide. Sites of lesser importance may fair worse in the absence of a plan as may wildlife interest more generally without the controls that a plan and planning may put in place. The potential for biodiversity enhancement may also be lost or greatly prejudiced in the absence of a new local plan.

Sustainability issue	Summary commentary	Likely future trends in the absence of a new Local Plan
Landscape and seascape	With two thirds of the District falling in AONBs, and there being other important landscape assets, East Devon enjoys exceptional landscape qualities. A new local plan offers potential to afford these landscapes on-going protection whilst setting out policies to support sensitive and appropriate development. A new plan also offers scope for policy protection for local landscape features and areas that would not benefit from higher level statutory protection. East Devon's seascape is similarly exceptional, with the coast designated as a World Heritage Site, and offering tourism, maritime and recreation opportunities. Ongoing erosion and rising sea levels may threaten these opportunities going forwards.	National policy to protect the highest tier of landscape designation areas would remain in place and as such, for the AONB areas in particular, there would be national level protection. However, there is the danger that without local policy coverage there could be increased incremental damage and losses and lack of ability to take a strategic overview of concerns. Local landscape considerations may fair far less well under the absence of a new local plan as there would not be the means, or at least there would be much reduced means, to assess what is locally important and why and establish local controls. On the coast, the World Heritage Site and other heritage and biodiversity designations would limit development to an extent, but without a new Local Plan ad-hoc development may take place. The Local Plan can also identify Coastal Change Management Areas to restrict development where there are likely to be physical changes to the coast.
Historic environment	The historic environment of East Devon is important and varied. The buildings and structures of the District, and past human activities that have built them and helped shape the landscape, have defined much of the District we now live in. A new local plan adds specific scope to afford continued protection to all types of designated and non-designated heritage assets and their settings whilst offering potential for sympathetic reuse, for example through town centre regeneration.	The most important heritage features will continue to be afforded protection in the absence of a plan under national legislation and policy. However, the same may not apply to locally important features as the potential for local and more detailed policy guidance that a new local plan could deliver would be lost. Furthermore a new local plan may offer potential for taking an overarching strategic view of heritage considerations that would be lost in its absence and as such incremental negative impacts could occur whilst opportunity to use heritage as a positive driver for change, that a new local plan could promote, may also be lost.

Sustainability issue	Summary commentary	Likely future trends in the absence of a new Local Plan
Quality of new development	The quality of new development has a significant impact on how spaces and places perform and function, how they look and how well they serve residents and visitor's needs. However, quality standards vary greatly in new development but concerted policy effort in a new local plan can seek to improve greatly on some of the less good past developments. Improved design standards, in particular, are being promoted by Government including through its National Design Guide, and National Model Design Code.	In the absence of strong policy promoting high quality development and design there is a risk that mediocrity (or worse) will be an accepted norm. Whilst high quality design is sought in national policy, without a local policy context there is a risk local distinctiveness and characteristics would not be promoted.
Climate change and carbon emissions	A changing warming climate is recognised as a fundamental challenge for the world. Adverse impacts will occur and will be worse in the absence of significant actions now. A new local plan provides the opportunities to promote high standards in building, support renewable energy generation projects and also to promote and identify locations for development in the most accessible locations where carbon dioxide emissions, for example from transport use, are lower.	The absence of a robust and rigorous policy would lessen the ability to promote the highest development standards and as such could lead to higher levels of carbon emissions from buildings and development, though this to some degree might depend on how quickly and to what ways the Government move in respect of changing minimum building standards. Perhaps of greater relevance, however, is the loss of ability to actively plan for renewable energy generation technologies and to plan spatially, what is built where and why, to promote patterns of development that lead to lower carbon dioxide emissions. Without a plan carbon emissions could be higher.

Sustainability issue	Summary commentary	Likely future trends in the absence of a new Local Plan
Climate change adaption	With a warmer and wetter East Devon there will be a need to adapt to climate change. A new local plan provides scope to take into account flooding concerns as well as potential increasing patterns of land loss to the sea through coastal erosion. There will also be impacts on habitats and species that a new local plan can actively plan for and around through habitat creation and setting standards for new planting,	Flooding considerations, specifically at the planning application stage, can still be expected to be addressed on the strength of national policy. However a strategic approach to development in the realms of flooding and habitat planning may be lost or greatly eroded, as will opportunities to set local standards applicable and bespoke to East Devon, as opposed to national standards that could lack local relevance.
Land resources	Land resources (soil, minerals, previously developed land and waste) form a basis to support life and a new local plan can actively take account of these resources. Opportunities to minimise adverse impacts can be planned for whilst potential, for example in respect to building on previously developed land, can be realised through plan policy.	The absence of a new Local Plan would diminish the opportunities to take land resources into account. Possible impacts in the absence of a plan could include loss to development of higher quality agricultural land and development that does not appropriately utilise previously developed land.
Water quality	Water quality in East Devon is varied with some water courses, in particular, suffering from pollution that is detrimental to nature conservation objectives, most notably sections of the River Axe. A new plan provides the opportunity to restore and improve water quality outcomes and also to protect water supplies for domestic and other uses.	In the absence of a new Local Plan it may be that it will not be possible, or at least not easy, to pro-actively plan for water quality improvements or it might be that it is not possible to accommodate development, building work may stop, on account of there not being acceptable means to secure mitigation. Likewise, scope to spatially plan for patterns of development that protect water supplies would not be possible, however, through national policy, at least on a case by case basis, impacts from specific developments would be taken into account.

Sustainability issue	Summary commentary	Likely future trends in the absence of a new Local Plan
Homes	Having a decent home to live in should be seen as a fundamental need for all people. Critical considerations include, however, that differing people have differing needs and can have variable funds to pay for housing. Availability of affordable housing is a particular concern in East Devon. A local plan provides the means to establish policy designed around providing the right homes in the right places.	In the absence of a local plan there is far less control over the types of homes that may be built and where and of what type. Without robust policy in place the development industry is likely to build the types of homes, at the quantities that suits them, around the objective of maximising profits. This could well meet many consumers' needs but is unlikely to meet all, especially in respect of some specialist needs to include adapted houses and affordable homes. Development would be expected to carry on in the absence of a plan but it may be more likely to result from appeals or at least come forward in an unpredictable manner.
Health	Key planning concerns around health are centred on promoting the ability and opportunity for people to be able to be physically active and to enjoy high quality open space areas. Robust policy allows for relevant standards to be set.	The absence of a plan would reduce the scope to actively plan in a coordinated way for open space provision and to coordinate what is built with the best accessible existing provision.
Well-being	Generally people in East Devon live in a safe and healthy environment with limited levels of pollution. Crime levels are also comparatively low though there is a fear of crime.	In the absence of a plan it would be less possible to actively plan to minimise possible adverse impacts and if relevant to secure relevant mitigation.

Sustainability issue	Summary commentary	Likely future trends in the absence of a new Local Plan
Access to services and facilities	Generally speaking the towns of East Devon are well served with facilities, but peripheral parts of some East Devon towns may be some distance from key services. Service provision in villages is more sporadic and even more so in many rural areas.	Robust policy provides positive opportunities to plan for services and facilities alongside new development, especially housing development. The absence of a plan would provide less scope and less overview to ensure that services are accessible either through new provision alongside development or through directing development to locations that are already well served. A consequence of not having a plan could be a more ad-hoc pattern of development that may not be well related to or not served by facilities.
Jobs and employment	Having a job for individuals and securing better employment opportunities is likely to be key for a local plan to promote. Pre-Covid, East Devon had low unemployment levels but also low wage levels. There is an emerging high technology base in the western part of the District but lower skilled jobs, many seasonal in nature, are a prevalent characteristic of the District.	There will continue to be jobs and employment in East Devon in the absence of a plan. But not having a plan reduces scope to seek to identify appropriate sites and take other measures to support and encourage inward investment and business start-ups and expansions. As such an absence of a new local plan could reduce the scope to encourage more and better paid and more secure jobs. In a post Covid-19 world supporting new jobs in new emerging sectors could be very important.
Town centres	Town centres form a vital resource and area that support retail as well as social and wider commercial activities. They form a critical location to actively plan for where people congregate and come together. On-line retailing, with impacts exacerbated by Covid, however casts a fundamental challenge to future town centre vitality and viability.	In the absence of a plan, and active policy to promote town centre activity, opportunities may be lost to protect commercial premises, to plan for new ones and to promote activities that could encourage town centre vitality. This is not to say that town centre will cease to function in the absence of a plan, much of what happens in them is not plan dependent, but opportunities to be more proactive would be lost in the absence of a plan.

Sustainability issue	Summary commentary	Likely future trends in the absence of a new Local Plan
Connectivity and transport	The quality and availability of broadband connections and infrastructure for walking and cycling, and access to public transport in East Devon varies greatly. Public transport is of variable quality, generally reasonable or good in towns and on some through routes connecting urban together, within and beyond East Devon. However, in rural areas coverage can be patchy and in places poor or non-existent. East Devon itself has limited road congestion, though routes into the City of Exeter can be busy and tailbacks do occur.	One of the key policy areas that a plan can address is to direct development to locations that are served by or can or will be served by good transport links and especially public transport. Other connectivity issues can, as well, be taken into account. In the absence of a plan there is the potential for a more ad-hoc pattern of development that does not, in a coordinated manner, plan for issues around connecting places in an efficient and effective manner.

Areas of particular environmental importance

- 3.9 In addition to environmental problems highlighted in the baseline information and table above, SEA Regulations state those relating to any areas of particular environmental importance, such as the conservation of Wild Birds and Habitats Directive, be included.¹⁷
- 3.10 There are a number of European Sites, designated for their core breeding, feeding and resting habitats for rare and threatened species whose boundaries fall wholly or partly within a 20km radius of the East Devon boundary. European sites are the ‘top tier’ of protected nature conservation sites, and subject to strict legal protection. These sites comprise Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar Sites. They are afforded the highest level of protection and any development proposals within or affecting these must satisfy the requirements of the EU Directive on the Conservation of Wild Birds (74/409/EEC) and the EU Directive on the Conservation of Natural Habitats (92/43/EEC).
- 3.11 Environmental problems that relate to areas of particular environmental importance are:
- River Axe SAC – classified by the EA as in “poor” status, for reasons including pollution from wastewater and in particular sewage discharge.
 - Beer Quarry and Caves SAC – potential loss of suitable bat foraging habitat, roost sites or connectivity.
 - Sidmouth to West Bay SAC – cliff vegetation may be vulnerable to changes in water quality, relating to poor water quality arising from agricultural run off or other human activity landwards of the cliffs; air pollution.
 - East Devon Pebblebed Heaths SAC – Recreation pressures from nearby development; water pollution; air pollution.
 - East Devon Pebblebeds SPA – Recreation pressures from nearby development; water pollution; air pollution.
 - Exe Estuary SPA and Ramsar – classified by the EA as “moderate”, with issues preventing waters reaching good status including pollution from towns, cities and transport. Also recreation pressures from nearby development.
- 3.12 The Council will be producing an assessment under the Habitat Regulations to inform the Local Plan that will be considering these designated sites, threats upon them, and potential mitigation measures in greater detail.

¹⁷ SEA Regulations, Schedule 2(4).

4 Appraisal Findings of Topic-based Policies and Reasonable Alternatives

- 4.1 This chapter, along with Appendix Five, presents the SA findings of the topic-based policies and reasonable alternatives for the East Devon Local Plan 2020 to 2040 Preferred Options consultation draft, November 2022. The SA findings of development sites considered in preparing the Preferred Options consultation draft are set out in Appendix Six.
- 4.2 The Local Plan Vision and Objectives set the framework for plan policies that follow. These cover the spatial strategy and development sites; followed by a series of topic-based policies addressing issues such as climate change, housing needs, employment, design, the environment, and open space.
- 4.3 The testing of Local Plan Objectives against the SA framework (Stage B1 of the SA process) can highlight where they are compatible, and also where there may be inconsistencies. This can help in developing alternatives in preparing the Local Plan. This 'compatibility testing' is shown in the following table.

Figure 4.1: Testing the Local Plan objectives against the SA framework

SA framework Local Plan Objectives	1. Biodiversity	2. Landscape	3. Historic and built environment	4. Climate change and carbon emissions	5. Climate change adaptation	6. Land resources	7. Water resources	8. Homes	9. Health and well-being	10. Access to services	11. Jobs and employment	12. Town centres	13. Connectivity and transport
i. To encourage healthy lifestyles and living environments for all East Devon residents.	+	+	0	+	0	0	0	+	++	+	0	0	+
ii. To ensure all new development moves the district towards delivering net-zero carbon emissions by 2040 and that we adapt to the impacts of climate change.	0	0	+	++	++	+	+	0	0	0	0	0	+
iii. To provide high quality new homes to meet people's needs.	- ?	- ?	+	0	0	0	0	++	0	0	0	0	0
iv. To support business investment and job creation opportunities within East Devon and support a resilient economy.	- ?	- ?	0	- ?	0	0	0	0	0	0	++	++	++
v. To promote the vitality of our town centres, encourage investment, greater flexibility and a wider range of activities to increase footfall and spend.	0	0	0	0	0	0	0	0	0	0	++	++	++
vi. To promote high quality beautiful development that is designed and constructed to meet 21 st century needs.	0	0	++	+	+	0	0	+	0	0	0	0	0
vii. To conserve and enhance our outstanding built heritage.	0	+	++	0	0	0	0	0	0	0	0	0	0

viii. To protect and enhance our outstanding natural environment and support an increase in biodiversity.	++	++	0	0	0	+	+	0	+	0	0	0	0
ix. To prioritise walking, cycling and public transport and make provision for charging electric vehicles.	0	0	0	++	0	0	0	0	+	0	0	0	++
x. To secure infrastructure needs at an appropriate time to support new development.	0	0	0	0	0	0	0	+	+	+	0	0	0
xi. To help support villages and protect and enhance facilities and services they offer.	0	0	0	0	0	0	0	0	+	++	0	0	0

- 4.4 In general, there are a wide range of positive effects arising from the Local Plan objectives, to be expected as they are aspirational in their wording. Some uncertain negative effects are identified for those Local Plan objectives that encourage built development for biodiversity, landscape, and climate change – this will depend upon the location of development. There are many neutral or negligible effects because the Local Plan Objectives are focussed on a specific topic that is only relevant for certain parts of the SA framework. The cross-cutting nature of climate change means there are several positive links between the Local Plan objectives and SA framework on this issue.
- 4.5 Appendix Five contains the SA findings of the topic-based policies and reasonable alternatives in the East Devon Local Plan 2020 to 2040 Preferred Options consultation draft, by chapter – see links below:
- [Chapter 3. The Spatial Strategy](#)
 - [Chapter 5. Future growth and development on the western side of East Devon](#)
 - [Chapter 7. Tackling the climate emergency and responding to climate change](#)
 - [Chapter 8. Meeting housing needs for all](#)
 - [Chapter 9. Supporting jobs and the economy and vibrant town centres](#)
 - [Chapter 10. Designing beautiful and healthy spaces and buildings](#)
 - [Chapter 11. Prioritising Sustainable travel and providing the transport and communications facilities we need](#)
 - [Chapter 12. Caring for our outstanding landscape](#)
 - [Chapter 13. Protecting and enhancing our outstanding biodiversity and geodiversity](#)
 - [Chapter 14. Open space and sports and recreation facilities](#)
 - [Chapter 15. Our outstanding historic environment](#)
 - [Chapter 16. Ensuring we have community buildings and facilities](#)
- 4.6 It is important to note that the SA findings relate to a 'consultation draft' and, as such, could be amended following public consultation. As noted in chapter two, the 'formal' SA report is produced alongside the 'publication' (regulation 19) version of the Local Plan.

5 Appraisal Findings of Sites and Reasonable Alternatives

5.1 Appendix Six contains the SA findings of the sites and reasonable alternatives considered in preparing the East Devon Local Plan 2020 to 2040 Preferred Options consultation draft – see links below:

- [Western side of East Devon](#)
- [Tier One – Principal Centre](#)
- [Tier Two – Main Centres](#)
- [Tier Three – Local Centres](#)
- [Tier Four – Service Villages](#)

6 Next steps

- 6.1 Following the current public consultation on East Devon Local Plan 2020 to 2040 Preferred Options consultation draft and this accompanying SA report, the responses will be reviewed and amendments made as appropriate to the Local Plan and SA report.
- 6.2 It is envisaged that the 'publication' Local Plan will be subject to consultation in autumn 2023, alongside the 'final' SA Report. Following this, an independent Examination will be undertaken by a Planning Inspector who will ensure the Local Plan is 'sound' and meets legal obligations before recommending its adoption.

Appendix One: Draft Scoping Report summary of consultation responses and Council response

Respondent	Succinct officer summary of issue raised	Officer response
A Bentham	Reference should be made to local climate and ecological emergency declaration and associated plan and great weight should be attached.	Whilst we will look to update reference in background reports the scoping work does need to address all sustainability considerations and it would be inappropriate to overtly focus through it on just some specific issues.
	Use should be made of citizen juries and improved engagement work (both for the local plan and SA).	It is suggested that engagement overall is a bigger issue than SA production and if it has relevance it relates far more to the process of local plan production. Under the proposed timetable for producing the local plan it would not be possible to undertake more extensive public engagement.
	Page 56, Figure 26 - The table of sustainability impacts is considered too vague to be useful as many issue require more detail in policy with costs hidden as externalities.	The submission made appears to address potential policy approaches and options for the future local plan rather than SA specific matters. For the SA scoping work no changes are suggested.
	Concern is expressed about the SA referring too much to economic indicators of GDP and GVA and should identify alternative indicators, such as life expectancy, carbon emissions, and education,	These comments appear more relevant to making policy and potential local plan content rather than the SA. For the SA scoping report changes are not proposed.
Environment Agency	Suggested that the first column in Figure 25 should be expressed more actively, specifically asking questions around potential outcomes.	It is agreed that this would be a useful amendment.
It should be noted that the EA submitted comments on the issues report and the SA in the same letter. The SA comments, as summarised, appear	In para 3.13 a more precise definition of the specific designation interest of the River Axe SAC is suggested.	This is agreed with and changes are appropriate.
	Para 3.20 should refer to the Districts rivers.	This is agreed with and changes are appropriate.
	Para 3.22 – threats to biodiversity should include historic legacy impacts to rivers.	This is agreed with and changes are appropriate.
	The climate change section should refer to the natural environment response to climate change.	This is agreed with and changes are appropriate.
	Para 3.46 – the text relating to the Exe Estuary strategy should be updated to note	This is agreed with and changes are appropriate. However the SA should not update any actual plan policy itself,

Respondent	Succinct officer summary of issue raised	Officer response
around 2/3rds of the way down the letter.	the dropping of managed realignment of the River Clyst.	as the submission text could perhaps be inferred to read/mean.
	Para 3.57 to 3.62 – text should refer to the physical form and function of rivers including in respect of biodiversity and landscape value. Issues relating to the Rivers Axe, Otter and Sid are highlighted.	This is agreed with and changes are appropriate.
	In section 5 – SA objectives 4 and 5 – heat, drought and storm extremes should be referenced.	
	In Figure 30 the reference to a 2009 document - South West River Basin Management Plan (Environment Agency, 2009) – is out of date and needs updating plus the River Exe Restoration Plan should be referred to.	This is agreed with and changes are appropriate.
	Duty to cooperate considerations – the text should note and account taken of the fact that river catchments do align with local authority boundaries.	Agree and additional text to the SA is appropriate.
	The SA text should refer to emerging Local Nature Recovery strategies in Devon, Dorset and Somerset.	Agree and additional text to the SA is appropriate.
Forestry Commission England	Para 3.17 and 3.18 – extend text to refer to ancient woodland and veteran trees – see NPPF para 175.	Agree and additional text to the SA is appropriate.
	The representation highlights a number of benefits that that tree planting can play in respect of green infrastructure matters, flood risk and renewable and low carbon energy	We will seek to adjust the SA text to incorporate headline matters raised. However these matters will and should be considered in more detail in the local plan policy making processes.
Historic England	Comments on - Task A1 – Policy context – other relevant, plans, policies and programmes and Appendix 1 and Figure 30 – A number of additional documents are highlighted that should be referenced in the SA work.	Agree and additional text to the SA is appropriate.
	Comments on Task A2 - Task A2 - Collecting Baseline Information - The landscape and seascape of East Devon. Historic England highlight a number of areas where text in the SA should cover more ground, including in respect of: • Cultural heritage;	In principle the matters raised are agreed with and attention will be given to incorporating amendments to address points raised. There may, however, be benefit in further conversation with Historic England on matters of detail that they highlight.

Respondent	Succinct officer summary of issue raised	Officer response
	- Registered parks and gardens being heritage assets; - presence and density of heritage assets along East Devon's coastline - which include the Jurassic Coast World Heritage Site; - The concept of seascape could be usefully explained. In general a need is seen for more evidence for identifying sustainability issues, predicting and monitoring likely effects and assessing alternative solutions. Task A2 – Collecting - Baseline Information Historic environment, built heritage and design quality. English Heritage identify additional information that should inform the evidence base for sustainability issues. They highlight: - all heritage asset types should be referenced and it should be noted that their settings can also positively contribute to their significance; - text should explain the difference between designated and non-designated heritage assets; - Figure 4 should provide the information source(s) and dates for this data; - Figure 4 should also seek to provide information on non-designated heritage assets including buried, waterlogged archaeological and paleoenvironmental remains of significant interest; - Information should be presented on heritage at risk through neglect, decay and other threats; - Efforts should go into identifying the current and likely future condition of East Devon's historic environment, and threats as well as opportunities related to the conservation, enhancement and enjoyment of heritage assets; - No information has been provided on the existing local plan, including relevant policies, how it has performed against its	In principle the matters raised are agreed with and attention will be given to incorporating amendments to address points raised. There may, however, be benefit in further conversation with Historic England on matters of detail that they highlight and there is need for further clarity on a number of matters – including in respect of whether all points raised do really need to be included in the SA and whether inclusion could make the document rather unwieldy and long.

Respondent	Succinct officer summary of issue raised	Officer response
	vision, issues and objectives for heritage assets; The section on design quality does not acknowledge positive contribution that heritage assets can make to local character and distinctiveness as per paragraph 185 of the NPPF 2019 and the National Design Guide and the emerging National Model Design Code. It is suggest that a Heritage Topic Paper should be prepared to inform the SA and the new Local Plan.	
	Task A3 – Identifying - key sustainability issues. English Heritage identify a number of key sustainability issues that should be identified, to include: - Landscape: should be broadened to cover seascape and townscape; - Historic and built environment: should be broadened to cover all types of designated and non-designated heritage assets. - Quality of new development: should recognise the positive contribution that heritage assets can make to local character and distinctiveness and to high-quality development. Without addressing these matters the likely future trends without a new local plan cannot be considered to be robust.	Points are agreed with and changes would be appropriate.
	Task A4 – Defining sustainability objectives. English Heritage advise that changes should be made to the following objectives: 2. Landscape - delete 'our natural environment' from the objective to recognise the historic character of landscapes and seascapes and include a reference to seascape character in factors. 3. Historic and built environment: reword title to read 'heritage assets;	It will be relevant to look on further detail at the points raised to identify specific changes that may be appropriate and desirable. To this end a conversation with English Heritage would be appropriate.

Respondent	Succinct officer summary of issue raised	Officer response
	- include reference to World Heritage Site, Registered Parks and Gardens and locally listed heritage assets - incorporate a new bullet point that seeks to address heritage at risk as a factor - reword the second bullet point 'sustain the historic environment and promote local character and distinctiveness by conserving and enhancing the significance of heritage assets and their settings and creating high quality new settlements, townscapes, developments, built environment and public realm' - reword the third bullet point: 'sustain the historic environment and promote local character and distinctiveness through urban design, build quality and detailing of new buildings, alterations/extensions to existing buildings, streets, and spaces; - include a new bullet point that focusses on the enjoyment of the historic environment given paragraph 185 of the NPPF 2019. Thy conclude by advising that the factors should recognise the holistic nature of the historic environment and its interrelationships with other Sustainability objectives, they cite climate change considerations and town centres.	
Naome Glanville	Page 14 – reference should be given to presence of otter and beaver in the river Otter.	Whilst not core to the SA inserting reference does give some positive local flavour and changes are seen as desirable,
	Page 32 – reference should be made to noise from the A30 and reference is made to EDDC to lobby for resurfacing.	Referencing noise from the A30 would be reasonable for the SA but it would not be the job of the SA to lobby for resurfacing (if lobbying were seen as desirable it would fall outside of the local plan and tasks that support its production).
	Page 53: No's 1 (Biodiversity) and 2 (Landscape) – Considered that the value of	The points raised are not challenged, however on review of the existing

Respondent	Succinct officer summary of issue raised	Officer response
	biodiversity and landscape should be acknowledged as something that should be preserved for residents and for visitors to enjoy. And also that biodiversity is important in not just AONBs but across East Devon and links to the wider planet.	scoping report text it is not clear where any changes could be relevant.
	Encouragement is given for tree planting.	Whilst more tree planting is not challenged it would not be appropriate to amend the SA but in due course the local plan can look to tree planting related policies.
	Page 53 – SA Objective 4 – encouragement is given to home working.	This can be an issue to consider and think about in local plan policy production but is not directly relevant to the SA scoping report content.
Natural England	Task A1 - Policy context Natural England advise of the types of plans that should feature in this task of work.	The list supplied will be reviewed to assess whether any changes or additions are appropriate.
	Task A2 – Baseline information Natural England provide general comment on this stage of the SA work, including on evidence sources. They specifically comment on the relevance of evidence to help inform key strategic growth areas.	The comments made are noted but are not identified as generating need for changes to the SA scoping report.
	Task A4 - Sustainability objectives Natural England make a number of comments against the SA objectives, these are: • <i>Biodiversity</i> – include a sub-objective which seeks to ensure current connectivity between habitats is not compromised, and that future improvements in habitat connectivity are not prejudiced. There is a need to consider the possible impact pathways between policy proposals and habitats and species impacted. The objective could include a commitment to deliver biodiversity net gain. • <i>Landscape</i> – the sub-objectives should provide a more detailed enquiry into the sustainability of the plan by asking whether the plan conserves and enhances the special qualities and distinctive	The points made are agreed with and it will be appropriate to incorporate changes to the SA scoping report to address concerns raised.

Respondent	Succinct officer summary of issue raised	Officer response
	character of the landscape and undeveloped coast. • <i>Land resources</i> – the sub-objective against which the plan will be assessed should set out an intention to avoid, and not just minimise, loss of best and most versatile agricultural land. • <i>Health and activity</i> – this objective would be stronger if it made it clear that assessment of the sustainability of the plan with regards to health and activity would be seeking enhanced provision of recreational resources but will also look to avoid impacts on the quality and extent of existing green infrastructure assets that have a recreational function.	
	Task A5 – Scope of the SA Natural England highlight that the SA Framework should include relevant indicators to monitor the potential significant environmental effects of implementing the plan. They suggest some possible indicators that could be incorporated.	It will be appropriate, in due course, to look at indicators for incorporation into the SA work
Pegasus Group on behalf of Land Value Alliances LLP Please note that the representation is not included in Appendix 1 but the full SA relevant submitted text, taken from an issues report submission, is reproduced.	Pegasus Group advise: 10.1 We are largely satisfied with the objectives that have been identified in the SA Scoping Report. 10.2 However, we do have concerns with the proposed metrics for assessing potential development sites. There are concerns that proposals for new towns and/or villages will perform poorly on the basis that these will be proposed in locations where there will be limited to no services and facilities available. However, a key benefit of new towns is that they are able to deliver a comprehensive range of jobs, infrastructure and services within convenient walking distance of their residents. This needs to be captured somehow in the SA or acknowledged as the conclusions of the SA are used to inform potential locations for future development.	The SA work will indeed need to consider the jobs, infrastructure and services that a new town may deliver and such potential provision will be captured, in due course, through the SA work.
Savills for Carter and Crealy Farm	Issue is raised that policies judged against Objective 8 (Homes) should have a more positive score if they deliver a larger number and mix of housing, incorporate a diversity of	As this is a comment about application of the SA and not scoping report content changes to the SA would not be appropriate.

Respondent	Succinct officer summary of issue raised	Officer response
	supply and include the provision of affordable housing.	
	Concern raised that some objectives, they cite No 3 – Historic and Built Environment, can be challenging to quantify and should not be measure against just such matters as proximity of any proposal to an asset. A judgement should be taken of actual potential adverse impacts and possible mitigation.	The points raised are noted and not challenged. However, it is not regarded that changes are needed to the SA scoping report in response. The issue at stake is the application of h SA work in practice.
	In respect of Figure 27 – distance of potential development sites to facilities, the distances should apply to both existing facilities and proposed new facilities.	
	In para 5.8 the proximity of faculties should include employment sites and that a further tier of +3 should apply to development sites within 800 metres of basic services or bus/rail and 1,600 metres of employment opportunities with 1,600 metres being considered a reasonable commuting walking distance	It is agreed that employment opportunities should feature in para 5.8 and changes should be made, though some thought will need to be given to establish what constitutes and employment opportunity. However it is not agreed that 1,600 is a reasonable walking distance and we are not are of any evidence to back this claim up.
Sid Valley Association	The document should be updated to reflect the fact that we have left the EU and comment made on any legislative changes and sources in the document need to be fully referenced.	It will be appropriate to review reference to legislative matters but it is understood that departure from the EU does n, at this point, change legislative requirements. Referencing in the document can be usefully reviewed to ensure consistency.
	On page 13 - Reference should be made to where protected sites can be located.	Whilst we will endeavour to find a public record reference this is not required for SA purposes.
	Para 3.36 – a query is raised about if a design guide is proposed.	This falls outside of the scope of SA wok and no changes are proposed.
	Para 2.41 – concern is raised that agricultural carbon emission are not stated.	It was not previously possible to identify a data source but we will review this point.
	Para 3.55 - Since EDDC is the waste collection authority why is no data available for the volume of ED waste?	This issue can be looked into.
	Para 3.65 - Age table - there is a need to break down the over 65s further, this is a significant issue and you cannot equate a 65 yr old with an 80 yr old. This is particularly significant given the large increase	For SA purposes it is not regarded that a finer grained age breakdown is needed.

Respondent	Succinct officer summary of issue raised	Officer response
	projected by ONS (quoted in the ORS report) in the number of people aged over 75 (13,390 people, representing 57% of total population growth)	
	Para 3.74 – It is considered that housing and household projections re needed, not just population projections.	For SA purposes it is not regarded that such information is needed, its relevance would rest with policy making itself.
	Para 3.79 – its advised that the affordability ratios are expressed 'upside down' making a nonsense of statements about trends. Figure 11 expresses this ratio correctly.	This point is not understood –no changes are proposed.
	Paras 3.89-3.94 - The sections on air pollution and noise pollution are particularly weak, and downplay the impact of traffic on main roads passing through the district.	Whilst we will seek out further information and evidence gathering will need to be proportionate to relevance for SA work and available resources. It may be possible to add changes.
	Para 3.124 - There need to be data on part time and casual working.	If available we will seek to source but it is not deemed essential to support SA work.
	Para 3.136 - It is the Paddington line that runs through the west of the district with no stations, not the Waterloo line. Why focus on the line that has no stations, rather than the one that is important locally both as a link to London and as a commuter route?	This line error will be corrected.
	Concerb us expressed about lack of reference to cycle routes and traffic accident data?	Whilst not deemed essential for SA purposes we will see if relevant data is available.
	It is queried why section 4 is included and why it sets out impacts in the absence of a local plan.	Inclusion of this section reflects legal requirements for the work. Relevance references should be included in the text to clarify this matter.
	Figure 25 is regarded as an “ill thought out mess, needing a lot more work”. This conclusion is contested and the table is identified as appropriate, albeit it others have suggested elements of refinement.	The assessment is not agreed and changes are proposed.
	Figure 26 is considered to be more appropriate if it were to define sub-objectives and the respondents advise “are unconvinced a mechanistic approach like this is helpful”.	The approach being taken is widely used and it is not considered that changes are appropriate
Sidmouth Town Council	Task A2	Points raised are noted – no changes to the SA scoping report are proposed.

Respondent	Succinct officer summary of issue raised	Officer response
	The collecting of baseline data is welcomed and it is noted that in the Sid Valley hedgerow loss has been great with biodiversity loss. It also noted that Broadband performance is variable including poor in some town locations.	
	Task 3 Matters raised in respect of Task 3 are noted below: • Information on the relevance and importance of hedgerows and trees is identified. • The plan need consider how the carbon footprint of existing buildings can be reduced. • Take away food outlets are a feature of all towns but the litter created by them can be significant. • The report highlights the poor quality of broadband connections in parts of East Devon, highlighting the more rural areas. However, there are also significant broadband issues in towns such as Sidmouth.	The points raised are noted and a review will be undertaken to see if there is relevance to include reference in the scoping report. However they are more relevant actual policy making on the plan.
	Task 4 Matters raised include: • Biodiversity - EDDC should work with local land owners and farmers to examine and extend best practice in hedge maintenance. It should work with Devon County Council and Highways England to evaluate and improve the roadside hedgerows. • Historic and Built Environment – Any changes to the Esplanade and sea front as part of any Beach Management Scheme must be in keeping with the character of the area and must maintain the connection between the Town and the sea. • The Council should seek excellence and quality in all additions to our built environment. The green spaces, corridors,	The points raised are considered to be largely operational matters for council function or matter that fall to possible plan policy rather than content of the SA scoping report. Whilst the Council (DDC) may choose to pick up on these issues elsewhere they are not directly relevant to SA content.

Respondent	Succinct officer summary of issue raised	Officer response
	conservation areas, and views laid out in the Sid Valley Neighbourhood Plan should be protected. - Climate change and carbon emissions – Minimising carbon emissions is indeed a vital objective for the plan but the plan actions should also include EDDC leading by examples in their offices and other property as well as in the activities they perform. - Land Resources – In addition to enhanced recycling EDDC should seek to encourage reuse or repurposing of both personal and council assets wherever possible. - Wellbeing – Take away food licencing should be far more tightly linked to efforts to control littering . - Town centres – Working with Devon County Council, EDDC should seek to pedestrianize town centres to make them a more pleasant place to be, and to support local businesses.	
	In their Appendix the town council include a matrix comparing Sidmouth Town Council policy against, amongst others, EDDC Local Plan considerations.	Whilst an interesting comparative table there are no identified changes that it is considered should be made to the SA in respect of this matrix.
T Dumper	The importance of qualitative data is highlighted as is the significance of biodiversity. Tough scepticism is expressed around Government commitments to resist biodiversity loss.	The points raised are noted.
	Specific topic matters highlighted in the submission include: - Waste - reducing material use and re-use are even more important than recycling, the low waste per household in ED needs factoring in with incineration and landfill being damaging - Public Transport -, we need better services, buses and trains, and made cheaper and more accessible. - Active travel needs to be encouraged everywhere, not just to meet Government criteria.	The points raised are noted, their potential relevance relate, however, to the policy making process rather than the actual SA work.

Respondent	Succinct officer summary of issue raised	Officer response
	- Population Balance - To maintain balance, rather than a perpetually ageing population we need sustainable employment and housing policies. - Housing - There should be proper mention and encouragement of social rented housing. - Employment Policy - We should be doing everything possible to minimise commuting to Exeter and other places to create self-sufficient local places.	
Transition Exmouth	The respondents raise a number of matters in their submission, these in summary, are: - Acknowledgement should be given to the 'Shifting Baseline Syndrome'. We should recognise much higher levels of biodiversity in the past. - In respect to climate change local authorities should educate the public. - There should be a baseline understanding of cycle land and their se promoted, whilst charging points should be available. - More weight should be given to securing segregated cycle lanes. The representation replicates a number of matters covered by T Dumper, above.	The points raised are noted, their potential relevance relate, however, to the policy making process rather than the actual SA work.

Appendix Two: Relevant Plans, Policies and Programmes

International

EU Directive 2001/42/EC (the 'SEA Directive') provides a high level of environmental protection by setting out detailed requirements for the environmental assessment of plans – indeed, this Directive, as translated into UK law, is the reason why SEA (and SA) is required for local plans. Another key EU Directive is 92/43/EEC on the conservation of wild fauna and flora (the 'Habitats Directive'), which requires a Habitats Regulations Assessment (HRA) of the Local Plan to ensure potential negative environmental effects on European protected sites are identified and can be mitigated. A wide range of other EU Directives exist on issues including water quality, waste, and air quality

National

There are numerous national level plans, policies and programmes that contain relevant objectives for the Local Plan and SA. The National Planning Policy Framework (NPPF) is particularly important, setting out the Government's planning policies for England and how these should be applied. The NPPF states the purpose of the planning system is to contribute to the achievement of sustainable development, setting out three overarching objectives: economic, social, and environmental (NPPF, paragraph 8). Further detail on delivering these objectives is contained throughout the NPPF, including the presumption in favour of sustainable development (paragraph 11) which means that "all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects. Strategic policies should provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas..." unless other NPPF policies provide a strong reason for restricting development. Planning practice guidance provides detail on implementing the NPPF, based around a wide range of topics.

The Climate Change Act 2008 was the first legislation in the world to provide a comprehensive framework to tackle global warming, and was amended in 2019 to commit the UK to net zero emissions by 2050.

The Environment Act 2021 provides long-term protection and recovery for the UK's natural environment, part of the delivery of the Government's 25-year Environment Plan. The Act introduces a 10% biodiversity net gain as a statutory requirement for new development, alongside requirements for Government to introduce long-term targets for air quality, water, biodiversity,

resource efficiency and waste reduction. Section 41 of the Natural Environment and Rural Communities Act 2006 and the UK Biodiversity Action Plan identify priority habitats and species.

Statutory protection for the historic environment is achieved through the Planning (Listed Buildings and Conservation Areas) Act 1990. Historic England has published a good practice guide on implementing historic environment policy (The Historic Environment in Local Plans). In light of this, the Local Plan should include policies to conserve and enhance the historic environment, and the SA process should reflect this aim. National Character Areas have been prepared by Natural England, which divide England into distinct natural areas, following natural lines in the landscape rather than administrative boundaries. These are based upon a combination of landscape, biodiversity, geodiversity, history, and cultural and economic activity.

'Build Back Better: our plan for growth' (2021) sets out the Government's plans to support economic growth through significant investment in the three core pillars of growth: infrastructure, skills, innovation. It intends for growth to level up the whole of the UK, support the transition to net zero, and support a vision for Global Britain.

The creation of high quality, beautiful and sustainable buildings and places is fundamental to what planning should achieve (NPPF, paragraph 130) – several guidance documents provide further detail on achieving this, including the National Design Guide and National Model Design Code, Building for a Healthy Life, and Lifetime Neighbourhoods.

Local

A range of local plans, policies and programmes provide further detail on sustainability issues in East Devon, often informed by those produced at an international and national level.

The East Devon District Council Plan 2021-23 has a vision to make a positive difference to residents' lives and the environment, to be achieved through three priorities: better homes and communities for all, a greener East Devon, and a resilient economy. Like many local authorities, East Devon District Council declared a "climate emergency" in 2019 and has produced a Climate Change Strategy 2020 – 2025 with a vision to become a carbon neutral council by 2040, working within a low carbon economy and lifestyle, reflected in travel, homes, businesses, visitors and communities.

South West Water's Water Resource Management Plan concludes that there is sufficient water supply up to the year 2045. It states that groundwater provides most of the water supply for East Devon. Water quality is considered in the South West River Basin Management Plan, which identifies the priority river basin management issues for the East Devon catchment as agricultural diffuse pollution, protected areas, and invasive and non-native species. The Devon Local Flood Risk Management Strategy 2021-2027 contains a series of principles to balance the needs of communities, the economy and the environment through partnership working, with sustainable

flood risk management. Priority communities in East Devon that will be considered for flood risk investigation and potential investment are Exmouth, Seaton, Budleigh Salterton, and Sidmouth, all due to surface water flooding. The River Axe Nutrient Management Plan includes measures to ensure that housing development in this river catchment does not increase phosphates, in order to protect its ecology.

The Devon Biodiversity Action Plan (2009) identifies the key wildlife and geological features and sets priorities for nature conservation. The East Devon and Blackdown Hills Landscape Character Assessment (2019) details the rich diversity of landscapes in the area, identifying 17 landscape character types across East Devon. The East Devon AONB Management Plan 2019-24 (renamed as the 'Partnership Plan') contains strategic aims to conserve and enhance the natural beauty of the AONB; and support sustainable social and economic development that is compatible with the landscape. Similarly, the Blackdown Hills AONB Management Plan 2019-2024 identifies the special qualities of this AONB, stating that planning policies should give it great weight, new buildings designed to the highest standards, and affordable housing need is met in accessible locations. The Clyst Valley Regional Park 25 Year Masterplan includes a range of sustainability objectives to ensure continued protection of this large area of land in the western part of East Devon.

In the future, as a requirement of The Environment Act 2021, Local Nature Recovery Strategies will establish priorities and map proposals for specific action actions to drive nature's recovery and provide wider environmental benefits.

Historic England produce a snapshot of historic sites known to be at risk from neglect, decay or inappropriate development in its annual Heritage at Risk Register. The latest register (2021) identifies 29 heritage assets as being 'at risk' in East Devon – the only asset where inappropriate development is identified as being an issue, and thus relevant to Local Plan production, is at Bickton Registered Park and Garden. East Devon District Council has produced a Heritage Strategy that contains detailed information on heritage assets in the district, and objectives that have implications for the Local Plan include to positively manage heritage assets, and to encourage development which enhances distinctiveness.

The Devon Minerals Plan makes clear the importance of maintaining an adequate supply of minerals, whilst limiting the impacts of their working. The Budleigh Salterton Pebble Beds are identified an important area for extracting sand and gravel, as are several small-scale building stone quarries. The Devon Waste Plan identifies how sustainable waste management will be achieved, with energy recovery sites identified at Greendale and Hill Barton, business parks that are adjacent to the A3052 in the western part of the district.

The importance of infrastructure delivery to underpin economic growth is made clear in the Heart of the South West Local Enterprise Partnership (LEP) Strategic Economic Plan. Similarly, the LEP

Local Industrial Strategy contains objectives to improve transport networks, improve digital connectivity, accelerate housing delivery, and ensure there is sufficient employment land.

Transport infrastructure in particular has been subject to several local plans, policies and programmes. The Local Transport Plan 2011-2026 objectives include supporting new development, providing sustainable travel, including the specific scheme for the Dinan Way extension in Exmouth. Further transport schemes are included in the Transport Infrastructure Plan, some of which have been delivered – outstanding projects include the Axminster relief road, Clyst St Mary roundabout, and the Clyst Valley Way. Walking and cycling improvements are proposed in the Cycling and Multi-Use Trail Strategy, with schemes including cycle links from Cranbrook to Exeter, Seaton to Colyton, and Feniton to Sidmouth. Strategic improvements to the railway network in East Devon are proposed through railway passing loops at Axminster, Honiton, and Whimble to Cranbrook (Continuous Modular Strategic Planning – West of England Line Study, 2020). Devon's Bus Services Improvement Plan aims/objectives include to grow bus patronage, create a bus network that meets the needs of users, and increase bus priority to make it an attractive alternative to the car. Propose strategic bus links in East Devon are new services to the east of Exeter (including the Enterprise Zone), more direct Seaton to Exeter journeys, improved frequency from Honiton to Taunton, a new link between Honiton and Cullompton, along with better bus connections to rail services.

Surrounding development plans

When preparing the Local Plan, East Devon District Council is under a legal 'duty to co-operate' with Devon County Council and other prescribed bodies on strategic matters that cross administrative boundaries – this will be addressed through statements of common ground. Many cross-boundary issues are already highlighted in the plans, policies and programmes prepared by Devon County Council and other prescribed bodies. The following cross-boundary issues arise from adopted and emerging development plans that surround East Devon, along with consultation responses to the East Devon Local Plan Issues and Options:

- Housing – both the West Dorset, Weymouth & Portland Local Plan (adopted 2015) and emerging Dorset Plan (consultation 2021) favour proposals that support the long-term growth of Lyme Regis and Uplyme if necessary, given the two settlements are adjacent to each other.
- Housing – Torbay submitted a consultation response that sought help in meeting their housing need by new homes being located in East Devon.
- Transport – impacts of development in East Devon upon the road network in Exeter.
- Water quality – phosphate issues in the River Axe, potentially arising from development in South Somerset, Dorset, and East Devon.

- Flood risk – river catchment boundaries do not align with East Devon’s district boundary, so need to consider flood risk management across administrative boundaries. Influencing development and land management in upstream areas of East Devon’s rivers can help to reduce adverse impacts on water quality (discussed above) and flooding.
- Climate change – opportunities to mitigate and adapt to climate change cross local authority boundaries.
- Habitat mitigation – existing partnership between Teignbridge, Exeter and East Devon to address the impacts of development upon European designated sites.
- Landscape – considering the AONB and any allocations that may impact upon adjoining local authorities.
- Green infrastructure – including nature delivery and recreation, such as the protection and enhancement of the Clyst Valley Regional Park, providing recreation opportunities to the east of Exeter.

Implications for the Local Plan and SA

The Local Plan should reflect the NPPF “presumption in favour of sustainable development” to meet community needs for new housing, in sustainable locations, whilst improving the environment and mitigating and adapting to climate change. The SA should include objectives to reflect this, and the process of appraising options and recommending mitigation measures should ensure a sustainable outcome.

The Local Plan should include policies that will contribute towards meeting climate change targets, for example through low/zero carbon homes, encouraging renewable energy, and minimising the need to travel; whilst the SA should include an objective relating to climate change. The Local Plan should also ensure new development is resilient to effects of climate change.

The Local Plan should incorporate biodiversity net gain, and any other targets as they are brought forward in preparing the Plan, as set out in the Environment Act 2021. The SA should include objectives to conserve and enhance biodiversity. The Local Plan should reflect landscape sensitivities in identifying sites for development, whilst the SA should consider landscape impact when assessing site options, recommending mitigation measures where appropriate – particularly for development that could affect the two AONBs located in East Devon. Similarly, the Local Plan should recognise heritage assets in conserving and enhancing the historic environment; and the SA should identify effects on the historic environment.

Policies in the Local Plan should support the economy and the SA should include objectives that reflect this aim. The SA process of appraising options, assessing economic effects, and recommending mitigation measures, should support the economy.

National policy and guidance relating to high quality design should be reflected in Local Plan policies, including through the use of internal space standards where justified, and SA objectives should address the built environment and design of neighbourhoods.

The Local Plan should optimise the use of water resources in new development, ensuring they are resilient to future droughts due to climate change. This could include setting design standards for water usage in new dwellings. The SA should ensure water resources and climate change are included in objectives. Similarly, the Local Plan should consider the impact of future development upon water quality, and the SA should include an objective relating to water quality.

Mineral resources should be safeguarded where possible, whilst the use of local building stone in new development can deliver high quality design. Similarly, with regards to land resources, the Local Plan can ensure sustainable waste management by supporting the waste hierarchy as appropriate. An SA objective relating to land resources can deliver these aims.

The provision of infrastructure should support the delivery of housing and economic development – this includes transport, digital connectivity, education, healthcare, open space, and sports provision. Infrastructure issues can be considered through several SA objectives such as providing access to community facilities and services, sustainable travel links, and open space.

All of the implications above should be considered in the context of the duty to co-operate, which may identify cross-boundary implications that should be addressed; for example, in relation to housing need, environmental impacts of development, and infrastructure requirements.

Appendix Three: Baseline information

In order to undertake the SA work it is important to have an understanding of the baseline i.e. “where we are now”, so that local plan strategy and policy choices can be informed by the current position. This Stage A2 of the SA process reflects on the current state of the environment, society and economy, and those characteristics which are most likely to be affected by a new Local Plan. This understanding allows us to not only consider the likely effects and impacts of the local plan but also to understand how it can make positive contributions in the future.

Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations 2004 sets out a number of topics that must be considered and presented in an SEA.¹⁸ These are assessed in this scoping report but also to broaden out the basis for the work, to meet Sustainability Appraisal specific requirements, assessment work also looks more broadly at social and economic considerations.

This section splits the sustainability matters into environmental, social and economic categories, and these form sub-headings in this chapter, with more detailed themes and issues sitting under these. However, it should be noted that much of the information recorded in this report could comfortably sit under any or all of the three main strands of sustainability and indeed under differing sub-headings. To avoid repetition this Scoping Report has sought to include the information under what is considered to be the most appropriate heading. However, sustainable development is, by its nature, a holistic concept and therefore the various themes, by implication, interact and cross boundaries.

It should be noted that there are some quite marked variations in the environmental, social and economic make-up across differing parts of East Devon and this work picks up on not just an overarching East Devon wide picture but where information and data is available it seeks to drill down to smaller scale geographies.

As well as commenting on the current state of affairs the SA work comments on potential impacts and implications that could arise without the benefit of a local plan or a coherent set of planning policies.

Impacts of Covid-19

The data and information in this scoping report largely dates from before Covid-19. The pandemic, starting from early 2020, can be expected to have short term as well as potentially long term impacts. At this stage it is not possible to state what these impacts, especially over the long term, may prove to be. This scoping report in any redraft, or more likely appraisal work that follows from it, may require

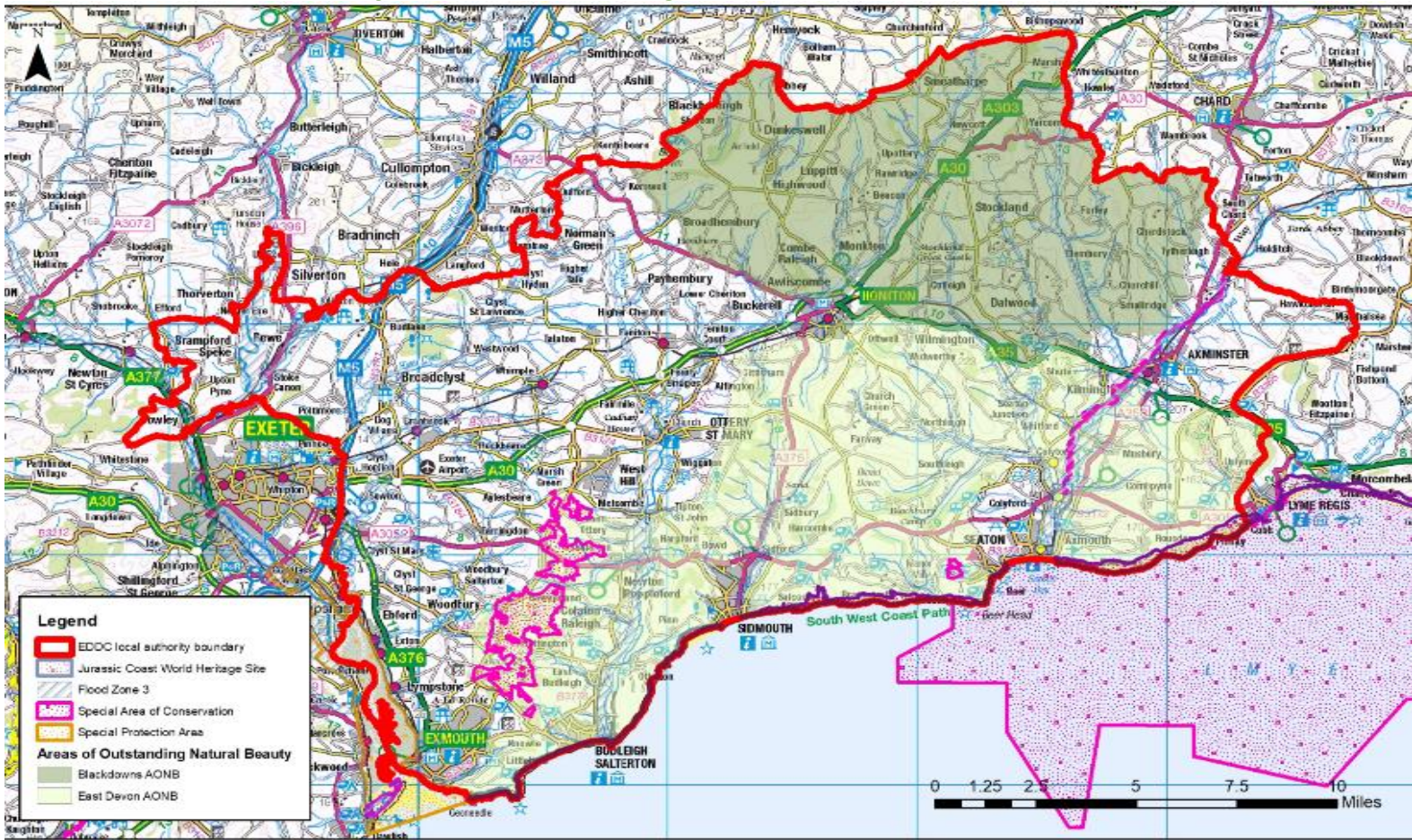
¹⁸ Namely: biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological, landscape.

updating over time to take into account possible impacts, but in its present draft it reports on published (largely pre Covid-19) data and information that is available.

Key environmental baseline data

East Devon benefits from a very high quality environment with an exceptional landscape, great biodiversity resources and outstanding heritage assets. Commentary in this section provides an overview of the state of East Devon's natural, built and historic environment, highlighting the qualities of the area as well as the concerns and challenges that exist. The following map shows the most important natural environment designations in East Devon. Detailed mapping of these designations and many others, along with habitats and species maps is available at [MAGIC \(defra.gov.uk\)](https://magic.defra.gov.uk)

Key environmental designations in East Devon



Biodiversity in East Devon

Biodiversity refers to the variety of life on earth, including the different species of animals, plants, and micro-organisms that coexist. East Devon is home to an abundance of rare species (including dormice, otters, reptiles, bats and birds) and home to important habitat types, including woodland, meadows, hedges, heaths, ponds as well as a varied coastline.

Many sites and land areas in East Devon, on account of their habitat types and/or species present, are protected by national and European Union legislation. The exceptional wildlife and biodiversity of East Devon is important in its own right but also it provides a highly appealing asset and attraction that enhances the quality of people's lives, and supports many jobs, for example in tourism and wildlife friendly land management.

Statutory wildlife designations in East Devon

The highest tier of wildlife sites in England (and across the countries of the European Union) are Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). There is a further designation, Ramsar sites that although established through different means, are afforded the same protection as the SPAs and SACs.

There are four SACs in East Devon, these are:

- Beer Quarry and Caves (rare bats);
- East Devon Pebblebed Heaths (lowland heathland);
- River Axe (supporting floating vegetation and rare fish); and
- Sidmouth to West Bay (sea cliffs).

Lyme Bay and Torbay (reefs and sea caves) is a currently a candidate SAC (and a Site of Community Importance) – it is treated in planning terms as an SAC.

There are also two SPAs,

- the Exe Estuary (also a Ramsar site and designated for waterbirds); and
- East Devon Pebblebeds (Dartford warbler and nightjar).

There are a number of further European Sites within 20 kms of East Devon. Sites beyond East Devon but which planning and development decisions in East Devon could impact on need to be taken onto account in when making planning policy. Separate assessment under the Habitat Regulations will be undertaken to look at potential issues and mitigation associated with development that could adversely impact on this highest tier of wildlife sites.

There are 26 Sites of Special Scientific Interest (SSSIs) falling wholly or partly in East Devon. These are sites designated for wildlife and/or geological interest. Site conditions are varied though the

Government has set (in Biodiversity 2020) national targets for 50% of SSSI to be in favourable condition and 95% to be in favourable or unfavourable recovering condition by 2020. There is two National Nature Reserves in East Devon, at the Axmouth to Lyme Regis Undercliffs; and the Pebblebed Heaths.

Other designations and Priority habitats and species

The East Devon Local Plan 2013-31 advises that there are approximately 300 non-statutory County Wildlife Sites (CWS) in East Devon as well as many other County Geological Sites and Local Nature Reserves. Priority habitats and species are also present in East Devon,¹⁹ with Ancient Woodlands and a wealth of UK Priority habitats (such as grazing marsh, lowland meadow, lowland heathland, hedgerows and coastal habitats). It is important to note that many of these habitats are of CWS and SSSI standard but have no formal designation.

Ancient woodland are an irreplaceable natural resource that has remained constantly wooded since at least AD1600 with a number of such wooded areas across the District. The length of time ancient woodland takes to develop and evolve (centuries, even millennia), coupled with the vital links it creates between plants, animals and soils accentuate its irreplaceable status. The varied and unique habitats of ancient woodland sites support many of the UK's most important and threatened fauna and flora species and ancient woodlands cannot be re-created. Similarly, ancient or veteran trees have exceptional biodiversity, cultural or heritage value, and can also be found in East Devon – these are generally found outside of woodland and are therefore more vulnerable to the impact of development.

Approximately one quarter of priority UK Biodiversity Action Plan species are associated with woodland habitats. Forests, woods, and trees make a significant contribution to biodiversity, and ancient sites are recognised as being of particular value. Due to their longevity, ancient woodlands are more species rich, and are often refuges for specialist woodland species that struggle to colonise new areas.

A number of species are afforded particular protection specifically on account of their rarity. In some cases protected species will be found on designated sites (designation can be justified on account of their presence) but also these species may be found in or on non-designated areas. European protected species found in East Devon, amongst others, include otter (widespread on rivers), dormice (widespread in woodlands, hedges and scrub), Great Crested Newts and bats, noting that East Devon supports Greater Horseshoes, Lesser Horseshoes, Barbastelle and Bechstein bats which are all Annex 1 species.

Wildlife more generally

¹⁹ Further information on UK BAP priority habitats and species is available at: [UK BAP | JNCC - Adviser to Government on Nature Conservation](#)

Most of East Devon does not, however, fall within area designated for nature conservation value though great un-designated swathes of the district are of importance for wildlife. Farmland (particularly where not intensively managed) and hedgerows, trees and woodland,²⁰ parks and open spaces of all sorts can be important for wildlife and the public enjoyment of wildlife; as are the district's rivers and their drainage networks. In addition domestic gardens can be of real significance for wildlife and just simply for human enjoyment of outdoor space.

Threats to biodiversity and opportunities for enhancement

Notwithstanding the important biodiversity that East Devon supports, there has been, in common with the national picture a decline in biodiversity and loss of habitats across East Devon over past decades.

Wildlife and habitat are vulnerable to a number of threats, these include:

- changing agricultural practices and particularly agricultural intensification (over past decades this has had the biggest adverse impacts on wildlife);
- habitat fragmentation/isolation;
- urbanisation impacts (including lighting, traffic collisions, fire, noise, cat predation, invasive species, pollution, limitations on the space for rivers and estuaries to naturally adjust and adapt to change);
- air and water quality/quantity impacts;
- historic legacy impacts to rivers, including from infrastructure, dredging and land management; and
- recreational impacts.

Whilst significant adverse impacts have occurred there are, however, opportunities to improve the biodiversity interest. Rebuilding Devon's Nature Map²¹ identifies the priority areas (river corridors and Strategic Nature Areas) in Devon for expanding our wildlife habitats. However, there are also opportunities in and around development sites for wildlife enhancement.

Legislation (The Environment Act 2021) now requires a net gain in biodiversity, and the degree to which such enhancement will be sought will be set out in local plan policy.

The landscape and seascape of East Devon

²⁰ There are multiple benefits of trees and woodland, such as slow water in surface run-off, improve water quality by absorbing pollutants, scrub air of pollutants, provide summer shading, provide landscape screening, capture carbon, and biodiversity enhancements, provide sustainable construction material.

²¹ See: [Rebuilding Devon's Nature Map – DBRC](#) and Strategic Nature Areas within East Devon: [OverallmapEastDevon.jpg \(1753×1241\) \(dbrc.org.uk\)](#)

East Devon has exceptional landscape qualities and the planning system gives great weight to conserving landscape and scenic beauty, specifically including Areas of Outstanding Natural Beauty (AONBs). The East Devon AONB falls entirely in East Devon as does most of the Blackdown Hills AONB, they collectively cover around two thirds of the District. A very small part of the Dorset AONB also falls in East Devon.

There are distinct variations in the character of the landscape across East Devon as described in the East Devon and Blackdown Hills Landscape Character Assessment, see:

https://eastdevon.gov.uk/media/2816886/lca_complete_final_march-2019_low-res.pdf. Broad types of landscape include valleys, scarp slopes, estuaries, cliffs, rolling hills, plateaux and ridges. However, although varied, there are comparatively few areas of low lying flat land and the vast majority of the landscape is characterised in some form by undulating topography.

Away from the main towns of East Devon the District is predominantly rural, characterised by a land cover of fields, hedges, copses and woodland with a settlement pattern of villages, hamlets and isolated dwellings and farmsteads. This rural character is reflected in dark sky and tranquillity mapping.²² Many settlements have distinct relationships with their landscape, located on intersections of historic routes, at water sources and crossings, but away from wetlands or exposed areas. Many have distinct identities and traditional vernacular character reflecting a long history of human settlement, locally available building materials and agricultural land use. The rural setting and identity of many settlements is valued and protected as is evident from designations that seek to maintain their open, undeveloped character. The character of historic built cores of many are also valued, evident from conservation area designations.

In some parts of East Devon, however, major road and rail corridors and pylons dissect the landscape and there are distinct areas of modern and recent development including the growth areas around Exeter Airport and Cranbrook. There are also numerous medium to large-scale solar farms in East Devon.

The East Devon coast

Seascape is defined as a view of an expanse of sea, and East Devon benefits from a stunning coastline and International recognition, on account of geological interest and importance, with the Dorset and East Devon Coast World Heritage Site (the “Jurassic Coast”). Other designated heritage assets along the coast include scheduled monuments, and listed buildings. The coastline is cliff dominated with some sandy but mostly rocky beaches. The coastline provides residents and visitors

²² Dark sky map: [England's Light Pollution and Dark Skies \(cpre.org.uk\)](https://cpre.org.uk/englands-light-pollution-and-dark-skies/) ; Tranquillity map: [tranquillity_map_england_regional_boundaries_1.pdf \(cpre.org.uk\)](https://cpre.org.uk/tranquillity-map-england-regional-boundaries-1.pdf) . Both prepared by Campaign to Protect Rural England.

with opportunities for work in tourism and maritime industries as well as recreational opportunities, it provides an exceptionally attractive place to play and relax.

The coast of East Devon is subject to ongoing erosion from wave's and the sea's activity as well as water flowing from the land. Impacts are exacerbated by rising sea levels. It is important to note, however, that the status of the World Heritage Site rests in part on this erosive activity.

In addition to the cliffs and beaches the landward site of the coast has an outstanding patchwork of flora and fauna.

The coastline of East Devon is mostly undeveloped though there are towns and villages located in valley systems that cut through higher land to the sea. Fishing and maritime activities remain commercially important activities in many of these towns and villages and tourism forms a significant part of the economy.

It is important to note the inter-relationships between landscape, seascape, townscape and the historic environment. For example, the conservation and enhancement of cultural heritage is an important consideration in AONBs; Registered parks and gardens are areas of designated landscape as well as being designated heritage assets; and important landscapes, townscapes and seascapes often form the settings of heritage assets.

Historic environment, built heritage and design quality

East Devon's historic environment

Many millennia of human occupation in East Devon has left a rich legacy of historic buildings, structures and spaces, historic landscapes and archaeological sites and monuments. This heritage forms a fundamental feature of the physical fabric and cultural identity of East Devon. Collectively these are referred to as heritage assets, defined as “a building, monument, site, place, area or landscape as having a degree of significance meriting consideration in planning decisions, because of its heritage interest” (NPPF, Annex 2: Glossary). A significant proportion of historic buildings and areas in East Devon are valued and protected as designated assets: Listed Buildings, Conservation Areas, Registered Historic Parks and Gardens or Scheduled Monuments. In addition, non-designated assets are those identified by local planning authorities as having a degree of heritage significance but which do not meet the criteria for designated heritage assets. It is important to note that the settings of heritage assets can positively contribute to their significance.

The table below (figure 3.2) identifies designated heritage assets in East Devon, with a map of heritage and landscape designations on the following page. There are numerous non-designated assets in

East Devon, including 23 identified on East Devon's local list²³ and those shown on the Devon Historic Environment Record. As highlighted in chapter 2, East Devon District Council has an adopted heritage strategy²⁴ which contains further detail on baseline information for the historic environment in East Devon. In addition, conservation area appraisals assess the setting, built environment, features of special importance and potential threats to these areas.²⁵

Designated Heritage assets in East Devon²⁶

	East Devon
Listed Buildings	3,090 (54 Grade I, 184 Grade II*, 2,852 Grade II)
Scheduled Monuments	112
Registered Park/Gardens	8 (1 Grade I, 1 Grade II*, 6 Grade II)
Conservation Areas	34
World Heritage Sites	1

The 'Heritage at Risk' Register, updated annually, identifies sites that are most at risk of being lost as a result of neglect, decay or inappropriate development. There are 29 entries located in East Devon in the latest register (2021) – the only asset where inappropriate development is identified as being an issue, and thus relevant to Local Plan production, is at Bickton Registered Park and Garden.

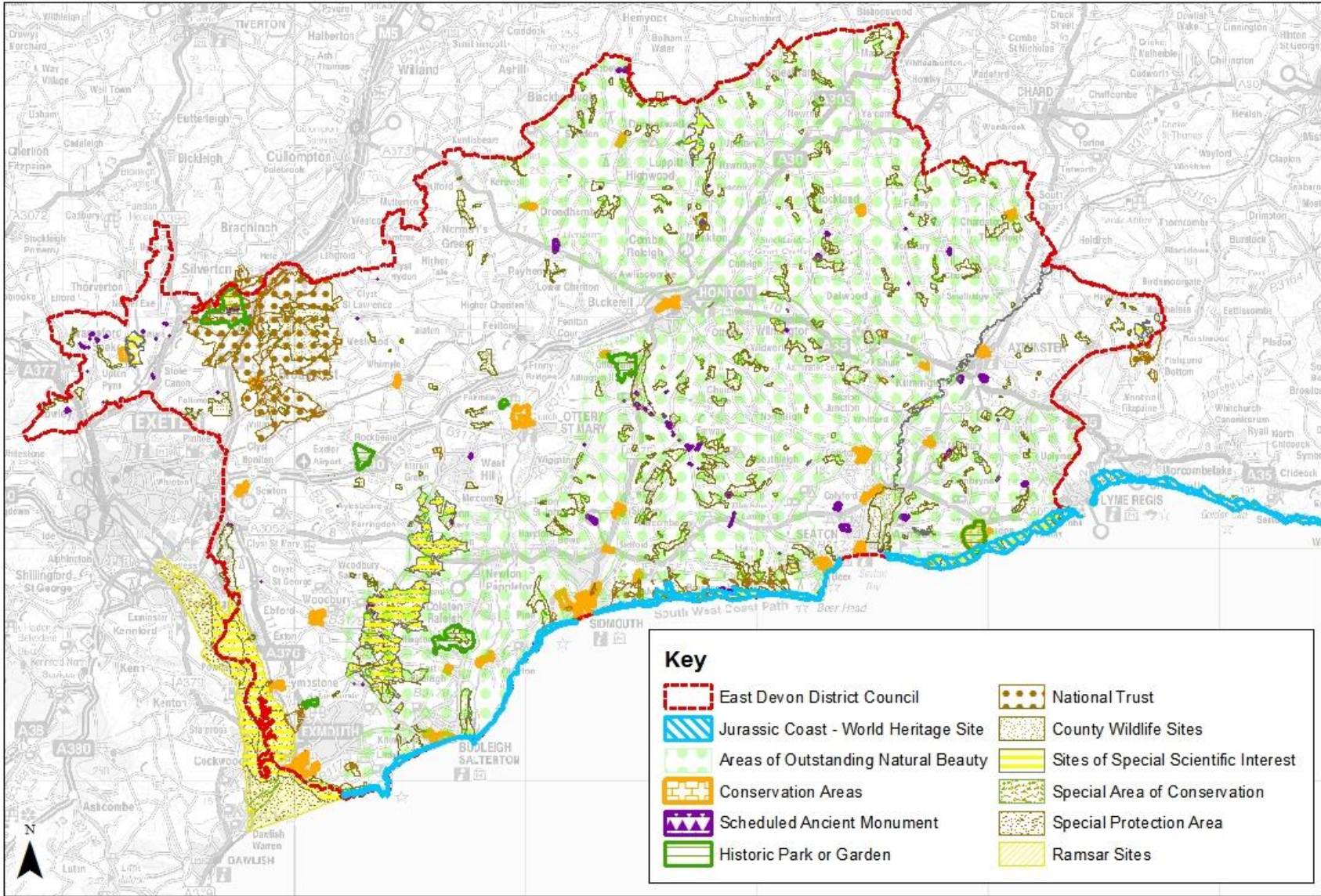
²³ East Devon local list of heritage assets [east-devon-list-of-local-heritage-assets-december-2020.pdf](#) ([eastdevon.gov.uk](#)) ; Devon Historic Environment Record [Historic Environment Record \(HER\) - Devon County Council](#)

²⁴ See: <https://eastdevon.gov.uk/media/3413423/final-heritage-strategy-2019-2031.pdf>

²⁵ Available at: [Conservation areas - East Devon](#)

²⁶ Historic England's Local Authority Profiles: [Indicator Data | Historic England](#) ; East Devon Heritage Strategy 2019-31: [final-heritage-strategy-2019-2031.pdf](#) ([eastdevon.gov.uk](#))

East Devon Heritage and Landscape designations



Heritage assets, in their various forms, can require ongoing use and management if they are to remain in good condition. They are, however, highly vulnerable to negative impacts from poor quality and inappropriate works and activities. Examples of opportunities and threats to the historic environment include mitigation and adaptation to climate change, coastal erosion and flooding, challenges facing historic town centres, and the role of the historic environment in promoting health and well-being.

Design quality

The design quality of new development (and that built in recent years) in East Devon varies greatly and it can be a challenge to uphold high design standards. Much building work is undertaken to national design standards using materials that are not local and design approaches that are not reflective of or sympathetic to local vernacular styles or not innovative in approach. For instance, heritage assets can make a positive contribution to local character and distinctiveness as set out in the NPPF and National Model Design Code.

The existing East Devon Local Plan does, none the less, include design policies which encourage high quality urban design in new developments. There are various measures which could be used to measure design quality of new development, such as the number of schemes which score highly in the 'Building for Healthy Life' system. However, consistent monitoring of recent development has not been undertaken and the onus typically rests on encouraging good design and 'testing' planning applications coming forward.

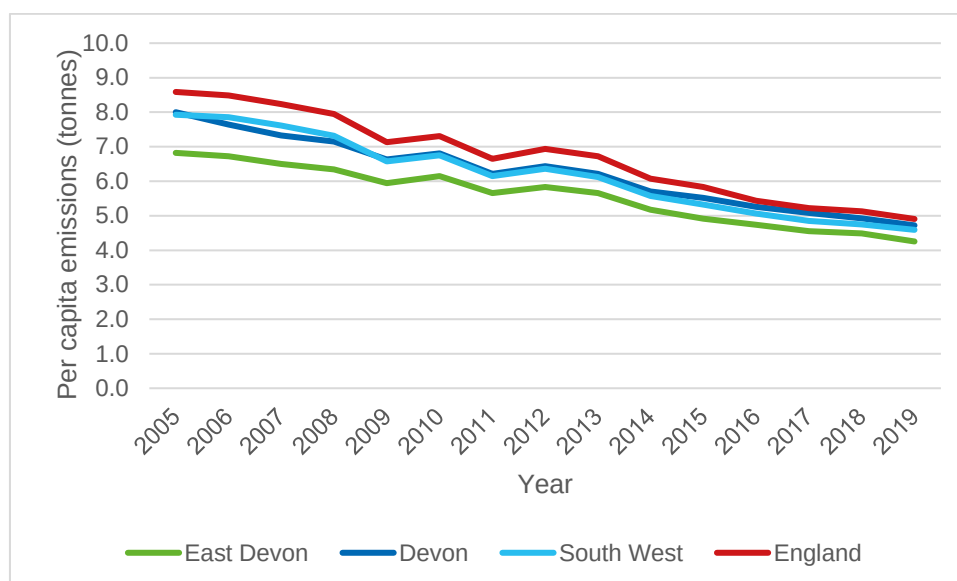
The changing climate and carbon emissions

Climate change

Climate change is the effect of direct and indirect human activity *“that alters the composition of the global atmosphere and which is in addition to natural climate variability observed over comparable time periods”* United Nations Framework Convention on Climate Change (UNFCCC) (Article 1:2, p.7). The potential impacts and implications of further climate change, noting the world is warming, include more extreme weather events, flooding, coastal erosion and loss of species and habitats.

Reducing carbon dioxide (CO₂) emissions in the atmosphere is a national objective. This is driven by the Climate Change Act (2008), which sets a legally binding target of at least a 34% reduction in UK emissions by 2020 and net zero by 2050, against a 1990 baseline. The graph below shows per capita CO₂ emissions for East Devon, Devon, the South West region and England from 2005 to 2019.

Carbon dioxide emissions 2005-2019 - tonnes per capita²⁷



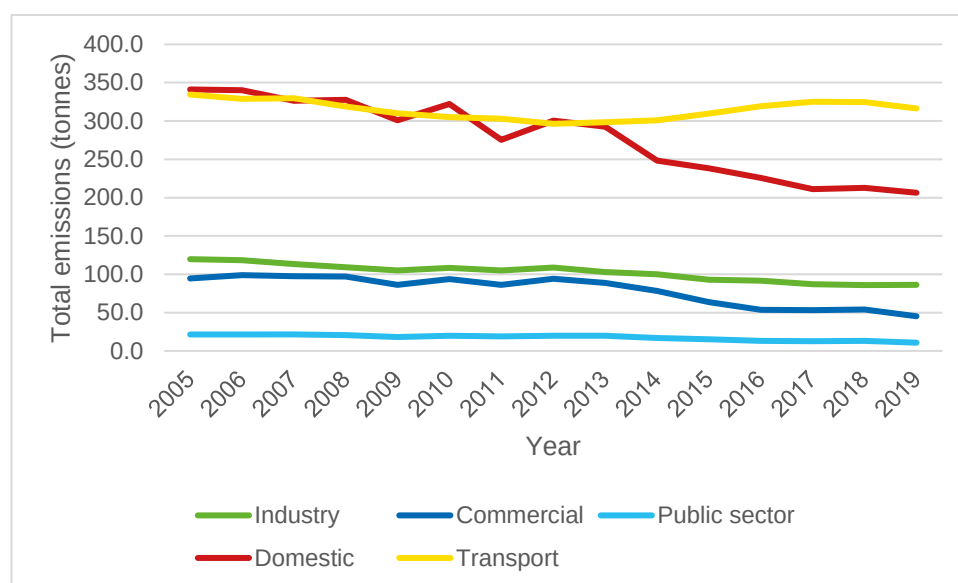
The graph shows a clear pattern of declining carbon dioxide emissions per person over the period from 2005 to 2019. It also shows emissions per person being lower in East Devon compared to Devon, South West, and England, although the gap has narrowed over recent years. In 2005 there were 6.8 tonnes per person emitted in East Devon compared to an England figure of 8.6, the South West at 7.9, and Devon at 8. By 2019 the differences between East Devon, Devon, regional and national level were much closer, with comparative figures ranging from 4.3 tonnes per person to 4.9 per person.

The main drivers of the fall in emissions were a decrease in the use of coal for electricity generation and a reduction in the use of natural gas for space heating. The figure below/over the page shows the changes in emission levels in East Devon over the period of 2005 to 2019, broken down into five sectors. Emissions from all sectors have reduced, but to varying degrees. Commercial and public sector emissions have fallen by half, whilst transport, the biggest emitter, has only seen a slight decline and indeed is similar to total emissions back in 2008.

East Devon carbon dioxide emissions 2005-2019 by sector²⁸

²⁷ UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2019: [UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2019 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2019)

²⁸ UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2019: [UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2019 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2019)



Climate change adaption

Despite efforts to reduce levels of CO₂ emissions, and even if worldwide carbon and other greenhouse gas neutrality was achieved immediately, the effects of a changing climate can be expected to continue over the coming years. There is, therefore a need to adapt to a changing environment and this will affect the world we live in and how we need to plan for it. The natural environment must be given space and support to adapt to climate change.

Flood risk

Some areas within East Devon are at risk from fluvial (river), pluvial (surface water) and coastal (tidal) flooding. Development within these areas also has the potential to exacerbate flooding elsewhere and under an increasingly heated earth there is the very real likelihood that the flooding concerns will be greater in the future.

The extent of the flood zones in East Devon are shown on the map below. The map shows all areas within flood zone 1 (shown as 'clear'), flood zone 2 (light blue) or flood zone 3 (dark blue) in East Devon. Flood zone mapping is undertaken by the Environment Agency and the zones are defined as:

- Flood Zone 1 - land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%)
- Flood Zone 2 - land assessed as having between a 1 in 100 and 1 in 1,000 annual probability of river flooding (1% – 0.1%), or between a 1 in 200 and 1 in 1,000 annual probability of sea flooding (0.5% – 0.1%) in any year
- Flood Zone 3 - land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%), or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year

Note: These flood zones refer to the probability of river and sea flooding, ignoring the presence of defences²⁹.

Flood Zones 2 and 3 in East Devon



It should be noted that flood zone mapping is subject to review and updates and as more information is understood about global warming such reviews could show greater areas being vulnerable to flooding. Other localised areas across the District, not showing on flooding maps, may also be at risk, often associated with minor watercourses through urbanised areas.

Within East Devon there are also areas and properties at risk from surface water flooding – most notably are critical drainage areas (CDAs) where there are critical drainage problems meaning a need for surface water to be managed to a higher standard than normal to reduce flood risk. There are currently three CDAs in East Devon, covering land to the east of Whimble, west of Feniton, and east of Axminster.³⁰

²⁹ See the Flood map for planning at: [Flood map for planning - GOV.UK \(flood-map-for-planning.service.gov.uk\)](https://flood-map-for-planning.service.gov.uk)

³⁰ Further information on the CDAs can be seen at: [Planning and development - Flood Risk Management \(devon.gov.uk\)](https://devon.gov.uk)

Coastal flooding and erosion

The flooding maps show areas of coastline that are potentially liable to flood and in many cases, in urbanised areas, sea defences may be built. The Exe Estuary Strategy (Managing Flood and Coastal Erosion Risk for the Exe Estuary, Environment Agency 2014) concluded that it would be necessary to defend most of the developed coastline, although some of the defences might need to be moved or altered over time. It should be noted that some aspects of this Strategy are not being brought forward, for example the proposed managed realignment at Clyst, and mitigation for short to medium term impacts on the estuary to be delivered in the Otter Estuary.

In addition, and sometimes related, to flooding concerns is the process of coastal erosion. Large parts of the coastline of East Devon is subject to erosion and work being undertaken by the University of Plymouth is mapping out projected vulnerability to loss to the sea of the coast of the District. At the time of drafting this report, draft mapping work covers the coastline from Sidmouth to the East Devon border with Dorset.

The land resources of East Devon

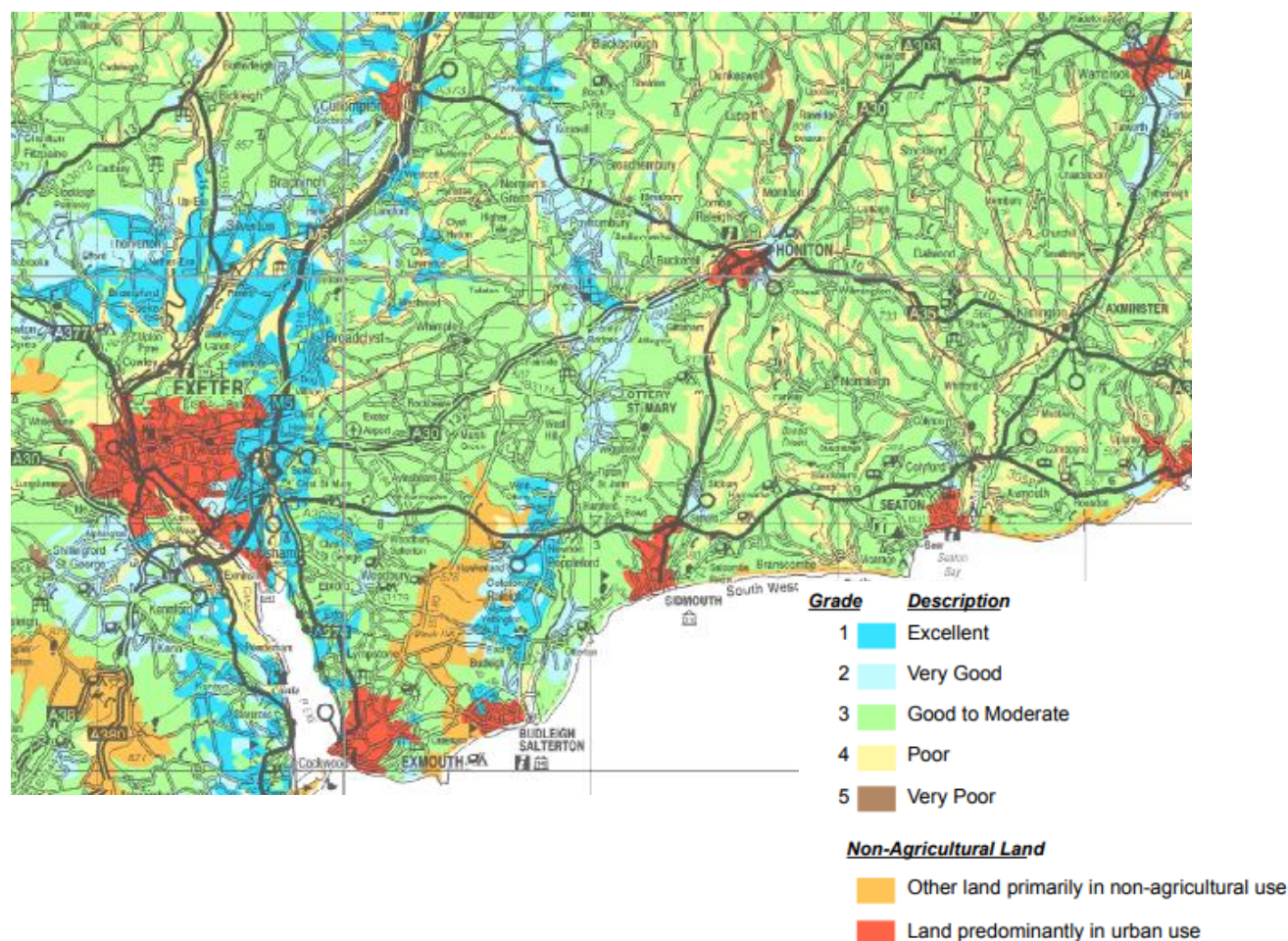
Soil quality

Soil is a fundamentally important natural resource that has developed over the millennia. Due to its varied geology East Devon has a number of different soil types.

The best and most versatile agricultural land is defined as Grades 1, 2 and 3a. Poorer quality land falls within Grades 3b, 4 and 5. This grading system considers climate, gradient, flood risk and soil quality. In broad terms, Grade 1 land is concentrated in or close to the Exe valley on the western edge of the District and more generally in valley systems. It is important to note that whilst higher grade land is more productive in agricultural terms it is often the case that lower grade land, especially where it has been less intensively farmed, will be of greater importance for wildlife and biodiversity. The following map shows the strategic assessment of agricultural land quality in East Devon – note that this does not show the subdivision of grade 3, which has only been assessed in a few locations in East Devon.

Agricultural land classification map³¹

³¹ Map extract obtained from [Agricultural Land Classification Map South West Region - ALC006](https://naturalengland.org.uk) (naturalengland.org.uk)



The main threats to soil quality in Devon relate to land in natural, countryside or agricultural uses, and include erosion by flooding and surface water runoff, intensive cultivation, poor forestry practice and trampling by grazing animals. These threats fall largely outside of the control of the planning system. However, development and urbanisation is clearly a planning matter and development in general can result in loss or damage.

Land contamination

Many areas of land become contaminated by residues left behind by activities such as waste disposal and general industrial processes. Until the contamination is treated the land may be severely restricted in how it may be used in the future.

During a ten year period from 2001, in East Devon, over 700 potentially contaminated sites were listed on the basis of their former uses. However over the same timescale no new sites were determined as 'contaminated land', although several are subject to ongoing investigation and works by landowners. Two of the council's priorities are to encourage voluntary remediation and promote the re-use of brownfield land, using the Local Plan, planning process and regeneration proposals.

Brownfield land

Brownfield land (also referred to as Previously Developed Land) is land that has previously been built-on or developed and which frequently will be in a despoiled state. The supply of brownfield land assessed as being suitable for redevelopment is shown in the following table. The land identified as being potentially suitable for redevelopment still makes up a relatively small proportion of overall potential land supply and the absence of a heavily industrialised past has meant that East Devon does not have the brownfield land legacy that many more urban areas have. The 2020 East Devon Brownfield Land Register has 27 sites totalling 24.6 ha of land.

Minerals

The varied geology means there are a range of minerals worked across East Devon. There are Mineral Safeguarding Areas (MSAs) concentrated through the western part of East Devon stretching from Exmouth towards the county border with Somerset near Wellington.³²

Waste

Household waste generated per head in East Devon is among the lowest in Devon, second only to Exeter.³³ East Devon's recycling rate has grown significantly over the last 15 years to become the highest in Devon, and amongst the highest in the country, shown in the table below.

Recycling Rates (%)³⁴

Area	2004/05	2011/12	2014/15	2019/20	2020/21
East Devon	16.4	48.5	46.3	60.5	60
Exeter	20.7	36.2	33.8	26.1	27.8
Mid Devon	17.8	49.2	48.2	53.1	53.7
Teignbridge	26.9	57.3	53.7	56.3	55.9
Devon	32.7	55.3	55.4	56.6	55.3

The water quality of East Devon

Water quality

Water is a critical resource in terms of meeting human needs as well as being of wider environmental importance.

³² MSAs can be seen in the Devon Minerals Plan Policies Map: [Devon Minerals Plan Policies Map.pdf \(sharepoint.com\)](#)

³³ [Waste Performance Statistics 2020 21.pdf \(devon.gov.uk\)](#)

³⁴ Sources: Devon Waste Plan 2014; Devon Waste & Resource Management Strategy Review & DEFRA (2015) Local Authority Collected Waste Statistics – Local Authority Data; [Waste Performance Statistics 2020 21.pdf \(devon.gov.uk\)](#)

Surface water includes rivers, lakes, estuaries and (under council planning control) the coast down to the mean low water mark. The waters are important in their own right but so are associated floodplains and wooded banks. A surface water's overall quality is assessed as a combination of its ecological and chemical quality.

The biggest rivers in East Devon are the Exe, Otter and the Axe. The largest is the River Exe, whilst much of its length falls outside East Devon, it does reach the sea at Exmouth. Adequate quantity, quality and timing of water flows is required to sustain ecosystems and the valuable clean water that they provide.

The ecological status for surface freshwaters, estuaries and coastal water bodies varies across East Devon. In the most part, surface water quality is moderate to good across the plan area, with a small incidence of poor quality affecting parts of the Exe Estuary and other locations. Common reasons for less than good status include impacted fish and diatom (algae) communities; physical modification; and phosphate, which can be linked to fertilisers used in farming and other pollutants. The River Axe is a case where phosphate pollution has been identified as significant in terms of impacts on the designated Special Area of Conservation.

Other impacts on water quality may come from pollution from road run-off, and overflow of sewage from combined sewerage systems after heavy rain. The physical form and function of rivers are also under pressure and key to supporting biodiversity and landscape value throughout the district, including impacts of the River Otter on infrastructure, and fish passage connectivity along the River Sid.

A recent project initiative of South West Water (SWW) called 'Upstream Thinking' is an environmental improvement programme aimed at improving water quality in river catchments to reduce water treatment costs

Groundwater quality varies across East Devon. The majority of the District has some poor chemical status with pockets of good status for instance around the Yarty and Axe. Surface water sources provide the majority of the supply from reservoirs and river intakes across the northern part of the district, the most significant reservoir supply being Wimbleball. The water supply for the southern half of East Devon comes from deep underground boreholes.³⁵ Drinking Water Safeguard Zones have been designated where the land use is causing pollution of the raw water. Groundwater bodies that fall into this category are located between Ottery St Mary and Otterton. Human health is not at risk from these sources because SWW provide extra treatment.

³⁵ [Water hardness \(southwestwater.co.uk\)](https://southwestwater.co.uk)

Key social baseline data

This section covers issues relating to social considerations – falling under the broad headings noted below:

- The population and homes of East Devon;
- Health in East Devon;
- Wellbeing in East Devon; and
- Access to services.

The population and homes of East Devon

The population make up

East Devon has a population of just under 146,300 people, the highest of the eight districts in Devon. The 10 years from 2009 to 2019 saw significant growth, with East Devon's population growing by around 14,000 people in that time.³⁶ Nevertheless, East Devon remains sparsely populated with 180 people per square kilometre – the England average is 432.³⁷ Past evidence suggests that East Devon falls within a larger 'Greater Exeter' housing and functional economic market area, comprising the four districts of East Devon, Exeter, Mid Devon and Teignbridge.³⁸

Exmouth has by far the largest population in East Devon at nearly 36,000, nearly three times that of Sidmouth, the second largest town. Honiton's population is slightly below Sidmouth, and then there is a gap to five settlements with around 7,500 to 4,300 people (Seaton, Axminster, Ottery St Mary, Budleigh Salterton, Cranbrook). As a developing new town, Cranbrook's population is growing more quickly than elsewhere, and is predicted to be around 18,000 people when complete in the early 2030s. Colyton is largest of the other settlements, leading a cluster of 11 settlements with 1,500-2,000 people. Beer, Whimple, Clyst St Mary and Kilminster all have around 1,000 people, and below this, the population of a series of smaller settlements ranges from around 200 to 800 people.³⁹

Residents of East Devon are among the oldest in the country with a median age of 51.2, compared to the UK figure of 40.3. The proportion of those aged 65 plus in East Devon is 30.4%, the third

³⁶ Mid-2019 population estimates, ONS, published June 2020:

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/annualmidyearpopulationestimates/mid2019estimates#toc>

³⁷ Mid-2019 population estimates, ONS, published June 2020.

³⁸ Local Housing Needs Assessment for the Greater Exeter Area, May 2020; Greater Exeter Economic Development Needs Assessment, March 2017. Available at: [Evidence - Greater Exeter Strategic Plan \(gesp.org.uk\)](https://www.gesp.org.uk/evidence-greater-exeter-strategic-plan)

³⁹ Population estimates – small area based by single year of age – England and Wales, 2019, Nomis: <https://www.nomisweb.co.uk/>

highest of any local authority in the UK and far higher than the national average of 18.5%⁴⁰ – this elderly population is projected to grow in the years ahead. The age profile varies across different settlements with more than 40% of the population over 65 years old in Sidmouth, Seaton, Budleigh Salterton, Colyford (highest at 60%), and East Budleigh. However in Cranbrook just 4% of people are over 65, and 34% are aged 0 to 15 (twice as high as the district average), indicating this new town is popular for families with children.⁴¹ Cranbrook also has one of the highest proportions of working age people aged 16-64 (62%) – other settlements with a proportion over 60% are Exton (highest at 84%), Broadclyst, Woodbury Salterton, Colaton Raleigh, Clyst Honiton and Brampford Speke. This suggests either a high level of jobs at these settlements, or that they are within an easy commute to jobs elsewhere. By far the highest number of working age people can be found in Exmouth with nearly 20,000, three times Honiton in second. Below Sidmouth, there is again a cluster of five settlements with 2 – 3,000 residents of working age, which drops off to around 1,000 and below for the remaining settlements.

The elderly population profile has an impact on the provision of health care, housing requirements, the labour market, and economic growth in the District and a further aging population will present additional challenges.

The future population of East Devon

For many years there has been an overall pattern of population increase in East Devon, with more people moving into the district than leaving. It is this net in-migration, particular by the middle aged (with an associated in movement of older school children) and older people that is the primary factor accounting for the increasing population change. In contrast, however, there is a pattern of net out-migrations of younger adults.

The increasing population, alongside a decreasing average household size (less people on average living in each home) has informed house building needs. Though other factors such as economic growth policies and job creation projections have been important in East Devon in terms of determining housing provision. More recently, as set out in the Government's Planning White Paper consultation document of August 2020, there is a Government aspiration for the affordability of housing to be a very major determinant of future housing requirements.

In a housing needs report for the council from ORS⁴², drawing on Office for National Statistics records, there is a projected population increase in East Devon of 23,343 people over the 20 year period from 2020, with the population of 145,871, going up to a 2040 population of 169,214. This

⁴⁰ Mid-2019 population estimates, ONS, published June 2020.

⁴¹ Population estimates – small area based by single year of age – England and Wales, 2019, Nomis: <https://www.nomisweb.co.uk/>

⁴² See: [201020bpitem9afinalhousingneedsineastdevonappendix 1orsaug2020.pdf](#)

amounts to a projected annual average increase in population of 1,167 persons. On the basis of these projections, and with people generally living longer, the ORS work shows that there will be a marked increase in older people in the district, specifically those aged 65 and older. For aged group below 65 comparative population changes between the 2020 and 2040 are not as significant with most five year age bands seeing moderate increases in population, and the greatest increases being in 40 to 50 year olds and 15 to 19 years old.

In their report ORS advise of a 20 year need of 15,143 dwellings to meet projected population growth. This averages out at 757 new dwellings a year. The Government currently sets out, through a standard national Government methodology, an annual average level of house building of 918 new homes per year. This level of house building clearly exceeds the 757 figure and some of it would provide for what the consultants refer to as 'pent-up' demand but also a small part, an annual average of around 80 homes a year, would effectively imply a moderate increase in net in-migration above the Office for National Statistics estimates. It remains to be seen what may happen to Government housing requirement figures.

Ethnicity and religion

Predominantly East Devon residents are from a white British background. The 2011 census shows that just 1.59% of the district's population is from an ethnic background, this is a slight increase on the 2001 census at which 0.74% of the population were from an ethnic background. This is very low by national standards with the England and Wales average standing at 14.03% but is in common with the other districts in Devon.

Christianity is the largest religion practiced in East Devon at 65.6% of residents being adherents (86,934). The largest non-Christian religion practiced in East Devon is Buddhism with 351 adherents. 10,796 people (8.2% of the population) said that they followed no religion at the 2011 Census.

Housing and its affordability

There are a total of 70,175 dwellings in East Devon, of which 6,746 are considered to be affordable.⁴³ This proportion of affordable dwellings (9.6%) is lower than both the county (11%) and national (17.2%) average.

The latest available data on tenure types of homes occupied by East Devon resident's dates back to the 2011 census, see ORS report. This showed that around 76% of households in the District either owned their home outright or were in the process of buying it. The proportion of households owning

⁴³ Number of dwellings by tenure and district, England, 2019, Table 100: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>

Affordable dwellings in this context are local authority owned, private registered provider, and other public sector.

or buying their home has fallen slightly in recent years. The proportion of household in social rented housing has also fallen in recent years, down from 11% in 1991, to 10% in 2001 and to 9% in 2011. In contrast the proportion of households in the private rented sector has seen a marked increase, 11% in 1991 up to 12% in 2001 and 15% in 2011. It should be noted that the above information reflects a percentage split of total housing, actual numbers of households in owner occupied and private rent have increased, in contrast, and since the 1980's, those in social rent have gone down.

Whilst it is still a minority part of the overall market there has been a clear and growing trend of increasing numbers and an increasing proportion of households living in private rented sector housing. As the cost of buying a house has increased, and specifically so has the ratio of income levels to house prices, and as fewer affordable houses are being built, people are increasingly turning to private rented sector housing to meet their needs. This East Devon pattern of occupation is consistent with the national trend and in their report ORS advise that the CLG forecast that the private rented sector could increase in size to 35% of households nationally by 2032. A continued pattern of increasing private sector renting of housing may therefore be seen in East Devon in the future.

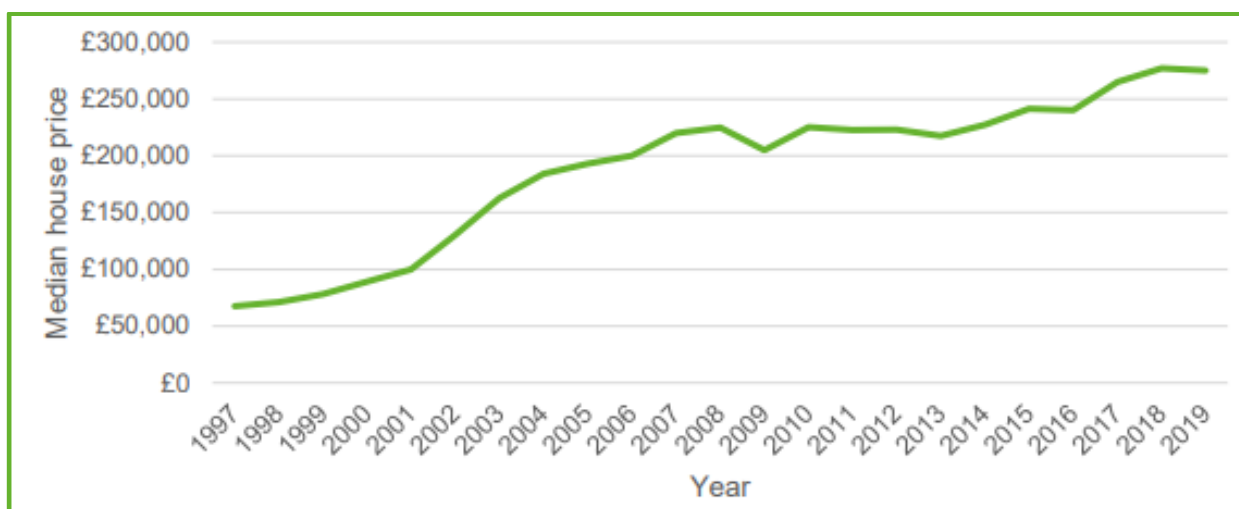
Housing costs in East Devon

Drawing on 2019 data⁴⁴ the average house price in East Devon is £275,000, which is 10.47 times average earnings. This makes East Devon a less affordable place to buy a house than both the England (7.83) and south west region (8.79) averages. The following graphs show average house prices in East Devon since 1997, along with the affordability ratio that compares house prices to earnings. These indicate that house prices trebled between 1997 and 2007, but were then broadly stable until a rise in 2017-18. The affordability ratio doubled from 5 to 10 between 1997 and the mid-2000s, and house prices have remained around 10 times earnings ever since. In line with the national picture the comparative cost of buying a house, the income to house price ratio, has risen significantly over recent years. In simple terms house prices have gone up but wage levels have not followed in the same way. It is worth noting that house prices vary across East Devon – for example houses in the coastal towns, specifically Sidmouth and Budleigh Salterton, are typically more expensive than elsewhere.

Average house price in East Devon 1997 – 2019

⁴⁴ See:

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2019>



Affordability ratio in East Devon 1997 – 2019⁴⁵



Private renting prices are also understood to have increased over recent years though social rent costs are less volatile and will not have seen such significant changes. However, social housing forms just a part of the affordable housing sector and whilst there are still a large number of social rent properties in East Devon, specifically in the form of a retained Council Housing stock, they are largely a product of 20th century development. Many recent additions to the affordable housing stock are not in the social rent sector and are typically more expensive to occupy.

⁴⁵ See:

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2>

The latest housing monitoring report for East Devon⁴⁶ reports on a local plan objectively assessed housing need to build an average of 950 homes per year from 2013 to 2031 (that is 17,100 over 18 years). From 2013 to 2020 there were 6,470 new homes built, an average of 924 per year. Over the next five years the annual average build rate is predicted to be 1,186 per year and over the full duration of the local plan there is a current (as at 1 April 2020) projected delivery of 18,415 new homes.

The health of the East Devon population

At just over 82.6 years old the life expectancy for residents in East Devon is very high with the area ranking in the top 10% of districts nationally and is top of all the Devon districts.⁴⁷ The ward with the highest average life expectancy is Yarty at 85 years and the lowest is Trinity at 77 Years old.⁴⁸

The proportion of the working age who are economically inactive due to suffering from long-term sickness is about the national average at 2.29% of the working age population. The national average is 2.29%, although the Devon average is 1.25% which is low by national standards.⁴⁹

At the 2011 census residents were asked what their general health had been like in the past 12 months. In East Devon 79.81% of residents said that they were in good or very good health. This is below the national average of 81.19% and one of the lowest of the Devon districts. The figure in the 2011 census was a rise from the 2001 census when 67.1% of residents said they were in good health, with 24.2% in fairly good health and 8.7% whose health was not good.⁵⁰

Health of the resident population - self reporting 2011⁵¹

	Good Health: good (pop.)	Good Health: fairly (pop.)	Good Health: not good (pop.)
East Devon	79.81	15.07	11.68
Exeter	83.28	11.95	9.57
Mid Devon	82.08	13.37	9.75
North Devon	80.23	14.16	12.1
South Hams	81.78	13.32	10.34

⁴⁶ See: <https://eastdevon.gov.uk/planning/planning-policy/monitoring/>

⁴⁷ Office for National Statistics: Life expectancy at birth 2012-14

⁴⁸ Office for National Statistics: Life expectancy at birth 1999-2003 Ward Level

⁴⁹ Office for National Statistics: Annual Population Survey 2018

⁵⁰ Office for National Statistics: Census 2011

⁵¹ Office for National Statistics: Census 2011

Teignbridge	79.83	14.68	12.22
Torridge	78.37	15.42	14.28
West Devon	80.58	14.28	11.21
National Average	81.19	13.2	11.9

The East Devon Public Health Implementation Plan 2018/19 sets out the areas of health and wellbeing where the greatest impact can be made on the health inequality of the Devon population and the actions being taken to tackle them. The priorities within the Public Health Implementation Plan are:

- Improving the wider determinants of health
- Health Improvement
- Health protection
- Healthcare public health and preventing premature mortality.

Deprivation

The Index of Multiple Deprivation (IMD) is based upon seven domains of deprivation: income, employment, health and disability, education skills and training, barriers to housing and services, living environment and crime. These are weighted and combined to create the overall IMD. Overall levels of deprivation in East Devon are low, with the district ranking 238th out of 317 local authorities in England (where 1st is the most deprived, and 317th is least deprived). However, parts of Exmouth and Honiton are in the most deprived 30-40% overall in the country, and some rural areas (particularly in the Blackdown Hills) are among the most deprived for access to services in the country.⁵² The following table shows the most deprived parts of East Devon, by local super output area (LSOA).

The top 10 most deprived LSOAs in East Devon, 2019⁵³

Rank	LSOA Name	Ward	National Rank (1 is most deprived, 32,844 least deprived)
1	East Devon 020C	Exmouth Littleham	6,745
2	East Devon 018C	Exmouth Withycombe Raleigh	10,143

⁵² English Indices of Deprivation 2019: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

⁵³ English Indices of Deprivation 2019 explorer: [Indices of Deprivation 2015 and 2019 \(communities.gov.uk\)](https://www.communities.gov.uk/explore/indices-of-deprivation-2019)

3	East Devon 002A	Honiton St Michael`s	11,056
4	East Devon 002B	Honiton St Paul`s	11,603
5	East Devon 019A	Exmouth Town	11,616
6	East Devon 019C	Exmouth Town	11,927
7	East Devon 019D	Exmouth Town	12,577
8	East Devon 005B	Axminster Town	13,255
9	East Devon 009B	Coly Valley	14,049
10	East Devon 005A	Yarty	14,799

Wellbeing in East Devon

Wellbeing can be looked upon as the quality and happiness of life that people enjoy. Key determinants of wellbeing are general health as well levels of mental and physical activity and access to stimulating and attractive environments. Good jobs, housing and general safety also all feed into wellbeing. Many of these wider wellbeing considerations are addressed elsewhere in tis appraisal.

Air quality and Air quality

The quality of the air we breathe, and the pollutants it may contain, can have fundamental impacts on human health, wellbeing and also wider environmental impacts and implications.

The main pollutant of concern in East Devon is Nitrogen Dioxide (NO₂) arising from road traffic around the busier and more congested areas. East Devon District Council had fifty four passive monitoring sites monitored NO₂ concentrations across the District in 2018, as well as the Honiton Urban Background automatic monitoring site.

Air quality across the District is of a high overall standard; with only two exceedances in the most recent reporting year, with both being below the exceedance limit after distance correction. Monitoring results from the more populous towns such as Honiton and Axminster were slightly elevated compared to other areas.

Historically there was one Air Quality Management Area (AQMA) declared in East Devon which was revoked in April 2018 as a result of improvement in air quality in the designated area as well as the preparation of a detailed air quality report that found no exceedances observed at sensitive receptor locations.

Noise

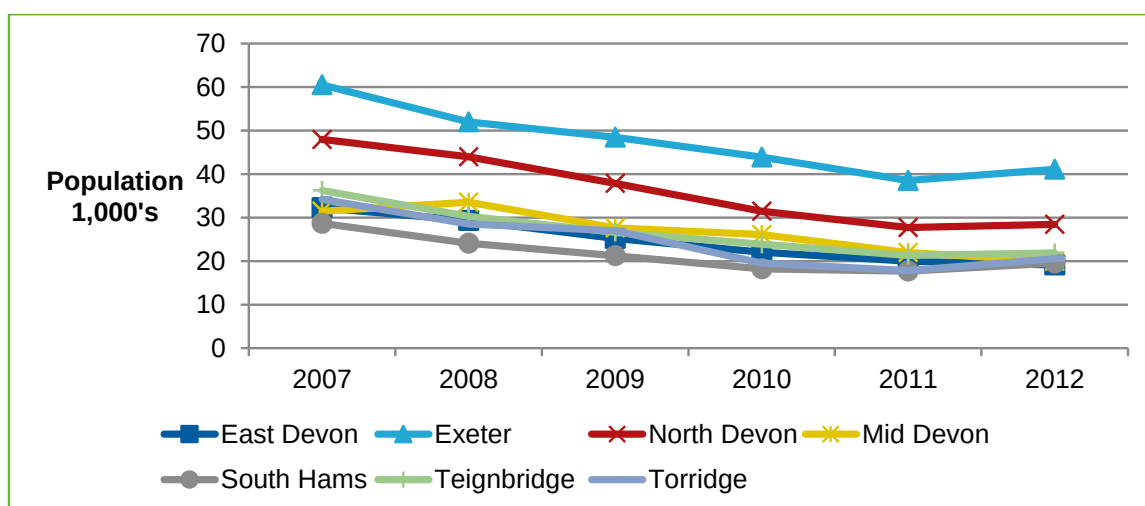
Noise pollution can also have a detrimental impact on levels of wellbeing. Urban areas tend to be noisier than rural areas though it is vehicle and traffic noise that typically generates the greatest levels of noise pollution and dwellings and other noise sensitive land uses near to main roads can see significant detrimental noise impacts.

Exeter International airport, in the western part of the District, also generates high noise levels from aircraft movements as well as engine testing and there are particular restrictions to development that apply close to the airport, these have, for example, constrained options for Cranbrook new town development.

Crime

East Devon has one of the lowest crime rate in Britain with 19.1 offences per 1,000 residents in 2012. By comparison the Devon figure 27.49 and the national figure was 37.63 offences per 1,000 residents.⁵⁴

Recorded crime per 1,000 population 2007-2012¹⁴



The levels of recorded crime in East Devon have fallen over the 6 years from 2007-12, following a similar pattern to the rest of the Devon districts. East Devon has very low rates of crime for dwelling burglaries, vehicle crimes and violent crimes making East Devon one of the safest districts to live in, in one of the safest counties to live. However, there does remain a fear of crime that can be a significant concern and it will also be the case that there are localised areas where crime rates are much higher than general District wide levels.

Crime rates by crime types 2012⁵⁵

⁵⁴ Office for National Statistics: Recorded Crime 2012

⁵⁵ Office for National Statistics: Recorded Crime 2012

	Burglaries (per 1000 pop.)	vehicle crimes (per 1000 vehicles)	violent crimes (per 1000 pop.)
East Devon	1.43	5.23	8.6
Exeter	3.6	15.63	18.77
Mid Devon	1.87	4.51	8.49
North Devon	1.81	7.37	14.43
South Hams	1.66	5.85	7.27
Teignbridge	1.44	6.33	9.83
Torridge	1.5	4.69	11.23
West Devon	1.15	3.56	7.41
Devon	1.85	7.69	9.6
National Average	4.44	16.38	13.57

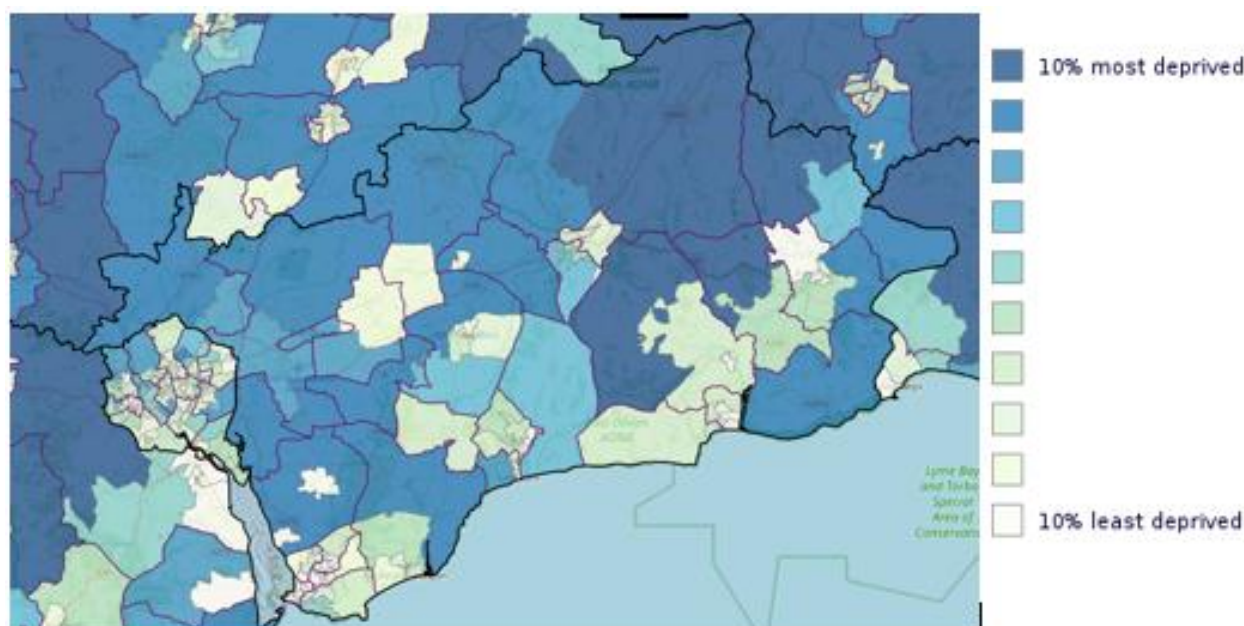
Access to and availability of facilities and services

Access to facilities and services

The ability to be able to readily access services and facilities is of great importance in achieving sustainable development. Access to community facilities and services in East Devon varies significantly, with relatively wide range of facilities in the larger settlements, but poorer access in the more rural areas, as shown on the map below.

Access to Housing and Services in East Devon (outlined in black)⁵⁶

⁵⁶ Barriers to Housing & Services Domain, English Indices of Multiple Deprivation 2019:
<https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>



Evidence⁵⁷ on the availability of community facilities and services in East Devon is broken down by 'strategic' and 'local' facilities, as follows:

- Strategic – supermarket, secondary school, library, hospital, leisure centre, swimming pool, emergency services facility, train station, hourly bus service
- Local – convenience store, post office, primary school, pub, GP, community hall, allotment, children's play area, less than hourly bus service, sports playing pitch.

Only Exmouth, Honiton, and Axminster are home to all of the community facilities and services. Sidmouth, Seaton, and Ottery St Mary also benefit from a wide range of facilities and services, deficient in only 1-3 strategic facilities (although the number of shops in Ottery is notably lower). Cranbrook is currently missing most strategic facilities, but there are plans for a supermarket, leisure centre, swimming pool, and emergency services facility, which means that in a few years' time it will only lack a hospital. These seven places all play an important role in providing services and facilities for a large number of people across the settlement and wider rural area. The number of primary schools, shops, and GP surgeries in Exmouth distinguishes it from the other settlements.

6.3 Budleigh Salterton, Colyton, Broadclyst, and Lymptstone all have two or three strategic facilities, along with at least 10 of the 11 local facilities, so play a wider than local role. Below this, with two exceptions (Exton, Colyford) the remaining settlements have just one strategic facility (train station or hourly bus service in nearly all cases), with several having no strategic facilities at all. 22 further settlements have at least seven local facilities and

⁵⁷ The Role and Function of Settlements, FINAL DRAFT, October 2021: [1a. Role and Function of Settlements_report_v3 final draft for SPC.pdf \(eastdevon.gov.uk\)](#)

therefore play a local role for both the settlement and immediate surrounding area in meeting the basic needs for residents on a day-to-day basis.

All of the larger settlements have access to superfast broadband speeds, with Cranbrook exceptionally having ultrafast broadband. Whilst the majority of smaller settlements have superfast broadband (and even ultrafast in the case of Upottery, Smallridge, and Westclyst), several have only standard broadband speeds making it more difficult to access internet services.⁵⁸

Key economic baseline data

Availability of and promoting jobs in East Devon

This section covers issues relating to economic aspects of East Devon - including economic performance, business and enterprise, labour market and skills and qualifications. By way of broad overview East Devon has low unemployment levels but wages are comparatively low and there are a comparatively high number of smaller employer organisations and businesses in the District. There are high out-commuting levels of residents, primarily travelling to jobs in the city of Exeter where wage levels are on average higher. East Devon has something of a divide between a number of bigger businesses and more technology based activities on the western fringes of East Devon, close to Exeter, and a more traditional business make-up across much of the rest of the District.

Skills and qualifications

The level of skills and qualifications in East Devon is relatively low. There are a higher proportion of people aged 16-64 with no qualifications (8.1%) in East Devon than both the regional (5%) and Great Britain (6.4%) average. Similarly, the proportion of East Devon residents with higher level qualifications (39.1%) is lower than both the regional (40.4%) and national (Great Britain) average (43.1%).⁵⁹

Income and earnings

Having a good income provides a measure of security and ability to buy goods and services to meet needs. Weekly earnings for East Devon residents (£593) are higher than the South West average (£577), but fall behind the figure for Great Britain as a whole (£613). The gap between East Devon and Great Britain for weekly earnings by place of work is higher (£575 compared to £613), indicating that the jobs available in East Devon are relatively low paid.⁶⁰

⁵⁸ Broadband speeds from the centre of the settlement, from Ofcom broadband coverage checker, accessed on 02.06.21: <https://checker.ofcom.org.uk/>

⁵⁹ ONS annual population survey, 2020, accessed on Nomis: [Labour Market Profile - Nomis - Official Labour Market Statistics \(nomisweb.co.uk\)](#)

⁶⁰ Earnings by place of residence and Earnings by place of work, ONS annual survey of hours and earnings, 2021, accessed on Nomis: [Labour Market Profile - Nomis - Official Labour Market Statistics \(nomisweb.co.uk\)](#)

With average income levels for people in employment falling below national averages it suggests a local economy that is under-performing. However, information on distribution of wages within East Devon is not available.

The average pension income for those paying tax in 2016/17 was £19,400 which is one of the highest pension incomes in Devon. The Devon average was £18,100 and the England average was £17,700. East Devon is in the top 20% of districts for pension income across England.⁶¹ This indicates a disparity between the wealth levels of the retired compared to the working population.

Average household and pension incomes 2016/17

	Self-employment income	Employment income	Pension income	Total income
East Devon	16,700	23,700	19,400	29,300
Exeter	17,200	25,600	16,600	28,300
Mid Devon	17,400	24,200	17,300	29,500
North Devon	14,900	23,000	18,000	27,000
South Hams	17,300	25,600	19,500	32,100
Teignbridge	17,200	24,400	17,900	28,400
Torridge	14,200	24,000	16,400	25,900
West Devon	16,200	24,900	18,600	29,700
Devon	16,500	24,400	18,100	28,800
England	24,500	31,300	17,700	34,300

The Pension Credit raises the minimum income for people aged over 60 with disability, caring responsibilities or housing costs, the number receiving this per 1,000 of the population in East Devon is 87.65 this is very low by national standards (national average is 140.59) and is the lowest of all of the Devon districts. The wards with the highest number of claimants for pension credit are Exmouth Town at 344.8 per 1,000 and Exmouth Withycombe Raleigh at 284.8 per 1,000. The ward with the lowest claimant rate is Sidmouth Rural at 55.62 per 1,000.⁶²

⁶¹ HMRC

⁶² Department for Work and Pensions

Attendance allowance is also paid to those aged over 65 years and who require assistance with day to day care of themselves. The number receiving this per 1,000 of the population in East Devon is 128.46 which is below the national average of 130.51 but above the Devon and Cornwall figure of 124.12. The wards with the highest number of claimants for pension credit are Exmouth Littleham at 199.2 per 1,000 and Exmouth Town at 194.8 per 1,000. The ward with the lowest claimant rate is Whimble at 72.5 per 1,000.⁶³

Despite the lower than average wages in East Devon, it has a low claimant count of 2.5% of those people aged 16-64, compared to 3.2% across the South West, and 4.4% for Great Britain as a whole.⁶⁴

Economic Performance

Gross Value Added (GVA) is the value of goods and services produced by an area giving an indication of the productivity of that area. The level of GVA per person in East Devon is low but growing, with the area ranking in the bottom 40% of districts nationally. GVA per head in East Devon is £47,109, compared with £60,119 in Exeter and £55,658 nationally. The share of national GVA in East Devon is also low by national standards, with the area ranking in the bottom 40% of districts nationally. It accounted for 0.14% of all GVA in Great Britain, Exeter accounted for 0.24%.⁶⁵

Throughout the global economy, the critical structural trend is the growth of the knowledge economy which typically supports higher wages and more secure employment. Knowledge-based industries include aerospace, electrical machinery manufacture, printing and publishing, and chemicals and energy, telecommunications, computing, research and development, finance and business services, and recreational and cultural services. These industrial groupings are based on European Commission and OECD definitions, where individual industries are classified as knowledge-based if graduates make up at least 25 per cent of their workforce. Knowledge intensive business in East Devon accounted for 11.51% of total employment in 2017. This is very low with East Devon in the bottom 20% of districts nationally. By comparison, the Exeter figure was 22.41%, and the national figure was 20.83%.⁶⁶ However the western edges of East Devon, close to the City of Exeter, are seeing increases in knowledge based employment opportunities.

Jobs in the services industry predominate in East Devon, with the proportion of those working in retail, accommodation and food services all higher in East Devon than at a regional or national level⁶⁷ – these jobs are often lower paid and part time. Construction is also an important sector; but

⁶³ Department for Work and Pensions

⁶⁴ ONS Claimant count by sex and age, December 2021, accessed on Nomis: [Labour Market Profile - Nomis - Official Labour Market Statistics \(nomisweb.co.uk\)](https://nomisweb.co.uk/labour-market-profile)

⁶⁵ Office for National Statistics: GVA by NUTS 3 2014

⁶⁶ Office for National Statistics: The Business Register and Employment Survey (BRES) 2017

⁶⁷ Employee jobs, 2019, Nomis.

manufacturing, information and communications, and finance and insurance are all less concentrated in East Devon.⁶⁸

Business and Enterprise

A dynamic local enterprise culture is vital for the long-term competitiveness and overall success of any local economy. The measures that Place Analytics uses to assess the extent of an enterprise culture is composed of the new business formation rate, business size, business turnover, business stock and the business survival rate.

The new business formation rate in East Devon is low compared with national figures, with the area ranking in the bottom 20% of districts nationally. In 2017 the business formation rate was 10.04% of all businesses, this is below the national rate of 13.15% but is one of the top for all the Devon districts just behind Exeter's 10.8% and Teignbridge at 10.42%.⁶⁹

Between 2010 and 2021, the total number of enterprises in East Devon grew from 5,680 to 6,550, a figure that has remained the same since 2019.⁷⁰ The new business formation rate and the business stock change measures however do exclude very small businesses and the self-employed which in East Devon make up the vast majority of business types so growth in these areas is not shown.

In 2018 there were 7,295 VAT registered businesses (which includes the small businesses that might be excluded in the business stock figures) were listed in East Devon, the highest number of businesses of all the Devon districts including Exeter⁷¹. There has been a steady rise in the numbers of VAT registered businesses in East Devon with over 700 more businesses registered in 2018 than in 2012.

Numbers of VAT registered businesses 2018⁷²

	2012	2018
East Devon	6,590	7,295
Exeter	5,045	5,680
Mid Devon	4,575	4,955
North Devon	5,295	5,710

⁶⁸ Greater Exeter Economic Development Needs Assessment, March 2017: [Evidence - Greater Exeter Strategic Plan \(gesp.org.uk\)](https://www.gesp.org.uk)

⁶⁹ Office for National Statistics: Inter Departmental Business Register (IDBR) 2017

⁷⁰ UK Business counts (2021), Enterprises, Inter Departmental Business Register, ONS – accessed on Nomis: [Labour Market Profile - Nomis - Official Labour Market Statistics \(nomisweb.co.uk\)](https://nomisweb.co.uk)

⁷¹ Office for National Statistics: UK business: activity, size and location 2018

⁷² Office for National Statistics: UK business: activity, size and location 2018

South Hams	5,265	5,815
Teignbridge	5,820	6,545
Torridge	3,695	4,030
West Devon	3,320	3,540

East Devon has a high number of micro and small businesses as well as a high level of self-employment. The proportion of all businesses in East Devon that are classed as micro, with 9 or less employees is 85.5% this places the area in the top 30% of districts nationally for the number of micro businesses. The average business size is 6.39 employees which is below the Devon and Cornwall average of 8.13 and the national average of 9.89 employees.⁷³

The self-employment rate in East Devon is also very high by national standards, with the district ranking in the top 20% of districts nationally. In 2018, the self-employment rate was 20.58%, compared with 10.15% in Exeter and 10.16% nationally.⁷⁴

Business turnover (%) 2018 – by employee numbers in the business

Location	Business Turnover: 0-49 (£000s) (%)	Business Turnover: 50-99 (£000s) (%)	Business Turnover: 100-249 (£000s) (%)	Business Turnover: 250-499 (£000s) (%)	Business Turnover: 500-99 (£000s) (%)	Business Turnover: 1,000-4,999 (£000s) (%)	Business Turnover: : 5,000+ (£000s) (%)
East Devon	19.25	21.83	31.46	13.07	7.51	5.56	1.33
Exeter	14.13	20.58	31.06	13.76	8.77	8.77	2.92
Mid Devon	24.89	19.8	29.42	12.28	6.64	6.08	0.88
North Devon	21.24	20.12	31.71	13.31	7.11	5.28	1.22
South Hams	20.04	20.43	31.57	13.59	7.23	5.96	1.17
Teignbridge	19.29	20.42	32.06	13.38	6.6	6.52	1.74
Torridge	25.59	21.16	28.22	12.86	6.5	4.56	1.11
West Devon	26.58	20.25	29.43	12.97	6.33	3.8	0.63
South west	18.47	23.09	30.81	12.69	7.04	6.27	1.63
National	16.53	23.97	31.26	12.05	7.05	6.86	2.27

The business closure rate for 2017 stood at 9.28% for East Devon which is one of the lowest closure rates nationally with the national average being 12.59%.⁷⁵

⁷³ Office for National Statistics: UK business: activity, size and location 2018

⁷⁴ Office for National Statistics: Annual Population Survey 2018

⁷⁵ Office for National Statistics: UK business: activity, size and location 2018

Labour market

In terms of labour supply, East Devon has 78,500 residents of working age (16 – 64) which is the third lowest proportion of working age people (53.6%) of any local authority in the UK.⁷⁶ Of these working age people, a relatively high number (84.5%, equating to 65,000 people) are economically active (those who are either in employment or unemployed). Unemployment is low at 2.3% in East Devon, compared to 3.5% across the south west, and a national figure of 4.2%.⁷⁷

There are around 61,000 jobs in East Devon, and the ratio of total jobs to working age people (also known as jobs or employment density) across the district is 0.77. This ratio has risen from 0.72 in 2008, but remains below the average level in the South West (0.88) and Great Britain as a whole (0.84).⁷⁸

The population aged 65+ has seen a big rise of those who are economically active – in 2005 just 5% of the 65+ population were economically active, which has increased to 13% in 2018.⁷⁹

The proportion of people claiming out-of-work benefits in East Devon is lower at 2.5% than the South West (3.2%) and Great Britain (4.4%) average. Similarly, unemployment rates are slightly lower in East Devon (3.2%) than the South West (3.6%) and Great Britain (4.8%) average.⁸⁰ As unemployment is low, from an employer perspective this can present problems in terms of available labour. Employers are struggling to recruit and retain and this is an issue for potential inward investors or growing existing local businesses.

A significant proportion of East Devon residents travel outside the district to work – 18,400 people (around 41% of the working population) commute elsewhere to work, whilst there is an inflow of 12,500 people coming to work in East Devon. Exeter is by far the most popular other district to work in with 11,430 East Devon residents commuting here, representing a quarter of all work trips.⁸¹ Significant numbers also travel to work in Mid Devon, West Dorset, South Somerset, Teignbridge, and Taunton Deane – the remaining five districts that adjoin East Devon.

Top inflow and Top outflow of commuters in East Devon⁸²

⁷⁶ Mid-2019 population estimates, ONS, published June 2020.

⁷⁷ Nomis, September 2020: <https://www.nomisweb.co.uk/reports/lmp/la/1946157358/report.aspx?#is>

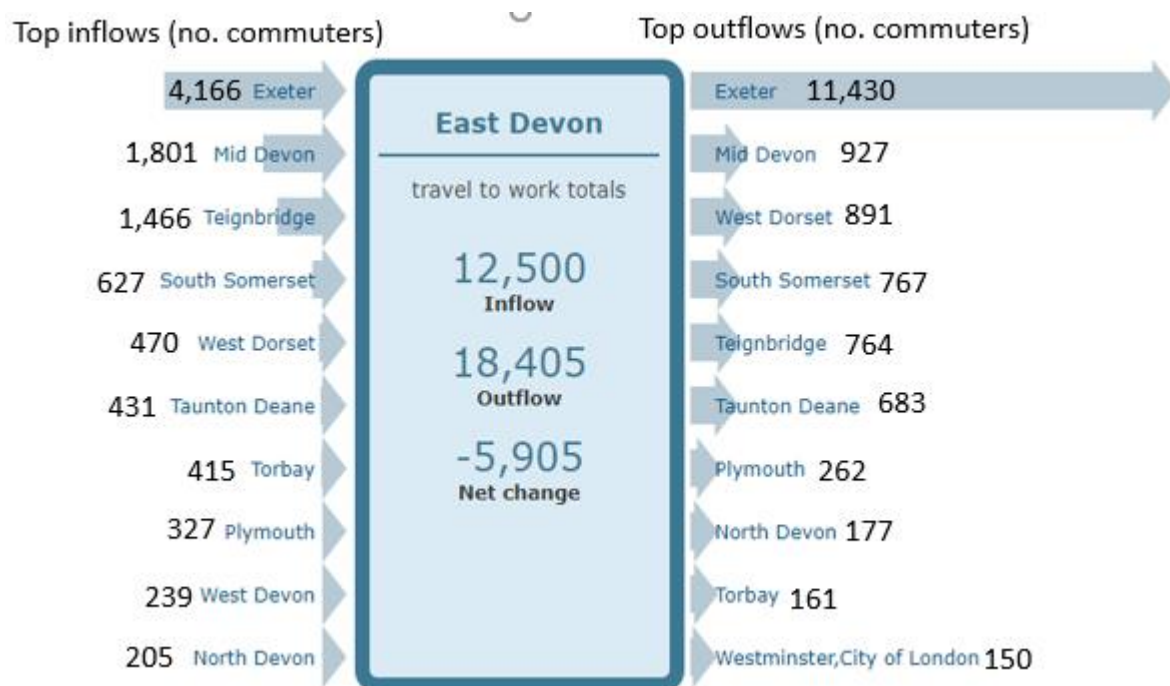
⁷⁸ Jobs density, 2020, Nomis.

⁷⁹ Office for National Statistics: Annual Population Survey 2018

⁸⁰ ONS claimant count, Dec 2021; Employment and unemployment (Oct 2020-Sep 2021), ONS annual population survey, accessed on Nomis: [Labour Market Profile - Nomis - Official Labour Market Statistics \(nomisweb.co.uk\)](https://www.nomisweb.co.uk/reports/lmp/la/1946157358/report.aspx?#is)

⁸¹ Table 1, Local Housing Needs Assessment for the Greater Exeter area, May 2020: <https://www.gesp.org.uk/evidence/>

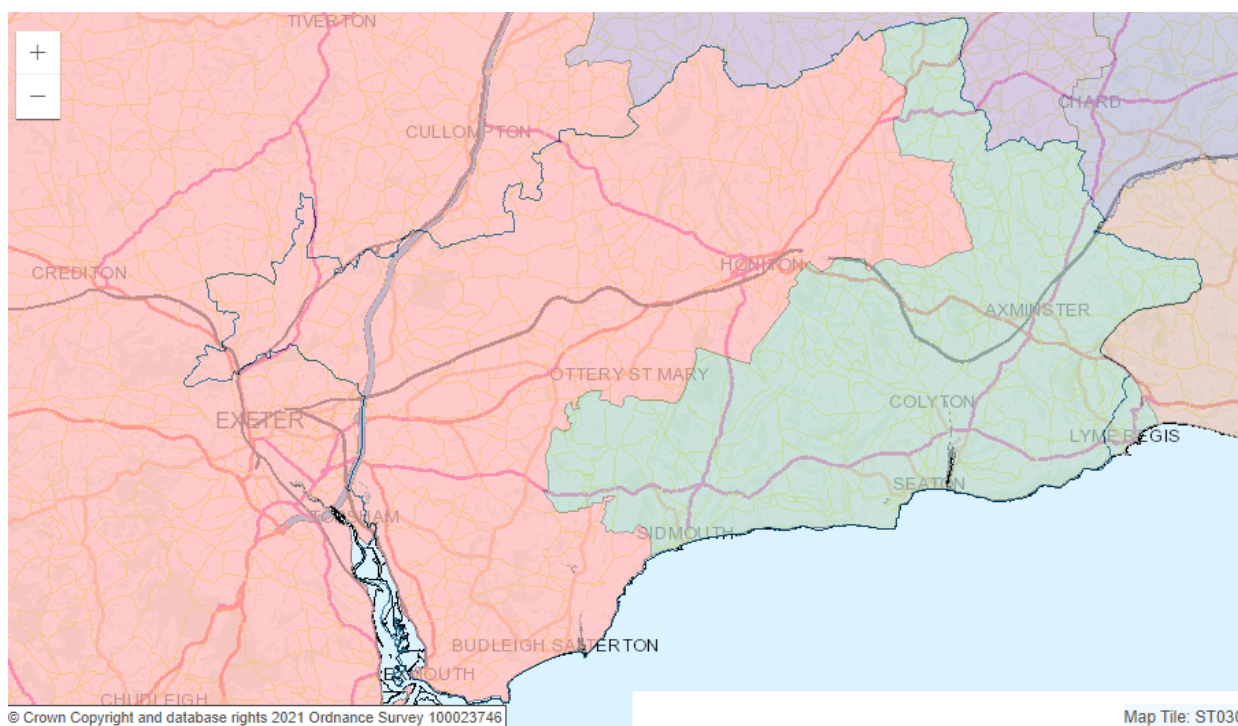
⁸² Location of usual residence and place of work by method of travel to work, Census 2011. This diagram is taken from the Nomis website: <https://www.nomisweb.co.uk/census/2011/wu03uk/chart>



The influence of Exeter in employing East Devon residents is reflected in data on Travel to Work Areas (TTWAs).⁸³ Indeed, Exeter's strong economic draw has seen its TTWA grow to be the second largest in the country. As shown in pink on the map below (figure 3.21), the Exeter TTWA extends far into East Devon, with the Sidmouth TTWA covering the south eastern part of the district.

Travel to Work Areas in East Devon

⁸³ TTWAs are defined by the Office for National Statistics (ONS) as "at least 75% of the area's resident workforce work in the area and at least 75% of the people who work in the area also live in the area. The area must also have an economically active population of at least 3,500".



The average distance that East Devon residents travel to work is 18km, but a significant amount (18%) travel less than 2km.⁸⁴ The majority of journeys to work are made in a car/van, with 62% driving to work and a further 5% as a passenger. 13% of people walk to work, 3% get the bus, and 2% travel by train. 10% of workers in East Devon work mainly from home.⁸⁵ The Covid-19 pandemic has required many more people to work at home – it remains to be seen whether this trend continues in the long term.

The vitality and viability of town centres

East Devon currently has nine town centres and one village centre:

- Axminster;
- Budleigh Salterton;
- Colyton
- Cranbrook;
- Honiton;
- Ottery St Mary;
- Seaton;

⁸⁴ Census 2011, QS702EW – Distance travelled to work, East Devon: [Data Viewer - Nomis - Official Labour Market Statistics \(nomisweb.co.uk\)](#)

⁸⁵ Census 2011, QS701EW - Method of travel to work, East Devon: [Data Viewer - Nomis - Official Labour Market Statistics \(nomisweb.co.uk\)](#)

- Sidmouth; and
- Beer (village centre)

Each of these towns supports a town/village centre though at Cranbrook the centre is very embryonic in nature with limited facilities at present, but there are plans for new shops and facilities to be built. Colyton is the smallest of the East Devon towns and it has the least facilities of the centres listed. The village of Beer, although a bit smaller than Colyton, actually supports more shops with a number of these most likely to be viable on account of the tourist trade that Beer attracts.

With the exception of Cranbrook, and to some degree Colyton and Budeligh Salterton, the town centres of East Devon provide facilities to meet most of the needs of the resident populations of those towns and of surrounding rural hinterlands. A range of shops are found in these centres along with supermarkets and a diverse selection of social and community facilities. Independent shops are comparatively common in East Devon towns. For much larger sized shops and a bigger selection as well as major recreational and cultural venues and such destinations as major sporting facilities residents of East Devon would need to leave the District, with Exeter being the closest option.

From a commercial operational perspective the towns of East Devon generally perform reasonably well when compared to many other centres across England. There is, however, a net flow of retail expenditure out of East Devon to shops in a number of bigger centres. The bigger longer term threat to town centre vitality and viability comes, however, from on-line retailing. There have been significant increases in people buying goods online over recent years and the sales from this sector have increased markedly from March 2020 over the period of the Covid-19 pandemic.

Connectivity and transport in East Devon

Connectivity and transport

Connectivity addresses the issue of connecting people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within and beyond East Devon

East Devon accommodates a north-south running length of the M5 Motorway and Junctions 29 and 30 fall partly within the District. The A30, which runs east-west through East Devon forms the next most significant highway with around half of the District length, running into Exeter, being duelled. In terms of the main roads in East Devon, traffic has increased slightly on the M5 and A30 since 2005, but flows have remained relatively constant on the A375 and A3052⁸⁶.

⁸⁶ Exeter Transport Strategy – Transport Empirical Data Report, Devon County Council, Jan 2019: <https://www.gesp.org.uk/evidence/>

Outside of East Devon, the main road links in into the city centre of Exeter can suffer from some peak time congestion which can affects those living and travelling into the City and backing-up congestion impacts do also occur on some short lengths of East Devon roads. Road congestion elsewhere in East Devon is, however, rare and limited in extent.

East Devon has a large number of train stations for its size (nine in total), across two lines, and usage has increased significantly over the last 20 years. The Exeter-London Waterloo line runs west to east, providing an hourly service at stations in the larger settlements. The other line (the Avocet line) has a half-hourly service from Exmouth to Exeter.

East Devon is also home to Exeter International Airport, which provides routes to a number of domestic and international locations.

Bus services in East Devon are of variable quality – within and between the main towns of the District, including links through to the City of Exeter, service frequency can be good. Many communities may be served by five or more buses a day. However in countryside locations (in practice this means the vast bulk of the land mass of the District) away from main through routes bus services can be poor or non-existent and even where they do exist may not be timetabled to allow for commuting for work or education purposes.

There are some high quality active travel (walking and cycling) corridors in East Devon, notably the Exe Estuary Trail and Clyst Valley Trail. The countryside of East Devon is accessible by a number of footpaths and the South West Coast Path runs along the entire length of the Districts coastline. Paths in towns are generally good.

A variety of projects are already in the pipeline to improve transport connections and support development across East Devon.⁸⁷ These include a passing loop for the train line near Cranbrook/Whimble to improve reliability and increase train frequency; a cycle path linking Cranbrook to Exeter; and the recently completed 'park and change' site at Exeter Science Park.

Road traffic collisions have fallen by a third across the Greater Exeter area over 10 years from 2006 to 2015. Roads in East Devon are generally safe, although the A375 Honiton High Street and link to Tesco Sidmouth Road is among the top five worst performing routes in the Greater Exeter area.⁸⁸

⁸⁷ East Devon Infrastructure Delivery Plan review, Nov 2017: https://eastdevon.gov.uk/media/2270747/idp-review-2017_report.pdf ; and Transport Infrastructure Plan, Devon County Council, March 2020: <https://www.devon.gov.uk/roadsandtransport/traffic-information/transport-planning/>

⁸⁸ Exeter Transport Strategy, Transport Empirical Data report, January 2019
[https://devoncc.sharepoint.com/sites/PublicDocs/Planning/Planning/Forms/AllItems.aspx?id=%2Fsites%2FPublicDocs%2FPlanning%2FPlanning%2FGESP%2FEvidence%2FGreater Exeter Study - Transport Empirical Report%2Epdf&parent=%2Fsites%2FPublicDocs%2FPlanning%2FPlanning%2FGESP%2FEvidence&p=true](https://devoncc.sharepoint.com/sites/PublicDocs/Planning/Planning/Forms/AllItems.aspx?id=%2Fsites%2FPublicDocs%2FPlanning%2FPlanning%2FGESP%2FEvidence%2FGreater%20Exeter%20Study%20-%20Transport%20Empirical%20Report%2Epdf&parent=%2Fsites%2FPublicDocs%2FPlanning%2FPlanning%2FGESP%2FEvidence&p=true)

Appendix Four: Sites SA framework

As explained in Chapter 2, the SA framework of sustainability objectives and factors to consider has been refined to make it more relevant and effective in the consideration of site options. The significance criteria in the following table guides the SA of site options, but it is not possible to cover all eventualities and there will be cases where sites do not fit ‘neatly’ into one of the ‘scores’. The explanation of effects will justify the ‘scores’ that are applied for each objective.

Sustainability objective	Significance criteria	
1. Biodiversity To conserve and enhance the habitat and wildlife of our natural environment <i>Evidence sources include: HELAA site assessments for proximity to wildlife sites; map of Strategic Nature Areas; Priority Habitats and Species in the Devon BAP; aerial imagery.</i>	++	Development at the site will deliver biodiversity gains, or improve ecological connections to strategic green infrastructure, or development will address a significant existing sustainability issue relating to biodiversity.
	+	Development will not lead to the loss of an important habitat or fragment ecological corridors identified as Strategic Nature Areas; and there are potential opportunities to enhance biodiversity.
	0	Development at the site is not likely to have positive or negative effects on any designated biodiversity site or sever green infrastructure.
	?	Uncertain until more detailed lower level surveys and assessments have been carried out.
	-	Development at the site has potential for negative effects on locally designated biodiversity sites, or sever ecological corridors identified as Strategic Nature Areas.
	--	Development at the site has the potential for negative effects on an internationally or nationally designated biodiversity site. Mitigation likely to be difficult.
2. Landscape To conserve and enhance the special qualities and distinctive character of our landscapes, undeveloped coast and seascape	++	Development significantly enhances the landscape or removes a significant eyesore and/or would regenerate previously developed land (PDL) that is currently having a major negative effect on the landscape/seascape.
	+	Development would remove an eyesore, or enhance the landscape and/or would regenerate PDL that is currently having a minor negative effect on the landscape/seascape, or the site has low landscape sensitivity.
	0	A neutral effect is not considered possible for this objective, given that development will have an impact upon the landscape (positive or negative).

Sustainability objective	Significance criteria	
<i>Evidence sources include: HELAA site assessments for proximity to AONB and comments on landscape impact; East Devon and Blackdown Hills Landscape Character Assessment (2019); aerial imagery.</i>	?	Uncertain until more detailed lower level surveys and assessments have been carried out.
	-	Site has medium sensitivity on landscape/seascape or is within the setting of the AONB or is located within a landscape that is identified in the East Devon and Blackdown Hills Landscape Character Assessment (2019) as vulnerable to the impacts of development.
	--	Site has medium to high or high sensitivity in landscape/seascape terms and/or is within an AONB. Mitigation likely to be difficult.
3. Historic and built environment To conserve and enhance our heritage assets and promote high quality design and accessibility in new development <i>Evidence sources include: HELAA site assessments for proximity to designated heritage assets and comment on impact; Devon Historic Environment Record; East Devon local list of heritage assets</i>	++	Development at the site has potential for a major positive effect on the significance of a designated heritage asset and/or its setting, including through promotion of public enjoyment of the site. Site will promote high quality design and accessibility.
	+	Development at the site has potential for minor positive effect as it secures appropriate new uses for unused heritage assets (particularly listed buildings), and/or enhance their setting.
	0	No significant effect because there are no heritage assets that would be affected by developing the site.
	?	Uncertain until more detailed lower level surveys and assessments have been carried out e.g. on the significance and sensitivity of heritage assets and their setting.
	-	Minor negative effects on a designated heritage asset or an important non-designated heritage asset and/or their setting.
	--	Potential for a major negative effect on a designated heritage asset or an important non-designated heritage asset and/or their setting. Mitigation likely to be difficult. High quality design and accessibility is unlikely.
4. Climate change and carbon emissions To minimise greenhouse gas emissions	++	Site offers opportunities to significantly minimise greenhouse gas emissions by reducing the need to travel, having access to sustainable travel links, and use of renewable and low carbon energy.
	+	Site could minimise greenhouse gas emissions by offering potential to reduce travel, sustainable travel links, and use of renewable and low carbon energy.

Sustainability objective	Significance criteria	
<i>Evidence sources include: HELAA site assessments for proximity to sustainable travel links; local studies on renewable and low carbon energy</i>	0	Site is well located to minimise greenhouse gas emissions from travel, but development likely to increase car travel. Limited opportunities to use renewable and low carbon energy.
	?	Uncertain until more detailed lower level surveys and assessments have been carried out.
	-	Development at the site is not likely to minimise the need to travel, with limited opportunities for sustainable travel and use of renewable and low carbon energy.
	--	Development on site is likely to significantly increase greenhouse gas emissions as there are few opportunities to reduce travel or use sustainable travel modes. The use of renewable and low carbon energy is unlikely. Mitigation to address these matters is likely to be difficult.
5. Climate change adaptation To adapt to the possible effects of climate change <i>Evidence sources include: HELAA site assessments for proximity to flood zones, surface water flooding, critical drainage areas; aerial imagery.</i>	++	Site is not located in an area of flood risk from river, sea, or surface water or critical drainage area; and evidence that development at the site offers an opportunity to reduce flood risk. The built and natural environment can likely cope with heat, drought and extreme storms.
	+	Site is not located in an area of flood risk from river, sea, or surface water or critical drainage area. Potential for the built and natural environment to cope with heat, drought and extreme storms.
	0	Site is partially located in an area of flood risk, but development can avoid this area. Some effect from heat, drought and extreme storms, but can be mitigated to an acceptable degree.
	?	Uncertain until more detailed lower level surveys and assessments have been carried out.
	-	Site is partially located in an area of flood risk or critical drainage area, and development of the site would find it difficult to avoid these constraints. Difficult to mitigate the effects of heat, drought and extreme storms.
	--	Site is wholly located in an area of flood risk and critical drainage area. Not likely to be possible to mitigate the effects of heat, drought and extreme storms.
6. Land resources	++	The site is entirely brownfield and will not result in the loss of any greenfield or agricultural land, and/or development

Sustainability objective	Significance criteria	
To utilise our land resources efficiently and minimise their loss or degradation <i>Evidence sources include: HELAA site assessments for agricultural land classification, mineral safeguarding areas and contaminated land; aerial imagery.</i>		of the site will remediate contaminated land. Not within a mineral consultation area.
	+	The majority of the site is brownfield and will not result in the loss of best and most versatile agricultural land. Not within a mineral consultation area.
	0	Not considered possible as development will always have some impact on a site (positive or negative).
	?	Uncertain until more detailed lower level surveys and assessments have been carried out e.g. mixed uncertain if Grade 3 agricultural land is not broken down into 'a' and 'b'.
	-	The majority of the site is greenfield. The site is partially covered by best and most versatile agricultural land; and/or partially within a mineral consultation area; and/or partially located on contaminated land.
	--	The site is wholly within best and most versatile agricultural land. Development also likely in a mineral consultation area and/or on contaminated land.
7. Water resources	++	Development at the site will lead to significant positive effects on water resources by using water efficiently and not affecting water quality.
To utilise our water resources efficiently and minimise their loss or degradation <i>Evidence sources include: HELAA site assessments for proximity to flood zones; proximity to River Exe; River Axe Nutrient Management Plan.</i>	+	Development will use water efficiently and not affect water quality, leading to a positive effect.
	0	Development at the site is unlikely to have any significant effects on water quality and quantity.
	?	Uncertain until more detailed lower level surveys and assessments have been carried out.
	-	Developing at the site will mean minor negative effects on water quality and quantity; for example due to its location within a groundwater source protection zone and/or lack of capacity at sewage treatment works.
	--	Developing at the site will mean major negative effects on water quality and quantity; for example due to its location within the River Axe SAC phosphates catchment and/or significant lack of capacity at sewage treatment works.
8. Homes	++	The site has the potential to provide a significant amount of new homes (100 dwellings or more), with an appropriate mix of tenures and sizes including affordable housing.

Sustainability objective	Significance criteria	
To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure to meet East Devon's needs. <i>Evidence sources include: HELAA; emerging Local Plan</i>	+	The site has the potential to provide new homes (up to 100 dwellings), with an appropriate mix of tenures and sizes including affordable housing.
	0	Neutral effect not considered possible as the site will either provide housing (positive) or not (negative).
	?	Uncertain as the capacity of the site for new housing is not known.
	-	Not applicable when considering site options.
	--	No housing is proposed as the site is being promoted for employment uses only.
9. Health and well-being To support healthy and active communities where people have access to attractive and functional recreation spaces <i>Evidence sources include: Indices of Multiple Deprivation; map showing transport network, heavy industry; Exeter Airport noise contours; aerial imagery. HELAA site assessments for proximity to open space/allotment and children's play area</i>	++	Will deliver new development in an area of higher deprivation (among 50% most deprived neighbourhoods in England), where there is good air quality and limited noise and light pollution (e.g. away from 'A' road, motorway, railway line, airport, heavy industry). The site is within 800m of open space/allotment and a children's play area.
	+	Will deliver new development in close proximity (800m) to an area of higher deprivation (among 50% most deprived neighbourhoods in England), where there is good air quality and limited noise and light pollution (e.g. away from 'A' road, motorway, railway line, airport, heavy industry). The site is within 1,600m of open space/allotment and a children's play area.
	0	Neutral effect not considered possible.
	?	Uncertain until more detailed lower level surveys and assessments have been carried out.
	-	Site is beyond 1,600m of open space/allotment and a children's play area; <u>or</u> developing the site would result in a net loss of existing open space/leisure facilities. Site is adjacent to an 'A' road, motorway or railway line.
	--	Site is beyond 1,600m of open space/allotment and a children's play area; <u>and</u> developing the site would result in a net loss of existing open space/leisure facilities. Site is within area of 57db or higher from Exeter Airport.
10. Access to services	++	Site is within 800m of a wide range of services/facilities (primary school and/or secondary school, shop, GP surgery, pub, library, community hall). No significant issues

Sustainability objective	Significance criteria	
To provide accessible and attractive services and community facilities for all ages and interests. <i>Evidence sources include: HELAA site assessments for proximity to facilities;</i>		relating to safety, quality and/or topography of route for pedestrians/cyclists.
	+	Site is within 1,600m of a range of services/facilities (primary school, shop, community hall and/or GP surgery/library). Limited issues relating to safety, quality and/or topography of route for pedestrians/cyclists.
	0	Neutral effect not considered possible.
	?	Uncertain until more detailed lower level surveys and assessments have been carried out.
	-	Site is more than 800m from a primary school, shop, and community hall; but is within 800m of an hourly bus or train station. <u>Or</u> site is within 1,600m of a primary school, shop, and community hall but there are significant issues relating to safety, quality and/or topography of route for pedestrians/cyclists.
	--	Site is more than 1,600m from a primary school, shop, and a community hall.
11. Jobs and employment To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity. <i>Evidence sources include: sites in Employment Land Review and Local Plan; aerial imagery</i>	++	The site is within 800m of an employment site; <u>and</u> has realistic potential to accommodate employment on site (e.g. larger site that has good access, acceptable landscape impact, and acceptable impact on amenity).
	+	The site is within 1,600m of an employment site; <u>and/or</u> has realistic potential to accommodate employment on site (e.g. larger site that has good access, acceptable landscape impact, and acceptable impact on amenity).
	0	Neutral effect not considered possible.
	?	Uncertain as the capacity for new employment on site is not known.
	-	No employment sites are within 1,600m or likely to be delivered on site.
	--	Developing the site would result in a net loss of existing employment uses.
12. Town centres	++	Site is located within 800m of an existing town centre.
	+	Site is within 1,600m of an existing town centre; or is of sufficient scale to provide its own town centre (4,000 homes plus).

Sustainability objective	Significance criteria	
To safeguard and strengthen the vitality and viability of town centres. <i>Evidence sources: defined town centres in the Local Plan, Villages Plan, and 'made' neighbourhood plans.</i>	0	Neutral effect not considered possible.
	?	Uncertain impact upon town centres until more detailed lower level surveys and assessments have been carried out.
	-	Site is beyond 1,600m of an existing town centre.
	--	Not applicable.
13. Connectivity and transport To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within and beyond East Devon. <i>Evidence sources include: HELAA site assessments for proximity to train station and bus service; Google Maps cycling trails, dedicated lanes, bike friendly roads; House of Commons Library: Constituency data and speeds</i>	++	Site is located within 800m of all of the following: - a train station or hourly or better bus service; - an 'A' road; - a recognised cycle route Site is located in an area with superfast broadband (30mbps plus) as a minimum.
	+	Site is located within 1,600m of: - a train station or an hourly or better bus service; <u>or</u> - an 'A' road; <u>or</u> - a recognised cycle route Site is located in an area with standard broadband (10-30 mbps) as a minimum.
	0	Neutral effect not considered possible.
	?	Unknown quality of connecting route to public transport, road network, cycle network, or broadband. Requires completion of lower level surveys and assessments.
	-	Site is located more than 800m from: - a train station or an hourly or better bus service; <u>and</u> - an 'A' road; <u>and</u> - a recognised cycle route Site is located in an area with standard broadband (10-30 mbps) or less.
	--	Site is located more than 1,600m from all of the following: - a train station or an hourly or better bus service; - an 'A' road; - a recognised cycle route

Sustainability objective	Significance criteria	
		Site is located in an area with standard broadband (10-30 mbps) or less.

Appendix Five: Appraisal matrices of Topic-based Policies and Reasonable Alternatives

Local Plan Chapter 3. The Spatial Strategy

Policy number/title: 1. Strategic Policy – Spatial Strategy

Reasonable alternatives

Option A. Promote significant development at one Principal Centre and six Main Centres⁸⁹; local development at five Local Centres; and limited development at 23 Service Villages; do not focus strategic development on the Western side of the district.

Option B. As Option A, but identify more Service Villages to accommodate development.

Option C. Promote significant development at one Principal Centre and six Main Centres; local development at five Local Centres; and limited development at 23 Service Villages; focus strategic development on the Western side of the district, including a new town (of around 2,000 to 8,000 dwellings) and other major development.

⁸⁹ Nb. Although Cranbrook is identified as a Main Centre in The Role and Function of Settlements, the recent adoption of the Cranbrook Plan means that Cranbrook is outside the scope of the Local Plan.

Option D. Promote significant development at one Principal Centre and six Main Centres; local development at five Local Centres; and limited development at 23 Service Villages; focus strategic development on the Western side of the district, including a new village (of around 1,000 dwellings) and other major development.

Outline of reasons for selecting the alternatives

Options A, C, and D reflect evidence in The Role and Function of Settlements (October 2021) on the level of jobs, facilities and services at settlements across East Devon. Option A directs development to existing settlements with jobs, facilities and services, without a focus on strategic development on the Western side of East Devon. Option B considers whether more rural settlements should accommodate development. In addition to existing settlements, Options C and D focus strategic development on the Western side – either at a new town of a minimum size comparable to existing Main Centres; or a smaller scale new village of a scale that could likely support key facilities including a primary school and shop; alongside other large housing/employment sites. An option to identify more settlements as Principal or Main Centres was not considered to be a reasonable alternative as it was not supported by evidence (The Role and Function of Settlements) which showed a clear cut-off between the Principal/Main Centres and other settlements. An option for a new town as well as a new village in the Western side was not considered to be a reasonable alternative as it would limit the potential to meet affordable housing needs in the rest of the district, not consistent with the Local Plan Vision. Note: these options consider the broad location of development – the total scale of development would be the same across all options.

Policy title: 1. Strategic Policy – Spatial Strategy					
Option SA Objective	Option A	Option B	Option C	Option D	Commentary
1. Biodiversity	-- ?	-- ?	-- ?	-- ?	All options for the spatial strategy will result in significant amounts of new housing and employment development, leading to negative effects arising from species disturbance, habitat loss, and severance. The effects will largely depend on the scale and precise location of development, meaning there is some uncertainty for all options.

Policy title: 1. Strategic Policy – Spatial Strategy					
Option SA Objective	Option A	Option B	Option C	Option D	Commentary
					By avoiding strategic development in the Western side of the district in the vicinity of internationally designated Exe Estuary SPA/Ramsar and Pebblebed Heaths SPA/SAC, Option A will minimise negative effects on these sites, but a strategy for development at several settlements in close proximity (e.g. Exmouth, Lympstone, Woodbury, Exton) to these sites will likely mean adverse effects due to recreation pressure from new residents. In addition, a Main Centre (Axminster) and several Service Villages (Chardstock, Hawkchurch, Kilminster, Musbury) are within the area where new housing will likely lead to additional nutrients in the River Axe SAC catchment; and other Main Centres (Sidmouth, Seaton) and Service Villages (Beer) are also located in close proximity to internationally designated biodiversity sites. So major negative uncertain effect for Option A. The effects for Option B will be the same as A, but with additional uncertainty depending upon which additional settlements become Service Villages. Options C and D will see a large amount of housing in the vicinity of internationally designated Exe Estuary SPA/Ramsar and Pebblebed Heaths SPA/SAC, in addition to the effects already highlighted elsewhere in the district, so a major negative uncertain effect is likely due to recreation pressure.
2. Landscape	-- ?	-- ?	- ?	- ?	The lack of brownfield land in East Devon means a significant amount of development will take place on greenfield sites, with potential for adverse landscape impact as a consequence. As the precise location of development is not set out, there may be uncertainty on the significance of the effects. Option A promotes development at numerous settlements located in a sensitive landscape, with all Principle or Main Centres apart from Ottery St Mary in close proximity to an AONB and/or undeveloped coast; two Local Centres (Budleigh Salterton, Colyton) within or in close proximity to AONB; and many Service Villages in an AONB (East Budleigh, Otterton, Newton Poppleford, Tipton St John, Sidbury, Branscombe, Beer, Musbury, Kilminster, Uplyme, Hawkchurch, Chardstock). This means a significant negative uncertain long-term effect arising from development under Option A. The effects for Option B will

Policy title: 1. Strategic Policy – Spatial Strategy					
Option SA Objective	Option A	Option B	Option C	Option D	Commentary
					be the same as A, but with additional uncertainty depending upon which additional settlements become Service Villages. The incorporation of strategic development in the Western side under Options C and D avoids designated landscape and the seascape, but would still see development at numerous settlements located in a sensitive landscape under Options A and B albeit to a lesser scale. The landscape effects of Option D would be less than C due to the smaller scale of a new settlement (village, rather than town), but negative uncertain effects are likely from both Options C and D.
3. Historic and built environment	- ?	- ?	- ?	- ?	The precise location of new development in relation to heritage assets will provide greater certainty on the significance of the effects, meaning uncertainty currently for these options. Effects will also be dependent to some extent on the design quality of new development – given the focus in national Government policy and guidance, it is envisaged that high quality design is likely to be achieved. The Principal Centre and Main Centres all have Conservation Areas and numerous listed buildings, with Scheduled Monuments in close proximity to Seaton and Axminster. Conservation areas and listed buildings are also present at many Local Centres and Service Villages, so again a minor negative uncertain effect is likely for Option A. The effects for Option B will be the same as A, but with additional uncertainty depending upon which additional settlements become Service Villages. The Western side has relatively few designated heritage assets (notable assets include Sowton Conservation Area with its cluster of listed buildings, Grade I listed Bishops Court, and scattered Grade II listed farm houses across the area), so minor negative uncertain effect overall for Options C and D.
4. Climate change and carbon emissions	+ / -	+ / - -	+ + / -	+ / -	The construction and occupation of new development will generate carbon emissions for all options. Promoting development at the Principal and Main Centres, Local Centres and Service Villages in Option A offers good access to existing jobs, facilities and services in these settlements, minimising emissions.

Policy title: 1. Strategic Policy – Spatial Strategy					
Option SA Objective	Option A	Option B	Option C	Option D	Commentary
					However, it will likely mean continued travel to Exeter for many residents to access jobs, facilities and services, causing carbon emissions, so overall a mixed positive and negative effect for Option A. Supporting development at more Service Villages will mean longer travel distances to access jobs, facilities and services, from locations with limited sustainable travel options, leading to a mixed significant negative effect for Option B, alongside the positive under Option A. The additional focus of strategic development on the Western side of the district limits the need to travel through closer proximity to jobs, facilities and services (including sustainable travel opportunities) in Exeter. This means a major positive effect for Option C due to more development in the Western side including a new town with potential for a wide mix of uses ‘on-site’; reduced to minor positive for Option D where the scale of housing is lower, and offering less potential for a mix of uses ‘on-site’.
5. Climate change adaptation	- ?	- ?	- ?	- ?	The potential for new development to adapt to heat, drought and extreme storms will be the same for all options. As the precise location of new housing in relation to flood risk is not identified, there is some uncertainty for all of these options. All Principal and Main Centres contain areas of high flood risk (flood zone 3), with flooding from the sea due to climate change likely at Exmouth, Sidmouth and Seaton. Similarly, areas of flood zone 3 affect most Local Centres and Service Villages, and potential for coastal flooding at Exton, Lympstone, Budleigh Salterton, Branscombe and Beer. There are critical drainage areas at Axminster, Feniton and Whimple, indicating particular drainage problems. These factors lead to a negative uncertain effect for Option A. Identifying more Service Villages is not likely to make a significant difference, so the same effect is likely for Option B. The additional focus of strategic development on the Western side of the district brings potential flood risk associated with the River Clyst flood plain and its tributaries which cover large parts of this area, leading to a minor negative uncertain effect for Options C and D.

Policy title: 1. Strategic Policy – Spatial Strategy					
Option SA Objective	Option A	Option B	Option C	Option D	Commentary
6. Land resources	+ / -	+ / - ?	+ / - ?	+ / - ?	Development at Principal/Main Centres, Local Centres and Service Villages (Option A) would likely mean loss of best and most versatile agricultural land which is present around some of these settlements. There is also potential to affect Mineral Safeguarding Areas at Beer, Feniton, West Hill and Whimple. But this option offers potential to re-use previously developed land at the existing settlements, albeit noting this is not a huge resource in East Devon, so overall a mixed positive and negative effect for Option A. Same effects are likely for Option B, with some uncertainty as the additional Service Villages are not identified. There are large areas of best and most versatile agricultural land in the Western side, which would be at threat from strategic development in this area, proposed under Options C and D, but there is some uncertainty until precise locations for development are known. These options would also lead to a large loss of greenfield land, and less opportunities to use previously developed land compared to the other options. Therefore, a mixed positive and major negative uncertain effect for Options C and D.
7. Water resources	- - ?	- - ?	- - ?	- - ?	There is general uncertainty on water resources due to the high level nature of these options. Option A would likely lead to a significant negative effect due to potential degradation of water resources from development at several of the settlements in the strategy, notably Exmouth in relation to the River Exe SPA/Ramsar given its sensitivity and classification as “moderate” quality; and Axminster, Kilmington, Musbury, Hawkchurch and Chardstock due to their location within the River Axe SAC catchment and potential to worsen the already significant phosphate levels in the River Axe SAC. Same effects are likely for Option B, with additional uncertainty as the additional Service Villages are not identified. Options C and D would entail strategic development within the River Clyst catchment which flows into the River Exe SPA/Ramsar, also leading to a major negative uncertain effect due to potential adverse impacts on water resources from new development.

Policy title: 1. Strategic Policy – Spatial Strategy					
Option SA Objective	Option A	Option B	Option C	Option D	Commentary
8. Homes	++ ?	++ ?	++ ? / -	++ ? / -	All options are assumed to deliver the total district-wide housing requirement, so variation in effects is due to build-out rates, and locating housing in the most appropriate areas. A degree of uncertainty is attached to positive effects as the options do not specify housing mix, quality or affordable housing delivery. Option A will provide significant amounts of housing at existing settlements, helping to meet needs of the indigenous population. As the housing requirement will be spread across a larger number of smaller-scale sites (rather than one or two new settlements in Options C and D), faster build-out rates are likely. This includes delivery in areas with housing affordability issues. This means a major positive uncertain effect for Option A. Same effects for Option B, albeit with greater positive effects from meeting housing need in rural areas from identifying more Service Villages. The focus of strategic development on the Western side (Options C and D) could mean affordable housing needs not being met elsewhere in East Devon. In addition, the long lead-in times for a new settlement will slow the pace of housing delivery – this issue will be less significant for Option D which incorporates a smaller new settlement. On the other hand, Options C and D are likely to incorporate large amounts of affordable housing in 'one hit' due to the large scale of development involved. Given this, Options C and D will have a mixed significant positive and minor negative effect.
9. Health and well-being	+ ?	+ ? / -	+ ? / -	+ ? / -	There is a degree of uncertainty across all options until open space and play space requirements are specified for new housing development. Short-term negative effects associated with noise and disturbance from the construction of housing will arise for all options. Option A would ensure access to a range of existing walking/cycling links, open space and leisure opportunities at the Principal/Main Centres, Local Centres and Service Villages. This option could also benefit deprivation levels, particularly at Exmouth, Honiton and Axminster which contain the top 8 most

Policy title: 1. Strategic Policy – Spatial Strategy					
Option SA Objective	Option A	Option B	Option C	Option D	Commentary
					deprived areas in the district. So, a positive effect for Option A. Option B would ensure good access to rural recreation opportunities, but there are fewer built leisure facilities (such as sports centre, swimming pool) in these more rural areas, so a mixed positive and negative effect. Options C and D are located close to strategic green infrastructure at Clyst Valley Regional Park, but could result in new housing being adversely affected by noise from Exeter Airport, resulting in a mixed effect.
10. Access to services	+ / -	+ / - -	++ ?	+ ?	Option A ensures that new development that good access to services at the Principal/Main Centres, Local Centres and Service Villages, of a scale appropriate to their role and function. However, this will likely mean continued travel to Exeter to access some higher level services (e.g. Hospital, large range of shops, museum), so overall a mixed positive and negative effect for Option A. The identification of more Service Villages to accommodate development under Option B will lead to more development in locations with limited services, so will have a significant negative effect to go along with the positive effect in Option A. Focussing strategic development on the Western side offers closer proximity to the numerous services in Exeter – this means a major positive for Option C, with uncertainty in case additional services and/or sustainable travel links are not provided alongside new development, reducing to a minor positive for Option D where the creation of a new village offers less potential for on-site services.
11. Jobs and employment	+ / -	+ / - -	++ ?	+ ?	All options are assumed to deliver the total district-wide employment requirement, so variation in effects is due to locating employment in the most appropriate areas in terms of access to workers, transport network, for example. A degree of uncertainty is attached to positive effects as the options do not specify employment types. Promoting development at existing settlements (Option A) provides access to an existing labour force, jobs and training opportunities, and offers conglomeration opportunities with other existing businesses in the

Policy title: 1. Strategic Policy – Spatial Strategy					
Option SA Objective	Option A	Option B	Option C	Option D	Commentary
					settlements. There are also generally good travel, including sustainable travel, links. However, it will likely mean continued travel to Exeter for many residents to access employment/training, so overall a mixed positive and negative effect for Option A. Identifying more Service Villages will mean development in generally more rural, inaccessible areas, with poorer travel links, less resident workers, and fewer existing businesses. Therefore, a mixed positive and major negative effect for Option B. Focussing strategic development on the Western side, in addition to existing settlements, offers the added benefit of close proximity to employment and training opportunities in the Western side of the district (e.g. Skypark, distribution centres, Exeter Airport) and in Exeter itself for Option C. However, this is reliant on people having easy access to jobs/training by, for example, sustainable travel links into Exeter or on-site. So the positive effects of location have some uncertainty for Options C and D in case additional employment and/or sustainable travel links are not provided alongside new development at the Western side in what is a currently countryside area. Overall, a major positive uncertain effect for Option C, reducing to a minor positive uncertain effect for Option D where the creation of a new village offers less potential for on-site employment.
12. Town centres	++	+	- ?	- ?	Option A promotes development at existing settlements, which will support existing town centres, leading to a significant positive effect for Option A. The identification of more Service Villages (Option B) will have a minor positive effect as, although larger settlements will continue to see development, there is poorer access to town centres from Service Villages. The focus of strategic development on the Western side (Option C) has the potential to detract from existing town centres, although this negative effect is uncertain as the form and location of development in the Western side is not prescribed. The same effect is likely for Option D.

Policy title: 1. Strategic Policy – Spatial Strategy					
Option SA Objective	Option A	Option B	Option C	Option D	Commentary
13. Connectivity and transport	+	-	++	+	All Principal and Main Centres have an hourly bus service, are adjacent to 'A' roads (apart from Ottery St Mary), and several train stations (Exmouth, Honiton, Axminster); some Local Centres and Service Villages also have connections to the main 'A' road network (Lypstone, Exton, Kilminster, Clyst St Mary, Newton Poppleford, Sidbury, Musbury); an hourly bus service, and/or train station (Lypstone, Feniton, Whimple, Exton). These connections mean a positive effect for Option A. Broadband coverage has improved rapidly over recent years, and is likely to continue to do so, but coverage still tends to be better in urban areas compared to rural areas. This, alongside the poorer transport connections in general, means that Option B to identify more Service Villages to accommodate development results in a minor negative effect. The focus of strategic development on the Western side in Options C and D provides good access to the strategic road network at the M5 and A30. There are several hourly or better bus routes in this area, including along the A3052, A376, B3174, and B3181. These provide good connectivity in the Western side, although the area suffers from congestion at peak times. Option C offers greater potential to incorporate sustainable travel links given its larger size and consequent 'economies of scale', so is likely to have a major positive effect, with a minor positive for Option D.
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: Mitigation measures will be required to address significant adverse effects at a site or topic-specific level, rather than in this strategic policy on housing distribution. The following mitigation measures should be considered in site or topic policies: • Western side development should provide suitable open space to reduce recreational pressure on international designated sites, to reduce major adverse biodiversity effects – this could include links to Clyst Valley Regional Park. • Nutrient neutrality from new housing would reduce the major adverse biodiversity and water resources effects. • Robust landscaping requirements can reduce the major adverse landscape effects.					

Policy title: 1. Strategic Policy – Spatial Strategy					
Option	Option A	Option B	Option C	Option D	Commentary
SA Objective	Option A	Option B	Option C	Option D	Commentary
					• Provide sustainable travel links, within new development for larger sites where critical mass allows, and/or to sustainable links elsewhere – Option C offers the best potential to do this. • Energy efficient buildings. • Facilitate home working. • Avoid developing in flood zones 2 and 3. • Take account of best and most versatile agricultural land. • Specify affordable housing requirement. • Provide facilities/services alongside new housing, including town centres. • Provide job/training opportunities alongside new housing. These measures will reduce the major negative effects to minor negative. Preferred alternative: Option C - Promote significant development at one Principal Centre and six Main Centres; local development at five Local Centres; and limited development at 23 Service Villages; focus strategic development on the Western side of the district, including a new town (of around 2,000 to 8,000 dwellings) and other major development. Reasons for alternatives being preferred or rejected: • Option A is rejected due to major adverse effects on biodiversity, landscape and water resources, and less potential for new development to access jobs, services and facilities in the Western side and Exeter. • Option B is rejected due to major adverse effects on biodiversity, landscape and water resources. Also, there is poorer access to jobs, services and facilities in the Western side and Exeter, and at the additional Service Villages themselves. • Option C is preferred as it promotes development at existing settlements where there is a range of jobs, services, and facilities; whilst also focussing development where there is good connectivity in close proximity to a much wider range of jobs, services, and facilities in the Western side and Exeter.

Policy title: 1. Strategic Policy – Spatial Strategy					
Option	Option A	Option B	Option C	Option D	Commentary
SA Objective					
					The scale of development proposed in the new town offers the greatest potential for a mix of uses, reducing the need to travel and providing opportunities sustainable travel links, which provides better accessibility and reduced carbon emissions. Option D is rejected due to major adverse effects on biodiversity and water resources. The scale of development in a new village offers less potential to create a sustainable, mixed use community compared to Option C due to the lower scale of proposed housing proposed, meaning poorer accessibility to jobs and services and greater carbon emissions.

Policy number/title: 2. Strategic Policy – Housing distribution

Reasonable alternatives

Option A. Continue with pattern of housing distribution in East Devon Local Plan 2013-31 (60% in Western side, 30% at the Principal Centre and Main Centres, 10% at Local Centres, Service Villages and Countryside)

Option B. Higher concentration of housing in the Western side of East Devon, less in rest of district (75% in Western side, 15% at the Principal Centre and Main Centres, 10% at Local Centres, Service Villages and Countryside)

Option C. No additional housing⁹⁰ in the Western side of East Devon, more at Principal and Main Centres (42% in Western side, 48% at the Principal Centre and Main Centres, 10% at Local Centres, Service Villages and Countryside)

Option D. No additional housing⁹¹ in the Western side of East Devon, more at Local Centres and Service Villages (42% in Western side, 15% at the Principal Centre and Main Centres, 43% at Local Centres, Service Villages and Countryside)

Outline of reasons for selecting the alternatives

The distribution of development in Option A was considered appropriate in the preparation, Examination and adoption of the East Devon Local Plan 2013-31 (adopted January 2016). Option B acknowledges the attraction of the large number of jobs and facilities in close proximity at Exeter. Option C entails more housing to support the largest settlements where there is best access to jobs, facilities and services in East Devon. Option D better meets housing needs in the smaller settlements and rural areas of East Devon.

Policy title: 2. Strategic Policy – Housing distribution					
Option SA Objective	Option A	Option B	Option C	Option D	Commentary
1. Biodiversity	-- ?	-- ?	-- ?	-- ?	All options will deliver significant amounts of new housing, leading to negative effects arising from species disturbance, habitat loss, and severance. The effects will largely depend on the precise location of development, meaning there is some uncertainty for all options.

⁹⁰ Beyond existing completions, commitments and Cranbrook DPD allocations.

⁹¹ Beyond existing completions, commitments and Cranbrook DPD allocations.

Policy title: 2. Strategic Policy – Housing distribution					
Option SA Objective	Option A	Option B	Option C	Option D	Commentary
					Options A and B will see a large amount of housing in the vicinity of internationally designated Exe Estuary SPA and Pebblebed Heaths SPA/SAC so a major negative uncertain effect is likely. Exmouth, Sidmouth, Axminster and Seaton are all located in close proximity to internationally and locally designated biodiversity sites, so Option C would also lead to a major negative uncertain effects due to a high proportion of development at these settlements. Nutrients affecting the River Axe SAC is a particular issue for growth at Axminster. Several Local Centres and Service Villages are near to internationally designated sites, including Woodbury, Colyton, Lympstone, Exton, Beer, Musbury and Kilminster. Therefore, a large proportion of housing at these settlements arising from Option D will have a major negative uncertain effect.
2. Landscape	- ?	- ?	--	--	The lack of brownfield land in East Devon means a significant amount of housing will take place on greenfield sites, with potential for adverse landscape impact as a consequence. As the precise location of housing is not set out, there may be uncertainty on the significance of the effects. Option A, and particularly Option B, will minimise the amount of development in East Devon and Blackdown Hills AONBs, and the undeveloped coast, so a minor negative uncertain effect is likely. Option C means less development in the undesignated Western side of East Devon, away from the sea, but a high proportion of housing at Principle and Main Centres – as all of these settlements are in close proximity to an AONB and/or undeveloped coast (with the exception of Ottery St Mary), a significant negative effect is likely. Option D is likely to adversely affect the rural landscape and, with most Local Centres and Service Villages located either within or in close proximity to an AONB, a significant negative effect is likely.

Policy title: 2. Strategic Policy – Housing distribution					
Option SA Objective	Option A	Option B	Option C	Option D	Commentary
3. Historic and built environment	- ?	- ?	- ?	- ?	The precise location of new housing in relation to heritage assets will provide greater certainty on the significance of the effects, meaning some uncertainty for these options. Effects will also be dependent to some extent on the design quality of new development – given the focus in national Government policy and guidance, it is envisaged that high quality design is likely to be achieved. The Western side has relatively few designated heritage assets (notable assets include Sowton Conservation Area with its cluster of listed buildings, Grade I listed Bishops Court, and scattered Grade II listed farm houses across the area), so a minor negative uncertain effect is likely for Options A and B. The Principal Centre and Main Centres all have Conservation Areas, numerous listed buildings, with Scheduled Monuments in close proximity to Seaton and Axminster. Therefore, a minor negative uncertain effect is likely for Option C. Conservation areas and listed buildings are also present at many Local Centres and Service Villages, so again a minor negative uncertain effect is likely for Option D.
4. Climate change and carbon emissions	+ / - ?	+ / - ?	+ / -	- -	The construction and occupation of new housing will generate carbon emissions for all options. Both Option A and B limit the need to travel through closer proximity to jobs, facilities and services (including sustainable travel opportunities) in Exeter, the western edge of East Devon, and larger settlements elsewhere in East Devon. This means a positive effect for these options, but some negative uncertainty in case additional jobs, facilities and sustainable travel links are not provided alongside new housing at the Western side in particular where there would be large-scale housing development in a currently countryside area. This uncertainty is more pronounced for Option B, although it remains a minor negative uncertain. The large proportion of housing at Principal and Main Centres in Option C offers good access to existing jobs, facilities and services in these settlements, although sustainable travel links vary, with Sidmouth, Seaton and Ottery St Mary lacking a train station, for example. New housing at Principal and Main Centres will likely mean continued travel to Exeter for many residents to access jobs, facilities and

Policy title: 2. Strategic Policy – Housing distribution					
Option SA Objective	Option A	Option B	Option C	Option D	Commentary
					services, so overall a mixed positive and negative effect for Option C. A largely rural distribution of housing (Option D) will mean longer travel distances to access jobs, facilities and services, from locations with limited sustainable travel options. The consequent increase in carbon emissions from travel by private car means a significant negative effect for Option D.
5. Climate change adaptation	- ?	- ?	- ?	- ?	The precise location of new housing in relation to flood risk is not identified, meaning some uncertainty for all of these options. The potential to adapt to heat, drought and extreme storms will be the same for all options. Areas of high flood risk associated with the River Clyst flood plain and its tributaries covers large parts of the Western side, resulting in a likely minor negative effect for Options A and B. All Principal and Main Centres contain areas of high flood risk (flood zone 3), with flooding from the sea due to climate change likely at Exmouth, Sidmouth and Seaton. In addition, there is a critical drainage area at Axminster meaning particular drainage problems here. These factors lead to a negative effect for Option C. Similarly, areas of flood zone 3 affect most Local Centres and Service Villages, with Feniton and Whimble also being within a critical drainage area, causing a negative effect for Option D.
6. Land resources	-	- -	+ / -	-	There are large areas of best and most versatile agricultural land in the Western side, which would be at threat from a high proportion of new housing in this area. Options A and B would also lead to a large loss of greenfield land, and less opportunities to use previously developed land compared to the other options. Therefore, a minor negative for Option A, rising to a major negative for Option B where the proportion of Western side housing is higher. Some areas around the Principal and Main Centres are also best and most versatile agricultural land, but more housing here offers the potential for greater re-use of previously developed land, so a mixed positive and negative effect for Option C. Option D has greatest potential to

Policy title: 2. Strategic Policy – Housing distribution					
Option SA Objective	Option A	Option B	Option C	Option D	Commentary
					affect Mineral Safeguarding Areas at Beer, Feniton, West Hill and Whimble; with relatively limited previously developed land opportunities given the smaller size of Local Centres and Service Villages. There would be a likely loss of best and most versatile agricultural land at these settlements. Overall, a minor negative effect for Option D.
7. Water resources	- ?	- ?	- - ?	- ?	There is general uncertainty on water resources due to the high level nature of these options. Nevertheless, a high proportion of housing in the Western side (Options A and B) could adversely affect water quality due to potential for pollution from housing into the Exe Estuary SPA, meaning a negative effect given its sensitivity and classification as “moderate” quality. The high amount of housing from Option C at Exmouth and Axminster in particular, could affect the Exe Estuary SPA, and worsen the already significant phosphate levels in the River Axe SAC, due to discharge from new housing – this results in a significant negative effect for Option C. Less development at the Western side, Principal and Main Centres (particularly Exmouth and Axminster), will lead to a minor negative effect for Option D, noting the effects from new housing at Kilminster, Musbury, Hawkchurch and Chardstock in particular due to their location within the River Axe SAC catchment.
8. Homes	++ ? / -	+ ? / -	++ ? / -	++ ? / -	All options are assumed to deliver the total housing requirement, so variation in effects is due to build-out rates and locating housing, particularly affordable housing, in areas of most need. A degree of uncertainty is attached to positive effects as the options do not specify housing mix, quality or affordable housing delivery. Options A and B will require the delivery of a new settlement (likely to be two for Option B) in the Western side of East Devon. Whilst larger sites may increase the level of affordable housing overall, this could mean affordable needs not being met elsewhere in East Devon. In addition, the long lead-in times for a

Policy title: 2. Strategic Policy – Housing distribution					
Option SA Objective	Option A	Option B	Option C	Option D	Commentary
					new settlement will slow the pace of housing delivery. Therefore, Option A will have a mixed significant positive and minor negative effect; with a minor positive and minor negative for Option B as it is likely to require two new settlements which could impede housing delivery. Option C will better meet needs at Principal and Main Centres, but limited housing in rural areas could mean rural housing need not being met. As the housing requirement will be spread across a larger number of smaller-scale sites (rather than one or two new settlements in Options A and B), faster build-out rates are likely. Affordable housing need in rural areas would likely be met in Option D, but this would be to the detriment of the Principal and Main Centres. Again, Option D will be spread across many small sites, increasing build-out rates. Given this, mixed significant positive and minor negative effects are likely for Options C and D.
9. Health and well-being	+ ? / -	+ ? / -	+ ?	+ ? / -	There is a degree of uncertainty across all options until open space and play space requirements are specified for new housing development. Short-term negative effects associated with noise and disturbance from the construction of development will arise for all options. Options A and B are located close to strategic green infrastructure at Clyst Valley Regional Park, but could result in new housing being adversely affected by noise from Exeter Airport, resulting in a mixed effect. There is also uncertainty on the level of open space and leisure facilities to be provided in this area alongside new housing. Option C would enable better access to a range of existing walking/cycling links, open space and leisure opportunities at Principal and Main Centres. This option could also benefit deprivation levels, particularly at Exmouth, Honiton and Axminster which contain the top 8 most deprived areas in the district. So, a positive effect for Option C. There would be good access to rural recreation opportunities under Option D, but there are fewer built leisure facilities (such as sports centre, swimming pool) in these more rural areas, so a mixed positive and negative effect.

Policy title: 2. Strategic Policy – Housing distribution					
Option SA Objective	Option A	Option B	Option C	Option D	Commentary
10. Access to services	+ / - ?	+ ?	+ ?	- -	Options A and B are located in close proximity to Exeter, offering access to numerous services in the city. However, this is reliant on people having easy access to these service by, for example, sustainable travel links into Exeter. This means a positive effect for Options A and B, with uncertainty in case additional services and/or sustainable travel links are not provided alongside new housing at the Western side in particular where there would be large-scale housing development in a currently countryside area. This uncertainty is more pronounced for Option B, although it remains a minor negative uncertain. The large proportion of housing at Principal and Main Centres in Option C offers good access to existing services in these settlements, although some Main Centres lack key services (for example Seaton does not have a secondary school). New housing at Principal and Main Centres will likely mean continued travel to Exeter for many residents to access some higher level services (e.g. Hospital, range of shops, museum), so overall a mixed positive and negative effect for Option C. Although local facilities are largely present at Local Centres and Service Villages, this is not always the case (for example Dunkeswell and Exton lack a primary school), and a rural distribution of housing (Option D) will mean longer travel distances to access a wider range of services, from locations with limited sustainable travel options. This means a significant negative effect for Option D.
11. Jobs and employment	+ ?	+ ?	+ / -	+ / - -	The options relate to housing distribution rather than providing employment directly, but there will be a general positive effect from job opportunities during construction (short-term for smaller sites, but medium-long term for larger sites). The objective seeks to increase access to training and improved job opportunities, so this commentary also considers that new housing provides a labour supply, and the proximity of housing to training and job opportunities. Options A and B provide good access to employment and training opportunities in the Western side of the district (e.g. Skypark, distribution centres, Exeter Airport) and in Exeter. There would also be access to

Policy title: 2. Strategic Policy – Housing distribution					
Option SA Objective	Option A	Option B	Option C	Option D	Commentary
					jobs and training from new housing at the Principal and Main Centres. This results in a positive effect. However, this is reliant on people having easy access to jobs/training by, for example, sustainable travel links into Exeter. So the positive effects of location have some uncertainty for Options A and B in case additional employment and/or sustainable travel links is not provided alongside new housing at the Western side in particular where there would be large-scale housing development in a currently countryside area. This uncertainty is more pronounced for Option B, although it remains a minor positive uncertain. The large proportion of housing at Principal and Main Centres in Option C offers good access to existing jobs/training in these settlements, although it will likely mean continued travel to Exeter for many residents to access employment/training, so overall a mixed positive and negative effect for Option C. The rural distribution of housing (Option D) will mean longer travel distances to access jobs/training, from locations with limited sustainable travel options. This means a mixed positive effect from jobs during housing construction, along with a significant negative effect for poor jobs/training access, for Option D.
12. Town centres	-	--	++	+	A high concentration of housing on the Western side of East Devon, with less elsewhere, will provide fewer residents to support vitality and viability of town centres in East Devon. Therefore a negative effect is likely for Option A, rising to significant negative for Option B where even less housing is proposed at Principal and Main Centres. Conversely, a high proportion of housing at Principal and Main Centres will support existing town centres in these settlements, leading to a significant positive effect for Option C. A high proportion of housing at Local Centres, Service Villages and Countryside (Option D) will help support local facilities, but only Colyton and Beer have identified town/village centres. Therefore, a minor positive for Option D in recognition of this, and the fact that additional housing at Local Centres, Service Villages and Countryside will be located near to town centres at Principal and Main Centres across East Devon.

Policy title: 2. Strategic Policy – Housing distribution					
Option SA Objective	Option A	Option B	Option C	Option D	Commentary
13. Connectivity and transport	+	+	+	-	The Western side has good access to the strategic road network at the M5 and A30. There are several hourly or better bus routes in this area, including along the A3052, A376, B3174, and B3181. These provide good connectivity in the Western side, but the area suffers from congestion at peak times. The Principal and Main Centres also have generally good connections, including several train stations, but connectivity at Local Centres and Service Villages is generally less good (with the exception of train stations at Lympstone, Feniton, Whimple, Exton). This means positive effects for Options A and B due to more housing in the Western side, and less at Local Centres and Service Villages. All Principal and Main Centres have an hourly bus service, are adjacent to 'A' roads (apart from Ottery St Mary), and several train stations (Exmouth, Honiton, Axminster), so a high proportion of housing under Option C would also have a positive effect. Some Local Centres and Service Villages have connections to the main 'A' road network (Lympstone, Exton, Kilminster, Clyst St Mary, Newton Poppleford, Sidbury, Musbury); an hourly bus service, and/or train station (Lympstone, Feniton, Whimple, Exton). Broadband coverage has improved rapidly over recent years, and is likely to continue to do so, but coverage still tends to be better in urban areas compared to rural areas. In general, connectivity and transport is less good at Local Centres and Service Villages, with fewer main road connections and public transport opportunities, meaning a likely negative effect for Option D.
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: Mitigation measures will be required to address significant adverse effects at a site or topic-specific level, rather than in this strategic policy on housing distribution. The following mitigation measures should be considered in site or topic policies: - Western side development should provide suitable open space to reduce recreational pressure on international designated sites, to reduce major adverse biodiversity effects – this could include links to Clyst Valley Regional Park. - Nutrient neutrality from new housing would reduce the major adverse biodiversity effects for Options C and D.					

Policy title: 2. Strategic Policy – Housing distribution					
Option	Option A	Option B	Option C	Option D	Commentary
SA Objective	Option A	Option B	Option C	Option D	Commentary
					• Robust landscaping requirements can reduce the significant adverse landscape effects for Options C and D. • Provide sustainable travel links, within new development for larger sites where critical mass allows, and/or to sustainable links elsewhere. • Energy efficient buildings. • Facilitate home working. • Avoid developing in flood zones 2 and 3. • Take account of best and most versatile agricultural land. • Specify affordable housing requirement. • Provide facilities/services alongside new housing, including town centres. • Provide job/training opportunities alongside new housing. These measures will reduce the major negative effects to minor negative. Preferred alternative: The broad housing distribution in Option A - Continue with pattern of housing distribution in East Devon Local Plan 2013-31 (the housing figures in Strategic Policy 2 result in a slightly different percentage breakdown – 60% in Western side, 25% at the Principal Centre and Main Centres, 15% at Local Centres, Service Villages and Countryside – the sustainability effects for this strategic option assessment would be the same as Option A). Reasons for alternatives being preferred or rejected: • Option A is preferred as it offers the best balance of accessing jobs, services and facilities at the Western side of East Devon and the Principal and Main Centres in an environmentally acceptable way, whilst also allowing for smaller-scale growth to meet needs in more rural areas. • Option B is rejected as it would limit the ability of existing settlements in East Devon to meet their own housing need, would adversely affect town centres, and would likely result in a higher loss of greenfield land. • Option C is rejected due to significant adverse landscape impact from development affecting AONBs, significant additional phosphates being discharged into the River Axe SAC, and limit the ability to meet housing needs in rural areas.

Policy title: 2. Strategic Policy – Housing distribution					
Option	Option A	Option B	Option C	Option D	Commentary
SA Objective					
					Option D is rejected due to significant adverse landscape impact from development affecting AONBs, poor access to jobs, services and facilities, resulting in increased carbon emissions due to travel requirements.

Policy number/title: 3. Strategic Policy – Levels of future housing development

Reasonable alternatives:

Option A. Minimum requirement of 18,920 dwellings

Option B. Minimum requirement of 18,920 dwellings plus 20%: 22,700 dwellings

Outline of reasons for selecting the alternatives: The minimum requirement figure (Option A) reflects the local housing need assessment, conducted using the standard method in national planning guidance, and equates to 946 dwellings per year. Option B increases the minimum requirement by 20%, equating to 1,135 dwellings per year – this is considered reasonable as it is only slightly above the highest level of annual dwelling completions in recent years (1,065 dwellings in 2019/20) so is deliverable, it would benefit affordable housing and labour supply, and is consistent with national policy to significantly boost housing supply. To meet all affordable need would result in a total requirement of 30,150 dwellings (1,508 per year), which is not a reasonable alternative as is not deliverable in terms of overall number; the assumption that all households who aspire to affordable home ownership can afford this type of housing is not realistic or deliverable; there would be likely significant negative environmental effect that could not be mitigated; and it would undermine the strategic objectives and spatial strategy in the Local Plan. Less housing than the minimum requirement is not a reasonable alternative as it is not consistent with national policy, and the proposed site allocations show there is a reasonable prospect of achieving the minimum requirement.

The other aspects of Policy 3 reflect national policy, and there are no reasonable alternatives.

Policy title: 3. Strategic Policy – Levels of future housing development			
Option SA Objective	Option A	Option B	Commentary
1. Biodiversity	- ?	- - ?	Both options will deliver significant amounts of new housing, leading to negative effects arising from species disturbance, habitat loss, and severance. The effects will largely depend on the precise location of development, meaning there is some uncertainty. Minor negative effects are likely from Option A, rising to major negative in Option B due to likely effects upon the internationally designated Exe Estuary SPA and Pebblebed Heath SPA/SAC and the River Axe SAC, in particular. The effects arise from more housing, meaning a higher land take and additional residents, increasing recreational pressure and a greater discharge of nutrients into watercourses.
2. Landscape	- ?	- - ?	The lack of brownfield land in East Devon means a significant amount of housing will take place on greenfield sites, with potential for adverse landscape impact as a consequence. As the precise location of housing is not set out, there is uncertainty on the significance of the effects. Option A is likely to result in a minor negative uncertain effect, rising to a major negative for Option B due to likely impact from higher land take upon the East Devon and Blackdown Hills AONBs and the undeveloped coast.
3. Historic and built environment	- ?	- - ?	The precise location of new housing in relation to heritage assets will provide greater certainty on the significance of the effects, meaning some uncertainty for these options. Effects will also be dependent to some extent on the design quality of new development – given the focus in national Government policy and guidance, it is envisaged that high quality design is likely to be achieved. New housing is likely to have adverse impacts upon the setting of listed buildings, conservation areas, scheduled monuments, and other heritage assets, leading to a minor negative effect for Option A; rising to major negative effect for Option B due to greater land take required.

Policy title: 3. Strategic Policy – Levels of future housing development			
Option SA Objective	Option A	Option B	Commentary
4. Climate change and carbon emissions	- ?	- - ?	There is some uncertainty as the location of new housing in relation to sustainable travel opportunities is not specified. In general, new housing is likely to increase greenhouse gas emissions due to additional travel from residents to access jobs, services and facilities; and emissions associated with the construction and occupation of new housing. This means a minor negative uncertain effect for Option A, rising to a major negative effect due to the higher housing figure under Option B.
5. Climate change adaptation	- ?	- ?	The potential to adapt to heat, drought and extreme storms is likely to be the same for all options. The precise location of new housing in relation to flood risk is not identified, meaning some uncertainty for all of these options. However, areas of flood risk affects most settlements and parts of the western side of East Devon, leading to a likely negative uncertain effect for Option A from an increase in impermeable land. Although Option B would result in more housing, it is likely that sufficient land in low flood risk areas (flood zone 1) could accommodate this level of housing (as noted in the HELAA).
6. Land resources	- ?	- - ?	New housing will likely lead to a negative effect on land resources, including through the use of greenfield sites (noting that the supply of brownfield land is relatively limited in East Devon). Best and most versatile agricultural land is present across much of East Devon, with smaller parts covered by mineral safeguarding areas. Some uncertainty as agricultural land is broken down into 3a and 3b in most cases, and as housing location is not identified. This results in a minor negative uncertain effect for Option A, rising to major negative for Option B due to the greater loss of greenfield sites.
7. Water resources	- ?	- - ?	There is general uncertainty on water resources due to the high level nature of these options. Nevertheless, new housing could adversely affect water resources due to discharge from new housing, particularly into the Exe Estuary SPA given its sensitivity and classification as “moderate” quality, and potential to worsen the already significant

Policy title: 3. Strategic Policy – Levels of future housing development			
Option SA Objective	Option A	Option B	Commentary
			phosphate levels in the River Axe SAC. Option A is likely to have a minor negative effect, rising to major negative for Option B from the higher level of housing.
8. Homes	++	++	Option A reflects the local housing need assessment, and ensures the supply of housing meets the need for East Devon, leading to a major positive effect. The increased level of housing under Option B will also likely lead to more affordable housing, and will also have a major positive effect.
9. Health and well-being	- ?	- ?	There is a degree of uncertainty as the location of new housing, along with open space and play space requirements, are not specified. Short-term negative effects associated with noise and disturbance from the construction of development will arise for both options.
10. Access to services	?	?	Uncertain effect for both options, as the location of housing in relation to services and facilities is not specified.
11. Jobs and employment	+	++	An adequate housing supply will support economic growth through job opportunities arising from construction (short term effect for small sites, but medium to long term for large scale sites), and through the provision of housing for the workforce i.e. a labour supply for new employment. A minor positive is likely for Option A, whilst the higher housing provision will likely mean a major positive for Option B.
12. Town centres	+ ?	+ ?	In general, new housing should help support the vitality and viability of town centres, due to additional residents in the area using these centres. However, the location of new housing is not specified, so a minor positive uncertain effect is likely for Options A and B.

Policy title: 3. Strategic Policy – Levels of future housing development			
Option SA Objective	Option A	Option B	Commentary
13. Connectivity and transport	- ?	- ?	Again, there is some uncertainty in relation to this objective until the location of new housing is specified. New housing is likely to lead to increased travel as residents' access jobs, services and facilities, which could cause congestion. A negative uncertain effect is likely for Options A and B.
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: The following mitigation measures will reduce adverse effects for objectives relating to the environment, access to services, and transport, but are more appropriately considered under topic-specific and site allocation policies: • Provide suitable open space to reduce recreational pressure on international designated sites. • Nutrient neutrality from new housing. • Robust landscaping requirements. • Provide sustainable travel links, within new development for larger sites where critical mass allows, and/or to sustainable links elsewhere. • Energy efficient buildings. • Facilitate home working. • Avoid developing in flood zones 2 and 3. • Take account of best and most versatile agricultural land. • Provide facilities/services alongside new housing, including town centres. • Enhance the road network alongside new housing where necessary to reduce congestion. The following measures are recommended to maximise beneficial effects: • Specify affordable housing provision – reference added to policy. • Require mix of affordable housing types – added to policy. • Add supply headroom to provide greater flexibility on the supply of housing – added to policy.			
Preferred alternative: Option A minimum requirement of 18,920 dwellings			

Policy title: 3. Strategic Policy – Levels of future housing development			
Option	Option A	Option B	Commentary
SA Objective			
Reasons for alternatives being preferred or rejected: - Option A is preferred as it meets local housing need for East Devon, will support economic growth, with a less adverse environmental impact. - Option B is rejected due significant adverse environmental impact of delivering a higher level of housing development.			

Policy number/title: 4. Strategic Policy – Employment provision and distribution strategy

Reasonable alternatives:

Option A. Continued focus on big employment sites in the West End of the District.

Option B. Encouraging greater business development in other areas close to Exeter (for example expanding Greendale and Hill Barton Business Parks).

Option C. Encouraging greater business development at and within the main towns of East Devon.

Option D. Encouraging business expansion and development in the villages and across the countryside of East Devon.

Option E. Encourage and enable more home working.

Outline of reasons for selecting the alternatives: The scale of employment provision is currently missing from this policy, and will reflect evidence in the emerging Economic Development Needs Assessment (EDNA) in due course. Without the scale of employment provision, the alternatives only consider the

distribution strategy for employment development. Each of the alternatives is consistent with national policy (NPPF paragraph 81) to help create the conditions in which businesses can invest, expand and adapt, placing significant weight on the need to support economic growth and productivity. In addition, the Preferred Options Consultation Draft Local Plan includes an objective to support business investment and job creation opportunities within East Devon and support a resilient economy.

Policy title: 4. Strategic Policy – Employment provision and distribution strategy						
Option SA Objective	Option A	Option B	Option C	Option D	Option E	Commentary
1. Biodiversity	-	-	- ?	- ?	+	Options A and B are more than 1km to the nearest international/nationally designated sites, but both within the 10km recreation zones of the Exe Estuary and Pebblebed Heaths – as the options relate to employment rather than housing, this will likely reduce the overall recreational impact from development. Several main towns are within 500m of international/nationally designated sites, including Exmouth (Exe Estuary SPA/Ramsar and Pebblebed Heaths SPA/SAC), Sidmouth, and Seaton (Sidmouth to West Bay SAC), Axminster (River Axe SAC) with land around Seaton also being used by bats from Beer Quarry and Caves SAC. This results in a negative effect for Option C, albeit with uncertainty on precise locations of employment development. The prevalence of wildlife habitat across rural areas means a negative effect for Option D, with similar uncertainty on precise locations of employment development. Option E scores positively as it will use new planned homes, rather than additional employment land.
2. Landscape	-	-	- - ?	- - ?	+	Whilst the development of employment sites will lead to negative effects against this objective, Options A and B would avoid AONB which means just a single negative. The presence of AONB around some of the main towns (Exmouth, Sidmouth, Seaton, Axminster, Honiton) and across much of the remaining countryside means a significant negative, with uncertainty until precise

Policy title: 4. Strategic Policy – Employment provision and distribution strategy						
Option SA Objective	Option A	Option B	Option C	Option D	Option E	Commentary
						locations are known. Option E scores positively as it will use new planned homes, rather than additional employment land.
3. Historic and built environment	+	+	- ?	- ?	+	There are relatively few designated heritage assets near to the big employment sites in the West End and other areas close to Exeter, the main exception being Sowton Conservation Area and listed buildings. The main towns and villages generally all have Conservation Areas and numerous listed buildings, therefore a negative effect is likely for Options C and D with uncertainty until precise locations are known. Option E scores positively as it will use new planned homes, rather than additional employment land.
4. Climate change and carbon emissions	+	0	+ ?	- -	+ +	Good sustainable travel links in the West End, being in close proximity to high frequency bus route, cycle/foot paths, Cranbrook train station, and a large workforce in Exeter, mean a positive effect for Option A as it should minimise carbon emissions from travel. There are fewer sustainable travel links at Greendale and Hill Barton, the only option being a ½ hourly bus service along the A3052 (Option B), reducing the effect to neutral. At the main towns there should be relatively good sustainable travel links, particularly those with train stations (Exmouth, Honiton, Axminster), along with a large resident workforce to reduce the distance travelled to work. Option D is likely to encourage longer journeys to work by less sustainable travel modes given the dispersed population and lack of sustainable travel opportunities. Option E would mean zero emissions from traveling to work and therefore a significant positive effect.
5. Climate change adaptation	- ?	- ?	- ?	- ?	0 ?	Uncertainty across the options until precise locations are known in relation to flood risk. In general, large areas of flood zone 3 are present in the West End associated with the River Clyst,

Policy title: 4. Strategic Policy – Employment provision and distribution strategy						
Option SA Objective	Option A	Option B	Option C	Option D	Option E	Commentary
						so negative effects likely from Option A. Small areas of flood zone 3 and high surface water flood risk are located in Greendale and Hill Barton Business Parks. The main towns and most villages are affected by flood risk to some degree. Option E would have a neutral effect as it will utilise homes that are already planned, rather than additional employment land.
6. Land resources	-	- ?	- ?	- ?	++	The lack of previously developed land in East Devon means a general negative effect for Options A-D. Much of the West End contains best and most versatile agricultural land, with potentially contaminated land present at the Airport and immediate surrounds, so negative effect is likely for Option A. Mostly Grade 3b agricultural land around Hill Barton, with some 3a and 2; land around Greendale is mostly Grade 3. Potentially contaminated land present at both Hill Barton and Greendale - therefore negative effect with some uncertainty depending on precise locations of development. Generally Grade 3 agricultural land around the main towns and villages, but some Grade 2 present so negative, uncertain effect until precise development locations are known. Significant positive effects from encouraging home working, as it will mean a 'dual-use' of land, utilising land resources efficiently.
7. Water resources	- ?	- ?	- ?	- ?	++	General uncertainty for Options A-D until sewage treatment works capacity is known to cope with additional employment land. Options A and B are close to the River Clyst and/or its tributaries, which runs into the Exe Estuary SPA/Ramsar, so uncertain negative effect. Similarly, there are sensitive watercourses elsewhere near to the main towns and villages, particularly the River Axe SAC, so also uncertain negative effect for Options C and D. Significant positive effects from encouraging home working, as it will mean a 'dual-use' of land, utilising water resources efficiently.

Policy title: 4. Strategic Policy – Employment provision and distribution strategy						
Option SA Objective	Option A	Option B	Option C	Option D	Option E	Commentary
8. Homes	0	0	0	0	+	Negligible effects for Options A-D they relate to employment, rather than housing. However, positive effect for Option E as likely to result in good quality, mixed homes.
9. Health and well-being	+	-	+ ?	+ ?	+ ?	There are good cycle links and footpaths in the West End, along with the potential to access green infrastructure at the Clyst Valley Regional Park, meaning positive effects for Option A. Negative effects for Option B as limited opportunities to walk, cycle and utilise green infrastructure. Generally the main towns and villages offer potential to walk and cycle, and access green infrastructure, mean some uncertainty until precise development locations are known for Options C-E.
10. Access to services	+ ?	+ ?	+ ?	- ?	+ ?	Broadband speeds are generally better for locations in Options A-C, compared to rural areas covered by Option D, but some uncertainty as connections will depend on precise location. Encouraging home working relies on good broadband speeds, which are generally good at the main settlements where the majority of housing will be delivered.
11. Jobs and employment	++	++	++	+	+	Positive effects across all options as each support job opportunities. Significant positive effect for Options A-C due to access to labour market and/or conglomeration effects of co-locating employment.
12. Town centres	+	-	+	-	+ ?	Whilst Option A could support town centres at Exeter and Cranbrook, Greendale and Hill Barton are not located near to a town centre so will mean negative effects. Option C offers the potential to support town centres at the main towns, which Option D does not. Encouraging home working

Policy title: 4. Strategic Policy – Employment provision and distribution strategy						
Option SA Objective	Option A	Option B	Option C	Option D	Option E	Commentary
						could mean more people access their town centre e.g. at lunchtimes, but some uncertainty depending on location (Option E).
13. Connectivity and transport	++ / -	+	+	-	+ ?	Very good transport links in the West End, being in close proximity to the M5 and A30, high frequency bus route, cycle/foot paths, and Cranbrook train station, plus a resident workforce, mean a significant positive effect mixed with a negative effect due to congestion in the vicinity of M5 J29 and the main roads into Exeter. The transport links are less good at Greendale and Hill Barton (Option B), although both are adjacent to a main 'A' road, with a ½ hourly bus service, there are no cycle/footpath links (Option B). At the main towns there are relatively good transport links, particularly those with train stations (Exmouth, Honiton, Axminster), along with a resident workforce. The dispersed population and relatively poor connectivity for villages and the countryside mean a negative effect for Option D. Encouraging home working will connect people digitally, as long as there are good broadband speeds, so some uncertainty for Option E.
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: The following mitigation measures will reduce adverse effects for objectives relating to the environment, access to services, and transport, but are more appropriately considered under topic-specific and site allocation policies: • Deliver biodiversity net gain and create green infrastructure links from employment sites, including potential to aid delivery of the Clyst Valley Regional Park. • Include appropriate landscaping of employment sites. • Ensure the provision of sustainable travel links. • Require energy efficient employment buildings. • Avoid developing in flood zones 2 and 3. • Take account of best and most versatile agricultural land.						

Policy title: 4. Strategic Policy – Employment provision and distribution strategy						
Option	Option A	Option B	Option C	Option D	Option E	Commentary
SA Objective						
						Development should ensure no deterioration of water quality, particularly at the River Axe SAC.
Preferred alternative: Overall, Option E has the most sustainability benefits, followed by Option A which performs slightly better than the others. However, there is not a single preferred alternative, as the options are not mutually exclusive. The range of positive effects means that a combination of the five options will be required to support economic growth, consistent with national policy. Reasons for alternatives being preferred or rejected: All options (A-E) are preferred as they are not mutually exclusive, and each is required to deliver national and local policy objectives to support economic growth. Therefore, aspects of all options are within Policy 4.						

Policy number/title: 5. Strategic Policy – Mixed use developments incorporating housing, employment and community facilities

Reasonable alternatives:

Option A. Include policy requiring mixed use development at certain thresholds.

Option B. Do not include policy requiring mixed use development at certain thresholds.

Outline of reasons for selecting the alternatives: Option A to include a policy on mixed use development is consistent with national policy (e.g. NPPF para 93a and e, 106a). Option B is a more flexible approach that would enable the mix of uses to be considered on a site-by-site basis, relying on the NPPF and other Local Plan policies.

Policy title: 5. Strategic Policy – Mixed use developments incorporating housing, employment and community facilities			
Option SA Objective	Option A	Option B	Commentary
1. Biodiversity	- ?	- ?	Both options will deliver employment (and community facilities for larger scale sites) alongside new housing and, as such, have the potential for negative effects arising from species disturbance, habitat loss, and severance. The effects will largely depend on the precise location of development, meaning there is some uncertainty.
2. Landscape	- ?	- ?	The lack of brownfield land in East Devon means a significant amount of development will take place on greenfield sites, with potential for adverse landscape impact as a consequence. As the precise location of development is not set out, there is uncertainty on the significance of the effects.
3. Historic and built environment	- ?	- ?	The precise location of new development in relation to heritage assets will provide greater certainty on the significance of the effects, but in general new development is likely to have adverse impacts upon the setting of listed buildings, conservation areas, scheduled monuments, and other heritage assets. Effects will also be dependent to some extent on the design quality of new development – given the focus in national Government policy and guidance, it is envisaged that high quality design is likely to be achieved.
4. Climate change and carbon emissions	+ + / -	- ?	The provision of employment (and community facilities for larger scale sites) on-site alongside housing development will minimise carbon emissions associated with travel, leading to major positive effect for Option A. The effect is mixed with negative due to carbon emissions associated with the construction and occupation of new development. The lack of policy under Option B creates negative uncertainty as to whether employment and community facilities will be provided alongside housing development.
5. Climate change adaptation	- ?	- ?	The potential to adapt to heat, drought and extreme storms is likely to be the same for both options. The precise location of new development in relation to flood risk is not identified, meaning some uncertainty. However, areas of

Policy title: 5. Strategic Policy – Mixed use developments incorporating housing, employment and community facilities			
Option SA Objective	Option A	Option B	Commentary
			flood risk affects most settlements and parts of the western side of East Devon, leading to a likely negative uncertain effect for both options from an increase in impermeable land.
6. Land resources	- ?	- ?	New development will likely lead to a negative effect on land resources, including through the use of greenfield sites (noting that the supply of brownfield land is relatively limited in East Devon). Best and most versatile agricultural land is present across much of East Devon, with smaller parts covered by mineral safeguarding areas. Some uncertainty as agricultural land is broken down into 3a and 3b in most cases, and as the location of development is not identified. Therefore, both options are likely to have a negative uncertain effect.
7. Water resources	- ?	- ?	There is general uncertainty on water resources due to the high level nature of these options. Nevertheless, the options could adversely affect water resources due to discharge from new development, particularly into the Exe Estuary SPA given its sensitivity and classification as “moderate” quality, and potential to worsen the already significant phosphate levels in the River Axe SAC. Both options are likely to have a negative uncertain effect.
8. Homes	0	0	Neutral effect as these options do not relate to the provision of housing.
9. Health and well-being	+	- ?	A mix of uses is likely to have positive effects by creating active, vibrant communities, leading to a positive effect for Option A. The lack of policy under Option B creates negative uncertainty as to whether employment and community facilities will be provided alongside housing development, due to less potential for active communities.
10. Access to services	++	- ?	The requirement for on-site community facilities at larger scale sites alongside housing development will provide accessible services and community facilities, leading to major positive effect for Option A. The lack of policy under

Policy title: 5. Strategic Policy – Mixed use developments incorporating housing, employment and community facilities			
Option SA Objective	Option A	Option B	Commentary
			Option B creates negative uncertainty as to whether community facilities will be provided alongside housing development.
11. Jobs and employment	+ +	- ?	The requirement for employment land alongside new housing development will support job opportunities and productivity, leading to major positive effect for Option A. The lack of policy under Option B creates negative uncertainty as to whether employment land will be provided alongside housing development
12. Town centres	+ ?	+ ?	In general, new development should help support the vitality and viability of town centres, due to additional residents in the area using these centres. However, the location of new development is not specified, so a minor positive uncertain effect is likely for Options A and B.
13. Connectivity and transport	+	- ?	The provision of employment (and community facilities for larger scale sites) on-site alongside housing development offers opportunities to connect people and businesses by sustainable travel modes, due to less distance between homes and jobs/facilities. Therefore a positive effect is likely for Option A. The lack of policy under Option B creates negative uncertainty as to whether jobs/facilities will be provided alongside housing development, as less potential to connect people and businesses.
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: The following mitigation measures will reduce adverse effects for objectives relating to the environment, but are more appropriately considered under topic-specific and site allocation policies: • Provide suitable open space to reduce recreational pressure on international designated sites. • Nutrient neutrality from new development. • Robust landscaping requirements. • Energy efficient buildings.			

Policy title: 5. Strategic Policy – Mixed use developments incorporating housing, employment and community facilities			
Option	Option A	Option B	Commentary
SA Objective			
			• Facilitate home working. • Avoid developing in flood zones 2 and 3. • Take account of best and most versatile agricultural land.
Preferred alternative: Option A. Include policy requiring mixed use development at certain thresholds. Reasons for alternatives being preferred or rejected: • Option A is preferred as it provides greater certainty that employment land and community facilities will be delivered alongside new housing, with resultant benefits on minimised carbon emissions associated with travel, and access to jobs and facilities and services. • Option B is rejected as it would cause negative uncertainty as to whether employment land and community facilities alongside housing, leading to increased carbon emissions from travel, and poorer access to jobs and facilities for new residents.			

Policy number/title: 6. Strategic Policy – Development inside Settlement Boundaries

Reasonable alternatives:

Option A. Include policy for development inside settlement boundaries.

Option B. Do not identify settlement boundaries.

Outline of reasons for selecting the alternatives: Historically, the use of settlement boundaries in previous East Devon Local Plan's has been a common policy approach to promote sustainable development, manage the overall scale and location of development, and prevent unregulated development across the countryside. However, there is no requirement in national policy to identify settlement boundaries, so Option B is presented as a reasonable alternative.

Policy title: 6. Strategic Policy – Development inside Settlement Boundaries			
Option SA Objective	Option A	Option B	Commentary
1. Biodiversity	+	- ?	Option A is likely to have positive effects as it focusses development within settlement boundaries, rather than the countryside where biodiversity designations (e.g. SACs, SPAs, Ramsar sites, SSSIs, county wildlife sites) and species are generally located. Not identifying settlement boundaries (Option B) offers potential for negative effects from development encroaching into countryside locations and causing species disturbance, habitat loss, and severance, but this is uncertain until the precise location of development is known.
2. Landscape	+	- ?	The special qualities of the landscape are likely to be conserved and enhanced under Option A, as it promotes development in settlement boundaries, limiting harm to the landscape and resulting in a positive effect. Option B is likely to have a negative effect on the landscape as development is more likely to occur outside settlements in countryside locations, but with some uncertainty until sites are known.
3. Historic and built environment	- ?	- ?	The precise location of new development in relation to heritage assets will provide greater certainty on the significance of the effects, but in general new development could have adverse impacts upon the setting of listed buildings and conservation areas which are widely present in settlements. Effects will also be dependent to some extent on the design quality of new development – given the focus in national Government policy and guidance, it is envisaged that high quality design is likely to be achieved.

Policy title: 6. Strategic Policy – Development inside Settlement Boundaries			
Option SA Objective	Option A	Option B	Commentary
4. Climate change and carbon emissions	+ / -	- ?	Option A is likely to have positive effects as it focusses development within settlement boundaries where there are likely to be a range of jobs, services and facilities, therefore minimising emissions associated with travel. This is mixed with negative effect from emissions arising the construction and occupation of development. In Option B, development is more likely to occur outside settlements, further away from existing jobs, services and facilities, leading to likely negative effect from carbon emissions from travel, with uncertainty depending upon the precise location of development.
5. Climate change adaptation	- ?	- ?	The potential to adapt to heat, drought and extreme storms is likely to be the same for both options. The precise location of new development in relation to flood risk is not identified, meaning some uncertainty. However, areas of flood risk affects most settlements, leading to a likely negative uncertain effect for both options from an increase in impermeable land.
6. Land resources	+	- ?	Focussing development within settlement boundaries will result in efficient use of land, minimising the loss of agricultural land and offering potential to re-use previously developed land. This means a likely positive effect for Option A. A less certain, negative effect is likely for Option B as it is likely to result in development in the countryside, outside settlements.
7. Water resources	- ?	- ?	There is general uncertainty on water resources due to the high level nature of these options. Nevertheless, the options could adversely affect water resources due to discharge from new development, particularly into the Exe Estuary SPA given its sensitivity and classification as “moderate” quality, and potential to worsen the already significant phosphate levels in the River Axe SAC. Both options are likely to have a negative uncertain effect.

Policy title: 6. Strategic Policy – Development inside Settlement Boundaries			
Option SA Objective	Option A	Option B	Commentary
8. Homes	+	++	Option A supports development (in principle) within settlements boundaries, resulting in a positive effect from the delivery of new housing. A major positive effect is likely from Option B as it would mean fewer restrictions on the location of housing, potentially resulting in a higher supply.
9. Health and well-being	+	- ?	Restricting development to within settlement boundaries provides greater opportunities to access existing public recreation spaces, play and leisure opportunities in settlements, leading to a likely positive effect for Option A. There will be less opportunity to access such facilities outside settlements, meaning a negative effect for Option B, with some uncertainty depending on the location of development.
10. Access to services	+	- ?	Option A is likely to have positive effects as it focusses development within settlement boundaries where there are likely to be a range of services and facilities, in relatively close proximity. In Option B, development is more likely to occur outside settlements, further away from existing services and facilities, with uncertainty depending upon the precise location of development.
11. Jobs and employment	+	+	Both options are likely to have positive effects arising from the economic benefits of new development, from short effects from job creation during construction, and long term effects from the delivery of employment land
12. Town centres	+	+	In general, new development should help support the vitality and viability of town centres, due to additional residents in the area using these centres. This means a minor positive uncertain effect is likely for Options A and B.
13. Connectivity and transport	+	- ?	Option A is likely to have a positive effect as development is able to benefit from existing digital and transport connections within settlements. Option B is likely to have a negative uncertain effect, as development may take place in locations outside settlements with poorer connectivity.

Policy title: 6. Strategic Policy – Development inside Settlement Boundaries			
Option	Option A	Option B	Commentary
SA Objective			
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: The following mitigation measures will reduce adverse effects for objectives relating to the environment, but are more appropriately considered under topic-specific and site allocation policies: • Provide suitable open space to reduce recreational pressure on international designated sites. • Nutrient neutrality from new development. • Robust landscaping requirements. • Energy efficient buildings. • Facilitate home working. • Avoid developing in flood zones 2 and 3. • Take account of best and most versatile agricultural land.			
Preferred alternative: Option A. Include policy for development inside settlement boundaries.			
Reasons for alternatives being preferred or rejected: • Option A is preferred as it directs development within settlement boundaries, leading to positive effects on biodiversity, landscape, carbon emissions, land resources, access to services. It will also benefit town centres, the economy and connectivity. • Option B is rejected as it will likely lead to more development in countryside locations, where there will be negative impacts upon biodiversity, the landscape, and land resources, with poorer access to jobs, facilities and services, resulting in increased carbon emissions.			

Policy number/title: 7. Strategic Policy – Development beyond Settlement Boundaries

Reasonable alternatives:

Option A. Include Strategic Policy – Development beyond Settlement Boundaries.

Option B. Do not include policy for development beyond settlement boundaries.

Outline of reasons for selecting the alternatives: Historically, the use of settlement boundaries in previous East Devon Local Plan's has been a common policy approach to promote sustainable development, manage the overall scale and location of development, and prevent unregulated development across the countryside. Option A provides clarity on the approach to development outside settlement boundaries. However, there is no requirement in national policy to identify settlement boundaries, so Option B of not including a policy is presented as a reasonable alternative.

Policy title: 7. Strategic Policy – Development beyond Settlement Boundaries			
Option SA Objective	Option A	Option B	Commentary
1. Biodiversity	+	- ?	Option A makes clear that development would only be permitted where it does not harm environmental qualities, which would include biodiversity, so a positive effect is noted. Not including a policy (Option B) offers potential for negative effects from development beyond settlement boundaries and causing species disturbance, habitat loss, and severance, but this is uncertain until the precise location of development is known.
2. Landscape	+	- ?	Option A makes clear that development would only be permitted where it does not harm the distinctive landscape of the area, so a positive effect is noted. The lack of clarity without a policy is likely to have a negative effect on the landscape, but with some uncertainty until sites are known.
3. Historic and built environment	+	- ?	The policy in Option A only permits development where it would not harm the environmental qualities of the area, which would include the historic and built environment. Therefore, a minor positive effect is noted for Option A. The

Policy title: 7. Strategic Policy – Development beyond Settlement Boundaries			
Option SA Objective	Option A	Option B	Commentary
			lack of clarity without a policy is likely to have a negative effect on the historic environment, but with some uncertainty until sites are known.
4. Climate change and carbon emissions	+	- ?	Allowing only a limited amount of development beyond settlement boundaries will minimise carbon emissions from travel to jobs, facilities and services that are found within settlements, so a minor positive effect for Option A. In Option B, without a policy limiting development, there is greater potential for development to occur outside settlements, further away from existing jobs, services and facilities, leading to likely negative effect from carbon emissions from travel, with uncertainty depending upon the precise location of development.
5. Climate change adaptation	?	?	The potential to adapt to heat, drought and extreme storms is likely to be the same for both options. Uncertainty for both options given the large potential geographic area covered by the policy, and as the location of development is not specified with regards to flood risk.
6. Land resources	+	- ?	Limiting development beyond settlement boundaries will result in efficient use of land, minimising the loss of agricultural land and offering potential to re-use previously developed land within settlements. In addition, the policy in Option A only permits development where it will not harm environmental qualities. This means a likely positive effect for Option A. Without a policy limiting development, there is greater potential for development to occur on greenfield land, leading to likely negative effect, with uncertainty depending upon the precise location of development.
7. Water resources	?	?	Uncertainty for both options given the large potential geographic area covered by the policy, and as the location of development is not specified with regards to water resources.

Policy title: 7. Strategic Policy – Development beyond Settlement Boundaries			
Option SA Objective	Option A	Option B	Commentary
8. Homes	-	+	Option A limits development beyond settlement boundaries, which will restrict the supply of housing, resulting in a minor negative effect. A positive effect is likely from Option B as it would mean fewer restrictions on the location of housing, resulting in a higher supply.
9. Health and well-being	0	?	Negligible effect for Option A given the limited amount of development that would be allowed under this policy. Uncertain for Option B as the scale and specific location of development is unclear.
10. Access to services	+	- ?	Limiting development beyond settlement boundaries will ensure little development will take place in locations with poor access to services and facilities, leading to a minor positive effect for Option A. In Option B, without a policy limiting development, there is greater potential for development to occur outside settlements, further away from existing services and facilities, leading to likely negative effect with uncertainty depending upon the precise location of development.
11. Jobs and employment	-	+	Option A limits development beyond settlement boundaries, which will restrict the delivery of employment land, resulting in a minor negative effect. A positive effect is likely from Option B as it would mean fewer restrictions on the location of employment land, resulting in a higher supply of rural employment land.
12. Town centres	0	?	Negligible effect for Option A given the limited amount of development that would be allowed under this policy. Uncertain for Option B as the scale and specific location of development is unclear.
13. Connectivity and transport	0	?	Negligible effect for Option A given the limited amount of development that would be allowed under this policy. Uncertain for Option B as the scale and specific location of development is unclear.
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects:			

Policy title: 7. Strategic Policy – Development beyond Settlement Boundaries			
Option	Option A	Option B	Commentary
SA Objective			
Option A refers to other Local or Neighbourhood Plan policies which could permit development – therefore, the negative effects on objectives relating to housing and employment are likely to be addressed in topic-specific policies, meaning no mitigation measures are suggested through this policy. For Option B, the following mitigation measures will reduce adverse effects for objectives relating to the environment, but are more appropriately considered under topic-specific and site allocation policies: • Provide suitable open space to reduce recreational pressure on international designated sites. • Nutrient neutrality from new development. • Robust landscaping requirements. • Energy efficient buildings. • Facilitate home working. • Avoid developing in flood zones 2 and 3. • Take account of best and most versatile agricultural land.			
Preferred alternative: Option A. Include Strategic Policy – Development beyond Settlement Boundaries. Reasons for alternatives being preferred or rejected: • Option A is preferred as it limits development outside settlement boundaries, with positive effects on access to services and environmental objectives, particularly as the policy makes clear development will only be permitted where it does not harm environmental qualities. Limiting • Option B is rejected as due to likely negative albeit uncertain environmental effects from development beyond settlement boundaries, in countryside locations.			

Local Plan Chapter 5. Future growth and development on the western side of East Devon

Policy number/title:

9. Strategic Policy – Development within the Enterprise Zone

10. Strategic Policy – Exeter and East Devon Science Park

13. Strategic Policy – Exeter Airport and its future operation and development

Reasonable alternatives:

10A. Do not expand Exeter and East Devon Science Park

13A. Do not allocate land for development at Exeter Airport

Outline of reasons for selecting the alternatives:

The alternatives are consistent with the preferred spatial strategy to focus development where there is good connectivity to a range of jobs, services, and facilities in the Western side and Exeter. Reasonable alternatives were not identified for the Enterprise Zone (policy 9), as that area has already been designated to actively encourage employment and business growth.

Local Plan Chapter 5. Future growth and development on the western side of East Devon				
Policy SA Objective	9. Enterprise zone	10. Science Park	13. Exeter Airport	
1. Biodiversity	.	.	.	

Local Plan Chapter 5. Future growth and development on the western side of East Devon				
Policy SA Objective	9. Enterprise zone	10. Science Park	13. Exeter Airport	
Biodiversity commentary	There are no biodiversity designations on or in close proximity to the area where these three policies would apply. Nevertheless, all three policies encourage development which could lead to effects arising from species disturbance, habitat loss, and severance and, as such, are likely to have negative effects on biodiversity. (As the policies relate to employment development rather than housing, the 10km recreation buffer zone around the Exe Estuary SPA/Ramsar and Pebblebed Heaths SPA/SAC where mitigation is required does not apply).			
2. Landscape	-	-	-	
Landscape commentary	There are no landscape designations that would be affected by these policies, but there is potential for adverse landscape effects from developing greenfield sites in these areas, meaning a minor negative effect.			
3. Hist. built env	+ / - ?	+ / - ?	0 / - ?	
Hist. built env. commentary	Policies 9 and 10 make clear that development should be of the highest design standards, and will therefore have a positive effect on promoting high quality design. Policy 13 does not refer to design, so will likely have a neutral effect. There are a limited number of designated heritage assets in the area, but potential for negative effect until precise development types and locations are known.			
4. Climate change carbon emissions	+	+	+ / - -	
Climate change carbon emissions commentary	The proximity of jobs, houses, facilities and services (including sustainable travel opportunities) in the area should minimise carbon emissions from travel. Policy 9 requires new buildings to meet BREEAM Excellent and to connect to the district heating network. Policy 10 includes an emphasis on high environmental quality. Policy 13 supports the transition to net zero carbon operations through			

Local Plan Chapter 5. Future growth and development on the western side of East Devon				
Policy SA Objective	9. Enterprise zone	10. Science Park	13. Exeter Airport	
	enhanced public transport and renewable energy generation. For these reasons, minor positive effects are noted, with a mixed major negative effect for policy 13 as it encourages growth of the airport resulting in carbon emissions.			
5. Climate change adaptation	- ?	- ?	- ?	
Climate change adaptation commentary	There are areas of flood zone 3 and high surface water flood risk that could be affected by these policies, so a minor negative effect with some uncertainty depending on precise location.			
6. Land resources	-	-	-	
Land resources commentary	Parts of the areas covered by these policies are located within best and most versatile agricultural land, so development is likely to have minor negative effects on land resources.			
7. Water resources	- ?	- ?	- ?	
Water resources commentary	The policies could entail development within the River Clyst catchment which flows into the River Exe SPA/Ramsar, leading to a minor negative uncertain effect due to potential adverse impacts on water resources from new development for policies 9, 10 and 13.			
8. Homes	0	0	0	

Local Plan Chapter 5. Future growth and development on the western side of East Devon				
Policy SA Objective	9. Enterprise zone	10. Science Park	13. Exeter Airport	
Homes commentary	Negligible effects as the policies relate to employment development.			
9. Health and well-being	+	+	-	
Health and well-being commentary	Employment development in general has positive effects on health and well-being through job creation. Policy 9 refers to ensuring new development is accessible by walking and cycling, which will likely have positive effects on health. The area covered by Policy 10 is located adjacent to existing walking and cycling links, so will also have a positive effect. The noise associated with the airport is likely to have a negative effect on health and well-being.			
10. Access to services	0	0	0	
Access to services commentary	Negligible effect as these policies do not deliver services and community facilities.			
11. Jobs and employment	++	++	++	
Jobs/employment commentary	Major positive effects are likely from all three policies as they foster a strong and entrepreneurial economy and support job opportunities, training and greater productivity.			

Local Plan Chapter 5. Future growth and development on the western side of East Devon				
Policy SA Objective	9. Enterprise zone	10. Science Park	13. Exeter Airport	
12. Town centres	0	0	0	
Town centres commentary	Negligible effect on this objective.			
13. Connectivity and transport	++	++	++	
Connectivity and transport commentary	The area covered by the three policies has good connectivity to the strategic road network on the A30 and M5, with regular bus routes and walking/cycling links. This means a major positive effect.			
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: • Deliver biodiversity net gain and create green infrastructure links, including potential to aid delivery of the Clyst Valley Regional Park. • Robust landscaping requirements can reduce adverse landscape effects. • Avoid developing in flood zones 2 and 3. • Take account of best and most versatile agricultural land.				
These measures will reduce the adverse effects of these policies.				
Preferred alternative: Policies 9, 10, 13				
Reasons for alternatives being preferred or rejected: • Policies 9, 10, 13 are preferred as they will have major economic positive effects, in areas with good connectivity.				

Local Plan Chapter 5. Future growth and development on the western side of East Devon				
Policy	9. Enterprise zone	10. Science Park	13. Exeter Airport	
SA Objective				
				10A. Do not expand Exeter and East Devon Science Park – this alternative may have fewer adverse environmental effects, but would also not have the major positive economic effects, so is rejected. 13A. Do not allocate land for development at Exeter Airport – whilst there may be fewer adverse environmental impacts, this alternative is rejected as it would not have major positive economic and connectivity effects from supporting the long term future of the airport as a valued transport and employment hub.

Local Plan Chapter 7. Tackling the climate emergency and responding to climate change

Policy number/title:

- 27. Strategic Policy – Climate Emergency;
- 28. Strategic Policy – Net-zero Carbon Development;
- 29. Strategic Policy – Promoting renewables and zero carbon energy;
- 30. Strategic Policy – Suitable areas for solar energy developments;
- 31. Strategic Policy – Suitable areas for wind energy developments;
- 32. Strategic Policy – Energy storage;
- 33. Strategic Policy – Heat networks;
- 34. Strategic Policy – Embodied carbon;

35. Strategic Policy – Flooding;

36. Policy – Coastal change management areas (CCMAs);

37. Policy – Relocation of uses affected by coastal change;

38. Strategic Policy – Development affecting coastal erosion.

Reasonable alternatives to these policies:

27A. Carbon neutral by 2050 – this reflects the requirement in the Climate Change Act 2008;

28A. Do not require new development to be net-zero – this would mean relying on national policy and the Future Homes and Future Buildings Standard;

30A and 31A. Do not identify suitable areas for solar and wind energy developments – this would entail general policy support rather than identifying areas;

32A. Identify suitable areas for energy storage;

33A. Do not require major development to connect to existing heat network, or for large-scale development to create a new heat network;

34A. Do not take account of embodied carbon in development.

Outline of reasons for selecting the alternatives: The proposed policies are consistent national policy on meeting the challenge of climate change, along with objectives contained in the Council Plan, including the “climate emergency” declaration, and the Local Plan itself. Reasonable alternatives to these policies have been identified where legislation and Building Regulations exist that provide a “fall-back” position without a Local Plan policy; where an approach to not identify suitable areas for renewable energy and, conversely, to identify areas for energy storage would also be consistent with national policy; and where policy is more ambitious than national policy by considering embodied carbon.

A more restrictive approach to renewable and low carbon energy (Strategic Policy 29) was ruled out as a reasonable alternative as it would not reflect national policy. Similarly, there is only one reasonable alternative for flood risk (Strategic Policy 35) and coastal change policies (Strategic Policy 36, 37, 38), as there are consistent with national policy and an option of not having a policy was not considered as being reasonable.

Local Plan Chapter 7. Tackling the climate emergency and responding to climate change													
Policy SA Objective	27. Climate emergency	28. Net-zero development	29. Renewables	30. Areas for solar	31. Areas for wind	32. Energy storage	33. Heat networks	34. Embodied carbon	35. Flooding	36. CCMA's	37. Relocate uses	38. Coastal erosion	
1. Biodiversity	0	0	+	+	+	+	0	0	+	0	+	+	
Biodiversity commentary	Negligible effects on biodiversity for policies 27, 28, 33, 34, 36. Positive effect noted for policies 29, 30, 31, 37 due to inclusion of reference to avoiding impacts on biodiversity. Minor positive effect also for policy 32 as energy storage schemes will only be permitted where there are no adverse impacts on the environment. Policy 35 states flooding measures should respect biodiversity, resulting in a minor positive effect. Sustainable coastal change management proposals will only be permitted where there is no unacceptable environmental impact, leading to a minor positive for policy 38.												
2. Landscape	0	0	+	+	+	+	0	0	+	0	+	+	
Landscape commentary	Negligible effects on landscape for policies 27, 28, 33, 34, 36. Positive effect noted for policies 29, 30, 31, 37 due to inclusion of reference to avoiding impacts on landscape. Minor positive effect also for policy 32 as energy storage schemes will only be permitted where there are no adverse impacts on the environment. Policy 35 states flooding measures should respect character, resulting in a minor positive effect. Sustainable coastal change management proposals will only be permitted where there is no unacceptable environmental impact, including on protected landscapes, leading to a minor positive for policy 38.												
3. Hist. built env	+	+	+	+	+	+	0	0	+	0	+	+	
Hist. built env. commentary	Long-term positive effect likely for policies 27, 28 as net-zero development will promote high quality design through highly energy efficient buildings. Positive effect noted for policies 29, 30, 31, 37 due to inclusion of reference to avoiding impacts on historic environment and residential amenity. Minor positive effect also for policy 32 as energy storage schemes will only be permitted where												

Local Plan Chapter 7. Tackling the climate emergency and responding to climate change													
Policy SA Objective	27. Climate emergency	28. Net-zero development	29. Renewables	30. Areas for solar	31. Areas for wind	32. Energy storage	33. Heat networks	34. Embodied carbon	35. Flooding	36. CCMA's	37. Relocate uses	38. Coastal erosion	
	there are no adverse impacts on the environment. Negligible effect for policy 33 as, apart from a central plant building, heat networks are located underground where environmental impact is likely to be limited. Policy 35 states flooding measures should respect character, resulting in a minor positive effect. Negligible effect for policies 34, 36. Sustainable coastal change management proposals will only be permitted where there is no unacceptable environmental impact, with specific reference to protecting the integrity of the Dorset and East Devon World Heritage Sites, leading to a minor positive for policy 38.												
4. Climate change carbon emissions	++	++	++	++	++	++	++	+	0	0	0	0	
Climate change carbon emissions commentary	Major positive effect is likely for policies 27, 28, 29, 30, 31, 33, 34 due to net-zero development, maximising renewable and low carbon energy, and retaining existing buildings where possible in recognition of embodied carbon. Policy 32 is also likely to have a major positive effect by storing renewable energy. Negligible effect for policies 35, 36, 37, 38 as they do not relate to greenhouse gas emissions.												
5. Climate change adaptation	0	++	0	0	0	+	0	0	++	++	++	++	
Climate change adaptation commentary	Negligible effects for policy 27, 29, 30, 31, 33, 34 as the policies relate to climate change mitigation rather than adaptation. Policy 28 requires homes to be future proofed from rising temperatures so they can adapt to the effects of climate change, leading to a major positive effect. Minor positive effect is noted for policy 32, as energy storage can supply energy in the event of extreme storms disrupting power supplies. Major positive effect for policy 35 as it avoids development in areas that flood, taking account of climate change, ensuring that development adapts to the effects of climate change. Similarly, policy 36 restricts development in areas that will be affected by coastal change, in part due to climate change from sea level rises and more extreme storms, so has a major positive effect. Policy 37 allows the relocation of development in areas affected by coastal erosion, in part due to climate change from sea level												

Local Plan Chapter 7. Tackling the climate emergency and responding to climate change													
Policy SA Objective	27. Climate emergency	28. Net-zero development	29. Renewables	30. Areas for solar	31. Areas for wind	32. Energy storage	33. Heat networks	34. Embodied carbon	35. Flooding	36. CCMA's	37. Relocate uses	38. Coastal erosion	
	rises and more extreme storms, so also has a major positive effect. Supporting sustainable coastal change management also reflects climate change from sea level rises and more extreme storms, meaning a major positive effect for policy 38.												
6. Land resources	0	0	- ?	- ?	- ?	+ ?	0	+	0	0	0	0	
Land resources commentary	Negligible effects on this objective for policies 27, 28, 33, 34, 35, 36, 37, 38. Potential for negative effect for policy 29 if there is a loss of best and most versatile agricultural land from renewable energy schemes – this is uncertain until precise locations are known. Negative uncertain effect for policies 30 and 31 as some areas identified as being suitable for solar and wind energy are located on best and most versatile agricultural land. Energy storage could also be located on best and most versatile agricultural land, but policy 32 only approves such schemes subject to no adverse impacts on the environment – as this is slightly vague, only uncertain minor positive effect. Minor positive effect is noted for policy 34 as the re-use of existing buildings will safeguard mineral resources.												
7. Water resources	0	0	0	0	0	0	0	0	+	0	0	0	
Water resources commentary	Negligible effects on this objective for policies 27 – 34, 36, 37, 38. Minor positive effect for policy 35, as effective management of surface water run-off can reduce the degradation of water resources.												
8. Homes	+ / -	+ / -	0	0	0	0	0	0	0	0	0	0	
Homes commentary	Net-zero homes are likely to be good quality due to being energy efficient and incorporating renewable energy, but these measures could increase the cost of housing, so a mixed positive and negative effect for policies 27, 28.												

Local Plan Chapter 7. Tackling the climate emergency and responding to climate change													
Policy SA Objective	27. Climate emergency	28. Net-zero development	29. Renewables	30. Areas for solar	31. Areas for wind	32. Energy storage	33. Heat networks	34. Embodied carbon	35. Flooding	36. CCMA's	37. Relocate uses	38. Coastal erosion	
	Negligible effects on this objective for policies 29, 30, 31, 32, 33, 34, 35, 37, 38. Although policy 36 prevents residential development in CCMA's, the area covered is relatively limited and geographically isolated, so will have a negligible effect on housing supply.												
9. Health and well-being	0	0	+	+	+	0	0	0	+	+	+	+	
Health and well-being commentary	Negligible effects on this objective for policies 27, 28, 32, 33 Positive effect noted for policies 29, 30, 31 due to inclusion of reference to avoiding impacts on health. Avoiding/relocating development in areas of flood risk or at risk of coastal change, making development safe over its lifetime, and promoting sustainable coastal change management will support safe communities, resulting in a minor positive effect for policy 35, 36, 37.												
10. Access to services	0	0	0	0	0	0	0	0	0	0	0	0	
Access to services commentary	Negligible effects on this objective for all policies in Chapter 7.												
11. Jobs and employment	+	+	+	+	+	+	+	0	0	0	0	0	
Jobs/employment commentary	Renewable and low carbon energy offer economic opportunities, so a minor positive effect is noted for policies 27, 28, 29, 30, 31, 32, 33. Negligible effect for policies 34, 35, 37, 38. Although policy 36 limits employment development in CCMA's, the area covered is relatively limited and geographically isolated, so will have a negligible effect on employment land supply.												

Local Plan Chapter 7. Tackling the climate emergency and responding to climate change													
Policy SA Objective	27. Climate emergency	28. Net-zero development	29. Renewables	30. Areas for solar	31. Areas for wind	32. Energy storage	33. Heat networks	34. Embodied carbon	35. Flooding	36. CCMA's	37. Relocate uses	38. Coastal erosion	
12. Town centres	0	0	0	0	0	0	0	0	0	0	0	0	
Town centres commentary	Negligible effects on this objective for all policies in Chapter 7.												
13. Connectivity and transport	0	0	0	0	0	0	0	0	0	0	0	0	
Connectivity and transport commentary	Negligible effects on this objective for all policies in Chapter 7.												
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: - Avoid unacceptable environmental impacts. - Take best and most versatile land into account when considering renewable energy schemes (policy 29, 30, 31).													
Preferred alternative: Policies 27 – 38.													
Reasons for alternatives being preferred or rejected: The preferred policies (27 – 38) are likely to have wide-ranging positive effects on minimising carbon emissions, climate change adaptation, health, and the economy. Negative environmental effects can be effectively mitigated.													

Local Plan Chapter 7. Tackling the climate emergency and responding to climate change

Policy SA Objective	27. Climate emergency	28. Net-zero development	29. Renewables	30. Areas for solar	31. Areas for wind	32. Energy storage	33. Heat networks	34. Embodied carbon	35. Flooding	36. CCMA's	37. Relocate uses	38. Coastal erosion	
	27A. Carbon neutral by 2050 – this reflects the requirement in the Climate Change Act 2008, but is rejected as it performs less well than the preferred policy as it performs less well than the preferred policy on climate change objectives, which is consistent with the Council Plan and “climate emergency” declaration. 28A. Do not require new development to be net-zero – this would mean relying on national policy and the emerging Future Homes and Future Buildings Standard. This is rejected as it performs less well than the preferred policy on climate change objectives, and introduces greater uncertainty on when and whether net-zero development will be achieved (given that Future Homes and Future Buildings Standard will make buildings zero-carbon ready, rather than net-zero). 30A and 31A. Do not identify suitable areas for solar and wind energy developments – this would entail general policy support rather than identifying areas. This is rejected as climate change effects are less positive compared to the preferred policy, due to a less proactive approach to delivering renewable energy. 32A. Identify suitable areas for energy storage – this would provide greater certainty on their delivery, but the impacts of such facilities are uncertain and will vary depending on the proposal, so it is considered more appropriate to have a general policy of support. 33A. Do not require major development to connect to existing heat network, or for large-scale development to create a new heat network – this is rejected as it would limit the potential for development to achieve net-zero, with evidence suggesting that heat networks are the most cost effective and efficient way of heating large-scale development. 34A. Do not take account of embodied carbon in development – this is rejected as carbon emissions from existing development would not be considered, and therefore performs less well on the climate change objective due to increased carbon emissions from new development.												

Local Plan Chapter 8. Meeting housing needs for all

Policy number/title:

39. Strategic Policy – Housing needs for all

40. Policy – Affordable Housing

41. Policy – Housing to meet the needs of older people

42. Accessible and adaptable housing

43. Policy – Market housing mix

44. Policy – Self-build and Custom-build housing

45. Policy – Residential Sub-division of existing dwellings and buildings and replacement of existing dwellings

46. Policy – Householder Annexes, extensions, alterations and out-buildings.

47. Policy – Policy – Hostels and Houses in Multiple Occupation (HMOS)

48. Strategic Policy – Provision for Gypsy and Travellers, and Travelling Showpeople Sites

49. Policy – Rural Exception Sites and First Homes Exception Sites

50. Policy – Housing for rural workers

Reasonable alternatives to these policies:

40A. Provide higher levels of affordable housing

40B. Provide lower levels of affordable housing

41A. Require a higher proportion of older persons housing on larger sites

41B. Restrict older persons housing in locations that are less accessible by public transport and with fewer services and facilities.

43A. Do not have a policy and allow the market to decide the mix of market housing

44A. Lower self-build site threshold

44B. Higher percentage of self-build plots

45A. Do not restrict dwelling size increase

45B. Do not support conversions/sub-divisions outside of settlement boundaries

46A. Do not have a policy on householder annexes, extensions, alterations and out-buildings

47A. Do not have a policy on hostels and houses in multiple occupation (HMOs)

48A. Release land for affordable traveller sites (exception sites)

49A. Higher percentage of affordable housing on Rural/First Homes Exception Sites

49B. Lower percentage of affordable housing on Rural/First Homes Exception Sites

50A. Rural business succession

50B. Low impact residential development

Outline of reasons for selecting the alternatives:

The proposed policies are consistent national policy on meeting housing needs, along with objectives contained in the Council Plan, and the Local Plan itself. Reasonable alternatives to these policies have been identified where differing approaches could be acceptable in this wider policy context.

Affordable housing tenure mix and property size reflect national policy and evidence (East Devon Local Housing Need Assessment, 2022), so reasonable alternatives have not been identified on these issues (policy 40). Site allocations for older persons housing is not a reasonable alternative as there is a lack of evidence that this approach is deliverable (policy 41). Standards for accessible and adaptable housing reflect the Building Regulations and local evidence, so no reasonable alternatives have been identified (policy 42).

Local Plan Chapter 8. Meeting housing needs for all													
Policy SA Objective	39. Address needs	40. Aff. housing	41. Older people	42. Adaptable housing	43. Mix	44. Self-build	45. Sub-division	46. Annexes etc	47. HMOs	48. Gypsy/ Traveller	49. Exception	50. Rural workers	
1. Biodiversity	0	0	0	0	0	0	0	0	0	0	0	0	
Biodiversity commentary	Negligible effects on this objective for all policies in Chapter 8.												
2. Landscape	0	0	0	0	0	0	0	0	0	-	-	-	
Landscape commentary	Negligible effects on this objective for most policies in Chapter 8. Policies 48, 49 and 50 are likely to lead to more development in rural locations, with likely negative effect upon the landscape.												
3. Hist. built env	0	0	0	0	0	0	+	+	+	0	0	0	
Hist. built env. commentary	Policies 45 and 47 avoid adverse impact on the character/amenity of the area, meaning a minor positive effect. Similarly, policy 46 requires proposals to be subordinate to the main dwelling, again meaning a minor positive effect on the built environment.												
4. Climate change carbon emissions	0	0	0	0	0	0	0	0	0	-	-	-	
Climate change carbon emissions commentary	Policies 48, 49 and 50 are likely to lead to more development in rural locations where there are less sustainable travel opportunities, causing carbon emissions. Negligible effects for the remaining policies in Chapter 8.												

Local Plan Chapter 8. Meeting housing needs for all													
Policy SA Objective	39. Address needs	40. Aff. housing	41. Older people	42. Adaptable housing	43. Mix	44. Self-build	45. Sub-division	46. Annexes etc	47. HMOs	48. Gypsy/ Traveller	49. Exception	50. Rural workers	
5. Climate change adaptation	0	0	0	0	0	0	0	0	0	0	0	0	
Climate change adaptation commentary	Negligible effects on this objective for all policies in Chapter 8.												
6. Land resources	0	0	0	0	0	0	0	0	0	0	0	0	
Land resources commentary	Negligible effects on this objective for all policies in Chapter 8.												
7. Water resources	0	0	0	0	0	0	0	0	0	0	0	0	
Water resources commentary	Negligible effects on this objective for all policies in Chapter 8.												
8. Homes	++	++	++	++	++	++	++	++	++	++	++	++	
Homes commentary	Major positive effects are likely for all policies, as they provide good quality, financially accessible homes of mixed type and tenure to meet local needs.												

Local Plan Chapter 8. Meeting housing needs for all													
Policy SA Objective	39. Address needs	40. Aff. housing	41. Older people	42. Adaptable housing	43. Mix	44. Self-build	45. Sub-division	46. Annexes etc	47. HMOs	48. Gypsy/ Traveller	49. Exception	50. Rural workers	
9. Health and well-being	+	+	+	+	+	+	+	+	+	+	+	+	
Health and well-being commentary	Meeting housing needs can support healthy and safe communities, and help with social deprivation, so a minor positive effect is noted for all policies.												
10. Access to services	0	0	+	0	0	0	0	0	0	+	-	-	
Access to services commentary	Policy 41 states that older person's accommodation should be within 400m of facilities, so a minor positive effect. Gypsy and traveller sites should within 15 minutes of a range of services, again meaning a likely positive effect. Exception sites are likely to be in rural locations, but there is no requirement for access to services and facilities to be considered, so a minor negative effect is likely for policy 49. Rural workers dwellings are also located in rural locations, so a minor negative effect for policy 50. Negligible effects on this objective for the remaining policies in Chapter 8.												
11. Jobs and employment	0	0	0	0	0	0	0	0	0	0	0	+	
Jobs/employment commentary	Minor positive effect for housing for rural workers policy (50), as it will support rural businesses. Negligible effects on this objective for the remaining policies in Chapter 8.												
12. Town centres	0	0	+	0	0	0	0	0	+	0	0	0	

Local Plan Chapter 8. Meeting housing needs for all													
Policy SA Objective	39. Address needs	40. Aff. housing	41. Older people	42. Adaptable housing	43. Mix	44. Self-build	45. Sub-division	46. Annexes etc	47. HMOs	48. Gypsy/ Traveller	49. Exception	50. Rural workers	
Town centres commentary	Negligible effects on this objective for all policies in Chapter 8, apart from policies 41 and 47 which make specific reference to older person accommodation and HMOs being easily accessible to town centres, helping their vitality and viability.												
13. Connectivity and transport	0	0	+	0	0	0	0	0	+	0	0	0	
Connectivity and transport commentary	Policies 41 and 47 refer to having good connectivity so a minor positive effect is likely. Negligible effects on this objective for the remaining policies in Chapter 8.												
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: • Ensure gypsy and travel sites conserve and enhance landscape character (policy 48, 49, 50). • Provide sustainable travel opportunities for rural development to minimise carbon emissions (Policies 48, 49, 50). • Require rural exception sites to have access to services and facilities (policy 49) – this is unlikely to be possible for rural workers dwellings (policy 50), given the nature of this type of development													
These mitigation measures will reduce adverse impacts to negligible or minor positive.													
Preferred alternative: Policies 39 – 50													
Reasons for alternatives being preferred or rejected: • The preferred policies (39 – 50) are likely to have major positive effects on meeting housing needs, with minor positive effects on supporting healthy and safe communities and social deprivation.													

Local Plan Chapter 8. Meeting housing needs for all												
Policy SA Objective	39. Address needs	40. Aff. housing	41. Older people	42. Adaptable housing	43. Mix	44. Self-build	45. Sub-division	46. Annexes etc	47. HMOs	48. Gypsy/ Traveller	49. Exception	50. Rural workers
	40A. Provide higher levels of affordable housing – this would better meet needs for affordable housing, but the additional cost of doing so is likely to limit the provision of services, facilities, and could have negative impacts upon the design of homes. Therefore, this alternative is rejected. 40B. Provide lower levels of affordable housing – whilst this could make the delivery of facilities and services more viable, this would limit the potential to meet affordable housing need and so is rejected. 41A. Require a higher proportion of older persons housing on larger sites – this would have benefits for the housing mix, but as older persons housing is generally more costly to construct it may 'skew' the remaining housing mix to larger, more profitable housing, and also could limit the provision of services and facilities. Therefore, this alternative is rejected. 41B. Restrict older persons housing in locations that are less accessible by public transport and with fewer services and facilities – whilst this would have positive effects on access to services and facilities, it would limit the ability to meet older persons housing needs in rural areas, so is rejected. 43A. Do not have a policy and allow the market to decide the mix of market housing – this approach is rejected as it offers less potential to meet local housing needs, so would have less positive effects on the housing objective. 44A. Lower self-build threshold – this could make development unviable and therefore not deliverable as small sites are less able to benefit from economies of scale, and/or mean there are less able to contribute to services, facilities and affordable housing. So this alternative is rejected as viability issues will mean less potential to meeting housing need. 44B. Higher percentage of self-build plots – this would reduce the potential to deliver other types of market and affordable housing on the site, so would perform less well on the housing objective. An over-supply of plots could also leave sites unfinished. Therefore, this alternative is rejected. 45A. Do not restrict dwelling size increase – this alternative is rejected as it would reduce the number of smaller homes, so there is less potential to meet local need for smaller homes. 45B. Do not support conversions/sub-divisions outside of settlement boundaries – this would constrain the amount of housing in the countryside, thereby reducing environmental impact from travel and carbon emissions, but it could lead to vacant and derelict housing if existing dwellings are not able to be altered/extended, and additional housing elsewhere would be required to replace the loss of dwelling stock. Therefore, this alternative is rejected.											

Local Plan Chapter 8. Meeting housing needs for all												
Policy SA Objective	39. Address needs	40. Aff. housing	41. Older people	42. Adaptable housing	43. Mix	44. Self-build	45. Sub-division	46. Annexes etc	47. HMOs	48. Gypsy/ Traveller	49. Exception	50. Rural workers
	46A. Do not have a policy on householder annexes, extensions, alterations and out-buildings – this approach would rely on other policies in the Local Plan relating to design to manage these types of development, but this would not address circumstances where the principal of creating additional dwellings, and the need to restrict occupancy, is not acceptable. Therefore, this alternative is likely to have negative effects on the built environment and meeting housing need, so is rejected. 47A. Do not have a policy on hostels and houses in multiple occupation (HMOs) – this approach would rely on other policies in the Local Plan relating to design, however this would not provide sufficient policy detail to address management issues and avoid over-concentration of HMOs in particular locations, leading to negative effects on housing mix, so is rejected. 48A. Release land for affordable traveller sites (exception sites) – Government policy allows this where there is a lack of affordable land to meet local traveller needs. At the current time, there is a lack of evidence that this is justified, so this alternative performs less well on meeting East Devon's needs. Therefore, this alternative is rejected. 49A. Higher percentage of affordable housing on Rural/First Homes Exception Sites – in theory this could deliver more affordable housing, better meeting East Devon's needs, but viability issues may prevent development from coming forward altogether. So overall, a less positive effect on the housing objective, meaning this alternative is rejected. 49B. Lower percentage of affordable housing on Rural/First Homes Exception Sites – this would deliver fewer affordable homes, so would perform less well on the housing objective, meaning this alternative is rejected. 50A. Rural business succession – this would allow a new dwelling for occupation by the 'next generation' on the rural business. Although this will have economic benefits by supporting rural business succession, it is likely to lead to incremental growth in the countryside, and associated negative effects on the environment and carbon emissions associated with travel. Therefore, this alternative is rejected. 50B. Low impact residential development – this would be categorised as a type of housing for rural workers. Although the environmental impact from the design is assumed to be limited, the rural locations means that environmental harm remains likely, and it would increase carbon emissions from travel to facilities and services. Therefore, this alternative is rejected.											

Local Plan Chapter 9. Supporting jobs and the economy and vibrant town centres

Policy number/title:

- 51. Policy – Employment development within existing settlement boundaries
- 52. Policy – Employment development in the countryside
- 53. Policy – Farm diversification
- 54. Policy – Resisting the loss of Employment sites
- 55. Policy – Employment and skills statements
- 56. Policy – Town centre hierarchy, sequential approach and impact assessment
- 57. Policy – Town centre development
- 58. Policy – Local shops and services
- 59. Policy – Rural shops
- 60. Policy – Sustainable tourism
- 61. Policy – Holiday accommodation parks in designated landscapes

Reasonable alternatives:

- 51A. Allow other job generating uses on existing employment sites (other than use E(g), B2 or B8)
- 53A. Restrict farm diversification to more limited uses and smaller scale development
- 54A. Taking a less restrictive approach by allowing a greater mix of uses on employment sites

55A. Do not include a policy requiring employment and skills statements

58A. Do not include a policy that resists the loss of local shops and services

59A. Do not include a policy that addresses rural shops

60A. Do not include a policy to address sustainable tourism

61A. Include a less restrictive criteria-based policy which permits extensions to existing holiday parks and establishment of new parks

Outline of reasons for selecting the alternatives:

The proposed policies are consistent national policy on building a strong, competitive economy, along with objectives contained in the Council Plan, and the Local Plan itself. Reasonable alternatives to these policies have been identified where differing approaches could be acceptable in this wider policy context. National policy is relatively prescriptive on town centre policy requirements, so a reasonable alternative is not identified for policies 56 and 57.

Local Plan Chapter 9. Supporting jobs and the economy and vibrant town centres												
Policy SA Objective	51. Set. Boundaries	52. Countryside	53. Farm diversify	54. Loss of empl. Sites	55. Empl. Statement	56. Town centre hierarchv	57. Town centre	58. Local shops and services	59. Rural shops	60. Sust. tourism	61. Hol. Accomm.	
1. Biodiversity	0	0	+	0	0	0	0	0	+	+	+	
Biodiversity commentary	Negligible effects for policies 51, 52, 54, 55, 56, 57, 58. Policies 53 and 60 seek opportunities to improve biodiversity, so will likely have a minor positive effect. Also a minor positive effect for policy 59 as proposals must not harm the natural environment. Policy 61 refers to achieving biodiversity net gain, so a minor positive effect is likely.											

Local Plan Chapter 9. Supporting jobs and the economy and vibrant town centres												
Policy SA Objective	51. Set. Boundaries	52. Countryside	53. Farm diversify	54. Loss of empl. Sites	55. Empl. Statement	56. Town centre hierarchy	57. Town centre	58. Local shops and services	59. Rural shops	60. Sust. tourism	61. Hol. Accomm.	
2. Landscape	0	-	+	0	0	0	0	0	+	+	++	
Landscape commentary	Negligible effects for policies 51, 54, 55, 56, 57, 58. Likely minor negative landscape effect from extending employment development in the countryside (policy 52). Policies 53 and 60 ensure no adverse impact on the character of surrounding natural environment, so a minor positive effect is noted. Also a minor positive effect for policy 59 as proposals must not harm the rural character of the natural environment. Policy 61 does not allow holiday accommodation in the most sensitive landscapes, and required extensive landscaping, resulting in a major positive effect.											
3. Hist. built env	+	0	+	0	0	- ?	- ?	0	+	+	+	
Hist. built env. commentary	Minor positive effect for policy 51 as employment uses should be compatible with neighbouring uses and not have adverse amenity impacts. Policies 53 and 60 ensure no adverse impact on the character of surrounding historic environment, so a minor positive effect is noted. The presence of conservation areas and listed buildings across nearly all centres means a negative effect for policy 56 and 57, due to encouraging development in these locations, with uncertainty depending upon specific proposals. Also a minor positive effect for policy 59 as proposals must not harm the historic environment and should be sympathetic to the surroundings. Policy 61 refers to avoiding adverse impacts upon local character or amenity, so a minor positive effect is noted. Negligible effects for policies 52, 54, 55, 58.											
4. Climate change carbon emissions	+	-	-	0	0	+	+	+	-	-	+	

Local Plan Chapter 9. Supporting jobs and the economy and vibrant town centres												
Policy SA Objective	51. Set. Boundaries	52. Countryside	53. Farm diversify	54. Loss of empl. Sites	55. Empl. Statement	56. Town centre hierarchy	57. Town centre	58. Local shops and services	59. Rural shops	60. Sust. tourism	61. Hol. Accomm.	
Climate change carbon emissions commentary	Permitting employment development within settlement boundaries should ensure good access to a local labour supply and sustainable travel opportunities, meaning a minor positive effect for policy 51. Minor negative effect from carbon emissions from additional travel to employment development in the countryside in policy 52, farm diversification schemes (policy 53), rural shops (policy 59) and tourism (policy 60). Minor positive effect from encouraging development in town centres in policies 56 and 57, where there are the best opportunities to access by sustainable travel modes. The provision of new shops or services in rural settlements (tier 3 and 4), and protection against the loss of existing local shops or services, is likely to minimise carbon emissions from the need to travel for residents in these settlements, resulting in a minor positive effect for policy 58. Policy 61 supports sustainable construction and on-site renewable energy production, meaning a minor positive effect. Negligible effects for policies 54, 55.											
5. Climate change adaptation	0	0	0	0	0	0	0	0	0	0	0	
Climate change adaptation commentary	Negligible effects for all policies in chapter 9.											
6. Land resources	0	0	0	0	0	0	0	0	0	0	+	
Land resources commentary	Negligible effects for all policies in chapter 9, apart from policy 61 which makes clear that proposals will not use the best and most versatile agricultural land.											

Local Plan Chapter 9. Supporting jobs and the economy and vibrant town centres												
Policy SA Objective	51. Set. Boundaries	52. Countryside	53. Farm diversify	54. Loss of empl. Sites	55. Empl. Statement	56. Town centre hierarchy	57. Town centre	58. Local shops and services	59. Rural shops	60. Sust. tourism	61. Hol. Accomm.	
7. Water resources	0	0	0	0	0	0	0	0	0	0	0	
Water resources commentary	Negligible effects for all policies in chapter 9.											
8. Homes	0	0	0	0	0	0	0	0	0	0	0	
Homes commentary	Negligible effects for all policies in chapter 9.											
9. Health and well-being	0	0	0	0	0	0	0	0	0	0	0	
Health and well-being commentary	Negligible effects for all policies in chapter 9.											
10. Access to services	0	0	0	0	0	++	++	++	+	0	0	
Access to services commentary	Negligible effects for most policies in chapter 9. Encouraging main town centre uses will provide accessible services, meaning a major positive effect for policies 56 and 57. The provision of new shops or services in rural settlements (tier 3 and 4), and protection against the loss of existing local shops or services, will provide accessible services for residents in these settlements, resulting in a major											

Local Plan Chapter 9. Supporting jobs and the economy and vibrant town centres												
Policy SA Objective	51. Set. Boundaries	52. Countryside	53. Farm diversify	54. Loss of empl. Sites	55. Empl. Statement	56. Town centre hierarchy	57. Town centre	58. Local shops and services	59. Rural shops	60. Sust. tourism	61. Hol. Accomm.	
	positive effect for policy 58. Similarly, shops outside villages will provide access to services, but the rural location limits this to a likely minor positive effect for policy 59.											
11. Jobs and employment	++	++	++	++	++	++	++	++	++	++	+	
Jobs/employment commentary	Most policies in chapter 9 are likely to have major positive effects by fostering a strong and entrepreneurial economy, increase access to high quality skills training, improve job opportunities and greater productivity. Minor positive for policy 61 as there are some restrictions on developing holiday parks in recognition of the high quality landscape in East Devon.											
12. Town centres	+	0	0	0	0	++	++	+	+	0	0	
Town centres commentary	Employment uses within settlement boundaries (policy 51) are likely to have a positive effect on town centres given the potential for additional trade. Negligible effects for policies 52, 53, 54, 55, 60 and 61. Major positive for policies 56 and 57 which actively promote town centres. Minor positive effect for policy 58 and 59 as they ensure the provision of new shops and services without impacting on the vitality and viability of any nearby centre.											
13. Connectivity and transport	+	+ / -	-	0	0	++	++	+	-	+	+	
Connectivity and transport commentary	Employment uses within settlement boundaries are likely to have good connectivity, so a minor positive effect for policy 51. Some existing employment sites in the countryside have good road connectivity (e.g. Hill Barton and Greendale business parks), whilst other, more rural sites do – therefore, a mixed positive and negative effect is likely for policy 52. Farm diversification schemes are likely to be in rural locations with poorer transport connections, so a minor negative effect for policy 53. Settlement centres generally have the best											

Local Plan Chapter 9. Supporting jobs and the economy and vibrant town centres												
Policy SA Objective	51. Set. Boundaries	52. Countryside	53. Farm diversify	54. Loss of empl. Sites	55. Empl. Statement	56. Town centre hierarchv	57. Town centre	58. Local shops and services	59. Rural shops	60. Sust. tourism	61. Hol. Accomm.	
	connections, so a major positive effect is likely from encouraging developing in these locations in policies 56 and 57. Shops and services in tier 3 and 4 settlements are likely to have reasonably good connectivity, so a minor positive effect is noted for policy 58. The rural location of retail development in policy 59 means that a minor negative effect is likely due to poor connectivity. New tourist facilities should be well-related to tier 1 – 4 settlements and public transport, leading to a minor positive effect for policy 60. Safe highway access is required in policy 61, meaning a minor positive effect. Negligible effects for policies 54, 55											
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: • Provide sustainable travel opportunities for rural employment development and farm diversification schemes. • Require landscaping for employment proposals in rural locations. These measures are likely to reduce negative effects to neutral.												
Preferred alternative: Policies 51 - 61												
Reasons for alternatives being preferred or rejected: • The preferred policies 51 – 61 are likely to have major positive effects by fostering a strong and entrepreneurial economy, increase access to high quality skills training, improve job opportunities and greater productivity. Policies will support the vitality and viability of town centres, will ensure good access to services and facilities, and good connectivity. The few negative effects can be effectively mitigated. • 51A. Allow other job generating uses on existing employment sites (other than use E(g), B2 or B8) – this would provide more choice and flexibility for other employment uses, but reduce the availability of land and premises for uses E(g), B2 or B8. In addition, it could increase site values and rentals from higher value uses such as retail, making it more difficult for traditional and transformational business uses to find suitable sites for start-up or expansion. For these reasons, the positive effects are lower than the preferred policy, and this alternative is rejected.												

Local Plan Chapter 9. Supporting jobs and the economy and vibrant town centres											
Policy SA Objective	51. Set. Boundaries	52. Countryside	53. Farm diversify	54. Loss of empl. Sites	55. Empl. Statement	56. Town centre hierarchy	57. Town centre	58. Local shops and services	59. Rural shops	60. Sust. tourism	61. Hol. Accom.
	53A. Restrict farm diversification to more limited uses and smaller scale development – this will have positive environmental effects by reducing the impact of farm diversification on the natural environment. However, it will reduce the economic viability of farm holdings and reduce the number of jobs in rural areas. The likely adverse impacts on the local economy and rural prosperity mean this alternative is rejected. 54A. Taking a less restrictive approach by allowing employment sites to be available for other uses – this would result in a positive effects on housing as it would increase the level of housing supply, but will have negative effects associated with the loss of employment sites, and is therefore rejected. 55A. Do not include a policy requiring employment and skills statements – this is rejected as it would provide less opportunity to access high quality skills training, limiting the positive effects on objective 11. 58A. Do not include a policy that resists the loss of local shops and services – this would rely on national policy to avoid the unnecessary loss of facilities, but the lack of a Local Plan policy would mean greater uncertainty and more potential for facilities to be lost to higher value uses. Therefore, the negative effects on objective 10 mean this alternative is rejected. 59A. Do not include a policy that addresses rural shops – without such a policy, shops in rural areas could sell a range of goods that could compete with, and affect the vitality and viability of, local centres, leading to negative effects on objective 12. It would also mean less support for local food and goods, with consequent increase in carbon emissions from travel as produce is sourced from further away. Therefore, this alternative is rejected. 60A. Do not include a policy to address sustainable tourism – this was rejected as it would likely mean less economic benefits (objective 11) through the lack of supporting policy for sustainable tourism, and potential for negative environmental effects through a lack of clarity on the balance between protecting the natural environment and encouraging visitors. 61A. Include a less restrictive criteria-based policy which permits extensions to existing holiday parks and establishment of new parks – the high landscape quality of East Devon means that permanent structures associated with new or extended holiday parks are likely to cause considerable harm, given the scale and range of facilities associated with such parks. Although this alternative could have positive economic benefits (objective 11), the major negative landscape effects (objective 2) mean that it is rejected.										

Local Plan Chapter 10. Designing beautiful and healthy space and buildings

Policy number/title:

62. Policy – Design and local distinctiveness

63. Policy – Housing density and efficient use of land

64. Policy – Display of advertisements

Reasonable alternatives:

62A. Do not include a design policy

63A. Do not set minimum density standards

64A. Do not have a policy relating to the display of advertisements

Outline of reasons for selecting the alternatives:

The proposed policies are consistent national policy on achieving well-designed places, along with objectives contained in the Council Plan, and the Local Plan itself. Reasonable alternatives to these policies have been identified where differing approaches could be acceptable in this wider policy context.

Local Plan Chapter 10. Designing beautiful and healthy space and buildings				
Policy SA Objective	62. Design	63. Housing density	64. Adverts	
1. Biodiversity	+	0	0	

Local Plan Chapter 10. Designing beautiful and healthy space and buildings				
Policy SA Objective	62. Design	63. Housing density	64. Adverts	
Biodiversity commentary	Minor positive effects are likely from policy 62 due to biodiversity enhancement, habitat creation, and retention of trees and hedgerows. Negligible effect for policy 63, 64.			
2. Landscape	+	+	+	
Landscape commentary	Policy 62 states that important landscape characteristics and prominent topographical features should not be adversely affected, along with 'greening' measures, leading to a minor positive effect. Housing density should conserve or enhance the character of the area, so a minor positive effect for policy 63. Advertisements should be sympathetic to the character of the area, appropriately positioned and scaled in relation to their context, leading to a minor positive effect for policy 64.			
3. Hist. built env	++	++	++	
Hist. built env. commentary	A major positive effect is likely from policy 62 arising from buildings relating well to their context, not adversely affecting the historic or architectural character of the area, and securing and attractive layouts with safe and convenient access, for example. Policy 63 requires housing density to conserve or enhance the character of the area, with design codes in some circumstances – given this, a major positive effect is likely. High quality design is promoted through ensuring adverts are sympathetic to the character of the area, appropriately positioned and scaled in relation to their context, designed with appropriate colours, materials, and lighting – this means a major positive effect for policy 64.			
4. Climate change carbon emissions	++	+ ?	0	

Local Plan Chapter 10. Designing beautiful and healthy space and buildings				
Policy SA Objective	62. Design	63. Housing density	64. Adverts	
Climate change carbon emissions commentary	Specific mention is made in policy 62 of a fabric-first approach to reduce carbon emissions over the lifetime of the development. Safe and convenient access, along with bicycle storage space, and meeting nationally described space standards to provide room for home working, should also minimise carbon emissions, meaning a major positive effect for policy 62. Making efficient use of land should minimise carbon emissions from travel, but this positive effect for policy 63 has uncertainty until density standards are prescribed. Negligible effect for policy 64.			
5. Climate change adaptation	+	0	0	
Climate change adaptation commentary	High quality design should ensure new development is adapted to climate change, meaning a minor positive effect for policy 62. Negligible effect for policy 63, 64.			
6. Land resources	+	++ ?	0	
Land resources commentary	Applying the waste hierarchy in managing waste during construction and operation is likely to mean a minor positive effect for policy 62. The efficient use of land in policy 63 has a major positive effect on this objective, with some uncertainty until density standards are prescribed. Negligible effect for policy 64.			
7. Water resources	0	0	0	

Local Plan Chapter 10. Designing beautiful and healthy space and buildings				
Policy SA Objective	62. Design	63. Housing density	64. Adverts	
Water resources commentary	Negligible effect for policy 62, 63, 64			
8. Homes	+	+	0	
Homes commentary	The provision of good quality homes means a positive effect for policy 62. The conservation and enhancement of the area through housing density means a minor positive effect for policy 63. Negligible effect for policy 64.			
9. Health and well-being	++	0	+	
Health and well-being commentary	Policy 62 requires safe and convenient access for the whole community, including disabled users, and measures to create a safe environment and reduce the potential for crime. Proposals should meet nationally described space standards, with health benefits (particularly mental health) arising from more internal space in homes, and have access to open space. This results in a major positive effect for policy 62. Negligible effect for policy 63. Ensuring the display of adverts considers public safety has a minor positive effect for policy 64.			
10. Access to services	+	+ ?	0	
Access to services commentary	Secure and attractive layouts in new development should provide the opportunity to access services and facilities, and a minor positive effect for policy 62. The efficient use of land should ensure housing density is highest where there is good access to services and facilities, but until standards are set there is an uncertain positive effect for policy 63. Negligible effect for policy 64.			

Local Plan Chapter 10. Designing beautiful and healthy space and buildings				
Policy SA Objective	62. Design	63. Housing density	64. Adverts	
11. Jobs and employment	0	0	0	
Jobs/employment commentary	Negligible effect for policy 62, 63, 64.			
12. Town centres	0	0	0	
Town centres commentary	Negligible effect for policy 62, 63, 64.			
13. Connectivity and transport	+	+ ?	0	
Connectivity and transport commentary	The requirement in policy 62 for secure and attractive layouts, with bicycle storage space, provide a minor positive effect on connectivity and transport. The efficient use of land should ensure housing density is highest where there is good connectivity, but until standards are set there is an uncertain positive effect for policy 63. Negligible effect for policy 64.			
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: • Include higher density housing at locations with good access to services and facilities (including public transport).				
Preferred alternative: Policies 62, 63 and 64.				
Reasons for alternatives being preferred or rejected:				

Local Plan Chapter 10. Designing beautiful and healthy space and buildings				
Policy	62. Design	63. Housing density	64. Adverts	
SA Objective				
- The preferred policies 62, 63 and 64 are likely to have major positive effects arising from high quality design, carbon emissions and health and well-being. A range of minor positive effects are noted in relation to biodiversity, landscape, land resources, housing and access to services. 62A. Do not include a design policy – this would rely on national policy and guidance, which has recently been updated with a stronger approach on achieving well-designed places. However, this alternative would result in greater uncertainty on promoting high quality design (objective 3), and would not provide a bespoke policy to prioritise locally important design issues, so has been rejected 63A. Do not set minimum density standards – this would make less efficient use of land, with negative effects on objective 6, particularly given the environmental constraints in the district. Therefore, this alternative is rejected. 64A. Do not have a policy relating to the display of advertisements – this alternative is rejected as it would lack clarity on what is likely to be acceptable for designing adverts and decision-making on planning applications, with negative effects on design (objective 3).				

Local Plan Chapter 11. Prioritising sustainable travel and providing the transport and communications facilities we need

Policy number/title:

- 65. Strategic Policy – Walking, cycling, and public transport
- 66. Policy – Protecting transport sites and routes
- 67. Policy – Travel Plans, Transport Statements, Transport Assessments
- 68. Policy – Parking standards
- 69. Policy – Rear servicing of shopping/commercial development

70. Policy – Safe vehicular access to sites

71. Policy – Aerodrome safeguarded areas and public safety zones

72. Strategic Policy – Digital connectivity

73. Policy – Wireless connectivity and telecoms infrastructure

Reasonable alternatives:

65A. Specify walking distances to local facilities from new housing

65B. Set mode share targets for different travel modes from new development

66A. Do not protect transport sites and routes

67A. Do not include a policy on Travel Plans, Transport Statements, Transport Assessments

68A. Do not set parking standards

72A. Do not include a policy on digital connectivity

Outline of reasons for selecting the alternatives:

The proposed policies are consistent national policy on promoting sustainable transport, along with objectives contained in the Council Plan, and the Local Plan itself. Reasonable alternatives to these policies have been identified where differing approaches could be acceptable in this wider policy context. Policies 69, 70, 71 and 73 are detailed policies on specific matters, to which there are no reasonable alternatives.

Local Plan Chapter 11. Prioritising sustainable travel and providing the transport and communications facilities we need										
Policy SA Objective	65. Walking, cycling, pub. transport	66. Protect routes/sites	67. Travel Plans etc.	68. Parking standards	69. Rear servicing	70. Safe access	71. Aerodrome	72. Digital	73. Telecoms	
1. Biodiversity	0	0	+	0	0	0	+	0	+	
Biodiversity commentary	Negligible effect for most policies in chapter 11. Minor positive effect for policy 68 as it takes into account proximity to environmental designations. Also a minor positive effect for policy 70 as restricts development in the vicinity of aerodromes where it will cause a bird strike hazard. Policy 73 is likely to have a minor positive effect as telecoms infrastructure must avoid adverse impacts on biodiversity.									
2. Landscape	0	0	+	0	0	0	0	0	- ?	
Landscape commentary	Negligible effect for most policies in chapter 11. Minor positive effect for policy 68 as it takes into account proximity to environmental designations. Telecoms infrastructure is likely to have a negative effect on landscape, but policy 73 notes proposal must avoid adverse impacts on landscape character, with a Landscape and Visual Impact Assessment required for sensitive locations, so a negative uncertain effect depending on location.									
3. Hist. built env	++	0	+	0	0	0	0	0	- ?	
Hist. built env. commentary	Policy 65 facilitates high quality accessibility in new development and is therefore likely to have a major positive effect. Negligible effect on this objective for policies 66, 69, 70, 71, 72. Minor positive effect for policy 68 as it takes into account proximity to environmental designations. Telecoms infrastructure is likely to have a negative effect on the historic and built environment, but policy 73 notes proposal must avoid adverse impacts on heritage and the environment, so a negative uncertain effect depending on location.									
4. Climate change carbon emissions	++	++	+	+ / -	0	0	0	+	+	

Local Plan Chapter 11. Prioritising sustainable travel and providing the transport and communications facilities we need										
Policy SA Objective	65. Walking, cycling, pub. transport	66. Protect routes/sites	67. Travel Plans etc.	68. Parking standards	69. Rear servicing	70. Safe access	71. Aerodrome	72. Digital	73. Telecoms	
Climate change carbon emissions commentary	Prioritising walking and cycling, alongside access to high quality public transport, means a major positive effect for policy 65 as it will minimise carbon emissions associated with travel. The transport sites and routes in policy 66 all relate to strategic cycle networks or public transport, so a major positive effect is likely from minimising carbon emissions. Policy 67 secures sustainable travel arrangements, so is likely to have a minor positive effect. The provision of cycle parking and electric car charging points in new housing development is likely to have a positive effect on minimising carbon emissions, but the requirement for car parking to be provided which could increase emissions, so a mixed positive / negative effect for policy 68. Negligible effect on this objective for policies 69, 70, 71. Digital connectivity and telecoms infrastructure can facilitate working from home which minimises carbon emissions, and therefore a minor positive effect for policies 72 and 73.									
5. Climate change adaptation	0	0	0	0	0	0	0	0	0	
Climate change adaptation commentary	Negligible effect for all policies in chapter 11.									
6. Land resources	0	0	0	0	0	0	0	0	0	
Land resources commentary	Negligible effect for all policies in chapter 11.									
7. Water resources	0	0	0	0	0	0	0	0	0	

Local Plan Chapter 11. Prioritising sustainable travel and providing the transport and communications facilities we need										
Policy SA Objective	65. Walking, cycling, pub. transport	66. Protect routes/sites	67. Travel Plans etc.	68. Parking standards	69. Rear servicing	70. Safe access	71. Aerodrome	72. Digital	73. Telecoms	
Water resources commentary	Negligible effect for all policies in chapter 11.									
8. Homes	0	0	0	0	0	0	0	0	0	
Homes commentary	Negligible effect for all policies in chapter 11.									
9. Health and well-being	++	++	+	+	+	+	+	0		
Health and well-being commentary	Prioritising safe walking and cycling routes, alongside access to high quality public transport, means a major positive effect for policy 65 as it will support healthy, safe and active communities. Protecting the strategic cycle network schemes will also support healthy, safe and active communities, whilst access to public transport can help relieve social deprivation, so a major positive effect is likely for policy 66. Securing sustainable travel arrangements is likely to mean positive effects for policy 67. The provision of cycle parking in new housing development results in a minor positive effect for policy 68. Minor positive effect also likely for policy 69, as rear service access of shops/commercial development reduces the potential for safety issues associated with large vehicles on high streets mixing with pedestrians. The requirement for safe vehicular access to new development means a minor positive effect for policy 70. Development will not be permitted where it cause safety concerns for aerodromes, and therefore a likely minor positive effect is noted for policy 71. Negligible effect for policy 72.									
10. Access to services	+	+	+	+	0	0	0	0	0	

Local Plan Chapter 11. Prioritising sustainable travel and providing the transport and communications facilities we need										
Policy SA Objective	65. Walking, cycling, pub. transport	66. Protect routes/sites	67. Travel Plans etc.	68. Parking standards	69. Rear servicing	70. Safe access	71. Aerodrome	72. Digital	73. Telecoms	
Access to services commentary	Prioritising walking and cycling, alongside access to high quality public transport, should support access to services and facilities, resulting in a minor positive effect for policy 65. Policy 66 is also likely to have a minor positive effect by protecting strategic cycle network and public transport schemes that will access to services and facilities. Securing sustainable travel arrangements can facilitate access to services and facilities, leading to a minor positive effect for policy 67. Providing car and cycle parking in new housing development is likely to have a minor positive effect on accessing services and facilities for policy 68. Negligible effect for policies 69, 70, 71, 72, 73.									
11. Jobs and employment	0	0	0	0	- ?	0	+	++	++	
Jobs/employment commentary	Negligible effect for policies 65, 66, 67, 68, 70. Potential for negative effect on policy 69 if rear service access is required but not able to be provided by commercial development, and is therefore refused planning permission – this effect is uncertain. The restriction of development near to aerodromes is likely to have positive economic effects on the operation of Exeter International Airport and Dukeswell Airfield. Digital connectivity and telecoms infrastructure is essential to foster a strong and entrepreneurial economy, so a major positive effect is identified for policies 72 and 73									
12. Town centres	0	0	0	0	+	0	0	0	0	
Town centres commentary	Negligible effect for policies 65, 66, 67, 68, 70, 71, 72, 73. Rear service access is likely to make town centres more attractive places, supporting their vitality and viability and resulting in a minor positive effect for policy 69.									
13. Connectivity and transport	++	++	+	+ ?	0	+	+	++	++	

Local Plan Chapter 11. Prioritising sustainable travel and providing the transport and communications facilities we need										
Policy SA Objective	65. Walking, cycling, pub. transport	66. Protect routes/sites	67. Travel Plans etc.	68. Parking standards	69. Rear servicing	70. Safe access	71. Aerodrome	72. Digital	73. Telecoms	
Connectivity and transport commentary	A major positive effect is likely for policy 65 from prioritising walking and cycling, alongside access to high quality public transport. Similarly, the protection of strategic cycle network and public transport schemes in policy 66 will have major positive effect on connectivity. Policy 67 supports transport connectivity by requiring measures to secure new sustainable travel arrangements, meaning a minor positive effect. Providing car and cycle parking in new housing development is likely to have a minor positive effect on connectivity and transport for policy 68, with some uncertainty on connecting businesses as standards are not prescribed for non-residential uses. Negligible effect for policies 69. The requirement for safe vehicular access to new development means a minor positive effect for policy 70. The restriction of development near to aerodromes is likely to have positive effects on connectivity and transport at Exeter International Airport and Dunkeswell Airfield, so a minor positive effect. Digital connectivity requirements and telecoms infrastructure in policies 72 and 73 results in a major positive effect on this objective.									
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: Include parking standards for non-residential uses to avoid uncertainty on connectivity and transport for businesses (policy 68).										
Preferred alternative: Policies 65 – 73										
Reasons for alternatives being preferred or rejected: - The preferred policies 65 – 73 are likely to have major positive effects minimising carbon emissions, health and well-being, access to services, jobs and employment, and connectivity and transport. Minor positive effects are noted for several other objectives. There a few negative uncertain effects, which can be mitigated to reduce their impact. 65A. Specify walking distances to local facilities from new housing – whilst this alternative is likely to have positive effects on minimising carbon emissions from travel (objective 4), access to services (10), and connectivity (13), these effects are uncertain as there are other factors to consider such as topography, surveillance, directness, attractiveness of the environment, and the intended destination. Therefore, this alternative is rejected.										

Local Plan Chapter 11. Prioritising sustainable travel and providing the transport and communications facilities we need										
Policy SA Objective	65. Walking, cycling, pub. transport	66. Protect routes/sites	67. Travel Plans etc.	68. Parking standards	69. Rear servicing	70. Safe access	71. Aerodrome	72. Digital	73. Telecoms	
	65B. Set mode share targets for different travel modes from new development – this approach could have positive effects on minimising carbon emissions from travel (objective 4), access to services (10), and connectivity (13), but these effects are uncertain as such standards are difficult to justify and challenging to enforce once development is occupied. Therefore, this alternative is rejected. 66A. Do not protect transport sites and routes – this alternative is rejected as it reduces the potential to deliver transport routes and sites to widen transport choice and deliver large-scale new development, and would therefore have fewer positive effects on minimising carbon emissions from travel (objective 4), access to services (10), and connectivity (13). 67A. Do not include a policy on Travel Plans, Transport Statements, Transport Assessments – this is rejected as it would cause uncertainty as to when Travel Plans, Transport Statements, Transport Assessments would be required, so performs less positively on minimising carbon emissions from travel (objective 4), access to services (10), and connectivity (13). 68A. Do not set parking standards – this is rejected as it would cause uncertainty on parking standards in new development, so performs less positively on minimising carbon emissions from travel (objective 4), access to services (10), and connectivity (13). 72A. Do not include a policy on digital connectivity – this would likely mean uncertain effects for objective 13 due to a risk of inadequate provision being made that is not future-proofed, and installations not providing consumer choice because the lack of conducting for other providers which is then costly to install after the event. Therefore, this alternative is rejected.									

Local Plan Chapter 12. Caring for our outstanding landscape

Policy number/title:

74. Policy – Landscape features

75. Policy – Areas of Outstanding Natural Beauty

76. Policy – Coastal Preservation Areas

77. Policy – Areas of Strategic visual importance

78. Policy – Green wedges

79. Policy – Land of local amenity importance or Local Green Space

80. Policy – Contaminated land

81. Policy – Potentially hazardous developments notifiable installations

82. Policy – Control of pollution

83. Policy – Development on high quality agricultural land

Reasonable alternatives:

74A. Do not include a policy to protect landscape features

75A. Do not include a policy to protect AONBs

78A. Do not have green wedges

78B. Have more extensive green wedges

79A. Do not include a policy on land of local amenity importance or Local Green Space

Outline of reasons for selecting the alternatives:

The proposed policies are consistent national policy on conserving and enhancing the natural environment, along with objectives contained in the Council Plan, and the Local Plan itself. Reasonable alternatives to these policies have been identified where differing approaches could be acceptable in this wider policy context.

The Coastal Preservation Areas (policy 76) reflect a direct visual relationship with the sea, so alternative boundaries are not considered to be reasonable. An alternative to not have a policy to protect the undeveloped coast is not reasonable given NPPF requirements and exceptional quality of East Devon's coast line. Similarly, given the outstanding quality of East Devon's landscape, an alternative to not have a policy on areas of strategic visual importance was not considered reasonable. An alternative to identify all Local Green Space in the district is not reasonable as these are by their nature 'local' and therefore more appropriately designated in Neighbourhood Plans, rather than the Local Plan. Policies 80-83 are detailed policies on specific matters, to which there are no reasonable alternatives.

Local Plan Chapter 12. Caring for our outstanding landscape											
Policy SA Objective	74. Landscape	75. AONBs	76. Coastal	77. Strat. Visual	78. Green wedges	79. Amenity or LGS	80. Contam. Land	81. Hazardous	82. Pollution	83. Agri. land	
1. Biodiversity	++	+	+	+	+	+	0	0	+	+	
Biodiversity commentary	Although titled "landscape features", several aspects of policy 74 will benefit biodiversity, such as protection of trees, hedgerow, water bodies, and irreplaceable habitats. AONBs are important locations for biodiversity, as well as landscape, so restricting development in AONBs means a minor positive effect for policy 75. The presence of biodiversity interest in Coastal Preservation Areas (CPAs), green wedges, and land of local amenity importance (LLAI) means that policies 76, 78 and 79 will have a positive effect through the restriction of development in these areas. Policy 77 protects views relating to biodiversity features and, as such, is likely to have a positive effect. Policy 82 protects sites of wildlife value, especially European sites, from pollution and therefore has a positive effect. Protecting high quality agricultural land could also benefit the habitat and wildlife, meaning a positive effect for policy 83. Negligible effect for policies 80, 81.										
2. Landscape	++	++	++	++	++	++	0	0	+	+	

Local Plan Chapter 12. Caring for our outstanding landscape											
Policy SA Objective	74. Landscape	75. AONBs	76. Coastal	77. Strat. Visual	78. Green wedges	79. Amenity or LGS	80. Contam. Land	81. Hazardous	82. Pollution	83. Agri. land	
Landscape commentary	The intention of policy 74 is to protect the landscape from harmful development, with detail on how this be achieved, meaning a major positive effect. The highest level of protection given to the landscape in AONBs means that policy 75 has a major positive effect. Policy 76 will conserve and enhance the undeveloped coast, so will have a major positive effect. Conserving and enhancing key views and local landmarks means a major positive effect for policy 77. Preventing settlement coalescence and recognising the character of settlements is likely to have major positive effects for policy 78. Restricting development in land of local amenity importance and Local Green Spaces (LGS) means that policy 79 will also have a major positive effect. Policy 82 has a positive effect as it prevents light intrusion in areas of open countryside. Protecting high quality agricultural land is likely to conserve and enhance the landscape, meaning a positive effect for policy 83. Negligible effect for policies 80, 81.										
3. Hist. built env	++	+	++	+	++	+	0	0	0	0	
Hist. built env. commentary	The protection and enhancement of features of cultural and historic value, and important views, means a major positive effect for policy 74. Restricting development in AONBs will benefit heritage assets and ensure high quality design in new development, so a positive effect for policy 75. Restricting development in CPAs will benefit the Jurassic Coast World Heritage Site, leading to a major positive effect. Policy 77 protects views relating to heritage assets and, as such, is likely to have a positive effect. Preventing settlement coalescence and recognising the character of settlements is likely to have major positive effects on the historic and built environment for policy 78. Restricting development in land of local amenity importance and Local Green Spaces means that policy 79 will have a positive effect on the historic and built environment. Negligible effect for policies 80-83.										

Local Plan Chapter 12. Caring for our outstanding landscape											
Policy SA Objective	74. Landscape	75. AONBs	76. Coastal	77. Strat. Visual	78. Green wedges	79. Amenity or LGS	80. Contam. Land	81. Hazardous	82. Pollution	83. Agri. land	
4. Climate change carbon emissions	0	0	0	0	0	0	0	0	0	0	
Climate change carbon emissions commentary	Negligible effect for all policies in chapter 12.										
5. Climate change adaptation	++	0	+	0	0	0	0	0	0	+	
Climate change adaptation commentary	The protection and enhancement of watercourses, irreplaceable habitats, and trees will help adapt to increased flood risk, heat, drought and extreme storms from climate change, meaning a major positive effect for policy 74. Minor positive effect for policy 76 from restricting development in CPAs which may suffer from coastal erosion and sea level rises, as a result of climate change. Protecting high quality agricultural land is likely to mean it is better able to cope with more periods of drought, so a positive effect for policy 83. Negligible effect for policies 75, 77, 78, 79, 80, 81, 82.										
6. Land resources	+	+	+	0	+	+	++	0	++	++	
Land resources commentary	Protection of best and most versatile agricultural land means a positive effect for policy 74. Land resources will be protected in AONBs, so a positive effect for policy 75. Restricting development in CPAs, green wedges, LLA and LGS will benefit land resources in these areas (policies 76, 78, 79). A major positive effect is likely from policy 80 as it requires detail on contaminated land where contamination is anticipated, with measures to remediate the site where necessary. The control of pollution will minimise degradation										

Local Plan Chapter 12. Caring for our outstanding landscape											
Policy SA Objective	74. Landscape	75. AONBs	76. Coastal	77. Strat. Visual	78. Green wedges	79. Amenity or LGS	80. Contam. Land	81. Hazardous	82. Pollution	83. Agri. land	
	of land resources, resulting in a major positive effect for policy 82. A major positive from policy 83 due to its detailed protection of best and most versatile agricultural land. Negligible effect for policies 77, 81.										
7. Water resources	+	0	0	0	0	0	++	0	++	0	
Water resources commentary	Policy 74 will protect and enhance watercourses and water bodies, with positive effects on water quality. Assessing and remediating contaminated land is likely to benefit water quality, so a major positive effect for policy 80. Similarly, policy 82 control pollution of surface or underground waters, again leading to a major positive effect. Negligible effect for policies 75, 76, 77, 78, 79, 81, 83.										
8. Homes	- ?	- ?	- ?	- ?	- ?	- ?	- ?	- ?	- ?	- ?	
Homes commentary	It is possible that all policies in chapter 12 could restrict housing delivery, depending upon the location of proposals, so a negative uncertain effect.										
9. Health and well-being	+	+	+	+	+	+	++	++	++	0	
Health and well-being commentary	Protecting and enhancing landscape features is likely to support healthy and active communities due to access to recreation spaces, resulting in a minor positive effect for policy 74. Policy 75 promotes understanding or enjoyment of AONBs and as such supports healthy and active communities, leading to a positive effect. Policy 76 supports public access to the coast, so will have a positive effect on health and well-being. The protection of views from public rights of way will ensure access to attractive recreation spaces, so a										

Local Plan Chapter 12. Caring for our outstanding landscape											
Policy SA Objective	74. Landscape	75. AONBs	76. Coastal	77. Strat. Visual	78. Green wedges	79. Amenity or LGS	80. Contam. Land	81. Hazardous	82. Pollution	83. Agri. land	
	positive effect for policy 77. Policies 78 and 79 support open space, play and recreation in green wedges, LLAI and LGS so will have a positive effect. Assessing and remediating contaminated land, and controlling various forms of pollution, will lead to major positive health and safety effects (policies 80, 82). Restricting development within notified consultation zones will have major positive health and safety effects for policy 81. Negligible effect for policy 83.										
10. Access to services	0	0	0	0	0	0	0	0	0	0	
Access to services commentary	Negligible effect for all policies in chapter 12.										
11. Jobs and employment	- ?	- ?	- ?	- ?	- ?	- ?	- ?	- ?	- ?	- ?	
Jobs/employment commentary	It is possible that all policies in chapter 12 could restrict employment land delivery, depending upon the location of proposals, so a negative uncertain effect.										
12. Town centres	0	0	0	0	0	0	0	0	0	0	
Town centres commentary	Negligible effect for all policies in chapter 12.										

Local Plan Chapter 12. Caring for our outstanding landscape											
Policy SA Objective	74. Landscape	75. AONBs	76. Coastal	77. Strat. Visual	78. Green wedges	79. Amenity or LGS	80. Contam. Land	81. Hazardous	82. Pollution	83. Agri. land	
13. Connectivity and transport	0	0	0	0	0	0	0	0	0	0	
Connectivity and transport commentary	Negligible effect for all policies in chapter 12.										
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: None identified.											
Preferred alternative: Policies 74 – 83											
Reasons for alternatives being preferred or rejected: - Policies 74 – 83 are preferred due to numerous and wide ranging benefits relating to biodiversity, landscape, the historic and built environment, land/water resources and health. 74A. Do not include a policy to protect landscape features – this alternative would result in some uncertainty on the positive effects for objective 2, so is rejected. 75A. Do not include a policy to protect AONBs – although AONBs are afforded protection in legislation and by the NPPF, given that two thirds of East Devon is designated as AONB, this alternative could reduce the positive effects and cause uncertainty. 78A. Do not have green wedges – this alternative is rejected as it would result in negative effects on landscape (objective 2) as could potentially lead to settlement coalescence. It would also have less positive effects in relation to associated benefits of green wedges, such as flood management, recreation and biodiversity.											

Local Plan Chapter 12. Caring for our outstanding landscape										
Policy SA Objective	74. Landscape	75. AONBs	76. Coastal	77. Strat. Visual	78. Green wedges	79. Amenity or LGS	80. Contam. Land	81. Hazardous	82. Pollution	83. Agri. land
78B. Have more extensive green wedges – this is rejected as it would go beyond the area of land required to avoid settlement coalescence and protect the character of settlements in close proximity to each other, and would lead to negative impacts on housing (objective 8) and employment land (objective 11) delivery. 79A. Do not include a policy on land of local amenity importance or Local Green Space – this would cause negative uncertain effects on biodiversity (objective 1) and landscape (objective 2), due to potential for the 14 areas designated as land of local amenity important to be under pressure from development given their location in settlement boundaries; and less positive effects in relation to the policy approach in areas designated as Local Green Space. Therefore, this alternative is rejected.										

Local Plan Chapter 13. Protecting and enhancing our outstanding biodiversity and geodiversity

Policy number/title:

- 84. Policy – Protection of internationally and Nationally important wildlife sites
- 85. Policy – Protection of irreplaceable habitats and important features
- 86. Policy – Habitats Regulations Assessment
- 87. Policy – Biodiversity Net Gain
- 88. Strategic Policy – Local Nature Recovery Strategy and Nature Recovery Network
- 89. Policy – Ecological Impact Assessment
- 90. Policy – Due consideration of protected and notable species

91. Policy – Ecological enhancement and incorporation of design features to maximise the biodiversity value of proposals

92. Policy – Tree policy

93. Policy – Protection and enhancement of the Jurassic Coast World Heritage site

94. Policy – Protection of designated geological sites

95. Policy – Regionally Important Geological and Geomorphological Sites

Reasonable alternatives:

84A. Do not include a policy on the matters covered by policies in chapter 13.

87A. Require 10% Biodiversity Net Gain

87B. Require higher than 20% Biodiversity Net Gain

Outline of reasons for selecting the alternatives:

The proposed policies are consistent national policy on conserving and enhancing the natural environment, along with objectives contained in the Council Plan, and the Local Plan itself. Reasonable alternatives to these policies have been identified where differing approaches could be acceptable in this wider policy context.

Local Plan Chapter 13. Protecting and enhancing our outstanding biodiversity and geodiversity													
Policy SA Objective	84. Wildlife sites	85. Habitats	86. HRA	87. Bio. Net Gain	88. Nature recovery	89. Eco. Impact Ass.	90. Species	91. Max. biodiversity	92. Trees	93. Jurassic Coast	94. Geological sites	95. RIGS	
1. Biodiversity	++	++	++	++	++	++	++	++	++	++	++	++	
Biodiversity commentary	The intention of policies 84-92 is to conserve and enhance habitat and wildlife – therefore these policies will have major positive effects on this objective. Policies 93, 94 and 95 relate to the protection of geological sites – these are supportive of and complementary to wildlife interests, so indirect major positive effects are likely.												
2. Landscape	+	++	+	+	+	+	+	0	+	++	+	+	
Landscape commentary	Minor positive effect is likely for policies 84, 86, 87, 89 as the protection of wildlife sites and species, and Biodiversity Net Gain, will have indirect benefits for landscape character. Features protected by policy 85 such as ancient woodland, veteran trees and hedgerow, are also special landscape qualities, so a major positive effect is likely. Contribution to the Local Nature Recovery Strategy is also likely to benefit landscape character, so a minor positive effect for policy 88. The protection of existing trees and provision of additional trees in policy 92 will benefit landscape character. The restriction of development along the Jurassic Coast World Heritage Site will have a major positive effect on conserving and enhancing the undeveloped coast and seascape (policy 93). Minor positive effects are likely from protecting nationally and regionally (policies 94, 95) designated geological sites, as they often contribute to the special qualities and character of the landscape. Negligible effect for policy 91 as the measures are specific, small-scale design features to maximise biodiversity value.												
3. Hist. built env	0	+	0	+	+	0	0	0	+	++	0	0	
Hist. built env. commentary	The retention of ancient woodland, trees and hedgerow in new development can promote high quality design, so policy 85 will have a minor positive effect. The incorporation of Biodiversity Net Gain (BNG) is likely to promote high quality design through incorporation of habitat creation in new development, so a minor positive effect for policy 87. Contribution to the Local Nature Recovery Strategy is also												

Local Plan Chapter 13. Protecting and enhancing our outstanding biodiversity and geodiversity													
Policy SA Objective	84. Wildlife sites	85. Habitats	86. HRA	87. Bio. Net Gain	88. Nature recovery	89. Eco. Impact Ass.	90. Species	91. Max. biodiversity	92. Trees	93. Jurassic Coast	94. Geological sites	95. RIGS	
	likely to help achieve high quality design, so a minor positive effect for policy 88. The protection of existing trees and provision of additional trees in policy 92 will promote high quality design. The restriction of development along the Jurassic Coast World Heritage Site, a designated heritage asset of the highest significance, means a major positive effect for policy 93. Negligible effect is likely for policies 84, 86, 89, 90, 91, 94, 95.												
4. Climate change carbon emissions	0	+	0	0	0	0	0	0	0	0	0	0	
Climate change carbon emissions commentary	Negligible effect for all policies in chapter 13, apart from a positive effect for policy 85 through its protection of blanket bog which stores carbon.												
5. Climate change adaptation	+	+	+	+	+	+	+	+	+	0	0	0	
Climate change adaptation commentary	The protection of wildlife sites and irreplaceable habitats will likely make them more resilient to climate change, resulting in a minor positive effect for policies 84, 85, 86, 89, 90 Policy 87 refers to flood risk mitigation benefits, which will help adaptation to increased flood risk and extreme storms from climate change. Contribution to the Local Nature Recovery Strategy is likely to help biodiversity adapt to the effects of climate change, so a minor positive effect for policy 88. Ecological enhancement measures in policy 91 can help species adapt to climate change. The protection of existing trees and provision of additional trees in policy 92 will benefit climate change adaptation by providing shade in hotter summers; and slowing down run-off and so minimising flood risk in extreme storms. Negligible effect for policies 93, 94 and 95.												

Local Plan Chapter 13. Protecting and enhancing our outstanding biodiversity and geodiversity													
Policy SA Objective	84. Wildlife sites	85. Habitats	86. HRA	87. Bio. Net Gain	88. Nature recovery	89. Eco. Impact Ass.	90. Species	91. Max. biodiversity	92. Trees	93. Jurassic Coast	94. Geological sites	95. RIGS	
6. Land resources	+	+	+	+	+	+	+	0	+	+	+	+	
Land resources commentary	The protection of wildlife sites and irreplaceable habitats will minimise the loss or degradation of land resources, so policies 84, 85, 86, 88, 89 are likely to have a positive effect. BNG is likely to minimise the degradation of land resources, so a positive effect for policy 87. Due consideration of protected and notable species will also indirectly minimise the loss or degradation of land resources resulting in a positive effect for policy 90. The protection of existing trees will minimise the loss of land resources, so a minor positive effect for policy 92. Policies 93, 94 and 95 protect geological sites and, as such, are likely to have a positive effect on land resources. Negligible effect for policy 91 as the measures are specific, small-scale design features to maximise biodiversity value.												
7. Water resources	+	+	++	+	+	+	+	0	+	0	0	0	
Water resources commentary	The protection of wildlife sites and species will minimise the loss or degradation of water resources, so policy 84, 89, 90 is likely to have a positive effect. Policy 85 includes protection of salt marsh, so will have a positive effect on water quality. Policy 86 requires nutrient neutrality and water efficiency for development in the River Axe SAC catchment, the most sensitive area of the district in terms of water quality, so will have a major positive effect. Habitat creation from BNG, contribution to the Local Nature Recovery Strategy is likely to include water resources, resulting in a positive effect for policies 87, 88. The protection of existing trees and provision of additional trees can improve water quality by filtering water, so a minor positive effect for policy 92. Negligible effect for policy 91 as the measures are specific, small-scale design features to maximise biodiversity value. Negligible effect also likely for policies 93, 94 and 95.												
8. Homes	- ?	- ?	- ?	- ?	- ?	- ?	- ?	- ?	- ?	- ?	- ?	- ?	

Local Plan Chapter 13. Protecting and enhancing our outstanding biodiversity and geodiversity													
Policy SA Objective	84. Wildlife sites	85. Habitats	86. HRA	87. Bio. Net Gain	88. Nature recovery	89. Eco. Impact Ass.	90. Species	91. Max. biodiversity	92. Trees	93. Jurassic Coast	94. Geological sites	95. RIGS	
Homes commentary	It is possible that all policies in chapter 13 could restrict housing delivery, depending upon the location of proposals, so a negative uncertain effect.												
9. Health and well-being	+	0	++	+	+	0	0	0	+	0	0	0	
Health and well-being commentary	Wildlife sites often provide recreation space, so policy 84 will support healthy communities through their protection. Mitigation measures in policy 86 include provision of attractive and functional recreation spaces, resulting in a major positive effect. Policy 87 recognises the health and well-being community benefits of habitat creation, so a positive effect. Similarly, contribution to the Local Nature Recovery Strategy can have indirect benefits by creating recreation spaces, so a minor positive effect for policy 88. Air quality is likely to improve through the protection of existing trees and provision of additional trees, which filter pollutants from the air, benefitting health. Negligible effect for policies 85, 89, 90, 91, 93, 94, and 95												
10. Access to services	0	0	0	0	0	0	0	0	0	0	0	0	
Access to services commentary	Negligible effect for all policies in chapter 13.												
11. Jobs and employment	- ?	- ?	- ?	- ?	- ?	- ?	- ?	- ?	- ?	- ?	- ?	- ?	

Local Plan Chapter 13. Protecting and enhancing our outstanding biodiversity and geodiversity													
Policy SA Objective	84. Wildlife sites	85. Habitats	86. HRA	87. Bio. Net Gain	88. Nature recovery	89. Eco. Impact Ass.	90. Species	91. Max. biodiversity	92. Trees	93. Jurassic Coast	94. Geological sites	95. RIGS	
Jobs/employment commentary	It is possible that all policies in chapter 12 could restrict employment land delivery, depending upon the location of proposals, so a negative uncertain effect.												
12. Town centres	0	0	0	0	0	0	0	0	0	0	0	0	
Town centres commentary	Negligible effect for all policies in chapter 13.												
13. Connectivity and transport	0	0	0	0	0	0	0	0	0	0	0	0	
Connectivity and transport commentary	Negligible effect for all policies in chapter 13.												
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: None identified.													
Preferred alternative: Policies 84-95													
Reasons for alternatives being preferred or rejected: Policies 84-95 are preferred due to numerous and wide ranging benefits relating to biodiversity, landscape, the historic and built environment, land/water resources and health.													

Local Plan Chapter 13. Protecting and enhancing our outstanding biodiversity and geodiversity												
Policy SA Objective	84. Wildlife sites	85. Habitats	86. HRA	87. Bio. Net Gain	88. Nature recovery	89. Eco. Impact Ass.	90. Species	91. Max. biodiversity	92. Trees	93. Jurassic Coast	94. Geological sites	95. RIGS
84A. Do not include a policy on the matters covered by policies in chapter 13 – this is rejected as, whilst many matters are covered by legislation and national policy, the positive effects would be more uncertain as it would reduce the scope to highlight issues of local importance, including specific localised mitigation measures. 87A. Require 10% Biodiversity Net Gain – this would reflect The Environment Act 2021, and would enable more developer contributions to be directed towards other issues such as affordable housing. However, evidence indicates that 10% is the minimum necessary to halt biodiversity loss, and this alternative has less positive and more uncertain effects on biodiversity, and is therefore rejected. 87B. Require higher than 20% Biodiversity Net Gain – this is rejected as it would limit developer contributions towards obligations such as affordable housing, open/play space, and sustainable travel measures. Viability issues could also inhibit housing supply in general.												

Local Plan Chapter 14. Open space and sports and recreation facilities

Policy number/title:

96. Strategic Policy – Access to open space and recreation facilities

97. Policy – Land and buildings for sport, recreation and open space areas in association with development

98. Policy – Location of facilities for sport and recreation, open spaces and allotments

99. Policy – Retention of land and buildings for sport and recreation use

100. Policy – New allotments and avoiding the loss of existing ones

101. Policy – Leisure and recreation developments in the countryside

Reasonable alternatives:

96A. Do not have a policy that promotes access to open space and recreation facilities

97A. Lower level of provision of land and buildings for sport, recreation and open space in new development

98A. Do not set out location criteria and offer more flexibility on the location of facilities

99A. Less restrictive approach to the loss of land and buildings for sport and recreation use

100A. Less restrictive approach to the loss of allotments to other uses

101A. Less restrictive approach to leisure and recreation developments in the countryside

Outline of reasons for selecting the alternatives:

The proposed policies are consistent national policy on promoting healthy and safe communities through the provision of accessible open spaces, along with objectives contained in the Council Plan, and the Local Plan itself. Reasonable alternatives to these policies have been identified where differing approaches could be acceptable in this wider policy context.

Local Plan Chapter 14. Open space and sports and recreation facilities							
Policy SA Objective	96. Access	97. Sport etc. buildings	98. Location	99. Retention of land	100. Allotments	101. Countryside	
1. Biodiversity	+	+	+	+	+	- ?	

Local Plan Chapter 14. Open space and sports and recreation facilities							
Policy SA Objective	96. Access	97. Sport etc. buildings	98. Location	99. Retention of land	100. Allotments	101. Countryside	
Biodiversity commentary	Open space, sports and recreation uses are often formed of green infrastructure which can have biodiversity value and enable habitat connectivity, so a minor positive effect for policy 96. Similarly, policy 97 requires several types of open space that can also benefit biodiversity; namely allotments, amenity open space, outdoor pitches, parks and recreation grounds, and natural and semi-natural greenspace. Policy 98 supports new open space, allotments and parks provided that unacceptable adverse environmental impacts do not arise, so will have a likely positive effect on biodiversity. The retention of land for open space, sport or recreation results in a positive effect for policy 99. Allotments can have biodiversity value and enable habitat connectivity, resulting in a positive effect for policy 100. The countryside location for outdoor recreation facilities (policy 101) has the potential for negative biodiversity effects, but proposals must be in scale with environmental characteristics, so the effect is uncertain depending upon the proposal and location.						
2. Landscape	+	+	+	+	+	- ?	
Landscape commentary	The generally open and green nature of open space, sports and recreation uses is likely to conserve and enhance the landscape, leading to positive effects for policies 96, 97, 98, 99. The provision of new allotments, and protection of existing ones, will benefit landscape character (policy 100). The countryside location for outdoor recreation facilities (policy 101) has the potential for negative effects on the landscape, undeveloped coast and seascape, but proposals must be in scale with environmental characteristics, so the effect is uncertain depending upon the proposal and location.						
3. Hist. built env	+	+	+	+	+	0	
Hist. built env. commentary	Ensuring access to open space, sports and recreation uses will promote high quality design, and therefore a positive effect for policies 96, 97, 98. Similarly, policy 99 does not permit the loss of open space, sport or recreation uses unless there are exceptional circumstances, helping to retain high quality design. The provision of new allotments, and protection of existing ones, can also promote high quality design (policy 100).						

Local Plan Chapter 14. Open space and sports and recreation facilities							
Policy SA Objective	96. Access	97. Sport etc. buildings	98. Location	99. Retention of land	100. Allotments	101. Countryside	
	Negligible effect for policy 101 as it relates to outdoor recreation facilities in the countryside, rather than alongside new housing development.						
4. Climate change carbon emissions	+	+	+	+	+	-	
Climate change carbon emissions commentary	The provision of open space, sports and recreation uses in accessible locations will minimise carbon emissions associated with travel, so policy 96 is likely to have a positive effect. Policy 97 sets distance standards on accessing open space types from new housing which are between 480-800m, minimising the need to travel so a positive effect on carbon emissions. Policy 98 supports open space, sport and recreation facilities within or adjoining built-up areas, reducing the need to travel and offering sustainable travel opportunities – therefore a positive effect from minimising carbon emissions associated with travel. Similarly, the retention of land for open space, sport or recreation results in a positive effect for policy 99. The provision of new allotments where there are well related to settlements, and protection of existing ones, will minimise carbon emissions from travel and also, to a limited degree, from food production. The countryside location of outdoor recreation facilities allowed in policy 101 is likely to have negative effects on carbon emissions from travel.						
5. Climate change adaptation	+	+	+	+	+	0	
Climate change adaptation commentary	The open and green nature of open space, sports and recreation uses can help reduce flood risk in new development, so policies 96, 97, 98, 99, 100 are likely to have a positive effect on adapting to the effects of climate change. Negligible effect for policy 101 as it relates to outdoor recreation facilities in the countryside, rather than alongside new housing development.						

Local Plan Chapter 14. Open space and sports and recreation facilities							
Policy SA Objective	96. Access	97. Sport etc. buildings	98. Location	99. Retention of land	100. Allotments	101. Countryside	
6. Land resources	0	0	0	0	0	0	
Land resources commentary	Negligible effect for all policies in chapter 14.						
7. Water resources	0	0	0	0	0	0	
Water resources commentary	Negligible effect for all policies in chapter 14.						
8. Homes	0	0	0	0	0	0	
Homes commentary	Negligible effect for all policies in chapter 14.						
9. Health and well-being	++	++	++	++	++	+	
Health and well-being commentary	Policies 96, 97, 98 are likely to have major positive effects by ensuring accessible open space, sports and recreation facilities as it will support healthy and active communities. The retention of land for open space, sport or recreation results in a major positive effect for policy 99. The provision of new allotments, and protection of existing ones, will likely support healthy (physically and mentally) and active communities, so a major positive effect is identified for policy 100. Minor positive for policy 101 as, although it provides recreation facilities, the countryside location limits their accessibility.						

Local Plan Chapter 14. Open space and sports and recreation facilities							
Policy SA Objective	96. Access	97. Sport etc. buildings	98. Location	99. Retention of land	100. Allotments	101. Countryside	
10. Access to services	0	0	0	0	0	0	
Access to services commentary	Negligible effect for all policies in chapter 14.						
11. Jobs and employment	0	0	0	0	0	0	
Jobs/employment commentary	Negligible effect for all policies in chapter 14.						
12. Town centres	0	0	0	0	0	0	
Town centres commentary	Negligible effect for all policies in chapter 14.						
13. Connectivity and transport	0	0	0	0	0	0	
Connectivity and transport commentary	Negligible effect for all policies in chapter 14.						

Local Plan Chapter 14. Open space and sports and recreation facilities							
Policy SA Objective	96. Access	97. Sport etc. buildings	98. Location	99. Retention of land	100. Allotments	101. Countryside	
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: None identified.							
Preferred alternative: Policies 96 – 101							
Reasons for alternatives being preferred or rejected: - Policies 96 – 101 are preferred because of major positive effects on supporting healthy and active communities, along with a range of other benefits to biodiversity, landscape, design, and climate change mitigation and adaptation. 96A. Do not have a policy that promotes access to open space and recreation facilities – this alternative is rejected due to less significant positive effects relating to the built environment (objective 3) and health and well-being (9). 97A. Lower level of provision of land and buildings for sport, recreation and open space in new development – whilst this alternative may allow more development to come forward, it will have less positive effects in relation to the built environment (objective 3) and health and well-being (9), and is therefore rejected. 98A. Do not set out location criteria and offer more flexibility on the location of facilities – this could allow more facilities to come forward, but potentially in locations that are less accessible for those without a car, with negative effects on creating high quality design (objective 3), minimising carbon emissions (4), supporting healthy and active communities (9). 99A. Less restrictive approach to the loss of land and buildings for sport and recreation use – this is not preferred as it would cause likely negative effects on promoting high quality design (objective 3), and supporting health and active communities (9). 100A. Less restrictive approach to the loss of allotments to other uses – although this could increase housing and employment delivery, the negative effects upon biodiversity (objective 1), landscape (2), high quality design (3) and health and well-being (9) mean this alternative is not preferred. 101A. Less restrictive approach to leisure and recreation development in the countryside – whilst this alternative could open up new opportunities for leisure and recreation provision, it is likely to result in adverse landscape impacts (objective 2), and increase carbon emissions (4) given the likely use of the car to access such development, and is therefore rejected.							

Local Plan Chapter 15. Our outstanding historic environment

Policy number/title:

102. Policy – Historic environment

103. Policy – Listed buildings

104. Policy – Conservation Areas

105. Policy – Archaeology and Scheduled Monuments

106. Policy – Historic Landscapes, parks and gardens

Reasonable alternatives:

102A. Do not include policies on the conservation and enhancement of the historic environment

Outline of reasons for selecting the alternatives:

The proposed policies are consistent national policy on conserving and enhancing the historic environment, along with objectives contained in the Council Plan, and the Local Plan itself. Reasonable alternatives to these policies have been identified where differing approaches could be acceptable in this wider policy context.

Local Plan Chapter 15. Our outstanding historic environment						
Policy SA Objective	102. Historic Env.	103. Listed buildings	104. Con. Areas	105. Archaeology	106. Hist. landscapes	
1. Biodiversity	0	0	0	0	0	
Biodiversity commentary	Negligible effect for all policies in chapter 15.					
2. Landscape	+	+	+	+	++	
Landscape commentary	The conservation and enhancement of the historic environment will have positive effects on landscape character, for policies 102-105. The focus of policy 106 on historic landscapes, parks and gardens means a major positive effect.					
3. Hist. built env	++	++	++	++	++	
Hist. built env. commentary	The purpose of chapter 15 is the conservation and enhancement of the historic environment, so major positive effects are identified for all policies.					
4. Climate change carbon emissions	-	0	0	0	0	
Climate change carbon emissions commentary	Policy 102 requires alterations to historic buildings to improve energy efficiency or reduce carbon emissions to respect the historic environment – this could restrict the potential for historic buildings to minimise carbon emissions, so will likely have a minor negative effect. Negligible effect for all other policies in chapter 15.					

Local Plan Chapter 15. Our outstanding historic environment						
Policy SA Objective	102. Historic Env.	103. Listed buildings	104. Con. Areas	105. Archaeology	106. Hist. landscapes	
5. Climate change adaptation	0	0	0	0	0	
Climate change adaptation commentary	Negligible effect for all policies in chapter 15.					
6. Land resources	0	0	0	0	0	
Land resources commentary	Negligible effect for all policies in chapter 15.					
7. Water resources	0	0	0	0	0	
Water resources commentary	Negligible effect for all policies in chapter 15.					
8. Homes	+ / - ?	- ?	- ?	- ?	- ?	
Homes commentary	It is possible that all policies in chapter 15 could restrict housing delivery in proximity to heritage assets, depending upon the location of proposals, so a negative uncertain effect. The encouragement of schemes to secure the long-term conservation of vacant and under-used buildings and bring them back into appropriate use, which can include housing, means a positive effect for policy 50.					

Local Plan Chapter 15. Our outstanding historic environment						
Policy SA Objective	102. Historic Env.	103. Listed buildings	104. Con. Areas	105. Archaeology	106. Hist. landscapes	
9. Health and well-being	0	0	0	0	0	
Health and well-being commentary	Negligible effect for all policies in chapter 15.					
10. Access to services	0	0	0	0	0	
Access to services commentary	Negligible effect for all policies in chapter 15.					
11. Jobs and employment	+ / - ?	- ?	- ?	- ?	- ?	
Jobs/employment commentary	It is possible that all policies in chapter 15 could restrict employment land delivery in proximity to heritage assets, depending upon the location of proposals, so a negative uncertain effect. The encouragement of schemes to secure the long-term conservation of vacant and under-used buildings and bring them back into appropriate use, which can include employment, means a positive effect alongside negative uncertain effect for policy 102.					
12. Town centres	0	0	0	0	0	

Local Plan Chapter 15. Our outstanding historic environment						
Policy SA Objective	102. Historic Env.	103. Listed buildings	104. Con. Areas	105. Archaeology	106. Hist. landscapes	
Town centres commentary	Negligible effect for all policies in chapter 15.					
13. Connectivity and transport	0	0	0	0	0	
Connectivity and transport commentary	Negligible effect for all policies in chapter 15.					
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: None identified.						
Preferred alternative: Policies 102-106						
Reasons for alternatives being preferred or rejected: - Policies 102-106 are preferred due to major positive effects on conserving and enhancing heritage assets (objective 3), along with positive effects on the landscape (objective 2). 102A. Do not include policies on the conservation and enhancement of the historic environment – although legislation and national policy would still provide strong protection for designated heritage assets, this alternative would result in less positive effects on the historic and built environment, with some uncertainty, particularly for non-designated heritage assets.						

Local Plan Chapter 16. Ensuring we have community buildings and facilities

Policy number/title

107. Policy – New or extended community facilities

108. Policy – Loss of community facilities

Reasonable alternatives

107A. Less restrictive approach to the provision of community facilities in terms of location and meeting a local need

108A. Less restrictive approach to the loss of community facilities

Outline of reasons for selecting the alternatives

The proposed policies are consistent national policy on the provision of new community facilities, and protection of existing facilities, along with objectives contained in the Council Plan, and the Local Plan itself. Reasonable alternatives to these policies have been identified where differing approaches could be acceptable in this wider policy context.

Local Plan Chapter 16. Ensuring we have community buildings and facilities			
Policy SA Objective	107. New facilities	108. Loss of facilities	
1. Biodiversity	0	0	

Local Plan Chapter 16. Ensuring we have community buildings and facilities			
Policy SA Objective	107. New facilities	108. Loss of facilities	
Biodiversity commentary	Negligible effect for policies 107 and 108.		
2. Landscape	0	0	
Landscape commentary	Negligible effect for policies 107 and 108.		
3. Hist. built env	+	+	
Hist. built env. commentary	The provision and protection of community facilities will promote high quality design and accessibility in new development, and therefore a positive effect for policies 107 and 108.		
4. Climate change carbon emissions	+	+	
Climate change carbon emissions commentary	Allowing new community facilities in locations that are well-related to an existing settlement should minimise carbon emissions associated with travel, leading to a minor positive effect for policy 107. Preventing the loss of community should will have similar effects.		
5. Climate change adaptation	0	0	

Local Plan Chapter 16. Ensuring we have community buildings and facilities			
Policy SA Objective	107. New facilities	108. Loss of facilities	
Climate change adaptation commentary	Negligible effect for policies 107 and 108.		
6. Land resources	0	0	
Land resources commentary	Negligible effect for policies 107 and 108.		
7. Water resources	0	0	
Water resources commentary	Negligible effect for policies 107 and 108.		
8. Homes	0	0	
Homes commentary	Negligible effect for policies 107 and 108.		
9. Health and well-being	+	+	

Local Plan Chapter 16. Ensuring we have community buildings and facilities			
Policy SA Objective	107. New facilities	108. Loss of facilities	
Health and well-being commentary	The provision and protection of community facilities will support healthy and active communities, and therefore a positive effect for policies 107 and 108.		
10. Access to services	++	++	
Access to services commentary	A major positive effect is likely for policies 107 and 108 as they enable the provision of accessible and attractive new community facilities, and protection of existing facilities.		
11. Jobs and employment	0	0	
Jobs/employment commentary	Negligible effect for policies 107 and 108.		
12. Town centres	0	0	
Town centres commentary	Negligible effect for policies 107 and 108.		
13. Connectivity and transport	0	0	

Local Plan Chapter 16. Ensuring we have community buildings and facilities			
Policy SA Objective	107. New facilities	108. Loss of facilities	
Connectivity and transport commentary	Negligible effect for policies 107 and 108.		
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: None identified.			
Preferred alternative: Policies 107 and 108			
Reasons for alternatives being preferred or rejected: - Policies 107 and 108 are preferred due to major positive effects on providing accessible and attractive community facilities, with consequent positive effects on health, design and minimising carbon emissions. 107A. Less restrictive approach to the provision of community facilities in terms of location and meeting a local need – this would likely result in community facilities in more remote locations which increases the need to travel (and associated carbon emissions) and the potential for adverse environmental impacts. Therefore, this alternative is rejected. 108A. Less restrictive approach to the loss of community facilities – although this alternative may have minor benefits in housing and employment delivery, it would lead to negative effects on supporting health and active communities and access to services and is therefore rejected.			

Appendix Six: Appraisal matrices of Preferred sites and Reasonable Alternatives

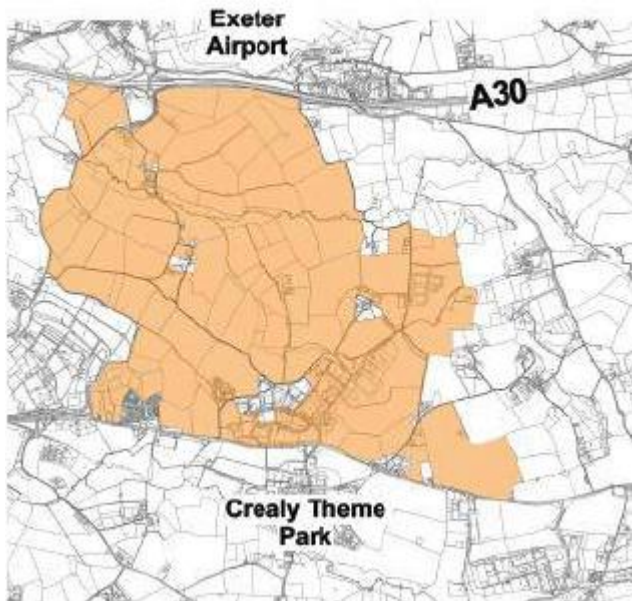
Western side of East Devon

Settlement: Second New town east of Exeter

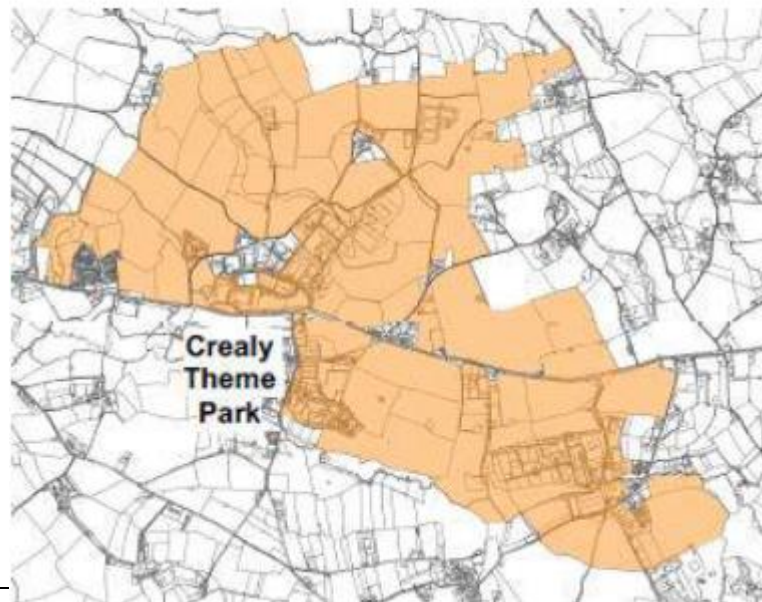
Reasonable alternatives

- Option 1
- Option 2
- Option 3

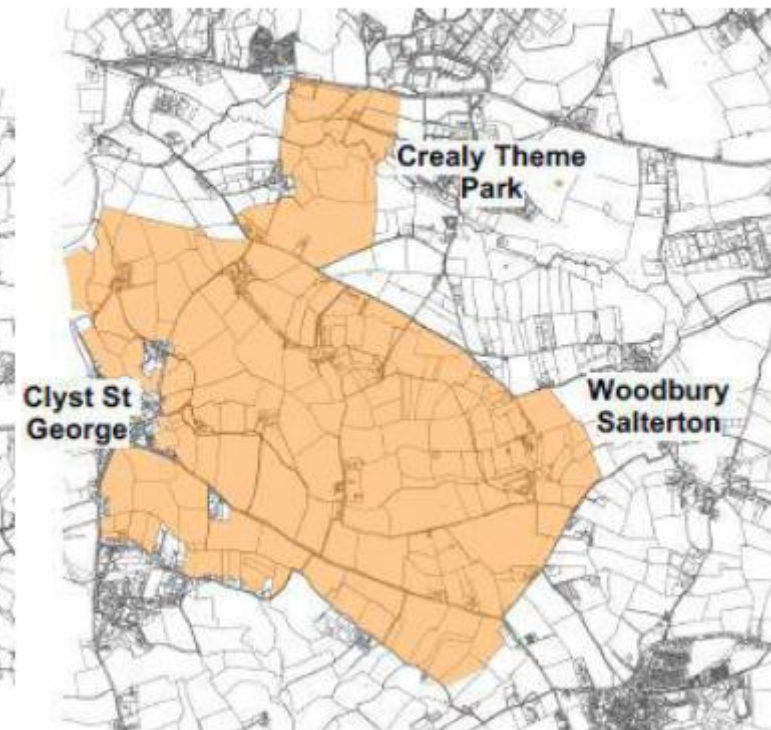
Option 1



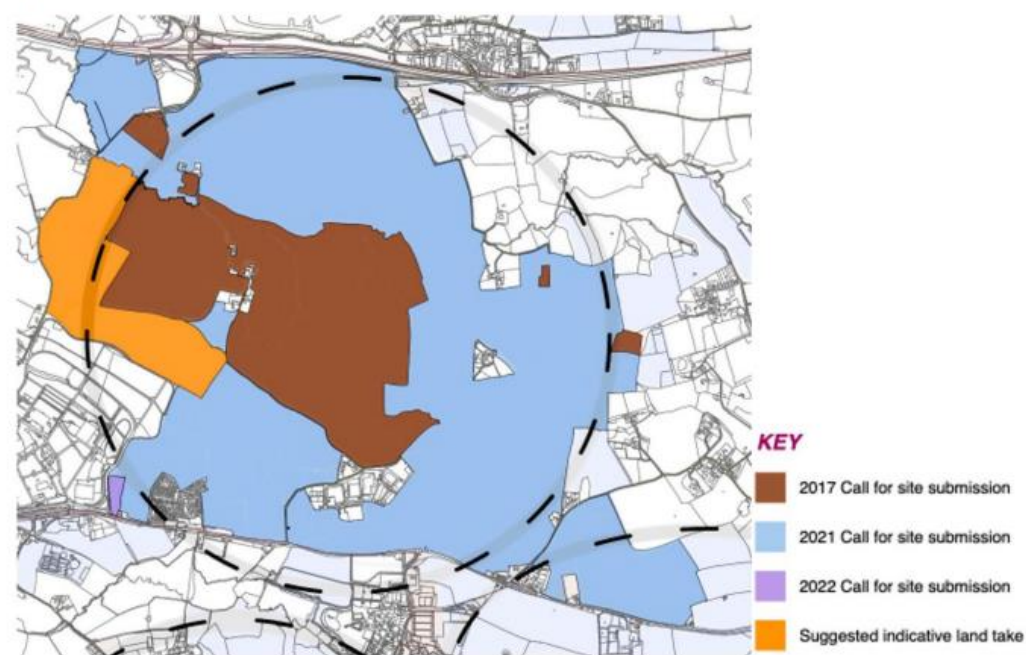
Option 2



Option 3

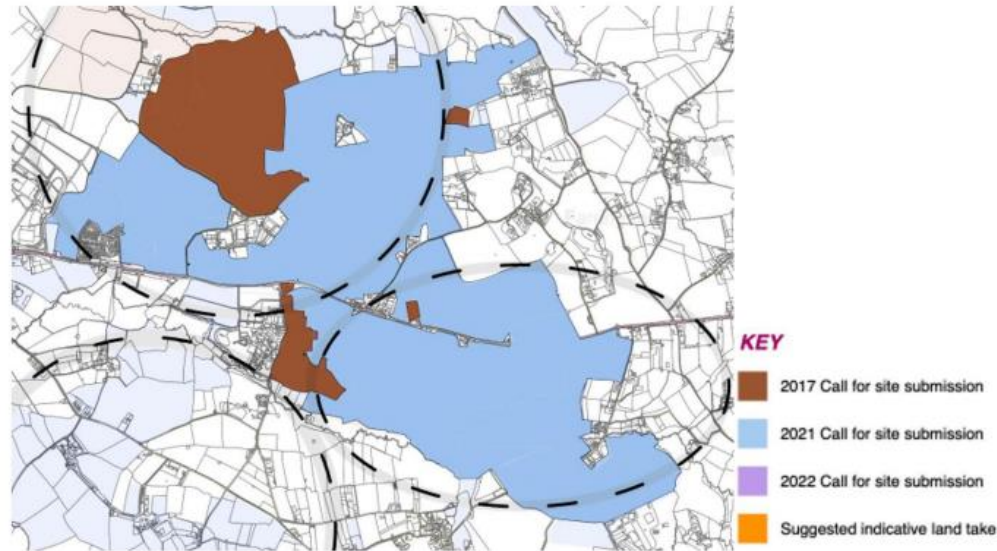


Option 1:



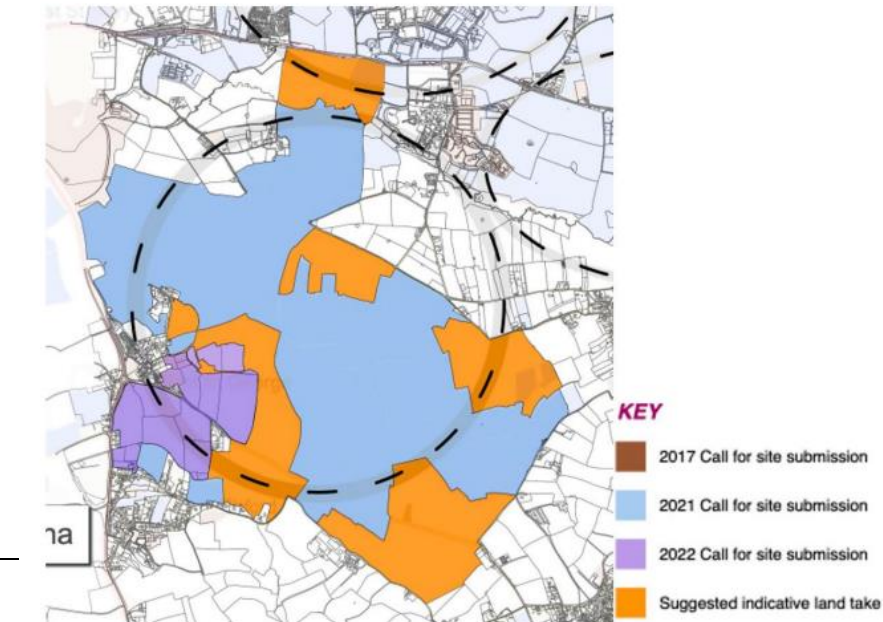
Source: Tibbalds (2022)

Option 2:



Source: Tibbalds (2022)

Option 3:



Source: Tibbalds (2022)

Outline of reasons for selecting the alternatives

Initial assessment of sites at existing settlements across East Devon indicated there would be shortfall of acceptable sites to meet the district-wide housing requirement, particularly in relation to environmental constraints given that two thirds of the district is covered by AONB. Therefore, a new settlement is required to ensure the district-wide housing requirement can be met in the most sustainable manner, consistent with the spatial strategy in the Local Plan. The broad location of the three reasonable alternatives avoid significant environmental designations (AONB, international/national biodiversity designations), are in close proximity to the wide range of jobs, facilities and services in Exeter and at the western side of East Devon, and are largely comprised of land submitted by landowners indicating they are available for development.

A settlement of around 8,000 homes would establish a town which could deliver a wide range of jobs, services, and facilities. This will minimise the need to travel, and have consequent benefits of offering greater potential for sustainable travel choices, minimising carbon emissions, and achieving good levels of self-containment overall. The long lead-in times and build-out rates for a new settlement mean that 2,500 dwellings are proposed in the Local Plan period up to the year 2040, with the remaining 5,500 dwellings to be delivered after 2040.

The vast majority of the area covered by the reasonable alternatives is formed of sites that have been assessed as suitable, available and achievable in the HELAA. This provides evidence that they can be delivered. Land in the western part of Option 1, and several parcels of land around Option 3, has not yet been submitted through a HELAA 'call for sites' (shown on the maps above as "suggested indicative land take"). These areas have been added to ensure a cohesive development of sufficient size to accommodate 8,000 dwellings – none of these 'missing' parcels are essential to opening up development at the options, and this relatively small degree of uncertainty on land availability is acceptable given the long delivery times for a new settlement.

The three options all have a land area of 521 hectares, the size required to deliver 8,000 homes and associated employment, retail, education, public open space, and gypsy and traveller pitches. The location of the three options has been refined to ensure that the existing settlements in the area would not converge with the new settlement. Several areas have been excluded from the land take for environmental reasons (flood zone 2/3, historic environment) and also to recognise existing land uses that are not likely to relocate, namely Hill Barton and Greendale Business Parks, Crealy Adventure Park, large group of buildings south east of the A3052/Oil Mill Lane junction, Exeter Athletic Rugby Club,

Exeter FC training pitches, and land west of Crealy. The three options provide, as far as possible, a nucleated, compact settlement that is conducive to active travel. Boundaries have been defined using landscape features to create rational settlement edges, including existing watercourses, field boundaries and hedgerows.

No other alternatives have been identified that meet these reasons to be considered a ‘reasonable alternative’.

Sites: New town				
Site SA Objective	Option 1	Option 2	Option 3	
1. Biodiversity	-	-	--	
Biodiversity commentary	No option is within or adjacent to any statutory wildlife sites – Option 1 is over 2km from the nearest such designation, Option 2 is 1.6km from the East Devon Pebblebed Heaths (SAC, SPA, SSSI, NNR), whilst Option 3 is 0.4km from the Exe Estuary (SPA, Ramsar, SSSI). However, all options are within the 10km recreational buffer zone for the Exe Estuary and Pebblebed Heaths within which new dwellings must provide mitigation for visitor pressure under the ‘current’ Local Plan 2013-31. A small part of Option 2 (around 20%) falls within the 10km buffer from Dawlish Warren SAC, and the majority of Option 3 (95%) is within this buffer. With regards to non-statutory (local) wildlife sites, Option 1 contains three Unconfirmed Wildlife Sites (UWS), is adjacent to several local wildlife sites, and is within 1km of a further ten local wildlife sites. Option 1 also contains land allocated for the Clyst Valley Regional Park in the west and north west. There are there UWS located in Option 2, and a further 12 local wildlife sites within 1km. there are no local wildlife sites located in Option 3, with one just 10m away from the boundary, and a further 10 sites within 1km. All options include Habitats of Principal Importance (HPI) and Devon Biodiversity Action Plan habitats, such as woodlands, veteran/ancient trees, hedgerows, rivers/streams, and ponds/lakes. The overall risk to the ecological network for Option 1 is limited, but position within wider network has potential for fragmentation effects. Option 2 also has limited overall risk and avoids			

Sites: New town				
Site SA Objective	Option 1	Option 2	Option 3	
	key areas within Habitat Network for enhancement but contains some habitats of principal importance. Option 3 has some overlap with the ecological network, especially links east-west, with closer proximity to statutory sites and supporting habits, with potential for fragmentation effects. Protected species have been recorded across all options, but Option 3 has a higher diversity likely due to its position between the Exe Estuary and Pebblebed Heaths. Overall, a likely minor negative effect is identified for Options 1 and 2, and a major negative for Option 3 given its proximity to the Exe Estuary and greater overall risk to the ecological network.			
2. Landscape	--	--	-	
Landscape commentary	There are a number of landscape sensitivities that occur throughout each option, such as the character of rural lanes, the presence of large trees and hedges, and the character of existing historic settlements on the peripheries. Much of the area is visible from surrounding high land, including parts of the East Devon AONB. Unique sensitivities for Option 1 are the quality and integrity of the historic rural landscape and associated Holbrook river corridors flowing east-west through the option. The eastern end of Option 2 has the highest elevation of the three options and is widely visible in the surrounding landscape. For Option 3, particularly high sensitivity occurs in the south where there is intervisibility with land to the south and the East Devon AONB, the east where the land is relatively steep with medieval field patterns, and the setting of Clyst St George in the south west. In addition to Clyst St George, there is potential for settlement coalescence with Clyst St Mary and Ebford, given they adjoin the boundary of Option 3. Across the three Options, land with the lowest landscape sensitivity is found in the southern part of Option 1 (overlapped by the western part of Option 2), and the northern part of Option 3. Overall, Option 3 has medium landscape sensitivity, and Options 1 and 2 have high-medium landscape sensitivity. Therefore, Options 1 and 2 are likely to have a major negative effect, whilst Option 3 will have a minor negative effect.			

Sites: New town				
Site SA Objective	Option 1	Option 2	Option 3	
3. Historic and built environment	-	-	-	
Hist. built env. commentary	Option 1 contains one Grade II listed property to the south east, and a registered park and garden close to the north west boundary, with all other Grade II and II* listed buildings excluded from the land identified for a new settlement. Option 2 also contains just one Grade II listed building in the site area, with multiple other Grade II and II* listed properties excluded from the site area. There are three Grade II listed properties in Option 3, plus a schedule monument off Woodbury Road on the western boundary of the site, with all other Grade II and II* listed buildings excluded from the land identified for a new settlement. Given this, all Options are likely to have minor negative effect due to potential impact upon the setting of designated heritage assets.			
4. Climate change and carbon emissions	++	0	+	
Climate change carbon emissions commentary	As all three Options are located in predominantly rural locations, pedestrian connectivity is currently undeveloped, although the topography of Option 2 makes it more challenging for pedestrians. Similarly, there is limited dedicated cycling infrastructure across the Options, but the rural nature of many of the local lanes results in relatively low traffic volumes, meaning they can be suitable for cyclists. The proximity of National Cycle Network Route 2 (the Exe Estuary Trail) approximately 1.5km south west of the centre of Option 3 provides a largely traffic-free cycle route to Exeter city centre to the north, and Exmouth to the south. Similarly, Option 1 benefits from a shared footway/cycleway along Old Honiton Road to the north of the Option, which connects to Cranbrook to the			

Sites: New town				
Site	Option 1	Option 2	Option 3	
SA Objective				
	north and Exeter to the west via the Science Park. Option 2 is isolated from existing dedicated cycle infrastructure and local topography is not conducive to internal cycle movements. A range of bus service frequencies (14 to 85 minutes) are available along the A3052 to and from Exeter, bisecting Option 2, and running along the southern boundary of Option 1, and northern boundary of Option 3. Other bus services are found in close proximity to Option 1 (to the north towards Cranbrook), to the south of Option 2 (Woodbury Salterton), and to the south west of Option 3 (Ebford and Topsham). Therefore, all three Options have good existing bus connections. Options 1 and 3 benefit from their proximity to Exeter and the series of train stations along the Avocet line which has a half hourly service to Exmouth and Exeter. Cranbrook train station is 3.5km north of the centre of Option 1, offering an hourly service to Exeter and London Waterloo. Option 2 has relatively poor train access, with Digby and Sowton the closest station 5.6km to the west. Topsham train station is 2.3km from Option 3. The timescale of delivering the new settlement means that all new homes should meet the Future Homes standard to be zero-carbon ready. Option 1 offers the best potential for a low carbon district heating network by connecting to the proposed Energy from Waste plant at Hill Barton. Options 1 and 3 offer potential for open loop ground source heat pumps due to an underlaying aquifer, whilst Option 2 is underlain by rocks with no or very low levels of groundwater which would limit ground source heat pump technology to closed loop systems. All three options are likely to be suitable for solar energy, although the potential is lower at Option 1 due to its proximity to Exeter Airport and potential for glint and glare from significant solar arrays. Overall, Option 1 performs marginally better than Option 3, with Option 2 offering the lowest potential to achieve net zero. Given all of the above, Option 1 is likely to have a major positive effect on minimising carbon emissions by reducing the need to travel, offering sustainable travel opportunities, and low carbon energy generation. Option 2 is likely to have a neutral effect given few opportunities to promote sustainable travel, and achieve net zero. A minor positive effect is noted for Option 3 given its sustainable travel and net zero carbon potential.			

Sites: New town				
Site SA Objective	Option 1	Option 2	Option 3	
5. Climate change adaptation	0 ?	0 ?	0 ?	
Climate change adaptation commentary	Climate change is likely to mean more frequent drought, heatwaves, extreme precipitation and storm events. Extreme precipitation and storm events are likely to increase fluvial (river) and surface water flood risk. A slither of land shown as flood zones 2 and 3 runs through the centre of Option 1, east to west, and from the centre of the site southwards associated with watercourses. Surface water flood risk is also shown for these areas, as well as other small sections across Option 1. Similarly, Option 2 has small areas of medium-high fluvial flood risk (flood zones 2 and 3) running through the centre of the site, with a larger section of flood zone 3 covering the southern part of Option 2, north of Woodbury Salterton. Surface water flood risk also covers these areas and other small parts of the site. As with Options 1 and 2, areas of medium-high flood risk in Option 3 are generally limited in extent to small areas of land associated with watercourses, apart from a larger area on the north of the option shown as flood zone 3, immediately south of the A3052. In addition, surface water flood risk covers other slithers of land. All Options can contribute to leakage reduction through the inclusion of new water supply infrastructure. Option 3 contains the largest mix of soil types that may present additional challenges from soil subsidence. Option 3 also has the greatest risk from increased surface water flood risk as a result of development. Soil geology mean that soil erosion from water run-off is more likely for Option 1, with Option 3 least constrained. Overall, Option 2 performs best in terms of climate resilience, as it provides the highest overall level of resilience through lower exposure and/or vulnerability to climate change, although there is some uncertainty as further assessment of soil geology is required which factors into a significant number of risks. Options 1 and 3 have similar overall climate resilience.			

Sites: New town				
Site SA Objective	Option 1	Option 2	Option 3	
	Overall, all Options have predominately low flood risk, but contain small areas of medium-high fluvial and surface water flood risk – built development can avoid these areas with relative ease. All all Options are likely to have a neutral effect overall with uncertainty depending on further assessment of soil types.			
6. Land resources	- ?	- ?	- ?	
Land resources commentary	All Options are currently large, greenfield sites. More detailed agricultural land classification (post 1988) data is only available for Option 1 and the northern part of Option 2. This shows Option 1 as a mix of Grade 2, 3a and 4 agricultural land; and the northern part of Option 2 as roughly half Grade 3a and half 3b. Strategic agricultural land classification (provisional, 2002) indicates a small area of Grade 1 in the western part of Option 1, the remaining area being Grade 3. Option 2 is mostly Grade 3, with a small area of Grade 2 across the centre of the Option. A relatively large area of Grade 1 agricultural land covers the northern part of Option 1, the remainder being Grade 3. Option 1 contains a minerals safeguarding zone associated with Hill Barton Business Park, which also has an established strategic waste facility. The northern part of Option 2 contains the same minerals safeguarding zone at Hill Barton Business Park, along with established strategic waste facilities at Hill Barton and Greendale Business Parks. Option 2 also contains a nitrate vulnerability zone and an area of medium priority for phosphates. Option 3 is not affected by minerals, waste, nitrate or phosphate zones. Overall, all Options are currently large, greenfield sites, that are likely to result in the loss of best and most versatile agricultural land, with some areas affected by minerals and waste zones. Therefore, a minor negative effect is likely for all Options, with some uncertainty as detailed agricultural land classification data is not available across all Options.			
7. Water resources	- ?	- ?	- ?	

Sites: New town				
Site SA Objective	Option 1	Option 2	Option 3	
Water resources commentary	All three Options are likely to require a significant level of reinforcements to the drinking water network due to the scale of proposed development. Each Option has an opportunity to connect to an existing trunk main (along the A3052, or on London Road, north west of Option 1) to provide a water supply, and the reinforcements required to accommodate the new development would not be differentiated between the Options. A source protection zone is located in the southern part of Option 2, indicating this area is vulnerable to groundwater pollution from development. In terms of foul drainage impacts on water quality, all Options fall within the same sewerage catchment area which drains generally to the west and discharges to the Countess Wear treatment works. As all Options are in generally rural settings there are no significant existing foul/combined drainage networks present, and there is current uncertainty as to whether a new treatment works should be built specifically for the development that can discharge to the local watercourse network, or a connection is made to Countess Wear treatment works – the scale of proposed development mean that improvements are likely to be required to this treatment works. Overall, a minor negative uncertain effect is likely for all Options given the need for further assessment and the likely lack of capacity at existing treatment works. The effect from Option 2 is slightly worse due to the presence of a source protection zone, but remains minor negative.			
8. Homes	++	++ ?	++ ?	
Homes commentary	All Options are able to deliver a significant number of new homes, including a range of types, sizes and affordable housing, so a major positive effect is likely for all. A large proportion of the land in Option 1 is being promoted by a single entity; whilst Option 2 is in multiple ownership with significant land assembly required to enable this Option to come forward. A relatively large proportion of the land in Option 3 has not been submitted by the landowners, so are unknown. Therefore, an uncertain effect has been added to Options 2 and 3.			

Sites: New town				
Site SA Objective	Option 1	Option 2	Option 3	
9. Health and well-being	-	-	-	
Health and well-being commentary	The rural nature of the area means a current lack of public recreation spaces for all three Options. None of the options are located in an area of higher deprivation (among 50% most deprived neighbourhoods in England), meaning that development cannot assist in improving deprivation levels in such areas. The northern and southern edges of Option 1 are adjacent to main 'A' roads (A30 and A3052), causing noise pollution from traffic in these areas. The A3052 bisects Option 2, so noise pollution from this road will affect the central part of Option 2. A small, northern part of Option 3 also adjoins the A3052, but a greater noise issue is likely from the A376 which runs along its western boundary, with noise also from the B3179 Woodbury Road running through the southern part of the site. Noise from Exeter Airport is a factor in the northern western edge of Option 1, where noise contours range from 57dB to 63dB. Noise may also be an issue in the vicinity of Hill Barton and Greendale Business Parks, present in Options 1 and 2. Overall, a negative effect is likely from all three Options due to the lack of recreation space, and noise from main roads, the Airport (Option 1), and business parks.			
10. Access to services	-	-	-	
Access to services commentary	The rural location of the three Options means there is currently limited access to services and facilities. As noted under objective 4, a regular bus service runs along the A3052 which adjoins (Options 1 and 3) or is within (Option 2) all of the Options. Option 3 adjoins Clyst St George to its south west, which contains a primary school and village hall.			

Sites: New town				
Site SA Objective	Option 1	Option 2	Option 3	
	A negative effect is therefore likely for all three Options, based on current access to services. However, it is highly likely that a development of 8,000 dwellings will also include a wide range of services and facilities – as noted in the mitigation measures, a major positive post-mitigation effect is likely.			
11. Jobs and employment	++	+	+	
Jobs/employment commentary	All Options will provide positive effects from job opportunities during construction. The large-scale of the sites also mean a significant amount of employment land should be provided on-site. Options 1 and 3 benefit from their proximity to Exeter due to the volume of employment opportunities located within the city. The employment centres located in proximity to Option 2 are limited to Greendale and Hill Barton Business Parks. Option 3 is also in close proximity to other employment opportunities at Winslade Park, Darts Farm, and Topsham. However, Option 1 has the largest number of employment opportunities in close proximity which, in addition to Exeter, include Exeter Airport and the associated Airport Business Park, Skypark, Exeter Science Park, and Exeter Business Park/Met Office facility. The range of employment opportunities in the vicinity of Option 1 mean it is likely to have a major positive effect on this objective, with Options 2 and 3 having a minor positive effect.			
12. Town centres	-	-	-	
Town centres commentary	As the three Options are located in what is presently a largely rural area, they are all beyond 1,600m of a town centre, so will likely have a minor negative effect. However, it is highly likely that a development of 8,000 dwellings will also include a town centre – as noted in the mitigation measures, a major positive post-mitigation effect is likely.			

Sites: New town				
Site SA Objective	Option 1	Option 2	Option 3	
13. Connectivity and transport	++	+	+	
Connectivity and transport commentary	As noted under objective 3, all three Options are located in predominantly rural locations meaning that pedestrian connectivity is currently undeveloped, although the topography of Option 2 makes it more challenging for pedestrians. Similarly, there is limited dedicated cycling infrastructure across the Options, but the rural nature of many of the local lanes results in relatively low traffic volumes, meaning they can be suitable for cyclists. The proximity of National Cycle Network Route 2 (the Exe Estuary Trail) approximately 1.5km south west of the centre of Option 3 provides a largely traffic-free cycle route to Exeter city centre to the north, and Exmouth to the south. Similarly, Option 1 benefits from a shared footway/cycleway along Old Honiton Road to the north of the Option, which connects to Cranbrook to the north and Exeter to the west via the Science Park. Option 2 is isolated from existing dedicated cycle infrastructure and local topography is not conducive to internal cycle movements. A range of bus service frequencies (14 to 85 minutes) are available along the A3052 to and from Exeter, bisecting Option 2, and running along the southern boundary of Option 1, and northern boundary of Option 3. Other bus services are found in close proximity to Option 1 (to the north towards Cranbrook), to the south of Option 2 (Woodbury Salterton), and to the south west of Option 3 (Ebford and Topsham). Therefore, all three Options have good existing bus connections. Options 1 and 3 benefit from their proximity to Exeter and the series of train stations along the Avocet line which has a half hourly service to Exmouth and Exeter. Cranbrook train station is 3.5km north of the centre of Option 1, offering an hourly service to Exeter and London Waterloo. Option 2 has relatively poor train access, with Digby and Sowton the closest station 5.6km to the west. Topsham train station is 2.3km from Option 3. The three options offer good highways connectivity, with all being adjacent to main 'A' roads, and 2-3km east of the M5. Option 1 is the only option that is adjacent to the strategic road network with the A30 running along its northern boundary. The A3052 is			

Sites: New town				
Site SA Objective	Option 1	Option 2	Option 3	
	located along the southern boundary of Option 1, and bisects Option 2. Option 3 is adjoined to the A376 along its western boundary, and a short section of the A3052 to the north. Traffic modelling indicates that Option 1 has the least significant highways impact, and development of the initial 2,500 homes up to the end of the plan period (year 2040) could be accommodated without significant highways interventions. Options 2 and 3 would have traffic impacts at the Clyst St Mary roundabout, with Option 2 also impacting on surrounding local roads around Woodbury Salterton and the A376/Topsham Road junction. Option 1 is preferred in terms of highways impact, followed by Option 3, with Option 2 being least preferred. All three options will be equally suitable for good digital connectivity (fibre) given the proposed number of new residential and business customers that will be connecting to the networks. Given the above, Option 1 is likely to have major positive effect, with a minor positive effect likely for Options 2 and 3.			
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: • Mitigation to address recreational pressure upon the Exe Estuary, Pebblebed Heaths, and Dawlish Warren European designated sites – to be considered further by a Habitats Regulations Assessment of the Local Plan. • Make use of existing habitats and features, seek opportunities to expand/create new habitat, including the Clyst Valley Regional Park for Option 1. • Sensitively designed green and blue infrastructure. • Landscape buffer between the new settlement and existing settlements to respect the character of existing settlements. • Protect the setting of designated heritage assets. • Include the 20 minute neighbourhood principle. • Require a network of convenient, direct, permeable, safe and easy to navigate pedestrian routes. • Options 1 and 3 should link with the proposed Clyst Valley Trail.				

Sites: New town				
Site SA Objective	Option 1	Option 2	Option 3	
	• Provide high quality, safe and direct cycle routes that provide appropriate priority over motor vehicles to surrounding settlements, jobs, facilities and services. • Require high-quality, frequent and direct public transport linking with nearby settlements, jobs, services and facilities. • Use land at risk of flooding for well-designed drainage and water mitigations, and open space. • Provide recreation space, play and leisure facilities alongside new housing. • Deliver a wide range of community services and facilities alongside new housing – this will result in a likely major positive effect. • Linked with the measure above, deliver a town centre with a range of retail and other main town centre uses – this will result in a likely major positive effect. • Minor highways mitigation works for Option 1; more significant mitigation required for Options 2 and 3 involving improvements at Clyst St Mary roundabout, with Option 2 also requiring improvements around Woodbury Salterton and at the A376/Topsham Road junction.			
Preferred alternative: Option 1				
Reasons for alternatives being preferred or rejected: • Option 1 is preferred as there is greater certainty that the proposed new town can be delivered as a large proportion of the land is being promoted by a single entity. This Option has greater potential to reduce carbon emissions through the use of low carbon energy at a prospective district heating network between the proposed Energy from Waste plant at Hill Barton and the existing network serving Cranbrook and other major sites in the area. Option 1 offers sustainable travel opportunities given its proximity to regular bus services, and Cranbrook train station to the north. It is located in proximity to the greatest range of existing employment opportunities at Exeter, Exeter Airport and the associated Airport Business Park, Skypark, and Exeter Science Park. Traffic modelling indicates that Option 1 has the least significant highways impact, and development of the initial 2,500 homes up to the end of the plan period (year 2040) could be accommodated without significant highways interventions. • Option 2 is rejected due to medium-high landscape sensitivity; being isolated from existing cycle infrastructure with local topography making it more challenging for pedestrians and cyclists; poor access to train stations; in multiple ownership with significant land assembly required to				

Sites: New town				
Site	Option 1	Option 2	Option 3	
SA Objective				
				enable this Option to come forward; and impact on the highway network requiring significant mitigation at Clyst St Mary roundabout and the A376/Topsham Road junction. Option 3 is rejected due to major negative biodiversity effects given its proximity to the Exe Estuary and greater overall risk to the ecological network; potential for settlement coalescence due to proximity to Clyst St Mary, Ebford with a particularly high sensitivity on the setting of Clyst St George in particular; uncertainty on delivering the new town as a relatively large proportion of the land in Option 3 has not been submitted by the landowners, so their intentions are unknown; adverse highways impact requiring significant mitigation including at Clyst St Mary roundabout.

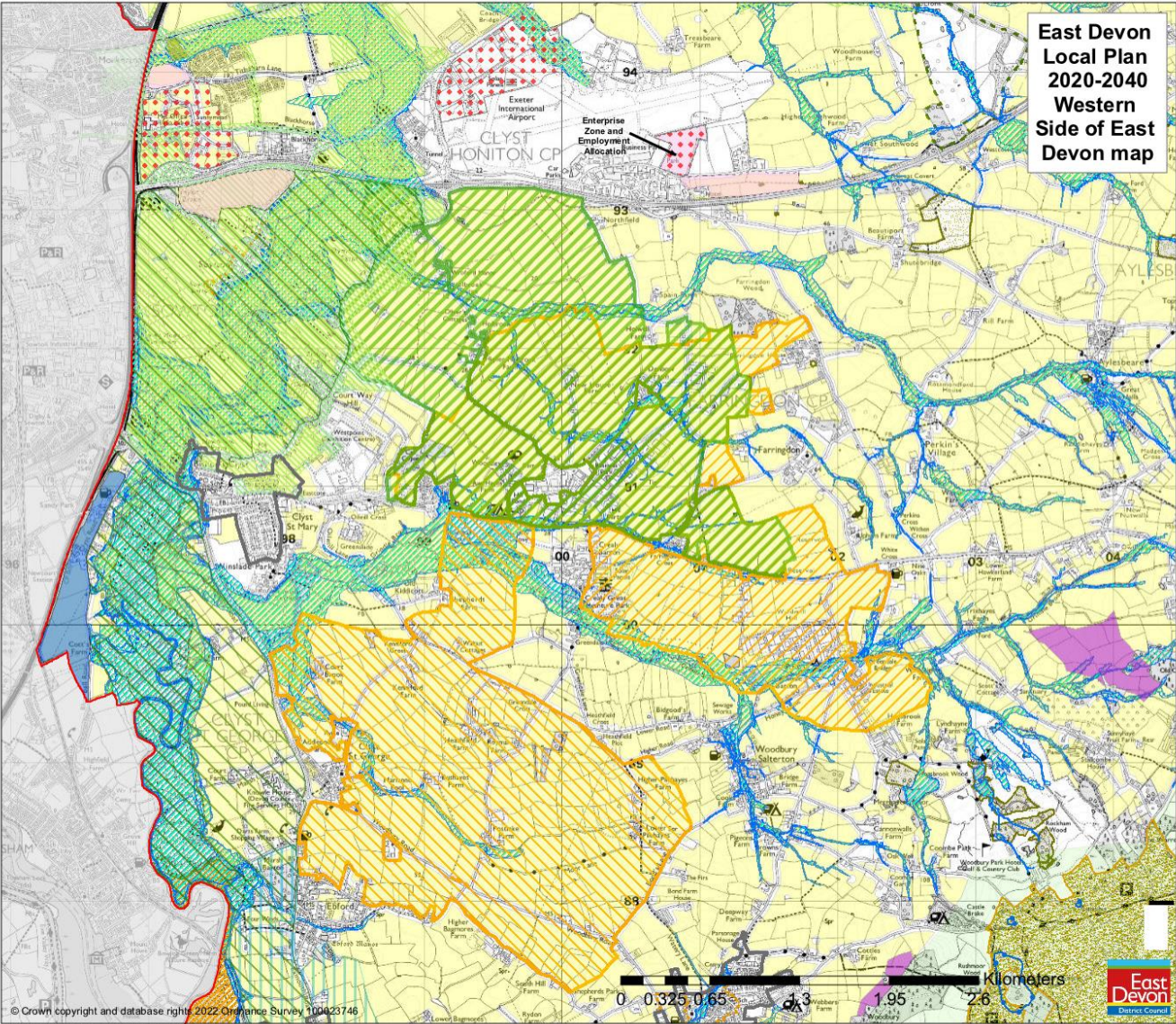
Settlement:

Western side of

East Devon

(excluding the

new town)



The Preferred Options consultation draft Local Plan includes a series of policies that allocate various sites on the western edges of East Devon, close to Exeter, for development. These include a series of employment sites and land north of Topsham for housing/mixed use development. Plan policy also provides for the expansion of the Clyst Valley Regional Park, though it does not explicitly allocate land for park expansion, this work will follow on in 2023.

The assessment work in this section of the SA is built on the emerging plan strategy that specifically identifies the western side of East Devon for strategic scale growth. At this stage of work the focus is on the suitability of identified sites for uses set out in plan policy, as opposed to details of policy wording in the draft plan.

It should be noted that this element of the assessment work, in this iteration of the SA, does not consider all possible site options that have been promoted on the western side of East Devon. Depending on choices made (or not) around new settlement allocation and boundaries there may be a need to revisit possible other, extra or alternative site options (that could be extra or in addition to a new settlements) at a later date in plan making. These may be for housing, employment or other or mixed uses.

The sites that are assessed in this section of this work are closely related or nearby to larger scale or strategic developments that already exist or that are planned (this extends to developments within Exeter City). Those not assessed at this stage (other than in respect of excluding sites at possible new community options) are for the most part comparatively remote from relatively larger population centres. There is, therefore, a strategic compatibility with those sites that are allocated in the draft plan and overall plan strategy.

Further work, as part of local plan preparation, will need to consider alternative options though these possible options will become clearer once local plan making progresses and in particular further information is available on the new settlement and also once all HELAA sites have been fully assessed and reviewed in light of their potential achievability for development and compatibility with emerging plan strategy.

The employment sites assessed in this section of the SA have been treated in similar manner to assessments of suitability of sites for housing. The work has not sought to shift the balance or weighting of consideration given that employment sites will function differently from housing sites or there could be differing requirements, demands or expectations. In subsequent work there may be scope to look at refinement of approach or weightings to give a more nuanced view.

Reasonable alternatives

- Land north of the Science Park (Consultation Draft LP policy 11) – [Site Brcl_03](#)
- High quality employment north of Sowton village (Consultation Draft LP policy 12) – [Site GH/ED/66](#)
- Employment land to the east of airport buildings (Consultation Draft LP policy 14)
- Employment land east of the Airport and north of the A30 (Consultation Draft LP policy 15)
- Green infrastructure and the Clyst Valley Regional Park (Consultation Draft LP policy 16)
- Development next to the M5 and north of Topsham (Consultation Draft LP policy 17)
- Gypsy and traveller site east of the M5 and south of the Exeter-Waterloo line (Consultation Draft LP policy 18)

Outline of reasons for selecting the alternatives

The reasonable alternatives listed above have all been assessed as suitable, available and achievable in the HELAA (though note specific reference to north of Topsham sites below). HELAA conclusions provides evidence that they have potential to be delivered (subject to further consideration through the planning process). The sites offer strategic development in the Western side of the District, reflecting the settlement strategy in the consultation draft Local Plan. The proposed development to the north of Topsham is made up of a series of sites that have mostly been assessed as suitable, available and achievable in the HELAA. For some parcels of land (submitted site areas), however, concern was raised over site access issues. In promoting a comprehensive development scheme in this area the expectation is that access concerns can be addressed through achieving access through adjoining neighbouring sites.

At this stage a proposed boundary for the expansion of the Clyst Valley Regional Park has not been defined and land owners have not put forward land or sites, on a standalone basis, for park provision. However promoters of housing/mixed use developments sites that could be part of the new town, or which could be stand-alone (typically larger scale) developments have in some case highlighted matters around provision of Green Infrastructure and any such provision offers potential scope to become part of or integrate with the Clyst Valley Regional Park.

In this aspect of the SA work we assess and comment on the policy expectation, in principle, of extending the plan and the typologies of land that park expansion may encompass. See Policy 17 for more detail and explicitly reasoned justification to policy that advises:

“The park boundary (through future work) will be defined by work that draws on assessment of suitability of land for inclusion in the park of land areas that fall in:

Floodzone 2;

Critical Drainage Areas;

UK Biodiversity Action Plan Habitats;

Habitat Network (England);

Working with Nature areas for potential floodplain reconnection; floodplain and riparian woodland;

Scheduled Ancient Monuments and the Historic Environment Record; and

Ordnance Survey Open Greenspace.”

Sites: Western side of East Devon (excluding the new town)								
Site SA Objective	Land N. of Science Park	N. Sowton village	E. of Airport buildings	E. of Airport, N. A30	CVRP	Next to M5, N. of Topsham	E. of M5, S. of train line	
1. Biodiversity	+	+	+	+	++	+	+	
Biodiversity commentary	All of the sites fall within the 10km buffer zones around the Exe Estuary and the Pebblebed Heaths so there could be, for residential development and other developments providing overnight accommodation, adverse impacts that would require mitigation. • Land north of the Science Park – There are no designated sites at or close to the site though land to the north and north-east of the site is of local biodiversity value and importance. • High quality employment north of Sowton village – There are no designated sites at or close to the site though land to the east of the site, specifically at and around the River Clyst and its floodplain, is of local biodiversity value and importance.							

Sites: Western side of East Devon (excluding the new town)								
Site SA Objective	Land N. of Science Park	N. Sowton village	E. of Airport buildings	E. of Airport, N. A30	CVRP	Next to M5, N. of Topsham	E. of M5, S. of train line	
	• Employment land to the east of airport buildings – There are no designated sites at or close to the site though land to the north is of local biodiversity value and importance, albeit it does sit alongside the airport runway. • Employment land east of the Airport and north of the A30 – There are no designated sites at or close to the site. • Green infrastructure and the Clyst Valley Regional Park – Designation of an extended park of scope to afford greater protection to designated assets as well as targeting actions to enhance biodiversity value of land and water. • Development next to the M5 and north of Topsham – There are no designated sites at or close to the site. However, land to the east forms the Clyst Marshes County Wildlife Site and the defined area and other lands in the valley of the River Clyst are of importance for biodiversity. • Gypsy and traveller site east of the M5/south of railway – There are no designated sites at or close to the site though land to the east of the site is of local biodiversity value and importance.							
2. Landscape	0	--	0	0	+	0	0	
Landscape commentary	• Land north of the Science Park – This site has the M5 Motorway to the west and to the south and east abuts existing/planned development. Whilst the site is quite visual prominent it is viewed within an urban built up context. • High quality employment north of Sowton village – The site is of some landscape sensitivity with far reaching views to the east and despite proximity to Exeter and major roads nearby has aspects of a rural character. There is currently a lack of development to the south of the A30 so there would be an urbanisation effect on the local environment. As such significant negative effects are expected. • Employment land to the east of airport buildings – This site is quite open though is viewed and read within the context and backdrop of the built form and managed land of the airport. As such it recorded as having a neutral rating. • Employment land east of the Airport and north of the A30 – This site is quite open though is viewed and read, to some degree, within the context the airport and also the A30 which runs alongside (noting tree screening along this road). As such it is recorded as having a neutral rating.							

Sites: Western side of East Devon (excluding the new town)								
Site SA Objective	Land N. of Science Park	N. Sowton village	E. of Airport buildings	E. of Airport, N. A30	CVRP	Next to M5, N. of Topsham	E. of M5, S. of train line	
	Green infrastructure and the Clyst Valley Regional Park – Whilst most of the land and water that could fall into an extended park will be attractive undeveloped land there will be scope for landscape scale and more tightly defined improvements that could benefit the landscape overall and lead to beneficial outcomes as the park develops. Development next to the M5 and north of Topsham – This linear site lies adjacent to and alongside the M5 which runs along its western boundary. The site sits below the Motorway and is seen within the context of this road and also substantial development to its east falling in the City of Exeter. The shorter northern and southern boundaries have (will have to the south) an urban form. The eastern site boundary is formed by a lane that is well screened and forms a separation of the site from more visually open and sensitive land to the east. A neutral landscape impact is recorded. Gypsy and traveller site east of the M5/south of railway – This site is quite low lying and of little visual prominence with existing/planned development to some boundaries and the railway to the north, plus the Motorway is close by. Adverse landscape impacts are not identified.							
3. Historic and built environment	0	-	0	0	+	0	0	
Hist. built env. commentary	Land north of the Science Park – No significant effect because there are no heritage assets that would be affected by developing the site. High quality employment north of Sowton village – Development of the site would introduce built development south of the A30 which would alter the current rural character of the area and approach into Sowton Village. Development would be in relatively close proximity to various listed buildings and the Sowton conservation area to the south of the site, though as allocated agricultural land is retained between the site and the village. There is also some potential for various undesignated heritage assets on the site although further work would be required to establish their significance. Negative impacts are identified.							

Sites: Western side of East Devon (excluding the new town)								
Site SA Objective	Land N. of Science Park	N. Sowton village	E. of Airport buildings	E. of Airport, N. A30	CVRP	Next to M5, N. of Topsham	E. of M5, S. of train line	
	• Employment land to the east of airport buildings – No significant effect because there are no heritage assets that would be affected by developing the site. • Employment land east of the Airport and north of the A30 – No significant effect because there are no heritage assets that would be affected by developing the site. • Green infrastructure and the Clyst Valley Regional Park – The park would be expected to include heritage assets and as such offers scope for afforded protection to these and if degraded restoration. There would also be potential for interpretation initiatives as part of park provision. • Development next to the M5 and north of Topsham – There are no designated heritage assets in immediate vicinity of the site, the nearest designated asset being the Clyst St Mary road bridge but this around 200 metres away and seen in a semi-urban/developed context. Any heritage assets in Exeter are separated from the site by the busy M5 Motorway. • Gypsy and traveller site east of the M5/south of railway – No significant effect because there are no heritage assets that would be affected by developing the site.							
4. Climate change and carbon emissions	++	+	0	0	+	0	++	
Climate change carbon emissions commentary	• Land north of the Science Park – The site is close to Exeter so near to this centre of population, it is close a cycle path and close to a frequent bus route into Exeter. The site offers potential scope for renewable energy generation on site. Significant positive effects are expected for the site. • High quality employment north of Sowton village – The site is close to Exeter so near to this centre of population, albeit not in the immediate vicinity of large numbers of houses. The site is not located close to a railway station or a cycle path but is accessible via a frequent bus route at Blackhorse into Exeter. The site, being large scale, offers potential scope for renewable							

Sites: Western side of East Devon (excluding the new town)								
Site SA Objective	Land N. of Science Park	N. Sowton village	E. of Airport buildings	E. of Airport, N. A30	CVRP	Next to M5, N. of Topsham	E. of M5, S. of train line	
	energy generation on site and this would be expected to be compatible with green credential promoted for the site. Minor positive effects are expected for the site. • Employment land to the east of airport buildings – The site is accessible by public transport, close to 800 metres away at its nearest western edges to bus services. The site, being large scale, offers potential scope for renewable energy generation on site and this would be expected to be compatible with green credential promoted for the site. • Employment land east of the Airport and north of the A30 – The site is accessible by public transport, close to 800 metres away at its nearest western edges to bus services. The site, being large scale, offers potential scope for renewable energy generation on site and this would be expected to be compatible with green credential promoted for the site. • Green infrastructure and the Clyst Valley Regional Park – Responding to climate change concerns has been identified as an outcome objective for park designation so a positive effect is identified. However there may be limited scope for renewable generations (most so for larger scale initiatives) within the park. • Development next to the M5 and north of Topsham – The northern end of the site is close to a regular bus route but much of the rest of the site is remoter, though reasonably close to Newcourt railway station in Exeter City. The southern parts of the site abut Topsham in Exeter but are not nearby to services and facilities in Topsham. • Gypsy and traveller site east of the M5/south of railway – The site is close to Exeter so near to this centre of population, close a cycle path and close to a frequent bus route into Exeter. The site offers potential scope for renewable energy generation on site. Significant positive effects are expected for the site.							
5. Climate change adaptation	+	+	+	+	++	+	+	

Sites: Western side of East Devon (excluding the new town)								
Site SA Objective	Land N. of Science Park	N. Sowton village	E. of Airport buildings	E. of Airport, N. A30	CVRP	Next to M5, N. of Topsham	E. of M5, S. of train line	
Climate change adaptation commentary	• Land north of the Science Park – The land is Greenfield and does not suffer from flood risk. • High quality employment north of Sowton village – The land is Greenfield and does not suffer from flood risk. • Employment land to the east of airport buildings – The land is Greenfield and does not suffer from flood risk other than noting that a small part falls in a floodplain. • Employment land east of the Airport and north of the A30 – The land is Greenfield and does not suffer from flood risk. • Green infrastructure and the Clyst Valley Regional Park – Park objectives seek specific outcomes that respond positively to climate change and adaption. • Development next to the M5 and north of Topsham – The land is Greenfield and does not suffer from flood risk, other than a very small area of floodplain land. • Gypsy and traveller site east of the M5/south of railway – The land is Greenfield and does not suffer from flood risk other than a small part of the site that falls within a floodplain and on account of this a small part would not be suitable for buildings.							
6. Land resources	-	--	0	0	0	--	-	
Land resources commentary	• Land north of the Science Park – This site is all Grade 1 agricultural land, however in this location, with built development to most sides, is unlikely to be a credible option for agricultural use and as such a minor negative effect is identified. • High quality employment north of Sowton village – This site is all Grade 1 agricultural land and on this count significant negative effects are noted. • Employment land to the east of airport buildings – This site is all Grade 3 agricultural land and a neutral impact is recorded. • Employment land east of the Airport and north of the A30 – This site is all Grade 3 agricultural land and a neutral impact is recorded. • Green infrastructure and the Clyst Valley Regional Park – whilst much of the park extension could be expected to be on high quality agricultural land the expectation is that little will be taken out of farming use and as such a neutral impact is identified.							

Sites: Western side of East Devon (excluding the new town)								
Site SA Objective	Land N. of Science Park	N. Sowton village	E. of Airport buildings	E. of Airport, N. A30	CVRP	Next to M5, N. of Topsham	E. of M5, S. of train line	
	• Development next to the M5 and north of Topsham – This site is all Grade 1 agricultural land and on this count significant negative effects are noted. • Gypsy and traveller site east of the M5 and south of the Exeter-Waterloo line – This site is all Grade 1 agricultural land, however in this location, with built development to most sides, is unlikely to be a credible option for agricultural use and as such a minor negative effect is identified.							
7. Water resources	0	0	0	0	++	0	0	
Water resources commentary	• Land north of the Science Park – Development at the site is unlikely to have any significant effects on water quality and quantity. • High quality employment north of Sowton village – whilst the site lies adjacent to the river Clyst, which feeds into the River Exe SAC, there is no specific reason to identify that development will adverse impact on water quality. As such a neutral impact is identified. • Employment land to the east of airport buildings – Development at the site is unlikely to have any significant effects on water quality and quantity. • Employment land east of the Airport and north of the A30 – Development at the site is unlikely to have any significant effects on water quality and quantity. • Green infrastructure and the Clyst Valley Regional Park – The Park will see effective use and management of water resources and as such significant positive effects are predicted. • Development next to the M5 and north of Topsham – Development at the site is unlikely to have any significant effects on water quality and quantity, though it is noted that the River Clyst does lie close by and to the east of the site. • Gypsy and traveller site east of the M5 and south of the Exeter-Waterloo line – Development at the site is unlikely to have any significant effects on water quality and quantity.							

Sites: Western side of East Devon (excluding the new town)								
Site SA Objective	Land N. of Science Park	N. Sowton village	E. of Airport buildings	E. of Airport, N. A30	CVRP	Next to M5, N. of Topsham	E. of M5, S. of train line	
8. Homes	-	-	-	-	- -	++	+	
Homes commentary	• Land north of the Science Park – Not really relevant as the site is not proposed for housing, as such an in line with the SA methodology a minor negative effect is noted. • High quality employment north of Sowton village – Not really relevant as the site is not proposed for housing, as such an in line with the SA methodology a minor negative effect is noted. • Employment land to the east of airport buildings – Not really relevant as the site is not proposed for housing, as such an in line with the SA methodology a minor negative effect is noted. • Employment land east of the Airport and north of the A30 – Not really relevant as the site is not proposed for housing, as such an in line with the SA methodology a minor negative effect is noted. • Green infrastructure and the Clyst Valley Regional Park – With a restrictive policy approach towards development in the park the allocations of land for the park could adversely impact in a significant way on housing delivery (that is inside the park but it would be expected to be a catalyst to support housing outside of the park). • Development next to the M5 and north of Topsham – The site has the potential to provide a significant amount of new homes with a mix of tenures and sizes including affordable housing. • Gypsy and traveller site east of the M5 and south of the Exeter-Waterloo line – The site has the potential to provide new homes for gypsies and travellers on land that was promoted for this use through the HELAA.							
9. Health and well-being	0	-	-	-	++	-	0	
Health and well-being commentary	None of the identified proposed allocations fall within or 800 metres from any area that is among 50% most deprived neighbourhoods in England, this is a comparative negative in respect of sites.							

Sites: Western side of East Devon (excluding the new town)								
Site SA Objective	Land N. of Science Park	N. Sowton village	E. of Airport buildings	E. of Airport, N. A30	CVRP	Next to M5, N. of Topsham	E. of M5, S. of train line	
	• Land north of the Science Park – The site is close to the M5 Motorway and noise impacts could be of some concern, though it is reasonable close to a range of services and facilities. • High quality employment north of Sowton village – The site lies to the south of and adjacent to the A30 and this may result in some noise pollution as might the close by M5 motorway and there is limited formalised open space in close proximity of the site. These considerations have led to a negative impact being identified. • Employment land to the east of airport buildings – The site is close to Exeter Airport and the A30 highway and as such adverse noise impacts may occur. The site is also remote from a number of services and facilities. • Employment land east of the Airport and north of the A30 – The site is close to Exeter Airport and the A30 highway and as such adverse noise impacts may occur. The site is also remote from a number of services and facilities. • Green infrastructure and the Clyst Valley Regional Park – The park can be expected to be a healthy place that supports and encourages healthy lifestyles in an accessible environment. A significant positive impact is identified. • Development next to the M5 and north of Topsham – The site is close to the M5 Motorway and noise impacts could be of some concern. Existing services and facilities are relatively remote, for pedestrians, from the site. • Gypsy and traveller site east of the M5 and south of the Exeter-Waterloo line – The site is close to the M5 Motorway and noise impacts could be of some concern, though it is reasonable close to a range of services and facilities.							
10. Access to services	+	--	--	--	0	+	+	
Access to services commentary	• Land north of the Science Park – The site is within 1,600m of a range of services/facilities. • High quality employment north of Sowton village – the site has poor accessibility to services and facilities and this accounts for a significant negative impact. • Employment land to the east of airport buildings – the site has poor accessibility to services and facilities and this accounts for a significant negative impact.							

Sites: Western side of East Devon (excluding the new town)								
Site SA Objective	Land N. of Science Park	N. Sowton village	E. of Airport buildings	E. of Airport, N. A30	CVRP	Next to M5, N. of Topsham	E. of M5, S. of train line	
	• Employment land east of the Airport and north of the A30 – the site has poor accessibility to services and facilities and this accounts for a significant negative impact. • Green infrastructure and the Clyst Valley Regional Park – This consideration is not really seen as applicable to the Park, albeit the park itself could be looked upon as a very beneficial facility in its own right. • Development next to the M5 and north of Topsham – The site is within 1,600m of a range of services/facilities. • Gypsy and traveller site east of the M5 and south of the Exeter-Waterloo line – The site is within 1,600m of a range of services/facilities.							
11. Jobs and employment	++	++	++	++	0	+	+	
Jobs/employment commentary	• Land north of the Science Park – The site is allocated for employment uses and offers significant opportunities for the creation of a substantial number of high quality jobs. A significant positive effect is identified. • High quality employment north of Sowton village – The site is allocated for employment uses and offers significant opportunities for the creation of a substantial number of high quality jobs. A significant positive effect is identified. • Employment land to the east of airport buildings – The site is allocated for employment uses and offers significant opportunities for the creation of a substantial number of high quality jobs. A significant positive effect is identified. • Employment land east of the Airport and north of the A30 – The site is allocated for employment uses and offers significant opportunities for the creation of a substantial number of high quality jobs. A significant positive effect is identified. • Green infrastructure and the Clyst Valley Regional Park – The Park may support some employment provision, but this could be expected to be comparatively limited. • Development next to the M5 and north of Topsham – The site is allocated for housing and mixed uses and offers scope for the creation of a new jobs. A positive effect is identified.							

Sites: Western side of East Devon (excluding the new town)								
Site SA Objective	Land N. of Science Park	N. Sowton village	E. of Airport buildings	E. of Airport, N. A30	CVRP	Next to M5, N. of Topsham	E. of M5, S. of train line	
	Gypsy and traveller site east of the M5 and south of the Exeter-Waterloo line – The site is close to existing employment sites and offers scope to accommodate employment provision on site in association with gypsy and traveller accommodation.							
12. Town centres	-	-	-	-	0	-	-	
Town centres commentary	All sites fall beyond 1,600m of an existing town centre and as such a negative impact is identified in all cases, with the exception of the Clyst Valley Regional Park where the matter is not regarded as relevant given the nature and intent behind plan policy.							
13. Connectivity and transport	++	+	+	+	0	+	++	
Connectivity and transport commentary	At the time of drafting information is not available of internet connectivity, so this factor is not taken into account. Land north of the Science Park – the site is identified as being very well located in respect of bus services, main road and cycle lanes. High quality employment north of Sowton village – The site is located next to the A30 and near to Junction 29 on the M5 Motorway and these factors are significant for connectivity. There is an existing hourly bus close to the site though to the north of the A30, noting a bridged access over this road. Cycle routes are, however, absent. A positive effect for site allocation is identified. Employment land to the east of airport buildings – The site is located close to bus services and A roads. Employment land east of the Airport and north of the A30 – The site is located close to bus services and A roads. Green infrastructure and the Clyst Valley Regional Park – Neutral as no direct effect is really envisaged. Development next to the M5 and north of Topsham – The site is located close to Junction 29 on the M5 Motorway and there is an existing hourly bus service close to the site though to the north.							

Sites: Western side of East Devon (excluding the new town)							
Site	Land N. of Science Park	N. Sowton village	E. of Airport buildings	E. of Airport, N. A30	CVRP	Next to M5, N. of Topsham	E. of M5, S. of train line
SA Objective							
	Gypsy and traveller site east of the M5 and south of the Exeter-Waterloo line – the site is identified as being very well located in respect of bus services, main road and cycle lanes.						
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects:							
- All sites, though especially the larger ones, offer scope for biodiversity enhancement and opportunities should be realised through site development. This can be especially so where lower density development/less built form development is being proposed with more green spaces, such as may be found in campus styles developments. - A number of the employment sites are comparatively remote from housing/centres of population and as such will not benefit from easy pedestrian accessibility. This places an onus on securing high quality non-car based modes of transport to access the sites, especially public transport provision and cycle access. - As a number of the sites are large they could be expected to be of some prominence in landscape terms, albeit they are on land that falls outside of and some way from designated AONBs. Nonetheless, given site size and potential for adverse impacts (for example land north of Sowton village) it will be essential that high quality well designed schemes are brought forward with landscape considerations at the forefront of thinking. - Major roads and the airport are factors, from a noise perspective, that could adversely impact on a number sites and this points toward the need for careful planning and design and avoiding uses susceptible to adverse impacts from noise in noise sensitive areas and/or introducing bunds or other noise reducing measures. - Given lack of proximity, specifically within walking distance, of a number of the sites to many facilities it will be important to look to encourage mixed use development and specifically incorporating supporting facilities into any primary uses development that is coming forward. - All of the sites offer scope for building to high green standards and incorporating renewable energy generation. ‘Green’ development aligns with objectives for employment and wider growth in this part of the District (and District wide standards and approaches more generally). - Sites should integrate with and provide access into the Clyst Valley Regional Park.							
Preferred alternative: All of the sites reviewed in this stage of assessment are identified as preferred options to allocate for development.							

Sites: Western side of East Devon (excluding the new town)							
Site	Land N. of Science Park	N. Sowton village	E. of Airport buildings	E. of Airport, N. A30	CVRP	Next to M5, N. of Topsham	E. of M5, S. of train line
SA Objective							
Reasons for alternatives being preferred:							
• Land north of the Science Park – This site is well located in respect of proximity to recent and planned development. There are facilities in reasonably close proximity to the site and few constraints to development. • High quality employment north of Sowton village – The site is of some sensitivity in landscape and heritage terms and is not close to existing facilities. However, the site benefits from good highway accessibility and a prominence that would make it attractive in commercial terms. It would allow for a continuation of a pattern of accommodating strategic employment growth in the western side of East Devon. • Employment land to the east of airport buildings – The site is well related to existing employment sites and close to the airport and its facilities. There is a bus service that runs relatively close to the site though the site is some way from centres of population. Nonetheless allocation would align with existing patterns of ongoing development. • Employment land east of the Airport and north of the A30 – The site is well related to existing employment sites and close to the airport and its facilities. There is a bus service that runs relatively close to the site though the site is some way from centres of population. Nonetheless allocation would align with existing patterns of ongoing development. • Green infrastructure and the Clyst Valley Regional Park – The park scores well against a wide range of SA objectives and as such its extension is deemed to be desirable. Amongst other objectives the park will play a supporting role in facilitating development to come forward and promoting its success and the quality of life for residents and employees at nearby built developments and the wider public.							

Sites: Western side of East Devon (excluding the new town)							
Site	Land N. of Science Park	N. Sowton village	E. of Airport buildings	E. of Airport, N. A30	CVRP	Next to M5, N. of Topsham	E. of M5, S. of train line
SA Objective							
Development next to the M5 and north of Topsham – This site forms a logical urban extension to the north of Topsham. The overall site itself is not sensitive to adverse impacts, though land to its east is much more so. There are facilities and services in moderately close proximity of the site but the provision of additional facilities as part of a mixed use development would be sought as part of the overall site development. Gypsy and traveller site east of the M5 and south of the Exeter-Waterloo line – This site is well located in respect of proximity to recent and planned development. There are facilities in reasonably close proximity to the site and few constraints to development.							

Tier One – Principal Centre

Settlement: Exmouth

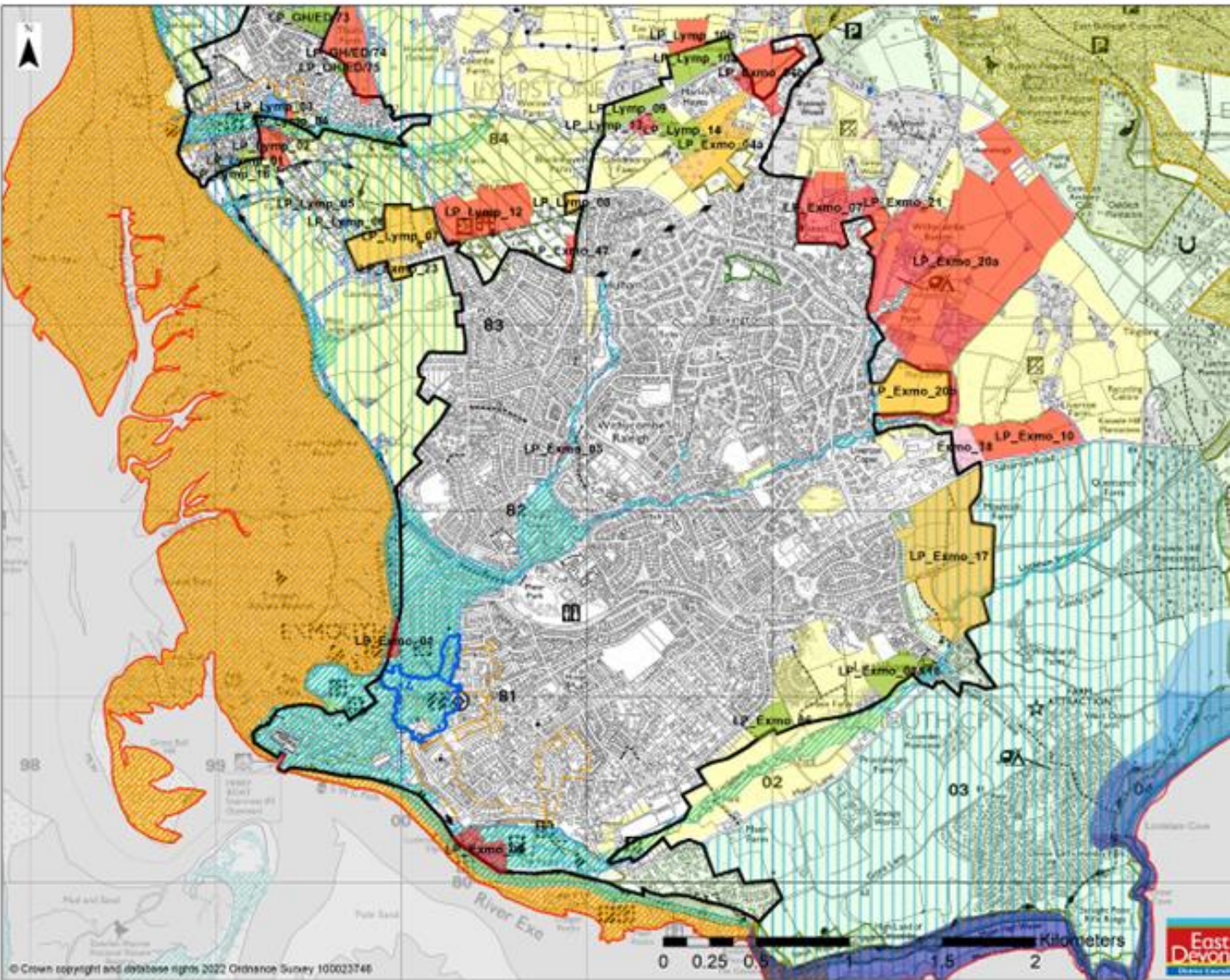
Legend

Housing and Mixed Use Allocations

Reference

- Preferred
- Second choice
- Rejected
- Planning permission granted
- Settlement Boundaries
- Employment Allocations
- Areas considered suitable for wind energy
- Areas considered suitable for solar energy
- Coastal Change Management Areas
- Town Centre Areas
- Primary Shopping Areas
- Coastal Preservation Areas
- Green Wedge
- Land of Local Amenity Importance
- Floodzone 2 - 0.1%
- Floodzone 3 - 1%
- AONBs
- Conservation Areas
- Scheduled Ancient Monument
- Historic Park or Garden
- Sites of Special Scientific Interest
- Special Areas of Conservation
- Special Protection Areas
- County Wildlife Sites
- Ramsar Sites
- Outside EDDC boundary

East Devon Local Plan 2020-2040 - Exmouth



b. Items in the Legend that appear in regular type are for consultation; items in italics are for information only

Reasonable alternatives

- Exmo_03 - Land at bottom of Bapton Lane
- Exmo_04 - Land at Marley Drive
- Exmo_06 - Douglas Gardens
- Exmo_07 - Bystock Court
- Exmo_08 - Littleham Fields
- Exmo_10 - Land to the north of Salterton Road
- Exmo_11 - Land to the South of Courtlands lane, though this site is in effect superseded by a larger 2022 call for sites site of Exmo_23
- Exmo_16 - Land to the rear of Elm Lane
- Exmo_17 - Land to the South of Littleham
- Exmo_18 - Land directly to the east of Liverton Business Park (assessed as an employment site)
- Exmo_28 - Foxholes Car park, Queen's Drive
- Exmo_34 - The Old Coal Yard, The Royal Avenue
- Exmo_40 - London Inn Car Park, Union St
- Exmo_41 - Maer Rd Car Park, Maer Rd
- Exmo_46 - Land south of St. John's
- Exmo_47 - Land west of Hulham Road (South East of Point in View)
- Exmo_AA - Land North East of Old Bystock Drive - this site has not been assessed through HELAA work but was submitted in plan representations and is assessed in this work (on account of having not been a HELAA assessed site it is given a unique number code reference of AA).
- Lymp_07 - Land at Courtland Cross
- Lymp_08 - Land off Summer Lane
- Lymp_09 – Land at Hulham Road

- Lymp_10 - Land off Hulham Road
- Lymp_12 – Land north of Summer Lane
- Lymp_13 - Kings Garden & Leisure, Higher Hulham Road
- Lymp_14 - Coles Field, Hulham Road

It should be noted that most of the above sites have been explicitly promoted for residential use and they are assessed against this proposed use. However, through draft local plan policy larger sites (sites with capacity for of 100 dwellings or more, including where taken in conjunction with adjoining land areas offer collective capacity at or exceeding this level) may be identified as allocations through emerging policy for mixed use developments. Assessment should be read to include potential and provision for residential use plus some additional employment and community uses.

There are some sites where the promoted use by the land owner has not been clearly specified, in such cases assessment is undertaken against an assumption of residential development. In one case, site Exmo_18 - Land directly to the east of Liverton Business Park, the site is promoted for employment uses and assessment is made explicitly against this proposed use.

Outline of reasons for selecting the alternatives

The reasonable alternatives listed above have all been assessed as suitable, available and achievable in the HELAA, which provides evidence that they have potential to be delivered (subject to further consideration through the planning process).

Site Exmo_20 - Land at St. John's - was originally submitted through HELAA work as a very substantial site on the eastern edge of Exmouth, it is understood, however, that the site overall is no longer being promoted for development by the landowner but the landowner is promoting a southerly part of it for development and this has come in as 2022 call for sites submission and given reference Exmo_46. Site Exmo_46 is assessed, all be it the land owner also advised that land to the west of the submission site may be available for development and the SA assessment work covers the potential of the larger (additional area incorporated to the west) as this forms a proposed allocation for development.

In respect of others sites at Exmouth that were assessed through the HELAA process they have either been dismissed as being remote from the settlements or dismissed for the summary reasons set out below, though readers should refer to the HELAA documents for a full explanation of HELAA assessment.

- Exmo_01 - not a reasonable alternatives as it falls within a floodplain.
- Exmo_02 - not a reasonable alternatives as it falls within a floodplain.
- Exmo_05 - dismissed from assessment as it now has a planning permission (and also overlaps Exmo_13).
- Exmo_09 - excluded from assessment as it falls within site Exmo_17.
- Exmo_12 - not assessed as it falls within the boundaries of a larger assessed site Exmo_04.
- Exmo_13 - dismissed from assessment as it now has a planning permission.
- Exmo_14 - regarded as too small (single dwelling size) to warrant assessment.
- Exmo_15 - not assessed as it falls within the boundaries of a larger assessed site Exmo_17.
- Exmo_19 – dismissed as t is remote from Exmouth.
- Exmo_22 – This site is the same area as Exmo_03 (which is assessed).
- Exmo_24 – This site duplicates Exmo_10 which is assessed.
- Exmo_25 – Dismissed as the site is in a floodplain.
- Exmo_26 – Dismissed as it falls below the size threshold.
- Exmo_27 - Dismissed as the site is in a floodplain.
- Exmo_29 - Dismissed as the site is in a floodplain.
- Exmo_30 – Dismissed as below size threshold.
- Exmo_31 – Dismissed as below size threshold.
- Exmo_32 - Dismissed as the site is in a floodplain.
- Exmo_33 - Dismissed as the site is in a floodplain.

- Exmo_35 - 0.09 Ha of this site has passed the Stage A Suitability Assessment for employment but not for housing as the residual 0.09ha GDA (approx. 2 dws at 25 dpa) is below size threshold. For SA work, at this stage, assessment for employment has not been undertaken given the small site size.
- Exmo_36 – Dismissed as much of the site is in a floodplain and the residual part outside of the floodplain falls below site thresholds.
- Exmo_37 – Dismissed as below size threshold.
- Exmo_38 – Dismissed on account of flooding considerations.
- Exmo_39 – Dismissed as below size threshold.
- Exmo_41 – Dismissed form assessment noting that all of site Exmo_41 lies within Exmo_20 – see notes about Exmou_20 and Exmo_41 above.
- Exmo_42 – Dismissed as below size threshold.
- Exmo_43 – Dismissed as below size threshold.
- Exmo_44 – Dismissed as below size threshold and folding concerns.
- Exmo_45 – Dismissed as site assessed under Exmo_04.
- Lymp_15 – Dismissed as assessed under Lymp_10 which overlays most of Lymp_15.

Sites: Exmouth																										
SA Objective \ Site	Exmo_03	Exmo_04	Exmo_06	Exmo_07	Exmo_08	Exmo_10	Exmo_11	Exmo_16	Exmo_17	Exmo_18	Exmo_28	Exmo_34	Exmo_40	Exmo_41	Exmo_46	Exmo_47	Exmo_AA	Lymp_07	Lymp_08	Lymp_09	Lymp_10	Lymp_12	Lymp_13	Lymp_14		
1. Biodiversity	.	.	.	.	.	.	.	.	.	0	.	.	.	.	.	.	.	.	.	.	.	.	.	.		

Sites: Exmouth																								
SA Objective \ Site	Exmo_03	Exmo_04	Exmo_06	Exmo_07	Exmo_08	Exmo_10	Exmo_11	Exmo_16	Exmo_17	Exmo_18	Exmo_28	Exmo_34	Exmo_40	Exmo_41	Exmo_46	Exmo_47	Exmo_AA	Lymp_07	Lymp_08	Lymp_09	Lymp_10	Lymp_12	Lymp_13	Lymp_14
Biodiversity commentary	All sites in Exmouth fall well within the current local plan 10km catchments of the European designated sites of the Exe Estuary and the Pebblebed Heaths and as such could have adverse impacts in the absence of appropriate mitigation, noting that there is no expectation that through new Habitat Regulation Assessment work any sites will fall beyond boundaries where mitigation is sought. Furthermore in some cases sites are very close to these designations. Falling within catchments, and proximity to sites, is a key factor in negative scores. However, it should be noted that currently mitigation is only sought in respect of cases where over-night accommodation is proposed (homes and tourism uses). Site Exmo_18, where employment is proposed, is currently 'exempt' from the specific habitat concerns. Sites on the north-eastern side of Exmouth, specifically Exmo_04, and Lymp_09, 10, 13 and 14 lie especially close to the Pebblebed Heaths and as such development of these sites could lead to some of the greater adverse impacts and a large part of Site Exmo_04 falls within the existing 400 metre exclusion zone for development on account around domestic cat predation, hence the overall double negative score on this site. However, parts of the site outside the exclusion zone, if considered alone, would not be scored so harshly. These north-eastern Exmouth sites are also of some local ecological value in their own right with proximity to County Wildlife Sites, mature trees and woodland and with some sites, and parts of, being made up of unimproved grassland. These are also considerations of significance in biodiversity terms. Sites in Lympstone Parish, but at Exmouth and to the west of the 'north-eastern' Exmouth sites, Lymp_07, 8, and 12 and close by in Exmouth Parish, sites Exmo_11 and 47, are further from the Pebblebeds, though somewhat closer (though in no sense 'next door') to the River Exe and are less sensitive in biodiversity terms. There are some local features that can be expected to be of value on these sites, including hedgerows and trees and Lymp_12 does lie relatively close to a County Wildlife site. Site Exmo_03 is surrounded by development but has mature vegetation on the site, and close by, so might be expected to support some local biodiversity importance though other urban, as opposed to edge of settlements sites, specifically Exmo_40 support less vegetation and would be expected to be of lesser importance.																							

Sites: Exmouth																										
Site SA Objective	Exmo_03	Exmo_04	Exmo_06	Exmo_07	Exmo_08	Exmo_10	Exmo_11	Exmo_16	Exmo_17	Exmo_18	Exmo_28	Exmo_34	Exmo_40	Exmo_41	Exmo_46	Exmo_47	Exmo_AA	Lymp_07	Lymp_08	Lymp_09	Lymp_10	Lymp_12	Lymp_13	Lymp_14		
	There are sites that lie very close to the Exe Estuary, which has the highest level of biodiversity designation (a SPA), and as such these sites, Exmo_28, 34 and 40, should be seen as being very much more on the sensitive side in respect of potential for adverse impacts though they do sit in a built-up context. There are three sites in Littleham Valley that are currently semi-rural in nature with some expectation of local wildlife importance given surrounding/boundary hedgerows and trees, these are sites Exmo_06, 08 and 16. On the western side of the town, north of Littleham, is the substantial site of Exmo_17 which contains extensive grassland areas, hedgerows and mature trees. Local wildlife value can be reasonably expected to exist and north of this site at Exmo_10 and 18 similar concerns will apply. Further north again Exmo_46 appears to comprise of unimproved grassland and is surrounded by mature woodland that can be assumed to support wildlife interest. Some of this woodland has the status of unconfirmed County Wildlife and highway access to the site is shown as coming through such an area. Site Exmo_07 and the Exmo_AA site have features of some significant within them and can be expected to be of more significant biodiversity sensitivity.																									
2. Landscape	0	0	-	0	-	-	-	0	--	--	0	0	0	0	0	0	0	-	0	0	0	-	0	0		
Landscape commentary	The greatest landscape concerns at around Exmouth can be expected to arise on account of the proximity of the East Devon AONB to the town and the importance of the setting of the town alongside the Exe Estuary and the English Channel coast, notably in respect of currently undeveloped coastal areas.																									

Sites: Exmouth																								
SA Objective \ Site	Exmo_03	Exmo_04	Exmo_06	Exmo_07	Exmo_08	Exmo_10	Exmo_11	Exmo_16	Exmo_17	Exmo_18	Exmo_28	Exmo_34	Exmo_40	Exmo_41	Exmo_46	Exmo_47	Exmo_AA	Lymp_07	Lymp_08	Lymp_09	Lymp_10	Lymp_12	Lymp_13	Lymp_14
	A number of the sites in Exmouth sit in an urban context and on these site it is concluded that landscape impacts from development will be neutral in nature. None of these sites are run-down in a way that development would be expected to constitute a landscape enhancements. Sites in question are Exmo_03, and 40. Where potential for landscape impacts become potentially more concerning are in respect of those sites that lie close to and may be visually connected to the East Devon AONB and even more so where they fall within the AONB itself. As a grouping of sites those on the north-eastern side of Exmouth, Exmo_04, and Lymp_09, 10, 13 and 14 lie in close proximity of the AONB but they are mostly well screened, typically with hedgerows to site boundaries that in many site cases contain mature trees. There are also blocks of woodland planting across this general area which add to screening. These same considerations also apply, and more so with wooded areas creating screening, for sites Exmo_07, 10, 46 and Exmo_AA. Also close to the AONB, but more visually open to it, are sites Exmo_10 and 18. Exmo_10 sits close to the existing built areas of Exmouth and is less visually open whereas Exmo_18 is more prominent in respect to visual openness to the AONB. To the south of these sites is Site Exmo_17 which falls within the AONB and as such significant adverse impacts in landscape terms could occur through development. On the south western side of Exmouth are three sites in the Littleham Valley, Exmo_06, 08 and 16 that all lie to the north of a coastal section of the AONB and all have some degree of visual connectivity with the AONB, though less so for Exmo_16. Though all sites sit against and within the urban built context of Exmouth. The coastal sites of Exmo_28, 34 and 41 have strong visual connectivity with the sea/estuary, but they are set against and within an urban backdrop and built-up area and as such adverse landscape impacts are not identified. A number of sites on the northern side of Exmouth are of greater prominent in coastal/estuary openness terms. Lymp_07 and Exmo_11 are quite open exposed sites, in very much rural fringe locations set above the Exe Estuary and subject to wide ranging inward/outward views from																							

Sites: Exmouth																										
Site SA Objective	Exmo_03	Exmo_04	Exmo_06	Exmo_07	Exmo_08	Exmo_10	Exmo_11	Exmo_16	Exmo_17	Exmo_18	Exmo_28	Exmo_34	Exmo_40	Exmo_41	Exmo_46	Exmo_47	Exmo_AA	Lymp_07	Lymp_08	Lymp_09	Lymp_10	Lymp_12	Lymp_13	Lymp_14		
	surrounding areas. Whilst to the west, and less estuarine in setting, Site Lymp_12 is visually prominent in views from the north. East of this is site Lymp_08 which is more contained in landscape terms set behind mature hedgerows and south of this site Exmo_47 which benefits from good screening and an urban southerly backdrop.																									
3. Hist. built env	0	0	0	-	-	0	0	-	-	0	-	0	0	0	0	--	0	-	-	0	0	--	0	0		
Hist. built env. commentary	Listed property on site Exmo_07 so potential for adverse impacts is identified. Exmo_08 has a listed farmhouse to the west of the site. Exmo_11 is close to the listed Courtland House and listed wall to this property. Exmo_16 listed buildings quite close but little indivisibility so some but limited possibility for adverse impacts. Exmo_17 listed church to the south of the site Exmo_28 listed hotel to the west of the site but expectation really is for limited adverse impacts. Exmo_47 site forms part of a part of the designated registered park and garden of A LA RONDE, and THE POINT-IN-VIEW. Lymp_08 lies to the north of designated registered park and garden of A LA RONDE, and THE POINT-IN-VIEW and listed properties. Lymp_07 lies just to the north the listed Courtland House and listed wall to this property.																									

Sites: Exmouth																										
Site SA Objective	Exmo_03	Exmo_04	Exmo_06	Exmo_07	Exmo_08	Exmo_10	Exmo_11	Exmo_16	Exmo_17	Exmo_18	Exmo_28	Exmo_34	Exmo_40	Exmo_41	Exmo_46	Exmo_47	Exmo_AA	Lymp_07	Lymp_08	Lymp_09	Lymp_10	Lymp_12	Lymp_13	Lymp_14		
	Lymp_12 is adjacent to the designated registered park and garden of A LA RONDE, close to the Grade I listed A LA RONDE and as such is likely to have a major negative effect. Neutral effect identified for all other sites as no significant effects upon heritage assets from developing the site.																									
4. Climate change carbon emissions	+	-	+	0	+	0	0	+	0	0	+	+	++	+	0	0	0	0	0	-	-	+	-	-		
Climate change carbon emissions commentary	An accessibility assessment undertaken for the site selection work identified a total of 12 services, facilities and employment sites. Sites assessed at and around Exmouth generally performed well in terms of accessibility to facilities. Sites Exmo_28, 34, 40 and 41 are all reasonably centrally located in Exmouth (Exmo_40 is very central) and they lie within 1,600 metres of Exmouth town centre and as such they meet proximity ‘tests’ of having access to a good range of facilities in the centre and elsewhere in the town (actual numerical measurements of facilities for these sites has not been undertaken). These sites have been given a positive score. Of the sites where measurements have been taken: - Exmo_11 has 9 facilities within 1,600 metres. - Exmo_03, Lymp_07 and Lymp_12 have 8 facilities within 1,600 metres. - Exmo_04, 06, 07, 08 and Lymp_13 and 14 have seven facilities within 1,600 metres. - Exmo_10, 16, 17, 18, have six facilities within 1,600 metres.																									

Sites: Exmouth																										
Site SA Objective	Exmo_03	Exmo_04	Exmo_06	Exmo_07	Exmo_08	Exmo_10	Exmo_11	Exmo_16	Exmo_17	Exmo_18	Exmo_28	Exmo_34	Exmo_40	Exmo_41	Exmo_46	Exmo_47	Exmo_AA	Lymp_07	Lymp_08	Lymp_09	Lymp_10	Lymp_12	Lymp_13	Lymp_14		
	On account of proximity of facilities all of these sites can be seen to meet a basic proximity test and there were a further four sites that have not yet been subject to facility proximity measurements, sites Exmo_46, 47, AA and Lymp_10 that are assumed to meet basic proximity tests.. As such sites would be given a positive rating (and some are). However, whilst meeting basic proximity tests a number of the sites are on the edges of Exmouth and comparatively far from Exmouth town centre – all sites where proximity distances have been measured are more than 1,600 metres away (bar Exmo_03) and many are mostly or totally beyond 2.5 kilometres and parts up to 4 kilometres distance. The sites clustered in the north-eastern part of Exmouth also have less frequent existing bus services than most of the rest of Exmouth and other sites that have been assessed. These sites beyond the 2.5 kilometre threshold have been given a neutral ranking on account of their comparative peripheral locations and greater likelihood, therefore, of leading to higher levels of car use and the north-eastern Exmouth sites a negative ranking on account of distance to the town centre and less god bus services.																									
5. Climate change adaptation	0	+	+	+	+	+	+	0	0	+	0	0	+	0	0	+	+	+	+	+	+	+	+	+		
Climate change adaptation commentary	None of these sites are located in a critical drainage area and In general sites offer the potential to cope with heat, drought and extreme storms through appropriate design and incorporation of sustainable drainage, for example. Parts of some of the sites are however in floodplains and in these cases, Exmo_03, 16, 17, 28, 34, 41 and 46, have been given a neutral rating though this has been taken into account in respect of adjustments to possible yields.																									
6. Land resources	-	-	-	-	--	-	--	-	-	-	++	++	++	++	-	-	-	--	-	-	-	--	++	-		

Sites: Exmouth																										
Site SA Objective	Exmo_03	Exmo_04	Exmo_06	Exmo_07	Exmo_08	Exmo_10	Exmo_11	Exmo_16	Exmo_17	Exmo_18	Exmo_28	Exmo_34	Exmo_40	Exmo_41	Exmo_46	Exmo_47	Exmo_AA	Lymp_07	Lymp_08	Lymp_09	Lymp_10	Lymp_12	Lymp_13	Lymp_14		
Land resources commentary	Most of the sites at Exmouth are wholly or largely Greenfield sites, the others, are those that are wholly or contain large Brownfield components. Lymp_13, Exmo_28, 34, 40, 41 - these sites achieve a high suitability for development against this measure of sustainability. In contrast the Greenfield sites are recorded with negative assessments. All sites fall outside mineral consultation areas. All of the Greenfield sites are wholly or mostly in Agricultural Grade land 1, 2 and 3 (though a distinction is not drawn between 3A and 3B). Site that are wholly or large parts in Grade 1 land are Lymp_07, Lymp_12, Exmo_11 and Exmo_08 and these sites are attributed with a significant negative score. It is also noted that around one quarter of Exmo_17 falls in this higher classification category.																									
7. Water resources	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?		
Water resources commentary	Development at the sites are unlikely to have any significant effects on water quality and quantity as none are located within a groundwater source protection zone and no other potential for adverse impacts are noted other than there is uncertainty on the capacity of local sewage treatment works to accommodate additional demand from new housing. This means an uncertain neutral effect for all sites.																									
8. Homes	+	+	+	+	+	--	+	+	++	+	+	+	+	+	+	+	+	++	+	+	+	++	+	+		
Homes commentary	Exmo_17 and Lymp_07 and 12 have a maximum yield in the HELAA at or over 100 dwellings, meaning a significant positive. All other sites identified for housing have potential to deliver up to 100 dwellings, so will have a positive effect. An appropriate mix of tenures and sizes including affordable housing is assumed for all sites. Site Exmo_10 is not proposed for housing, rather it is proposed as an employment allocation, and as such is attributed with a negative score.																									

Sites: Exmouth																										
Site SA Objective	Exmo_03	Exmo_04	Exmo_06	Exmo_07	Exmo_08	Exmo_10	Exmo_11	Exmo_16	Exmo_17	Exmo_18	Exmo_28	Exmo_34	Exmo_40	Exmo_41	Exmo_46	Exmo_47	Exmo_AA	Lymp_07	Lymp_08	Lymp_09	Lymp_10	Lymp_12	Lymp_13	Lymp_14		
9. Health and well-being	++	-	+	+	++	+	+	++	++	+	+	++	++	+	+	+	+	+	+	-	-	+	-	-		
Health and well-being commentary	Exmouth has some of the more significant areas of higher deprivation that are found in East Devon and many of the assessed sites fall within an area of higher deprivation (among 50% most deprived neighbourhoods in England) or within 800 metres of such an area. Sites within areas of higher deprivation have been afforded a double positive score and those within 800 metres a single positive. It is only the sites on the north eastern edge of Exmouth, Sites Exm_04 and Lymp_09, 10, 13 and 14, which are sufficiently far away from the more deprived areas to warrant a negatives score. There are open space and play areas within 1,600 metres of sites. Some sites are relatively close or some cases about busy roads though at this stage of work significant problems have not been identified and as such sites have not been 'marked-down' in this respect, noting that one such site, Exmo_18 is proposed as an employment site so possible road noise issues are not deemed a major concern given proposed non-housing uses.																									
10. Access to services	++	+	+	++	++	+	+	+	+	+	+	++	++	+	+	+	+	+	+	+	+	+	+	+		
Access to services commentary	Exmouth is the largest town in East Devon and has the greatest range of services and facilities, though the town centre where most facilities are located or they are close to it, falls on the south-west edge of the town, there are, however, local centres in the town and a selection of facilities around the town. All sites assessed at Exmouth fall within 1,600 metres of a range of community services and as such achieve positive score, though It is the sites that are closest to the centre of the town that tend to achieve the more positive scores. The sites with access to higher range of services, six or more, within 800 metres include Exmo_03, 07, 08, 34, 40																									

Sites: Exmouth																										
Site SA Objective	Exmo_03	Exmo_04	Exmo_06	Exmo_07	Exmo_08	Exmo_10	Exmo_11	Exmo_16	Exmo_17	Exmo_18	Exmo_28	Exmo_34	Exmo_40	Exmo_41	Exmo_46	Exmo_47	Exmo_AA	Lymp_07	Lymp_08	Lymp_09	Lymp_10	Lymp_12	Lymp_13	Lymp_14		
	Many of the sites on the periphery of the town are more than 800 metres from many of the services, under 5 within 800 metres, and as such they achieve a single positive score only, these specifically include Exmo_04, 06, 10, 11, 16, 17, 28, 41 and 46 and Lymp_07, 08, 09, 10, 12, 13 and 14. Site Exmo_18 is an employment site and proximity issues are not so significant though it is some distance from services and achieves a positive.																									
11. Jobs and employment	+	+	+	+	+	+	+	+	++	++	+	+	+	+	+	+	+	++	+	+	+	++	+	+		
Jobs/ employment commentary	Exmouth has a number of larger scale employment sites across the town, including at Liverton, for example, on the western side of Exmouth. There are, as well various employment sites within and close to the town centre. All sites will provide short-term positive effects from job opportunities during construction and larger sites offer scope for incorporating employment uses within mixed use development schemes. Exmo_17 on account of this potential and being within 800 metres of an employment site scores a double positive, other large sites, Lymp_07 and 12, a single positive on account such potential as well as being within 1,600 metres of employments sites. All other identified sites fall within 1,600 metres of an employment site and as such achieve a single positive. Site Exmo_18 is proposed as an employment site and is afforded a major positive effect.																									
12. Town centres	+	-	+	-	-	-	-	-	-	-	+	++	++	+	-	-	-	-	-	-	-	-	-	-		

Sites: Exmouth																										
Site SA Objective	Exmo_03	Exmo_04	Exmo_06	Exmo_07	Exmo_08	Exmo_10	Exmo_11	Exmo_16	Exmo_17	Exmo_18	Exmo_28	Exmo_34	Exmo_40	Exmo_41	Exmo_46	Exmo_47	Exmo_AA	Lymp_07	Lymp_08	Lymp_09	Lymp_10	Lymp_12	Lymp_13	Lymp_14		
Town centres commentary	The fact that the town centre of Exmouth is in the south-west corner of the town and many sites are on the periphery of the town accounts for a significant number of sites being more than 1,600 metres from the town centre and most are much more than this. Just two sites, Exmo_34 and 40 lie within 800 metres of the town centre and Exmo_03, 06, 28 and 41 are within the 1,600 metre catchment.																									
13. Connectivity and transport	+	+	+	+	+	+	+	+	+	+	+	++	++	+	+	+	+	+	+	+	+	+	+	+		
Connectivity and transport commentary	Broadband speeds in Exmouth vary but all are recorded as exceeding over 40 mbps and so all sites are assumed (at this stage) to have access to superfast broadband. There are only two sites in Exmouth that are within 800 metres of a train station, Exmo_34 and 40 and these score a double positive. All other sites fall within 1,600 metres of an hourly or better bus service and as such, just taking this consideration, score a single positive.																									
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: - Mitigate impact upon Exe Estuary and Pebblebed Heaths SPAs – to be considered in the Habitats Regulations Assessment, though for area of Exmo_04 within 400 metres of the Pebblebed Heaths mitigation would not be seen as possible. - Sites on the north eastern edge of Exmouth (Exmo_12,Lymp_09, Lymp_10, Lymp_13 and Lymp_14) contain and abut features and areas of biodiversity value and any development would need to be carefully managed. - For sites in the East Devon AONB landscape considerations would be especially heightened and there would be the need for significant attention being given to the highest quality development to ensure possible adverse impacts are minimised. There are also sites outside of the AONB that have direct inter-visibility with it or with other important landscape assets and as such there are landscape considerations in respect of mitigation at these sites.																										

Sites: Exmouth																								
SA Objective \ Site	Exmo_03	Exmo_04	Exmo_06	Exmo_07	Exmo_08	Exmo_10	Exmo_11	Exmo_16	Exmo_17	Exmo_18	Exmo_28	Exmo_34	Exmo_40	Exmo_41	Exmo_46	Exmo_47	Exmo_AA	Lymp_07	Lymp_08	Lymp_09	Lymp_10	Lymp_12	Lymp_13	Lymp_14
- All sites have relatively good access to basic facilities, though those on the edges of the town (that is the majority and the bigger ones) are some distance from the two centre where the concentration of major facilities and services are located. An emphasis should be placed on maximising and enhancing sustainable travel links e.g. create bus stops near to any given site, pedestrian/cycle links. - Positive effects for all sites in relation to jobs and employment could be maximised by providing on-site employment opportunities alongside new housing, where reasonable.																								
Preferred alternatives at Exmouth are: - Land on the north-eastern side of Exmouth – The land area is made up (parts or all) of sites under HELAA references – Exmo_04, Lymp_09, Lymp_10, Lymp_14. These sites perform well in avoiding adverse landscape impacts though less well in terms of negative biodiversity impacts. They form a cohesive grouping of sites that make for a reasonable allocation choice. - Land at Douglas Gardens (Exmo_06) – site performs well in sustainability terms being closer to the town centre than other options though it has some visual openness. - Littleham Fields (Exmo_08 and Exmo_16 combined) – these sites are close to facilities at Littleham though there are heritage impact considerations. - Land to the South of Courtlands Lane (Exmo_11) – site is of some landscape prominence and relatively close to heritage assets, though accessible to a range of facilities. - Land to the South of Littleham (Exmo_17) – site is in the AONB and this is a significant consideration, however it is close to a range of services and facilities. - Land directly to the East of Liverton Business Park (Exmo_18) – this land abuts an existing employment site and is relatively unobtrusive in landscape terms. - Land south of St. John's (Exmo_46) – The site is well screened though there is local biodiversity interest at site boundaries and there will be adverse impacts in respect of achieving highway access.																								

Sites: Exmouth																										
Site SA Objective	Exmo_03	Exmo_04	Exmo_06	Exmo_07	Exmo_08	Exmo_10	Exmo_11	Exmo_16	Exmo_17	Exmo_18	Exmo_28	Exmo_34	Exmo_40	Exmo_41	Exmo_46	Exmo_47	Exmo_AA	Lymp_07	Lymp_08	Lymp_09	Lymp_10	Lymp_12	Lymp_13	Lymp_14		
	- Land at Courtlands Cross (Lymp_07) – site is of some landscape prominence and relatively close to heritage assets, though accessible to a range of facilities. - Land off Summer Lane (Lymp_08) – this land is close to heritage assets though is reasonably well screened.																									
Reasons for rejecting sites - Exmo_03 - Land at bottom of Bapton Lane – whilst this site preforms well in a number of respects it is part of the proposed Valley Park. - Exmo_07 - Bystock Court – this site is of heritage value and there is local biodiversity value. - Exmo_10 - Land to the north of Salterton Road – this site if f prominence in the landscape and would considerably extend the built form of the town. - Exmo_28 - Foxholes Car park, Queen's Drive - rejected due to concerns about the loss of the existing use, although well related to facilities and may be a suitable allocation if these issues can be resolved. - Exmo_34 - The Old Coal Yard, The Royal Avenue – site is sensitively located in terms of proximity to biodiversity assets with tree cover n site and parts are within a floodplain. - Exmo_40 - London Inn Car Park, Union St - rejected due to concerns about the loss of the existing use, although well related to facilities and may be a suitable allocation if these issues can be resolved. - Exmo_41 - Maer Rd Car Park, Maer Rd - rejected due to concerns about the loss of the existing use, although well related to facilities and may be a suitable allocation if these issues can be resolved. - Exmo_47 - Land west of Hulham Road (South East of Point in View) – site forms part of a registered park and garden. - Exmo_AA - Land North East of Old Bystock Drive – site is of sensitivity in bio-diversity terms. - Lymp_12 – Land north of Summer Lane – site is significant in terms offsetting of heritage assets.																										

[illegible]

Reasonable alternatives

- GH/ED/79 – land east of Axminster
- GH/ED/80 – Prestaller Farm, Beaour Lane
- GH/ED/81 – land east of Axminster
- GH/ED/82 – land east of Axminster
- GH/ED/83 – land at Chard Road
- Axmi_01 – Land off Musbury Road
- Axmi_02 – Land north of Shoals, Musbury Road
- Axmi_07 – Axminster Carpets
- Axmi_08 – Land off Wyke Lane
- Axmi_09 – Great Jackleigh Farm
- Axmi_10 – Scott Rowe Building, Axminster Hospital, Chard Road
- Axmi_11 – land south east of Axminster
- Axmi_12 – land at Lea Combe, Field End
- Axmi_16 – The Co-operative Food, West Street
- Axmi_17 - Land at Millwey Chard Road
- Axmi_18 – Millwey Garages
- Axmi_19 – Combe Lane Car Park
- Axmi_20 – Poplar Mount car park

Outline of reasons for selecting the alternatives

The reasonable alternatives listed above have all been assessed as suitable, available and achievable in the HELAA, which provides evidence that they have potential to be delivered (subject to further consideration through the planning process).

Sites: Axminster																				
Site SA Objective	GH/ED/79	GH/ED/80	GH/ED/81	GH/ED/82	GH/ED/83	Axmi_01	Axmi_02	Axmi_07	Axmi_08	Axmi_09	Axmi_10	Axmi_11	Axmi_12	Axmi_16	Axmi_17	Axmi_18	Axmi_19	Axmi_20		
1. Biodiversity	--	--	--	--	--	--	--	--	--	--	-	--	--	--	--	--	--	--		
Biodiversity commentary	The majority of sites are adjacent to either the River Axe or tributaries that flow into it. The River Axe at Axminster is a Special Area of Conservation and a Site of Special Scientific Interest and all sites are in the River Axe Nutrient Management Zone. Axmi_01 is within the Beer Quarry Caves SAC bat consultation zone. Axmi_08 and Axmi_09 are within 50 metres from a core nature area (woodland). Axmi_11 is adjacent to a grassland nature area. Axmi_12 is around 25 metres from two different grassland nature areas.																			
2. Landscape	-	-	-	-	-	-	-	++	-	--	-	--	+	+	+	+	+	+		
Landscape commentary	Generally the greenfield sites around the town (Axmi_01, 02, 08 and GH/ED/79/80/81/82 and 83) have a medium sensitivity to landscape change and in the case of GH/ED/79, 80, 81 and 82 the Axminster Masterplan sets out how impacts can be mitigated. The medium sensitivity for Axmi_01 is justified even though it lies mainly within the East Devon AONB because it has few of the key characteristics of the AONB and is seen in the context of the urban area and major transport links. Axmi_12, 16, 17, 18, 19 and 20 are within the urban area and have the potential to regenerate previously developed land or improve landscape quality and in the case of Axmi_07 this impact could be significant.																			
3. Hist. built env	-	-	0	--	--	-	--	0	--	--	-	--	-	-	0	0	-	--		
Hist. built env. commentary	GD/ED/79 is around 60 metres from a Grade II listed building (Loop House) and is close to a non-designated heritage asset (the Town Leat). GD/ED/80 is around 75 metres from a Grade II listed building (Sector Hall). A very significant group of Grade I, Grade II* and Grade II Listed Buildings are located to the north of GH/ED/82 and GH/ED/83: development of these sites has the potential for a major negative impact on this group. Axmi_01 is within 100 metres of a Scheduled Ancient Monument and associated listed																			

Sites: Axminster																				
Site	GH/ED/79	GH/ED/80	GH/ED/81	GH/ED/82	GH/ED/83	Axmi_01	Axmi_02	Axmi_07	Axmi_08	Axmi_09	Axmi_10	Axmi_11	Axmi_12	Axmi_16	Axmi_17	Axmi_18	Axmi_19	Axmi_20		
SA Objective																				
	buildings, but the potential impact is limited by the intervening main road. There are many non-designated heritage assets (on Axmi_01) from prehistoric times to the 20 th Century on the site including WWII pill boxes and a WWII tank ditch. The Scheduled Ancient Monument around a Roman Fort could be affected by development of Axmi_02, Axmi_08, Axmi_09 and Axmi_11. An anti-tank ditch is recorded in Axmi_02 and Axmi_08 and Axmi_09 is within 40 metres of a Grade II Listed Building (Higher Wyke Farm). Axmi_10 is around 100 metres from a Grade II* Listed Building. Axmi_11 is around 75 metres from a Grade II Listed Building (Loop House). Axmi_12 is within 100 metres of two Grade II Listed Buildings. Axmi_20 has the potential to affect designated heritage assets, including a Grade II* listed building. Axmi_16 and 19 also have the potential to affect the setting designated heritage assets, but to a lesser extent than Axmi_20.																			
4. Climate change carbon emissions	+	+	+	+	+	+	+	++	+	+	++	+	++	++	+	+	++	+		
Climate change carbon emissions commentary	An accessibility assessment undertaken on the site selection work identified a total of 12 services, facilities and employment sites ⁹² and Axminster has all of these. All of the sites considered are within 1600 metres of at least 9 different types of services and facilities, including the town centre. GH/ED/79 is adjacent to a bus route with an hourly service and has reasonable pedestrian access to the town centre. Parts of GH/ED/80 and GH/ED/81 are somewhat remote from the train station and an hourly bus route. GH/ED/82 and GH/ED/83 are around 1800 to 2000 metres from the train station, but are adjacent to an hourly bus route. There is good pedestrian access to the town centre along Chard Road and national cycle route 33 runs through GH/ED/83. Axmi_01 and Axmi_02 are adjacent to an hourly bus route and within 600 metres of the train station. Axmi_07 is adjacent to a bus stop with an																			

⁹² Namely: train station, hourly or better bus route, primary school, secondary school, convenience store/shop, Post Office, Community hall, Pub, Open space/allotment, children's play area, GP, employment site (identified in the Employment Land Review).

Sites: Axminster																				
Site	GH/ED/79	GH/ED/80	GH/ED/81	GH/ED/82	GH/ED/83	Axmi_01	Axmi_02	Axmi_07	Axmi_08	Axmi_09	Axmi_10	Axmi_11	Axmi_12	Axmi_16	Axmi_17	Axmi_18	Axmi_19	Axmi_20		
SA Objective																				
	hourly service and within 150 metres of the train station and has good links to the town centre. Axmi_08 and Axmi_09 do not have good links to an hourly bus route. Axmi_10 has excellent pedestrian links to the town centre and is on an hourly bus route. Parts of Axmi_11 are close to an hourly bus route and all parts of the site have good pedestrian access to the town centre. Axmi_12 is on an hourly bus route and has good pedestrian access to the town centre. Axmi_16, 19 and 20 are all very close to the town centre.																			
5. Climate change adaptation	-	-	0	0	0	0	-	-	0	0	+	0	+	+	0	+	+	+		
Climate change adaptation commentary	The whole of GH/ED/79 and most of GH/ED/80 are within a critical drainage area. Significant parts of GH/ED/83, Axmi_01, Axmi_04 and Axmi_07 are within floodzone 2 and 3 together with smaller parts of GH/ED/80, GH/ED/81, GH/ED/82, Axmi_02, Axmi_08, Axmi_09 and Axmi_11. The only sites without surface or river flooding constraints are Axmi_10 and Axmi_12.																			
6. Land resources	- ?	- ?	- ?	- ?	- ?	- ?	- ?	+	- ?	- ?	+	- ?	- ?	+	+	+	+	+		
Land resources commentary	GH/ED/79, 81, Axmi_02, 08, 09, 11 and 12 are greenfield sites mostly on Grade 3 agricultural land, which could be 3a (best and most versatile) so uncertain negative effect. GH/ED/82 is mainly on Grade 4 agricultural land (not best and most versatile but still capable of food production) so uncertain negative effect as for Grade 3). GH/ED/80, 83 and Axmi_01 are on both Grade 3 and 4 agricultural land. Axmi_07, 10, 12, 16, 18, 19 and 20 will not result in the loss of any greenfield or agricultural land but may require remediation. None of the sites are in a mineral consultation zone.																			
7. Water resources	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--		

Sites: Axminster																				
Site SA Objective	GH/ED/79	GH/ED/80	GH/ED/81	GH/ED/82	GH/ED/83	Axmi_01	Axmi_02	Axmi_07	Axmi_08	Axmi_09	Axmi_10	Axmi_11	Axmi_12	Axmi_16	Axmi_17	Axmi_18	Axmi_19	Axmi_20		
Water resources commentary	All of the sites are within the River Axe SAC phosphates catchment and could cause major negative effects on water quality.																			
8. Homes	++	++	--	++	--	++	++	+	+	++	+	+	+	+	+	+	+	+		
Homes commentary	GH/ED79//80, 81, 83 Axmi_02, 09 and 11 have a maximum yield in the HELAA of over 100 dwellings, meaning a significant positive effect. GH/ED/82 and Axmi_01 are proposed for employment only so have a significant negative impact. All other sites have potential to deliver less than 100 dwellings, so will have a positive effect. An appropriate mix of tenures and sizes including affordable housing is assumed for all sites.																			
9. Health and well-being	+	+	+	-	-	-	-	-	+	+	-	+	+	+	+	+	+	+		
Health and well-being commentary	All the sites are either in or within 500 metre of a 50% most deprived neighbourhood and within 500 metres of an open space or play area so a positive effect. GH/ED/82, 83, Axmi_01, 02, 07 and 10 are adjacent to an A road and/or railway line meaning a negative effect.																			
10. Access to services	+	+	+	+	+	+	+	++	+	+	++	++	++	++	+	+	+	++		
Access to services commentary	Only Axmi_07, 10, 11, 12, 16, 19 and 20 are within 800 meters of a school, GP, pub, library and community hall, but all sites are within 1600 metres.																			

Sites: Axminster																					
Site SA Objective	GH/ED/79	GH/ED/80	GH/ED/81	GH/ED/82	GH/ED/83	Axmi_01	Axmi_02	Axmi_07	Axmi_08	Axmi_09	Axmi_10	Axmi_11	Axmi_12	Axmi_16	Axmi_17	Axmi_18	Axmi_19	Axmi_20			
11. Jobs and employment	+	++	++	++	++	++	++	+	+	++	+	++	+	+	+	+	+	+			
Jobs/employment commentary	Sites GH/ED/82 and Axmi_01 are proposed for employment use only. Sites GH/ED/80, 81, 83, Axmi_02, 09 and 11 are both within 800 metres of an employment site and large enough to accommodate employment uses on site so a positive effect. All other sites are within 1600 metres of an employment site.																				
12. Town centres	+	++	+	+	+	+	++	++	+	+	++	++	++	++	+	+	+	++			
Town centres commentary	GH/ED/80, Axmi_02, 07, 10, 11 and 12 are within 800 metres of the town centre. The remaining sites are within 1600 metres.																				
13. Connectivity and transport	+	+	-	-	+	++	++	++	++	+	+	++	++	++	+	+	+	++			
Connectivity and transport commentary	Axminster has 100% gigabit availability. Sites Axmi_01, 02, 07, 08, 11, 12, 16, 19 and 20 are within 800 metres of a railway station, an A road and a recognised cycle route. With the exception of GH/ED/81 and 82 the remaining sites are within 1600 metres of these facilities.																				
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: Mitigation measures to deal with River Axe nutrient neutrality required for all sites.																					

Sites: Axminster																				
Site	GH/ED/79	GH/ED/80	GH/ED/81	GH/ED/82	GH/ED/83	Axmi_01	Axmi_02	Axmi_07	Axmi_08	Axmi_09	Axmi_10	Axmi_11	Axmi_12	Axmi_16	Axmi_17	Axmi_18	Axmi_19	Axmi_20		
SA Objective																				
- Considerable landscaping at Axmi_09 and 11 would be required due to significant negative effects upon the landscape, but their sensitivity is such that a significant negative effect is likely to remain. A minor negative landscape effect for GH/ED/79, 80, 81, 83, 83 Axmi_01, 02, 08 and 10 means that appropriate landscaping should be incorporated, although as all sites are currently greenfield, a negative effect would remain. - The significant negative historic environment effect for Axmi_02, 08, 09 and 11 can be lessened by reducing the site area next to the Scheduled Monument, but significant negative uncertain effect would remain until archaeological surveys are undertaken. High quality design across all sites can reduce negative effects and maximise beneficial effects on the built environment. The significant negative historic environment effect for GH/ED/82 and 83 may be reduced by avoiding development on part of the sites and for Axmi_20 detailed design will be critical. - Sites in critical drainage areas, GH/ED/79 and 80, could make a contribution to a scheme that will reduce risks for existing properties liable to flooding. - Noise attenuation will lessen the negative health and well-being effect for GH/ED/82, 83, Axmi_01, 02, 07 and 10 caused by their location close to the A358 and/or railway. - All sites have relatively good access to facilities, but these beneficial effects can be maximised by enhancing sustainable travel links e.g. create bus stops near to the site, pedestrian/cycle links. - Designing new development for low water use and requiring sustainable drainage systems can help turn neutral uncertain effects on water resources into positive uncertain effects. - Positive effects for all sites in relation to jobs and employment could be maximised by providing on-site employment opportunities alongside new housing, where reasonable.																				
Preferred alternative: GH/ED/79, GH/ED/80 (part of), Axmi_02, 07, 08, 09, 10 and 12 preferred sites for housing and/or mixed use including employment. GH/ED/82 and part of Axmi_01 preferred for employment use only. Axmi_09 and 10 (part of) are 'second choice' sites. Reasons for alternatives being preferred or rejected: GH/ED/79 – Land east of Axminster preferred as consistent with spatial strategy, good access to facilities and employment.																				

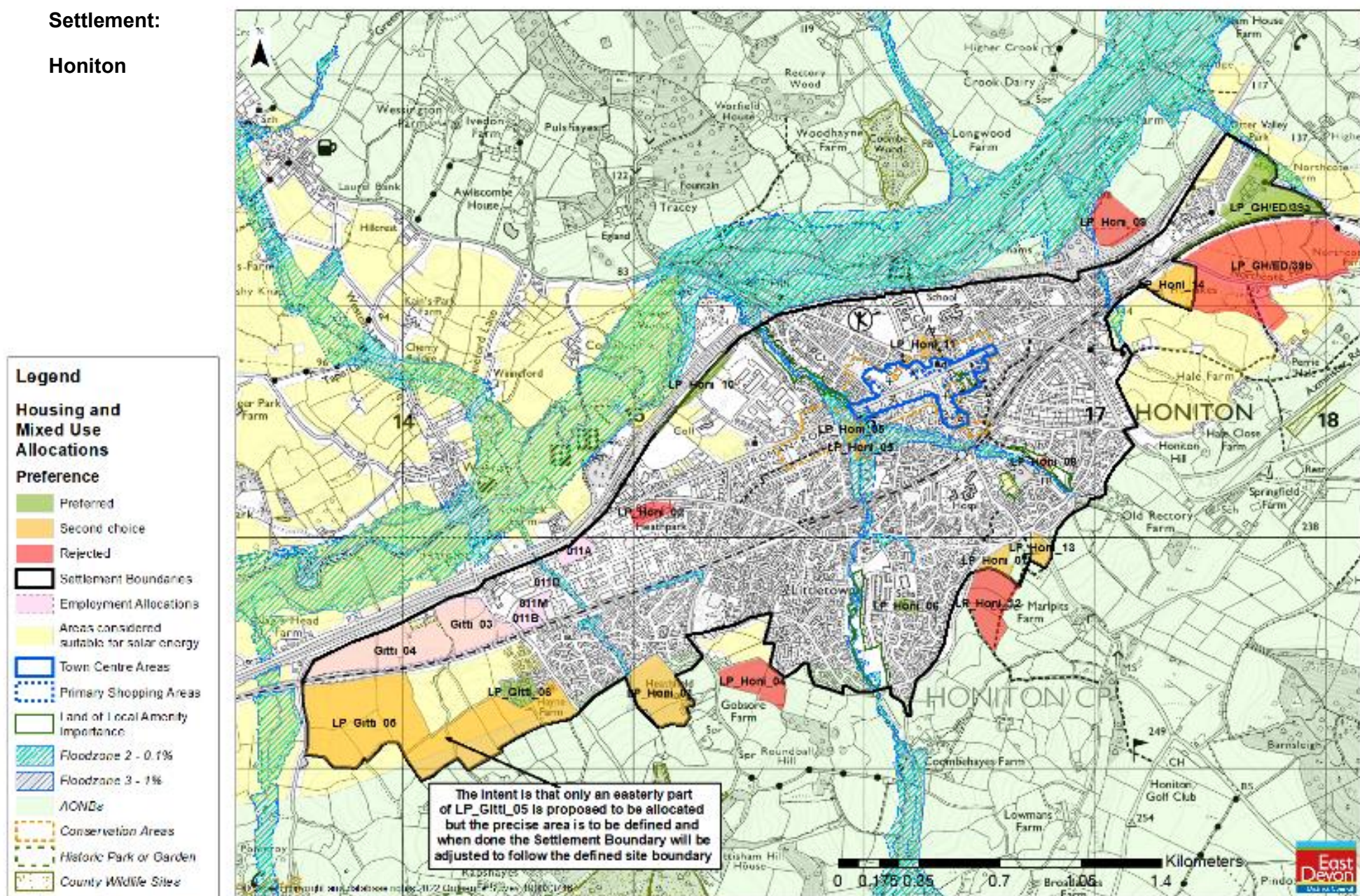
Sites: Axminster																				
Site SA Objective	GH/ED/79	GH/ED/80	GH/ED/81	GH/ED/82	GH/ED/83	Axmi_01	Axmi_02	Axmi_07	Axmi_08	Axmi_09	Axmi_10	Axmi_11	Axmi_12	Axmi_16	Axmi_17	Axmi_18	Axmi_19	Axmi_20		
- GH/ED/80 – Prestaller Farm, Beaour Lane part of site preferred as consistent with spatial strategy, good access to facilities and employment and part of site rejected as no longer proposed for development due to viability concerns. - GH/ED/81 – land east of Axminster rejected due to access difficulties in the absence of a viable relief road. - GH/ED/82 – land east of Axminster – preferred for employment on part of site as consistent with spatial strategy. - GH/ED/83 – land at Chard Road – preferred as consistent with spatial strategy, good access to facilities and employment. - Axmi_01 – Land off Musbury Road – preferred for employment on part of site as consistent with spatial strategy. - Axmi_02 – Land north of Shoals, Musbury Road – preferred as consistent with spatial strategy, good access to facilities and employment - Axmi_07 – Axminster Carpets – preferred for mixed development to retain existing employment use as consistent with spatial strategy, good access to facilities and employment and provides opportunities for environmental improvements and use of brownfield land. - Axmi_08 – Land off Wyke Lane – preferred as consistent with spatial strategy, good access to facilities and employment - Axmi_09 – Great Jackleigh Farm – preferred as a second choice as consistent with spatial strategy, good access to facilities and employment although concerns regarding impacts on landscape and heritage assets. - Axmi_10 – Scott Rowe Building, Axminster Hospital, Chard Road – preferred as consistent with spatial strategy, good access to facilities and employment and makes use of brownfield site. - Axmi_11 – land south east of Aximister – part of site preferred as a second choice as consistent with spatial strategy, good access to facilities and employment and part of site rejected on landscape and heritage impacts. - Axmi_12 – land at Lea Combe, Field End preferred as consistent with spatial strategy, good access to facilities and employment - Axmi_16 – The Co-operative Food, West Street - rejected due to concerns about the loss of the existing use, although well related to facilities and may be a suitable allocation if these issues can be resolved.																				

Sites: Axminster																				
Site	GH/ED/79	GH/ED/80	GH/ED/81	GH/ED/82	GH/ED/83	Axmi_01	Axmi_02	Axmi_07	Axmi_08	Axmi_09	Axmi_10	Axmi_11	Axmi_12	Axmi_16	Axmi_17	Axmi_18	Axmi_19	Axmi_20		
SA Objective																				
- Axmi_17 - Land at Millwey Chard Road –while it is not put forward for allocation at this stage of the plan making process, this site may be suitable for allocation at a later stage once additional work has been undertaken, including an assessment of the loss of the previous use of the site as a sports pitch. - Axmi_18 – Millwey Garages - rejected due to concerns about the loss of the existing use, although well related to facilities and may be a suitable allocation if these issues can be resolved. - Axmi_19 – Combe Lane Car Park - rejected due to concerns about the loss of the existing use, although well related to facilities and may be a suitable allocation if these issues can be resolved. - Axmi_20 – Poplar Mount car park - rejected due to concerns about the loss of the existing use, although well related to facilities and may be a suitable allocation if these issues can be resolved.																				

East Devon Local Plan 2020-2040 - Honiton

Settlement:

Honiton



n.b. Items in the Legend that appear in regular type are for consultation; Items in *italics* are for information only

Reasonable alternatives

- Gitti_03 Land on the western side of Hayne Lane, Gittisham, Honiton
- Gitti_04 Land to the West of Combe Garden Centre, Gittisham, Honiton
- Gitti_05 Land to west of Hayne Lane, Honiton
- Gitti_06 Hayne Farm, Hayne Lane, Honiton
- Honi_01 Land at Heathfield, East Of Hayne Lane, Honiton
- Honi_04 Land lying to the North East of Heathfield Manor Farm, Honiton
- Honi_05 Land to the north and south of King Street, including former Foundry Yard, Honiton
- Honi_06 Former Millwater School, Honiton Bottom Road, Littleton, Honiton
- Honi_07 Land adjacent to St Michaels Church, Honiton
- Honi_08 Land at the South Side of The Glenn Honiton
- Honi_09 Former Honiton Showground, Langford Road, Honiton
- Honi_10 Land at Ottery Moor Lane, Honiton
- Honi_12 land on the south-east side of Cuckoo Down Lane, Honiton and land at Lower Marl pits Farm, Honiton
- Honi_13 Middle Hill, Church Hill, Honiton
- Honi_14 Hurlakes, Northcote Hill, Honiton
- GH/ED/39 Land south of Northcote Hill, Honiton

Outline of reasons for selecting the alternatives

The reasonable alternatives listed above have all been assessed as suitable, available and achievable in the HELAA, which provides evidence that they have the potential to be delivered (subject to further consideration through the planning process). Honi_03 is not a reasonable alternative because identified as probably unachievable due to poor access to the site. GH/ED/40 is not a reasonable alternative as the HELAA Panel has assessed the site as unachievable for strategic housing development alongside HELAA site GH/ED/40 on the grounds that, even combined, the two sites are too small and isolated. The Panel advises that the site may be achievable as part of a large development linked to the main town. Access via the tunnels under the railway is considered to be a significant constraint, which only larger-scale development adjoining Axminster Road can resolve.

Honi_02, Honi_11 and Gitti_02 are not reasonable alternatives as all the sites already have planning permission, so are not being considered as allocations in the Local Plan. Gitti_01 is not a reasonable alternative as overlapped with other sites.

Sites: Honiton																				
Site SA Objective	Gitti_03	Gitti_04	Gitti_05	Gitti_06	Honi_01	Honi_04	Honi_05	Honi_06	Honi_07	Honi_08	Honi_09	Honi_10	Honi_12	Honi_13	Honi_14	GH/ED/39				
1. Biodiversity	0	-	-	0	?	-	+	+	-	-	0	+	-	0	0	-				
Biodiversity commentary	Gitti_03 is located at the edge of the Honiton Built-up area, the site is covered by improved grassland, and hedgerows with trees in the boundary, Section 41 (S41) Habitat of Principle Importance in 70m, it is not likely to have positive or negative effects. Gitti_04 is covered by improved grassland, and hedgerows with trees in the boundary, and located within 100m of Section 41 (S41) Habitat of Principle Importance & HRA mitigation zone, would have a negative effect Gitti_05 is covered by improved grassland with Trees and vegetation on the edge of the site boundary. Pebblebed Heaths SAC HRA mitigation zone and Section 41 (S41) Habitat of Principle Importance within 100m of the site, would have a negative effect Gitti_06 is an existing farm use, covered by improved grassland with Trees and vegetation on the edge of the site boundary and no ecological designations within 100m of the site, it is not likely to have positive or negative effects. Honi_01 is just over 100m from woodlands and TPO and it is surrounded by a similar environment, uncertain until more detailed lower-level surveys and assessments have been carried out. Honi_04 is covered by unimproved grassland, including overgrown grass with vegetation on the edge of the site boundary. Section 41 (S41) Habitat of Principle Importance within 100m of the site and Honi_04 adjoining to TPO. , it would have a negative effect Honi_05 & Honi_06 both are existing brownfield sites in the Honiton centre built area, with no ecological designations within 100m of the site. Potential opportunities to enhance biodiversity by development.																			

Sites: Honiton																				
Site SA Objective	Gitti_03	Gitti_04	Gitti_05	Gitti_06	Honi_01	Honi_04	Honi_05	Honi_06	Honi_07	Honi_08	Honi_09	Honi_10	Honi_12	Honi_13	Honi_14	GH/ED/39				
	Honi_07 is covered by Unimproved grassland, grazed by sheep with trees and vegetation on the edge of the site boundary. Section 41 (S41) Habitat of Principle Importance within 100m of site, it would have a negative effect Honi_08 connected with The Glen with large numbers of large trees. It would have a negative effect, due to the connection with The Glen. Honi_09 located within 100m of Section 41 (S41) Habitat of Principle Importance. Adjoining busy A30 & A35 roads is not likely to have positive or negative effects. Honi_10 covered by Unimproved grassland, Section 41 (S41) Habitat of Principle Importance and TPOs within 100m of the site. Adjoining busy A30 and new residential development. Potential opportunities to enhance biodiversity by development. Honi_12 covered by improved grassland with trees and vegetation on the edge of the site boundary and adjoining Honi_07. Section 41 (S41) Habitat of Principle Importance within 100m of site, it would have a negative effect Honi_13 existing dwelling with garden, it is not likely to have positive or negative effects. Honi_14 covered by Unimproved grassland, including overgrown grass, Trees and vegetation on the edge of the site boundary. No ecological designations within 100m of the site, it is not likely to have positive or negative effects. GH/ED/39 The north of the railway site covered by improved grassland with small areas that have overgrown grass and grazed by sheep, and the south of the railway site, it has improved grassland and arable. Trees and vegetation on the edge of the site boundary. Two small woodlands within the site would have a negative effect.																			
2. Landscape	-	-	--	-	--	--	+	+	--	-	--	+	--	--	-	-	-			

Sites: Honiton																				
Site SA Objective	Gitti_03	Gitti_04	Gitti_05	Gitti_06	Honi_01	Honi_04	Honi_05	Honi_06	Honi_07	Honi_08	Honi_09	Honi_10	Honi_12	Honi_13	Honi_14	GH/ED/39				
Landscape commentary	Gitti_05, Honi_01, Honi_04, Honi_07, Honi_09, Honi_12 & Honi_13 all fall in the AONB, Sites are within a designated landscape and have very high landscape value, which means a significant negative landscape effect. Gitti_04, Gitti_06, Honi_14 & GH/ED/39 are outside but abuts the AONB, which would have a visual impact on the AONB and likely negative effects. Gitti_03 is sheltered by trees, next to A30 Road. it is outside but abuts the AONB, with the human disturbance from the adjoining heathpark industrial estate, new residential development and the Gitti_06 farm. It has medium landscape sensitivity and negative effects. Honi_08 is not within a designated landscape. However, as the site has a strong connection with The Glen which likely has negative effects Honi_05 & Honi_06 both are existing brownfield sites, new development would enhance the landscape, as currently, both sites have a minor negative effect on the landscape. Honi_10 is not within a designated landscape and adjoining busy a30 and is surrounded by new residential development, development would possibly enhance the landscape.																			
3. Hist. built env	0	0	0	0	0	0	--	0	--	0	0	0	--	--	0	0				
Hist. built env. commentary	Gitti_03, Gitti_04, Gitti_05 & Gitti_06 are located on the edge of Honiton, with no designated heritage asset within 100m, thus No significant effect. Honi_01 & Honi_04 are located on the edge of the Honiton built-up area, with no designated heritage asset within 100m, thus No significant effect. Honi_05 is located inside the conservation area, and the number of listed buildings in the conservation area has a significant negative effect.																			

Sites: Honiton																				
Site SA Objective	Gitti_03	Gitti_04	Gitti_05	Gitti_06	Honi_01	Honi_04	Honi_05	Honi_06	Honi_07	Honi_08	Honi_09	Honi_10	Honi_12	Honi_13	Honi_14	GH/ED/39				
	Honi_06, Honi_08 & Honi_10 are located in a built-up area and have no designated heritage asset within 100m so no significant effect. Honi_07, Honi_12 & Honi_13 are adjoining the Church of St Michael, grade 2* listed building, The site is close to the asset and visible from the asset, so significant negative effect. Honi_09, Honi_14 & GH/ED/39 are located in a remote location in Honiton, with no designated heritage asset within 100m, so no significant effect																			
4. Climate change carbon emissions	-	-	-	-	+	+	++	++	++	++	0	+	++	++	0	0				
Climate change carbon emissions commentary	An accessibility assessment undertaken for the Site Selection work identified a total of 12 services, facilities and employment sites⁹³ – the findings are referenced for each site in this commentary Gitti_03, Gitti_04, & Gitti_06 have 4 out of 12 & Gitti_05 has 5 out of 12 facilities within 1,600m of the site, around 2000m to the town centre. Hourly or better bus service available. Overall not likely to minimise the need to travel unless more facilities are available in the surrounding area.																			

⁹³ Namely: train station, hourly or better bus route, primary school, secondary school, convenience store/shop, Post Office, Community hall, Pub, Open space/allotment, children's play area, GP, employment site (identified in the Employment Land Review).

Sites: Honiton																				
Site SA Objective	Gitti_03	Gitti_04	Gitti_05	Gitti_06	Honi_01	Honi_04	Honi_05	Honi_06	Honi_07	Honi_08	Honi_09	Honi_10	Honi_12	Honi_13	Honi_14	GH/ED/39				
	Honi_01 has 7 out of 12 & Honi_04 has 9 out of 12 facilities within 1,600m of site, less than 1000m to town centre, Hourly or better bus service available. Overall positive effects despite both being located at the edge of built-up areas. Honi_05, Honi_06, Honi_07, Honi_08, Honi_10, Honi_12 & Honi_13 have 9 out of 12 facilities within 1,600m of the site, around 600m to the town centre, Hourly or better bus & rail service available and have a good connection to the pavement, so these sites are likely to have a major positive effect. Honi_09, Honi_14 & GH/ED/39 have 9 out of 12 facilities within 1,600m of the site, and over 1000m to the town centre, Hourly or better bus service is available but with a distance, as all the sites are located in a remote location. Development is likely to increase car travel.																			
5. Climate change adaptation	+	+	+	+	0	+	?	+	+	0	0	+	+	+	+	0				
Climate change adaptation commentary	None of these sites is located in a critical drainage area. In general, all sites offer the potential to cope with the heat, drought and extreme storms through appropriate design and incorporation of sustainable drainage Gitti_03, Gitti_04, Gitti_05, Gitti_06, Honi_04, Honi_06, Honi_07, Honi_10, Honi_12, Honi_13 & Honi_14 are not located in an area of flood risk, leading to a positive effect. Honi_01, Honi_08, Honi_09 & GH/ED/39 have medium/high flood risk (zones 2 & 3) covering a minor part of the site and development could avoid those areas. Honi_05 falls in zone 2 & 3 flood zones, development might be able to avoid this area, however Uncertain until more detailed lower-level surveys and assessments have been carried out.																			
6. Land resources	- ?	- ?	- ?	- ?	- ?	- ?	+	+	-	- ?	-	+	- ?	-	-	-				

Sites: Honiton																				
Site SA Objective	Gitti_03	Gitti_04	Gitti_05	Gitti_06	Honi_01	Honi_04	Honi_05	Honi_06	Honi_07	Honi_08	Honi_09	Honi_10	Honi_12	Honi_13	Honi_14	GH/ED/39				
Land resources commentary	Gitti_03, Gitti_04, Gitti_05, Gitti_06, Honi_01, Honi_04 and Honi_12 are greenfield sites on Grade 3 agricultural land, which could be 3a (best and most versatile) so uncertain negative effect. Honi_10 has Grade 4 agricultural land in the eastern part of the site and is shown as “urban” in the western part, so a minor positive effect. Honi_05 and Honi_06 are shown as ‘urban’, so a minor positive effect. Honi_07, Honi_09 and Honi_13 are greenfield sites on Grade 2 agricultural land, so a negative effect. Honi_08 and Honi_14 have Grade 2 agricultural land with part of the site shown as ‘urban’, so uncertain negative effect GH/ED/39 has Grade 2 agricultural land in the eastern part of the site, and Grade 3 agricultural land in the western part, so a negative effect.																			
7. Water resources	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
Water resources commentary	Development at the sites are unlikely to have any significant effects on water quality and quantity as none are located within a groundwater source protection zone or the River Axe SAC phosphates catchment. Gitti_05 is located just outside the water protection zone (within 100m).																			
8. Homes	--	--	++	+	+	+	+	+	+	+	+	+	+	+	+	++				
Homes commentary	Gitti_03 & Gitti_04 are promoted for employment uses only, meaning a negative impact.																			

Sites: Honiton																				
Site SA Objective	Gitti_03	Gitti_04	Gitti_05	Gitti_06	Honi_01	Honi_04	Honi_05	Honi_06	Honi_07	Honi_08	Honi_09	Honi_10	Honi_12	Honi_13	Honi_14	GH/ED/39				
	Gitti_05 & GH/ED/39 both have a maximum yield in the HELAA of 100 dwellings, meaning a significant positive effect. All other sites have the potential to deliver less than 100 dwellings, so will have a positive effect. An appropriate mix of tenures and sizes including affordable housing is assumed for all sites.																			
9. Health and well-being	-	-	-	-	+	+	+	+	+	+	-	+	+	+	-	-				
Health and well-being commentary	Gitti_03, Gitti_04, Gitti_05 & Gitti_06 are within 1,600m of open space/allotment and a play area, but adjacent to A30 meaning a negative effect Honi_01 is within 800m of open space/allotment and a play area, just over 800m from an area of higher deprivation (among 40% most deprived neighbourhoods in England), there is good air quality and limited noise and light pollution. Honi_04, Honi_06, Honi_07, Honi_08, Honi_10, Honi_12 and Honi_13 will deliver development within 800m of a 40% most deprived neighbourhood and open space/allotment and a play area, away from sources of air, noise and light pollution. So a positive effect. Honi_05 is located in a 40% most deprived neighbourhood, it is within 800m of open space/allotment and a children's play area and away from sources of air, noise and light pollution. So a positive effect. Honi_09 is within 800m of open space/allotment and a play area, but adjacent to A30 meaning a negative effect. Honi_14 & GH/ED/39 are within 800m of a 40% most deprived neighbourhood and open space/allotment and a play area, but adjacent to the railway line meaning a negative effect.																			

Sites: Honiton																				
Site SA Objective	Gitti_03	Gitti_04	Gitti_05	Gitti_06	Honi_01	Honi_04	Honi_05	Honi_06	Honi_07	Honi_08	Honi_09	Honi_10	Honi_12	Honi_13	Honi_14	GH/ED/39				
10. Access to services	--	--	--	--	+	+	++	+	+	+	+	+	+	+	+	+				
Access to services commentary	Gitti_03, Gitti_04, Gitti_05 & Gitti_06 are more than 1,600m from a primary school, secondary school, and community hall, but it is within 800m of an hourly bus service and shops. So a major negative effect. Honi_01, and Honi_04 are within 1,600m of a primary school, shop, GP surgery and library, a minor positive effect Honi_05 is within 800m from a primary school, secondary school, pub, shop, GP surgery, community hall, post office and library, a major positive effect. Honi_06, Honi_07, Honi_08, Honi_09, Honi_10, Honi_12, Honi_13, Honi_14 and GH/ED/39 are within 1600m from a primary school, secondary school, pub, shop, GP surgery, community hall, post office and library, a minor positive effect																			
11. Jobs and employment	++	++	+	+	+	+	+	+	+	+	+	+	+	+	+	+				
Jobs/employment commentary	All sites will provide short-term positive effects from job opportunities during construction. Gitti_03, and Gitti_04, are within 800m of an employment site (Heathpark Industrial Estate) and are proposed for employment sites. So major positive effect. Gitti_05 & Gitti_06 are within 800m of employment sites (Heathpark Industrial Estate), and within 1600m to jobs in the town centre, so minor positive effect. Honi_01, Honi_04, Honi_05, Honi_06, Honi_07, Honi_08, Honi_10, Honi_12, and Honi_13 are within 800m to jobs in the town centre, so minor positive effects.																			

Sites: Honiton																				
Site SA Objective	Gitti_03	Gitti_04	Gitti_05	Gitti_06	Honi_01	Honi_04	Honi_05	Honi_06	Honi_07	Honi_08	Honi_09	Honi_10	Honi_12	Honi_13	Honi_14	GH/ED/39				
	Honi_09, Honi_14 and GH/ED/39 are within 1600m to jobs in the town centre and have the realistic potential to deliver on-site employment due to the scale of development, so minor positive effects.																			
12. Town centres	-	-	-	-	+	+	++	++	++	++	++	++	++	++	++	+				
Town centres commentary	Gitti_03, Gitti_04, Gitti_05 & Gitti_06 are beyond 1,600m of an existing town centre. So minor negative effect. Honi_01 & Honi_04 are beyond 800m but within 1,600m of an existing town centre, so a minor positive effect The rest of the sites are located in the town centre area or within 800m of an existing town centre, major positive effect.																			
13. Connectivity and transport	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+				
Connectivity and transport commentary	Honiton has good coverage of superfast broadband, so all sites are assumed to have access to standard/superfast broadband. All the sites are located within 800m of A30 or A35 road and an hourly or better bus service; Honi_05, Honi_06, Honi_07, Honi_08, Honi_12 and Honi_13 are also within 800m of the train station.																			
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: - Gitti_05, Honi_01, Honi_04, Honi_07, Honi_09, Honi_12 and Honi_13 fall within AONB, considerable landscaping would be required to these sites due to significant negative effects on the landscape. - All sites have relatively good access to facilities, but these beneficial effects can be maximised by enhancing sustainable travel links e.g. creating bus stops near the site, and pedestrian/cycle links.																				

Sites: Honiton																				
Site	Gitti_03	Gitti_04	Gitti_05	Gitti_06	Honi_01	Honi_04	Honi_05	Honi_06	Honi_07	Honi_08	Honi_09	Honi_10	Honi_12	Honi_13	Honi_14	GH/ED/39				
SA Objective																				
- Noise attenuation will lessen the negative health and well-being effect for Gitti_03, Gitti_04, Gitti_05, Honi_09, Honi_10 Honi_14 and GH/ED/39 caused by their location close to the railway line and/or A30 & A35 road. - Positive effects for all sites to jobs and employment could be maximised by providing on-site employment opportunities alongside new housing, where reasonable. - Sustainable drainage systems to minimise flood risk and Flood risk assessment are required for Honi_05 to address the flood risk issue - Heritage impact assessment for Honi_05, Honi_07, Honi_12 and Honi_13, addresses the negative effect of good design or reducing the development site area.																				
Preferred alternative: Gitti_03, Gitti_04, Gitti_05, Gitti_06, Honi_01, Honi_05, Honi_06, Honi_07, Honi_10, Honi_13, Honi_14 and GH/ED/39																				
Reasons for alternatives being preferred or rejected: - Gitti_03 Land on the western side of Hayne Lane, Gittisham preferred as consistent with spatial strategy, as new employment land with good access to A30. - Gitti_04 Land to the West of Combe Garden Centre Gittisham preferred as consistent with spatial strategy, as new employment land with good access to A30. - Gitti_05 Land to the west of Hayne Lane is preferred as 2nd best allocation and consistent with spatial strategy, good access to facilities, employment and public transport, and medium-high landscape sensitivity which could be addressed by reduced site area and good design. - Gitti_06 Hayne Farm, Hayne Lane preferred as a developing existing brownfield site with good access to facilities, neighbourhood and employment, and medium landscape sensitivity. - Honi_01 Land at Heathfield, East Of Hayne Lane preferred as 2nd best allocation and consistent with spatial strategy, good access to facilities, employment and public transport, considerable landscaping would be required on the site due to significant negative effects upon the landscape. - Honi_04 Land lying to the North East of Heathfield Manor Farm was rejected due to likely significant adverse landscape effect																				

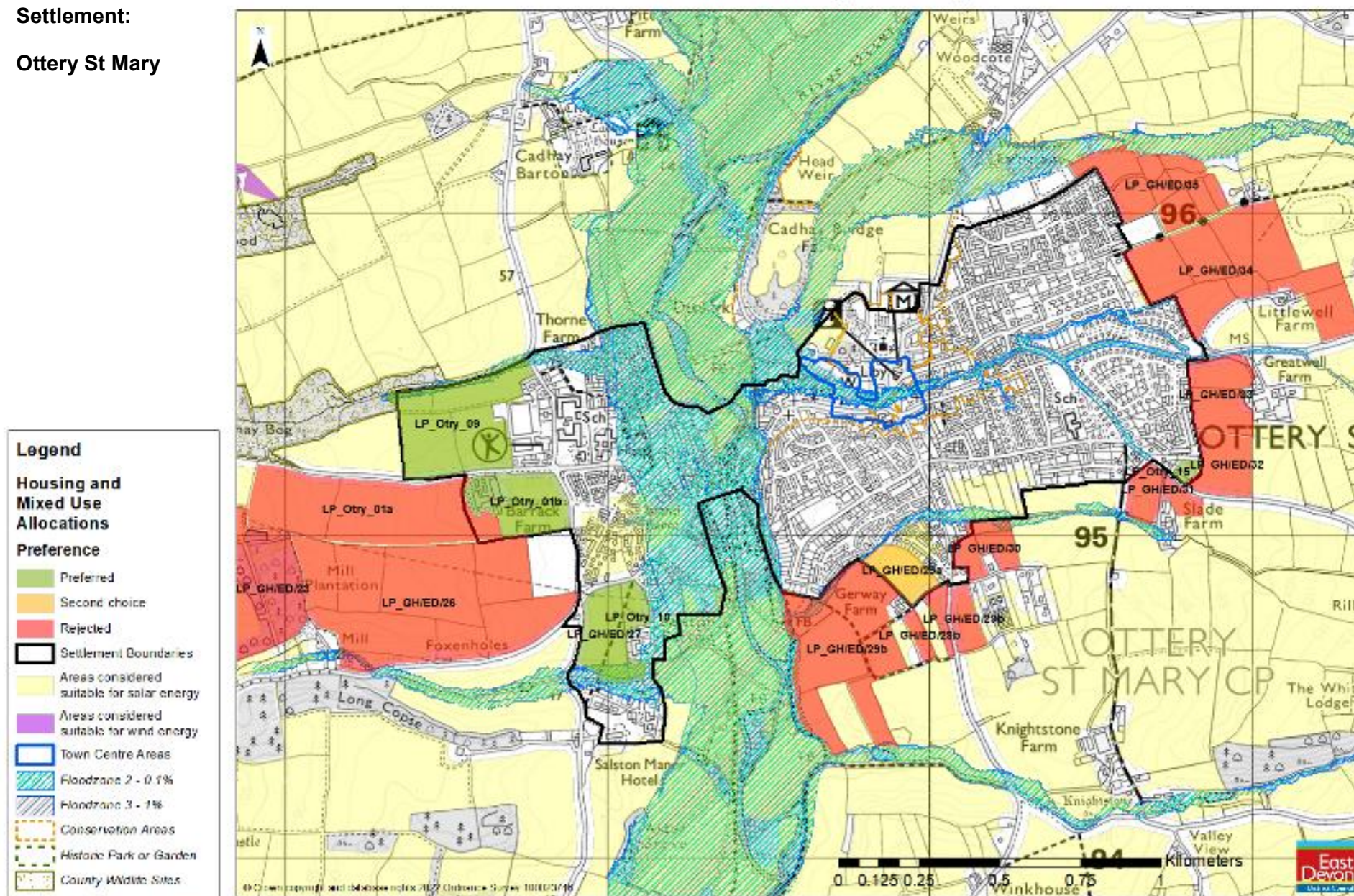
Sites: Honiton																			
Site	Gitti_03	Gitti_04	Gitti_05	Gitti_06	Honi_01	Honi_04	Honi_05	Honi_06	Honi_07	Honi_08	Honi_09	Honi_10	Honi_12	Honi_13	Honi_14	GH/ED/39			
SA Objective																			
- Honi_05 Land to the north and south of King Street, including the former Foundry Yard, is preferred as 2nd best allocation, the site is an existing brownfield site with good access to facilities, neighbourhood, public transport, town centre and employment. Heritage impact assessment and flood risk assessment are required to address the concern about developing in the conservation area and the flooding concern. - Honi_06 Former Millwater School, Honiton Bottom Road, Littleton preferred as developing existing brownfield site with good access to facilities, neighbourhood, public transport, town centre and employment lands, also have positive on landscape and biodiversity effect. - Honi_07 Land adjacent to St Michaels Church is preferred as 2nd best allocation, the site has good access to facilities neighbourhood, public transport, town centre and employment lands, considerable landscaping would be required on the site due to significant negative effects upon the landscape, and Heritage impact assessment required to address the heritage concern. - Honi_08 Land at the South Side of The Glenn, was rejected due to the likely significant adverse biodiversity effect. - Honi_09 Former Honiton Showground, Langford Road rejected due to likely significant adverse landscape effect. - Honi_10 Land at Ottery Moor Lane preferred consistent with spatial strategy, good access to facilities and employment, and positive effect on biodiversity and landscape. - Honi_12 land on the south-east side of Cuckoo Down Lane, Honiton and land at Lower Marl pits Farm was rejected due to likely adverse biodiversity landscape and heritage effect. - Honi_13 Middle Hill, Church Hill preferred as 2nd best allocation, the site has good access to facilities neighbourhood, public transport, town centre and employment lands, considerable landscaping would be required for the site due to significant negative effects upon the landscape, and Heritage impact assessment required to address the heritage concern. - Honi_14 Hurlakes, Northcote Hill preferred as 2nd best allocation, the site has good access to facilities neighbourhood, public transport, town centre and employment lands, considerable landscaping would be required for the site due to significant negative effects upon the landscape																			

Sites: Honiton																			
Site	Gitti_03	Gitti_04	Gitti_05	Gitti_06	Honi_01	Honi_04	Honi_05	Honi_06	Honi_07	Honi_08	Honi_09	Honi_10	Honi_12	Honi_13	Honi_14	GH/ED/39			
SA Objective																			
GH/ED/39 Land south of Northcote Hill, only parts of the site to the north of the railway preferred as consistent with spatial strategy, with good access to facilities, neighbourhood and town centre. Considerable landscaping would be required for the site due to significant negative effects on the landscape.																			

East Devon Local Plan 2020-2040 - Ottery St Mary

Settlement:

Ottery St Mary



n.b. Items in the Legend that appear in regular type are for consultation; items in italics are for information only

Reasonable alternatives

- Otry_01- Barrack Farm
- Otry_09- Land at Thorne Farm, Exeter Road
- Otry_10- Land North and South of Salston Barton
- Otry_15- Land at Bylands, Slade Road
- GH/ED/26- Land West of Cadhay Lane
- GH/ED/27- Land South of Strawberry Lane
- GH/ED/29- Gerway Farm
- GH/ED/30- Sidmouth Road, junction with Gerway Lane
- GH/ED/31- Slade Farm
- GH/ED/32- Church Path Field, land east of Chineway Gardens
- GH/ED/33- Land adjacent Great Well Farm
- GH/ED/34- Land at Littlewell
- GH/ED/35- Land at Ridgeway

Outline of reasons for selecting the alternatives

The reasonable alternatives listed above have all been assessed as suitable, available and achievable in the HELAA, which provides evidence that they have potential to be delivered (subject to further consideration through the planning process). GH/ED/21-26 were discounted due to their distance from the town. Sites Otry_3, Otry_12 and Otry_14 were discounted and did not progress to sustainability appraisal due to location within the floodplain, location within the Conservation Area and local green space/sports field use respectively.

Sites: Ottery St Mary																				
Site SA Objective	Otry_01	Otry_09	Otry_10	Otry_15	GH/ED/26	GH/ED/27	GH/ED/29	GH/ED/30	GH/ED/31	GH/ED/32	GH/ED/33	GH/ED/34	GH/ED/35							
1. Biodiversity	-	--	-	-	-	-	-	-	-	-	-	-	-							
Biodiversity commentary	The majority of sites are improved grassland and are in grazing or arable use. There are small pockets of woodland or copses adjacent to sites Otry_01, 09,11 and 12 and GH/ED/26/27/34 and 35. Most sites are bounded by mature hedgerows with some large specimen trees (those on Otry_10 will warrant specific protection as this is a preferred development site). GH/ED/29 and Otry_10 are both bounded by hedgerows containing some mature trees subject to Preservation Orders (the former lie outside of the suggested developable area). Otry_09 lies adjacent to a County Wildlife Site and Ancient Woodland, leading to potential significant moderate adverse effect. Development in Ottery St Mary may have adverse effects on the East Devon Pebblebed Heaths SAC, and the East Devon Heaths SPA, for example as a result of recreation activities. However, the distance between those sites and the town is reasonable; therefore the effects are likely to only be minor.																			
2. Landscape	-	-	-	-	-	-	-	-	-	-	-	-	-							
Landscape commentary	All of the sites lie outside the AONB, but most sites have some intervisibility with it (exception being Otry_15 which is a screened, garden site) and will be visible in medium-long range views. The first and second choice sites will all be seen in the context of existing urban form, albeit this is limited in the case of Otry_10 and GH/ED/27.																			
3. Hist. built env	?	0	0	0	--	-	-	-	?	?	?	?	?							
Hist. built env. commentary	There is a significant amount of subterranean archaeology around OSM and all sites have potential for artefacts to be discovered during excavation for building. Historic uses on Otry_01 require further investigation as does Otry_10; GH/ED/26 adjoins a Grade 11 listed mill to the west and contains features associated with the mill use which would be susceptible to change. Other sites lie further away from heritage assets and development will be seen in the context of intervening buildings and landscaping. Several																			

Sites: Ottery St Mary																				
Site SA Objective	Otry_01	Otry_09	Otry_10	Otry_15	GH/ED/26	GH/ED/27	GH/ED/29	GH/ED/30	GH/ED/31	GH/ED/32	GH/ED/33	GH/ED/34	GH/ED/35							
	sites to the south of OSM (GH/ED29 and 30) show the remains of historic field systems and neolithic and Roman pits have been discovered in the vicinity, evidence suggests similar finds are also likely on GH/ED31-35).																			
4. Climate change carbon emissions	+	+	+	+	+	+	+	+	+	+	+	+	+							
Climate change carbon emissions commentary	An accessibility assessment undertaken on the site selection work identified a total of 12 services, facilities and employment sites and Ottery St Mary has all of these apart from a train station, it also lacks a swimming pool. All of the sites considered are within 1600 metres of the majority of these different types of services and facilities, including the town centre and within 400m of an hourly bus service. Otry_01, Otry_09, Otry_10, GH/ED/26 and GH/ED/27 are all located to the west of the town, within 400m of the secondary school, hospital and leisure centre. Pedestrian access to the latter 3 sites would need to be provided but existing pavements then provide access to the town centre. The western sections of Otry_01 and GH/ED/26 do feel quite remote and it is questionable as to whether residents would walk to the town centre and primary school from here, and this is a factor in rejecting those areas for allocation. On street car parking makes pedestrian movements dangerous in places given the lack of paths. GH/ED/29 lies adjacent to existing development and potentially could be accessed through it, then using existing paths into the nearby town centre. Otry_13 could potentially link into GH/ED/29 but otherwise it, and GH/ED/30, are located further along Sidmouth Road and the height difference and narrowing of the road may prohibit a new pavement/cyclepath. Sites to the East and North East of the town are all constrained by narrow, largely unpaved and unlit country roads. Whilst all are within walking distance of the town centre, the hospital, secondary school and employment land are on the edge of what is likely to be a reasonable walk, particularly as the topography to the west is hilly. All of these sites are within 400m of an hourly bus service.																			

Sites: Ottery St Mary																				
Site SA Objective	Otry_01	Otry_09	Otry_10	Otry_15	GH/ED/26	GH/ED/27	GH/ED/29	GH/ED/30	GH/ED/31	GH/ED/32	GH/ED/33	GH/ED/34	GH/ED/35							
5. Climate change adaptation	+	0	0	+	0	0	0	0	0	+	0	0	0							
Climate change adaptation commentary	A significant band of flooding bisects the town along the River Otter and its tributaries, leading to one site being discounted at stage 1. The remaining sites are largely unaffected by river or surface water flooding constraints, however those which have small parts within floodzone 2 and 3 are Otry_09, Otry_10, GH/ED/26, GH/ED/27, GH/ED/29, GH/ED/30, GH/ED/31, GH/ED/33/GH/ED/34 and GH/ED/35. This is unlikely to have a significant bearing on the area of the sites to be developed as in most cases it is a narrow band of flooding along a boundary.																			
6. Land resources	?	?	?	-	?	?	-	-	-	-	-	-	-							
Land resources commentary	All of the sites are greenfield sites (note Otry_15 is a domestic garden laid to paddock). Otry_01, 09, 10 and GH/ED/26 and 27 are on Grade 3 agricultural land, which could be 3a (best and most versatile) so uncertain negative effect. Otry_13 and 15 and GH/ED/30 and 35 are on Grade 2 (best and most versatile) so negative effect and the remaining sites straddle both areas (assumed to be a negative effect since they contain best and most versatile land). None of these sites are within a mineral consultation zone.																			
7. Water resources	0	0	0	0	0	0	0	0	0	0	0	0	0							
Water resources commentary	The water supply for the southern half of East Devon comes from deep underground boreholes. Drinking Water Safeguard Zones have been designated where the land use is causing pollution of the raw water. Groundwater bodies that fall into this category are located between Ottery St Mary and Otterton. Human health is not at risk from these sources because SWW provide extra treatment. New development will create a demand for additional water.																			

Sites: Ottery St Mary																			
Site SA Objective	Otry_01	Otry_09	Otry_10	Otry_15	GH/ED/26	GH/ED/27	GH/ED/29	GH/ED/30	GH/ED/31	GH/ED/32	GH/ED/33	GH/ED/34	GH/ED/35						
8. Homes	+	++	+	+	++	+	++	+	+	+	+	++	++						
Homes commentary	Otry_01, 09 and GH/ED/26, 29, 34 and 35 have a maximum yield in the HELAA of over 100 dwellings, meaning a significant positive effect, although part of Otry_01 is identified for employment which reduces the positive effect slightly. All other sites have potential to deliver less than 100 dwellings, so will have a positive effect. An appropriate mix of tenures and sizes including affordable housing is assumed for all sites.																		
9. Health and well-being	+	+	+	-	+	+	+	+	-	-	-	0	+						
Health and well-being commentary	Parts of all of the sites on the western side of the town are within 500 metres of an open space or play area so a positive effect, although the western parts of Otry_01 and GH/ED/26 are significantly beyond this distance due to the size of the sites (although development would be required to include open space on these larger sites). They are also within walking distance of the hospital and the Dr surgery. GH/ED/35 and 29 lie close to existing play areas and open space. GH/ED/34 is a very large site and a significant part lies beyond 500m of a play area; in any case access is via an unlit, unmade track so a neutral score is given. The remaining sites lie over 500m from play areas or open spaces, meaning a negative effect. None of the sites lie on a railway track or major road, although Otry_01 and GH/ED/28 lie on a class 2 'B' road.																		
10. Access to services	+	+	+	+	+	+	+	+	+	+	+	+	+						

Sites: Ottery St Mary																				
Site SA Objective	Otry_01	Otry_09	Otry_10	Otry_15	GH/ED/26	GH/ED/27	GH/ED/29	GH/ED/30	GH/ED/31	GH/ED/32	GH/ED/33	GH/ED/34	GH/ED/35							
Access to services commentary	Due to the way the town has grown, with a main centre containing most facilities and a secondary area containing the hospital, employment and secondary school, none of the sites are within 800 meters of a school, GP, pub, library and community hall, but all sites are within 1600 metres.																			
11. Jobs and employment	++	+	+	0	++	+	+	0	0	0	0	+	+							
Jobs/employment commentary	Site Otry_1 is proposed to incorporate employment as part of a mixed use scheme. Sites Otry_09, Otry_10, GH/ED/26 and 27 are within 800 metres of an employment site (so score positively) and GH/ED/26 is large enough to accommodate employment uses on site so a strong positive effect. All other sites are within 1600 metres by road of an employment site, but only GH/ED/29,34 and 35 are large enough to accommodate employment as part of a mixed use scheme.																			
12. Town centres	+	+	+	+	+	+	+	+	+	+	+	+	+							
Town centres commentary	Most of the sites are further than 800 metres from the town centre (by road) although parts of GH/ED/29 and 30 are just within this distance (albeit along narrow, unpaved road). All of sites are within 1600 metres.																			
13. Connectivity and transport	0	0	0	0	0	0	0	0	0	0	0	0	0							
Connectivity and transport commentary	OSM has 100% gigabit availability. None of the sites are within 800 metres of a railway station, an A road and a recognised cycle route.																			

Sites: Ottery St Mary																			
Site	Otry_01	Otry_09	Otry_10	Otry_15	GH/ED/26	GH/ED/27	GH/ED/29	GH/ED/30	GH/ED/31	GH/ED/32	GH/ED/33	GH/ED/34	GH/ED/35						
SA Objective																			
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: • Accessibility effects arising from the distance between the town centre and the secondary area where the employment, hospital and secondary school are located could be reduced through the provision of high quality footpath and cycle links between the two, however the issue cannot be completely overcome. • The significant negative biodiversity effect for Otry_09 can be lessened by reducing the site area to the west, adjacent to the county wildlife site and ancient woodland and by retaining existing areas of habitat within the fields to the north. In addition to this, the existing hedgerows should be retained and new corridors introduced. • The significant negative historic environment effect for GH/ED/26 can be lessened by reducing the site area to the west. The significant negative uncertain effects identified on this and the other sites would remain until archaeological surveys are undertaken and this may reduce the developable area of the sites. High quality design across all sites can reduce negative effects and maximise beneficial effects on the built environment. • Health and wellbeing negative effects arising from a lack of accessible play areas could be overcome on the larger sites through the provision of on-site play areas and open spaces. • All sites have relatively good access to facilities, but these beneficial effects can be maximised by enhancing sustainable travel links e.g. create bus stops near to the site, pedestrian/cycle links. • Designing new development for low water use and requiring sustainable drainage systems can help turn neutral uncertain effects on water resources into positive uncertain effects. • Positive effects for all sites in relation to jobs and employment could be maximised by providing on-site employment opportunities alongside new housing, where reasonable.																			
Preferred alternative:																			

Sites: Ottery St Mary																				
Site SA Objective	Otry_01	Otry_09	Otry_10	Otry_15	GH/ED/26	GH/ED/27	GH/ED/29	GH/ED/30	GH/ED/31	GH/ED/32	GH/ED/33	GH/ED/34	GH/ED/35							
Otry_01 Preferred for 70 houses and 1.25ha employment; Otry_09 Preferred for 90 houses; Otry_10 Preferred for 20 houses; Otry_15 Preferred for 8 houses; GH/ED/27 Second choice site for 60 houses																				
Reasons for alternatives being preferred or rejected:																				
- Otry_01- Barrack Farm- A small eastern section of this site (5.1ha) is considered suitable for mixed use development, for at least 1.25ha of employment and up to 70 dwellings so this is a preferred site. This would be subject to Devon County Council Highways agreeing a suitable access, an archaeological assessment being undertaken and careful design to minimise visual obtrusiveness. There are ecology, heritage and landscape impacts with the remainder of the site. This site is part of an area identified in the adopted neighbourhood plan where development should be restricted to prevent settlement coalescence however it is considered that developing part of this site will not significantly undermine this aim. - Otry_09- Land at Thorne Farm, Exeter Road- There are medium landscape and significant ecology concerns associated with this site and these increase to the north and west. Eastern and southern parts of the site could be most favourable to development. Devon County Council Highways advise that a new roundabout is required for access to the site and this may prove to be expensive. Part of the site is protected in the current Local Plan and Neighbourhood Plan for education use and DCC advise that there is a shortage of primary and secondary pupil places in the town noting that they have previously promoted a new school on part of this site. Given site sensitivities and the potential need to address secondary education needs as well as primary on the site a lower housing yield is suggested compared to past proposals for development of the site so this is a preferred site for 90 houses. - Otry_10- Land North and South of Salston Barton- The site is discrete and self-contained, on the edge of the settlement. The northern section of the site (outside the floodplain) could be allocated but the density should reflect the need to protect existing trees/hedgerows, avoid the sloping section of the site and accommodate the cycle/footpath through the site. This is a preferred site for 20 houses.																				

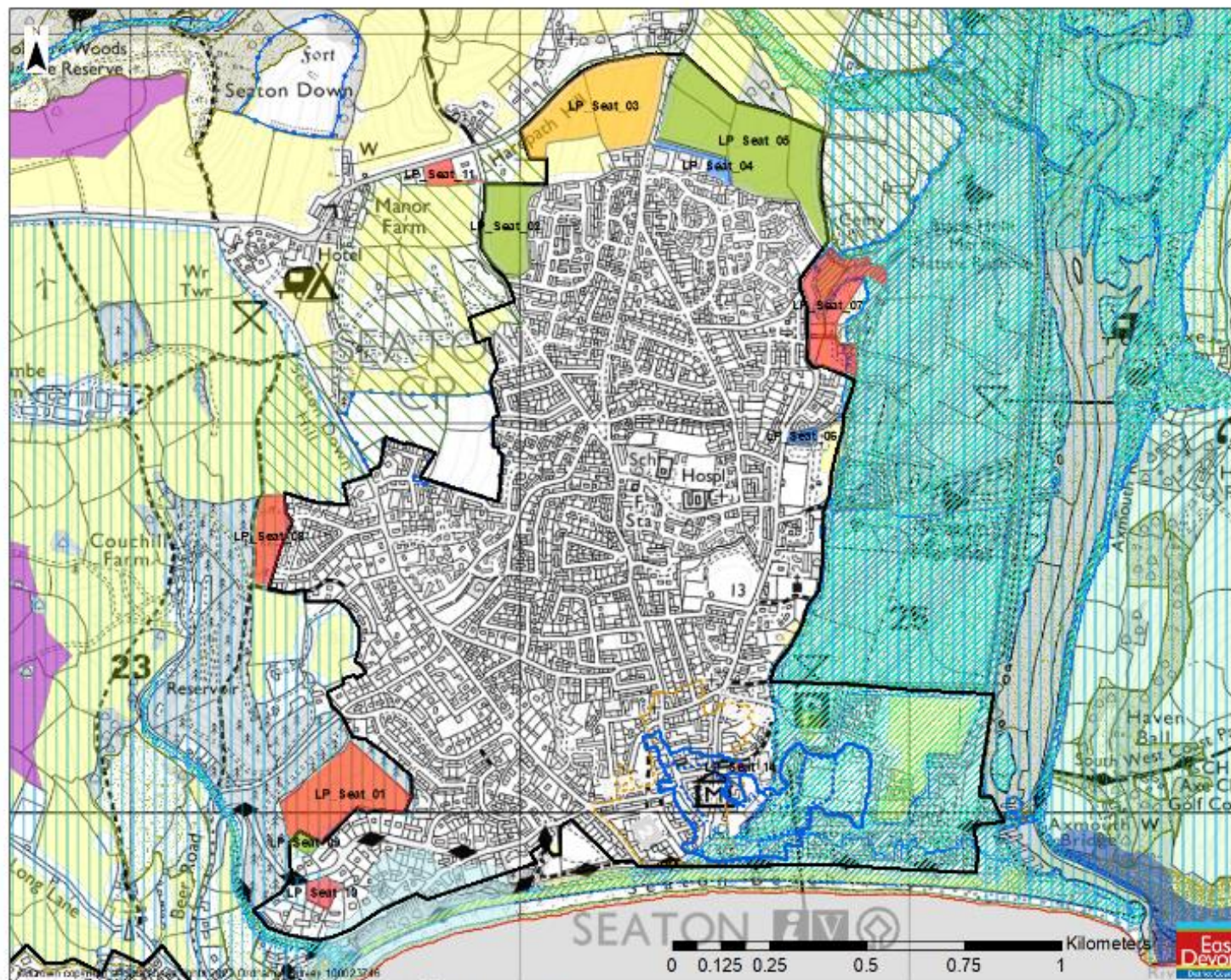
Sites: Ottery St Mary																				
Site	Otry_01	Otry_09	Otry_10	Otry_15	GH/ED/26	GH/ED/27	GH/ED/29	GH/ED/30	GH/ED/31	GH/ED/32	GH/ED/33	GH/ED/34	GH/ED/35							
SA Objective																				
- Otry_15- Land at Bylands, Slade Road- This site is a large garden on the eastern edge of the town. It has minimal ecological, landscape or heritage impacts, although the yield is slightly reduced to minimise the impact on mature boundary trees. Access is via a country lane and safe pedestrian access would need to be achieved. The lane cannot accommodate large numbers of extra cars. This site would 'round off' development. This is a preferred site for 8 houses. - GH/ED/26- Land West of Cadhay Lane- This site is rejected. This site does not abut the town and wholly extends into open countryside. There are heritage, ecology and visual impact concerns. This site is part of an area identified in the adopted neighbourhood plan where development should be restricted to prevent settlement coalescence. - GH/ED/27- Land South of Strawberry Lane- The site is on the southern periphery of the settlement and has a semi-rural character. It could be considered to round off this part of the town. Tree planting is required to reduce visual impact. This is a preferred site for 60 houses. - GH/ED/29- Gerway Farm- Part of this site is a second choice for 40 houses. This is a large site with large variation in character and constraints. Part of the site (adjoining existing development at Claremont Field and Gerway Close) could be allocated for development, and could provide benefits in the form of a footpath link between the two estates and a band of tree planting to minimise visual impact from the south. Allocation would need to be subject to satisfactory highways and archaeological/heritage assessment as the smaller section would need to be accessed through an existing estate and it is very sensitive in heritage terms, being a historic field enclosure with pre-historic and medieval finds nearby, - GH/ED/30- Sidmouth Road, junction with Gerway Lane- This site is rejected. Greenfield site which relates well to the built up area, highly sensitive in heritage terms, unable to achieve satisfactory access and pavement (this site has a history of refused planning permissions) - GH/ED/31- Slade Farm- This site is rejected. Site is a greenfield site on the eastern side of the town which would extend into open countryside. Development would be visible from a considerable distance. Concerns regarding insufficient highway capacity																				

Sites: Ottery St Mary																			
Site	Otry_01	Otry_09	Otry_10	Otry_15	GH/ED/26	GH/ED/27	GH/ED/29	GH/ED/30	GH/ED/31	GH/ED/32	GH/ED/33	GH/ED/34	GH/ED/35						
SA Objective																			
- GH/ED/32- Church Path Field, land east of Chineway Gardens- This site is rejected. Parts of the site are sensitive in landscape terms. Slade Road is unsuitable to accommodate additional vehicles, especially if Otry_15 is developed. Developing part of the site is not appropriate as development would extend into the countryside beyond the natural form of the town. - GH/ED/33- Land adjacent Great Well Farm- This site is rejected. Parts of the site are sensitive in landscape terms. Chineway Road is unsuitable to accommodate strategic level traffic. Developing part of the site is not appropriate as development would extend into the countryside beyond the natural form of the town. - GH/ED/34- Land at Littlewell- This site is rejected. Parts of this site are highly visible in the landscape but the main concern is the lack of suitable access. Current access is via a single width dirt track extending beyond the surfaced road of Higher Ridgeway. The site could only be developed if the road were extended and widened along this track (which is unlikely to be possible), or if access were taken via Chineway Road to the south of the site. However, access onto Chineway Road would require removal of a species-rich hedgebank and mature trees and the potential access point is located at least 450m along a country lane, beyond the built form of the town and with no obvious way to provide a pavement to the town. In either case, access into and through the town is constrained by narrow roads and a single route through the town centre. - GH/ED/35- Land at Ridgeway- This site is rejected. Parts of the site are highly visible in long range views. Current access is via a single width dirt track extending beyond the surfaced road of Higher Ridgeway. The site could only be developed if the road were extended and widened along this track (which is unlikely to be possible), or if access were taken via the "Butts Road" development which adjoins the site to the west. However, in either case, access into and through the town is constrained by narrow roads and a single route through the town centre.																			

Settlement:

East Devon Local Plan 2020-2040 - Seaton

Seaton



n.b. Items in the Legend that appear in regular type are for consultation; items in italics are for information only

Reasonable alternatives

- Seat_01 – Clay Common
- Seat_02 – Land at Barnards Hill Lane
- Seat_03 – Land to south of Harepath Hill
- Seat_05 – Land off Harepath Road
- Seat_07 (incl. Seat_12, entirely overlaps Seat_15) – Land at Colyford Road
- Seat_08 – Land between Churston Rise and Couchill Copse
- Seat_09 – Land at Clay Common (Little Paddock)
- Seat_10 – Land south of Beer Road
- Seat_13 – Land adjacent Axe View Road

Outline of reasons for selecting the alternatives

The reasonable alternatives listed above have all been assessed as suitable, available and achievable in the HELAA, which provides evidence that they have potential to be delivered (subject to further consideration through the planning process). The sites are all located within or adjacent to Seaton, a Main Centre, reflecting the settlement strategy in the Preferred Options consultation draft Local Plan.

With regards to sites not identified as reasonable alternatives, Seat_04 and Seat_06 are not reasonable alternatives as both already have planning permission, so are not being considered as allocations in the Local Plan. Seat_11 is not a reasonable alternative as it is not adjacent or well-related to Seaton, so does not reflect the settlement strategy. Seat_14 is below the site size threshold in the HELAA, so is not large enough to be a Local Plan allocation.

Sites: Seaton										
Site SA Objective	Seat_01	Seat_02	Seat_03	Seat_05	Seat_07	Seat_08	Seat_09	Seat_10	Seat_13	
1. Biodiversity	-	--	--	--	--	--	-	-	-	
Biodiversity commentary	All sites in Seaton are within the Beer Quarry and Caves SAC bat consultation zone, sustenance zones, and landscape connectivity zone, so have a likely negative effect as a minimum. Seat_01 is adjoined by woodland to west, north and east, with no ecological designations within 100m of site so will likely have a negative effect. Seat_02 and Seat_03 are located within “pinch point” for bats from Beer Quarry and Caves SAC, meaning a significant negative effect. Seat_05 is within the “pinch point”, and adjoins a small area of woodland to north, with Seaton Marshes CWS across road to east, so overall Seat_05 would also have a significant negative effect. Seat_07 is partially within a CWS, and partly contains unimproved grassland (as per the CWS designation), which is likely to be contained within the floodplain area of the site. A significant negative effect is likely given the CWS designation. Seat_08 has a large amount of rank grassland, scrub and encroaching woodland on site that are valuable habitats, so a significant negative effect. Seat_09 is adjacent to Seat_01 with woodland adjoining to west, and has the same, negative effect. Seat_10 is just over 100m to a Sidmouth to West Bay SAC to the south, but intervening dwellings limit the impact upon this designation, so a negative effect. Seat_13 is over 700m from the nearest biodiversity designation, and comprises unimproved grassland with limited on-site ecological value – however, presence within the bat “zones” means a negative effect.									
2. Landscape	--	-	-	-	-	--	-	--	--	
Landscape commentary	Due to the elevated nature and prominent views of site, including from the sea, and location on settlement edge, development at Seat_01 would not integrate with the existing settlement and would have a high/medium landscape sensitivity, so a significant negative effect. Seat_02 is bounded by historic hedgerow and is relatively prominent, being set above the level of the adjacent road and houses with open boundaries to the north and west. However, urban context due to existing dwellings to east and south, means a negative effect overall. Seat_03 is an open sloping side, with distant, expansive views, including from AONB 961m to east. However, human disturbance from A3052 along northern boundary, Harepath Road along east and their junction at north									

Sites: Seaton										
Site	Seat_01	Seat_02	Seat_03	Seat_05	Seat_07	Seat_08	Seat_09	Seat_10	Seat_13	
SA Objective										
	east edge, makes it an active and busy area. Dwellings to south and industrial units to south east provide context of built form, so Seat_03 has an overall medium sensitivity and likely negative effect. Seat_05 has historic hedgerow boundary and small blocks of woodland to north and south that are typical of the landscape character type. Site is visible from AONB 546m to the east, although it is set low down in the valley and seen in the context of the existing town which runs along the southern boundary, reducing its visual prominence. Overall, medium landscape sensitivity and negative effect. Seat_07 is open to views from sensitive receptors to east with AONB, and Grade I listed Axmouth church approx. 700-800m away. Landscape character to the east (Wetlands) is remote, wild and tranquil, but urban context to west and presence of two industrial/farm buildings on site reduces susceptibility to medium landscape sensitivity and negative effect. Rooftops of existing dwellings on eastern boundary indicate human presence at Seat_08, but countryside/woodland on remaining edges provide a rural feel and sense of tranquillity, leading to medium/high landscape sensitivity and significant negative effect. Seat_09 has a high degree of enclosure, with limited, glimpsed public views into the site, including from the sea. Small site size and urban context of dwellings to south reduces susceptibility to change, so a negative effect overall. Seat_10 is busy with human activity from adjacent to Beer Road and modern dwellings to north and east. Within CPA due to its visual openness and views to and from the sea, with open views from sensitive receptors, including SW Coast Path, so a high/medium landscape sensitivity to new development and significant negative effect. Seat_13 is on rising land, visible from AONB 1,600m to east. Although existing dwellings to south and east, and caravan park to north provide context of built form, the large scale of the site means a significant negative landscape effect.									
3. Historic and built environment	0	0	-	-	- ?	0 ?	0	- ?	--	
Hist. built env. commentary	In general, all sites offer the potential to promote high quality design and accessibility, subject to identified constraints. Seat_01 has no designated heritage assets within 100m of site, there is an archaeology record in eastern part, leading to a neutral effect. Seat_02 has no designated heritage assets within 100m of site, and no on-site records in the HER, so neutral effect. Grade II									

Sites: Seaton										
Site SA Objective	Seat_01	Seat_02	Seat_03	Seat_05	Seat_07	Seat_08	Seat_09	Seat_10	Seat_13	
	listed Harepath Farm overlooks Seat_03 from the north east, so potential impact upon its significance. However, this asset has east-west aspect with limited views to south, with a setting already compromised by A3052 and modern development to east and west, and HER notes on-site archaeology, so a minor negative effect. Seat_05 is also visible from Grade II listed Harepath Farm, 46m to the north west, so potential impact upon its significance, but as noted the setting is already compromised by A3052 and modern development to east and west. The HER notes some archaeology findings on the site, overall a minor negative effect. Seat_07 has no designated heritage assets within 100m of site, but the HER notes various archaeological records on site. Site is visible from Grade I listed Axmouth church, but 800m away and would not affect its setting. Overall a minor negative uncertain effect for Seat_07. No designated heritage assets within 100m of Seat_08, and no records on HER on site, but numerous records to east and west means that archaeology may be present on site, so a neutral uncertain effect. Closest designated heritage asset to Seat_09 is Jurassic Coast WHS, 270m to south, but intervening dwellings and trees mean there are only glimpsed views of the site from the WHS. No records on HER on site, and overall a neutral effect for Seat_09. Seat_10 is 125m from Jurassic Coast WHS, but developing the site would not affect the WHS due to distance and intervening dwellings. 3x archaeological records on site identified in the HER, so uncertain minor negative effect. Seat_13 is located almost entirely within the Honeyditches Roman Settlement Scheduled Monument, so significant negative effect.									
4. Climate change and carbon emissions	+	+	+	+	+	0	+	+	+	

Sites: Seaton										
Site SA Objective	Seat_01	Seat_02	Seat_03	Seat_05	Seat_07	Seat_08	Seat_09	Seat_10	Seat_13	
Climate change carbon emissions commentary	An accessibility assessment undertaken for the Site Selection work identified a total of 12 services, facilities and employment sites⁹⁴ – the findings are referenced for each site in this commentary. Note that Colyton Grammar secondary school is not included as it is a selective school, so not accessible for all pupils. Seat_01 has 9 out of 12 facilities within 1,600m of site, and can link to existing footpath on Beer Road, 900m to town centre. Hourly or better bus service available on Beer Rd, 67m to south. Overall, a positive effect. Seat_02, 03 and 05 all have 10 out of 12 facilities within 1,600m of site, and an hourly or better bus route on the boundary (03 and 05 have existing bus stops). Around one mile to town centre, although several other facilities are closer (e.g. primary school, GP are 600m), so a positive effect overall for Seat_02, 03 and Seat_05. Seat_07 also has 10 out of 12 facilities within 1,600m of site, with an hourly or better bus service approx 200m away to west. Proposed cycle path approved around the southern, western and northern edge of site will provide good links north to the Wetlands and south to the town centre (1km away), meaning a positive effect. Seat_08 has 9 out of 12 facilities within 1,600m of site, although most of these are relatively far at approx 1km away, with town centre one mile away, and a hilly journey that could discourage walking/cycling. 'Town' bus service (no. 393) departs from Churston Rise every 1 or 2 hours, but neutral effect overall. Seat_09 and Seat_10 also have 9 out of 12 facilities within 1,600m of site, and can link to existing footpath on Beer Road, 900m to town centre. Hourly or better bus service available on Beer Rd. Overall, a positive effect for Seat_09 and Seat_10. Seat_13 is within 1,600m of 10 facilities, can link to existing footpaths on estate roads to east. Town centre is 700m as the crow flies, but nearly twice this distance following existing roads. Close to hourly or better bus route on Barnards Hill Lane. Positive effect overall for Seat_13.									

⁹⁴ Namely: train station, hourly or better bus route, primary school, secondary school, convenience store/shop, Post Office, Community hall, Pub, Open space/allotment, children's play area, GP, employment site (identified in the Employment Land Review).

Sites: Seaton										
Site SA Objective	Seat_01	Seat_02	Seat_03	Seat_05	Seat_07	Seat_08	Seat_09	Seat_10	Seat_13	
5. Climate change adaptation	+	+	+	0	- ?	+	+	+	+	
Climate change adaptation commentary	None of these sites is located in a critical drainage area. In general, all sites offer the potential to cope with heat, drought and extreme storms through appropriate design and incorporation of sustainable drainage, for example. Seat_01, 08, 09, and 10 are not located in an area of flood risk, leading to a positive effect. Seat_02, 03 and 13 are also not located in an area of flood risk, but there are small areas of surface water flood risk beyond the site to the east which should not be exacerbated – nevertheless a positive effect for the sites themselves. Surface water flooding affects southern boundary of Seat_05, but development can avoid this area so a neutral effect. Seat_07 has medium/high flood risk (zones 2/3) covering northern half of site, with surface water flood risk running through middle of the site, north to south. It may be possible for development to avoid these areas, so negative uncertain effect.									
6. Land resources	- ?	-	-	-	- ?	- ?	- ?	- ?	- ?	
Land resources commentary	Seat_01, 02, 08, 09, 10 and 13 are greenfield sites on Grade 3 agricultural land, which could be 3a (best and most versatile) so uncertain negative effect. Seat_03 and 05 are greenfield sites on Grade 2 agricultural land (best and most versatile), so a negative effect. Seat_07 has Grade 2 agricultural land in northern part of site, and shown as “urban” in southern part, so an uncertain negative effect.									
7. Water resources	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	

Sites: Seaton										
Site SA Objective	Seat_01	Seat_02	Seat_03	Seat_05	Seat_07	Seat_08	Seat_09	Seat_10	Seat_13	
Water resources commentary	Development at the sites are unlikely to have any significant effects on water quality and quantity as none are located within a groundwater source protection zone or the River Axe SAC phosphates catchment. There is uncertainty on the capacity of local sewage treatment works to accommodate additional demand from new housing. This means an uncertain neutral effect for all sites.									
8. Homes	+	+	++	++	+	+	+	+	+	
Homes commentary	Seat_03 and Seat_05 both have a maximum yield in the HELAA of over 100 dwellings, meaning a significant positive effect (nb. the yield at Seat_03 has subsequently been reduced to 60 dwellings due to landscape constraints). All other sites have potential to deliver up to 100 dwellings, so will have a positive effect. An appropriate mix of tenures and sizes including affordable housing is assumed for all sites.									
9. Health and well-being	+	+	-	-	+	+	+	+	+	
Health and well-being commentary	Seat_01, 02, 07, 08, 09, 10 and 11 will deliver development within 800m of a 50% most deprived neighbourhood, away from sources of air, noise and light pollution, and within 1,600m of open space and play area, so a positive effect. Seat_03 and 05 are within 1,600m of open space/allotment and a play area, but adjacent to A3052 to the north meaning a negative effect.									
10. Access to services	+	+	+	+	+	+ / -	+	+	+	

Sites: Seaton										
Site SA Objective	Seat_01	Seat_02	Seat_03	Seat_05	Seat_07	Seat_08	Seat_09	Seat_10	Seat_13	
Access to services commentary	There is no secondary school in Seaton, so all secondary aged pupils will need to travel elsewhere. Seat_01, 09 and 10 are within 800m of a shop, GP surgery, pub, library and community hall, but 1 km to the primary school, so a minor positive effect for these sites. Seat_02 and 13 are within 800m all of these facilities apart from a pub and library so, again, a minor positive effect. A minor positive for Seat_03 due to being within 800m of these facilities apart from a school and pub. Seat_05 is within 800m all of these facilities apart from a pub, so a minor positive effect. Seat_07 is within 800m of a shop, GP surgery, pub, library and community hall, and primary school, but 1.1km to the library so will have a positive effect. Seat_08 is beyond 800m to these facilities, but within 1,600m. For most sites, there is relatively level access using existing footpaths to these services/facilities. The main exception is Seat_08 which is accessed via a steep incline that could deter pedestrians/cyclists – for this reason, a mixed positive/negative effect is identified for this site.									
11. Jobs and employment	+	+	+	++	++	+	+	+	+	
Jobs/employment commentary	All sites will provide short-term positive effects from job opportunities during construction. Seat_01, Seat_08, and Seat_10 are within 1,600m of employment sites, and approx. 1km to jobs in the town centre, but limited potential to provide on-site employment due to adverse landscape impact, so minor positive effect. Seat_02 is just 300m to Harepath Road industrial estate, but access and adverse landscape impact mean on-site employment is not realistic – minor positive overall. Seat_03 is just across the road from Harepath Road industrial estate and access likely to be acceptable for on-site employment, but adverse landscape impact means just a minor positive effect. Seat_05 has a significant positive effect as it is adjacent to Harepath Road industrial estate and has realistic potential to deliver on-site employment. Seat_07 also has a significant positive effect given its proximity to Harepath Road industrial estate, direct road access and acceptable landscape impact, offering potential to deliver on-site employment. Seat_09 is within 1,600m of employment sites but small-scale means on-site employment not likely, so just a minor positive effect.									

Sites: Seaton										
Site SA Objective	Seat_01	Seat_02	Seat_03	Seat_05	Seat_07	Seat_08	Seat_09	Seat_10	Seat_13	
	Seat_13 is within 800m of Harepath Road industrial estate and the town centre, but unsuitable access for employment and adverse landscape impact mean on-site employment is not likely, so a minor positive effect.									
12. Town centres	+	+	+	+	+	+	+	+	+	
Town centres commentary	All sites are beyond 800m but within 1,600m of Seaton town centre. Therefore, a minor, long-term positive effect is likely from all sites due to additional population from new housing accessing the town centre.									
13. Connectivity and transport	+	++	++	++	+	+	+	+	++	
Connectivity and transport commentary	Seaton has an average broadband speed of 47 mbps, so all sites are assumed to have access to superfast broadband. Seat_01 and 09 are located around 60m from an hourly or better bus route, within 400m of a cycle route, and within 1,600m of an 'A' road, so will have a positive effect. Seat_02 is 90m from an hourly or better bus service, close to the A3052 to the north, and around 800m from a cycle route, so has a significant positive effect against this objective. Seat_03 and Seat_05 are both adjacent to an hourly or better bus route, the A3052, and close/adjacent to the cycle route on Colyford Road, so both sites will have a significant positive effect. Seat_07 is adjacent to cycle route on Colyford Road (indeed there are plans for an off-road cycle path through the site itself), but slightly further to the A3052 (junction at Colyford is 1km to north) and hourly bus route (219m away), leading to a minor positive effect. Seat_08 is around 600m from an hourly or better bus route and the A3052, but over 1km to a recognised cycle route (excluding Homer Lane which is closer due to its short length), so is considered to have a positive effect. Seat_10 is adjacent to hourly or better bus route on Beer Road, within 400m of a cycle route, and within 1,600m of an 'A' road, so will have a positive effect. A significant positive effect is likely for Seat_13 as within 800m of an hourly or better bus route, the A3052, and cycle route.									

Sites: Seaton										
Site	Seat_01	Seat_02	Seat_03	Seat_05	Seat_07	Seat_08	Seat_09	Seat_10	Seat_13	
SA Objective										
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: - Mitigation measures such as sensitive lighting, compensatory bat foraging, and avoiding development in the northern areas of Seat_02, 03 and 05 within the “pinch point” should reduce the significant negative effect on biodiversity to a minor negative. - Considerable landscaping at Seat_01, 08, 10 and 13 would be required due to significant negative effects upon the landscape, but their sensitivity is such that a significant negative effect is likely to remain. A minor negative landscape effect for all other sites means that appropriate landscaping should be incorporated, although as all sites are currently greenfield, a negative effect would remain - The significant negative historic environment effect at Seat_13 can be lessened by reducing the site area to avoid the Scheduled Monument, but significant negative uncertain effect would remain until archaeological surveys are undertaken. High quality design across all sites can reduce negative effects and maximise beneficial effects on the built environment. - Noise attenuation will lessen the negative health and well-being effect for Seat_03 and 05 caused by their location close to the A3052. - All sites have relatively good access to facilities, but these beneficial effects can be maximised by enhancing sustainable travel links e.g. create bus stops near to the site, pedestrian/cycle links. - Designing new development for low water use and requiring sustainable drainage systems can help turn neutral uncertain effects on water resources into positive uncertain effects. - Positive effects for all sites in relation to jobs and employment could be maximised by providing on-site employment opportunities alongside new housing, where reasonable.										
Preferred alternative: Seat_02, Seat_05, Seat_09. In addition, Seat_03 is a second choice allocation in the Preferred Options Consultation Draft Local Plan.										
Reasons for alternatives being preferred or rejected: - Seat_01 – Clay Common rejected due to likely significant adverse landscape effect. - Seat_02 – Land at Barnards Hill Lane preferred as consistent with spatial strategy, good access to facilities and employment, and medium landscape sensitivity.										

Sites: Seaton										
Site	Seat_01	Seat_02	Seat_03	Seat_05	Seat_07	Seat_08	Seat_09	Seat_10	Seat_13	
SA Objective										
- Seat_03 – Land to south of Harepath Hill preferred as second choice as consistent with spatial strategy, good access to facilities and employment, and medium landscape sensitivity. - Seat_05 – Land off Harepath Road preferred as consistent with spatial strategy, good access to facilities and employment, and medium landscape sensitivity. - Seat_07 (incl. Seat_12) – Land at Colyford Road rejected due to significant adverse biodiversity effects and high flood risk. - Seat_08 – Land between Churston Rise and Couchill Copse rejected due to likely significant adverse landscape effect. - Seat_09 – Land at Clay Common (Little Paddock) preferred as consistent with spatial strategy, good access to facilities and employment, and medium/low landscape sensitivity. - Seat_10 – Land south of Beer Road rejected due to likely significant adverse landscape effect. - Seat_13 – Land adjacent Axe View Road rejected due to likely significant adverse effect upon landscape and the historic environment.										

East Devon Local Plan 2020-2040 - Sidmouth

Settlement:

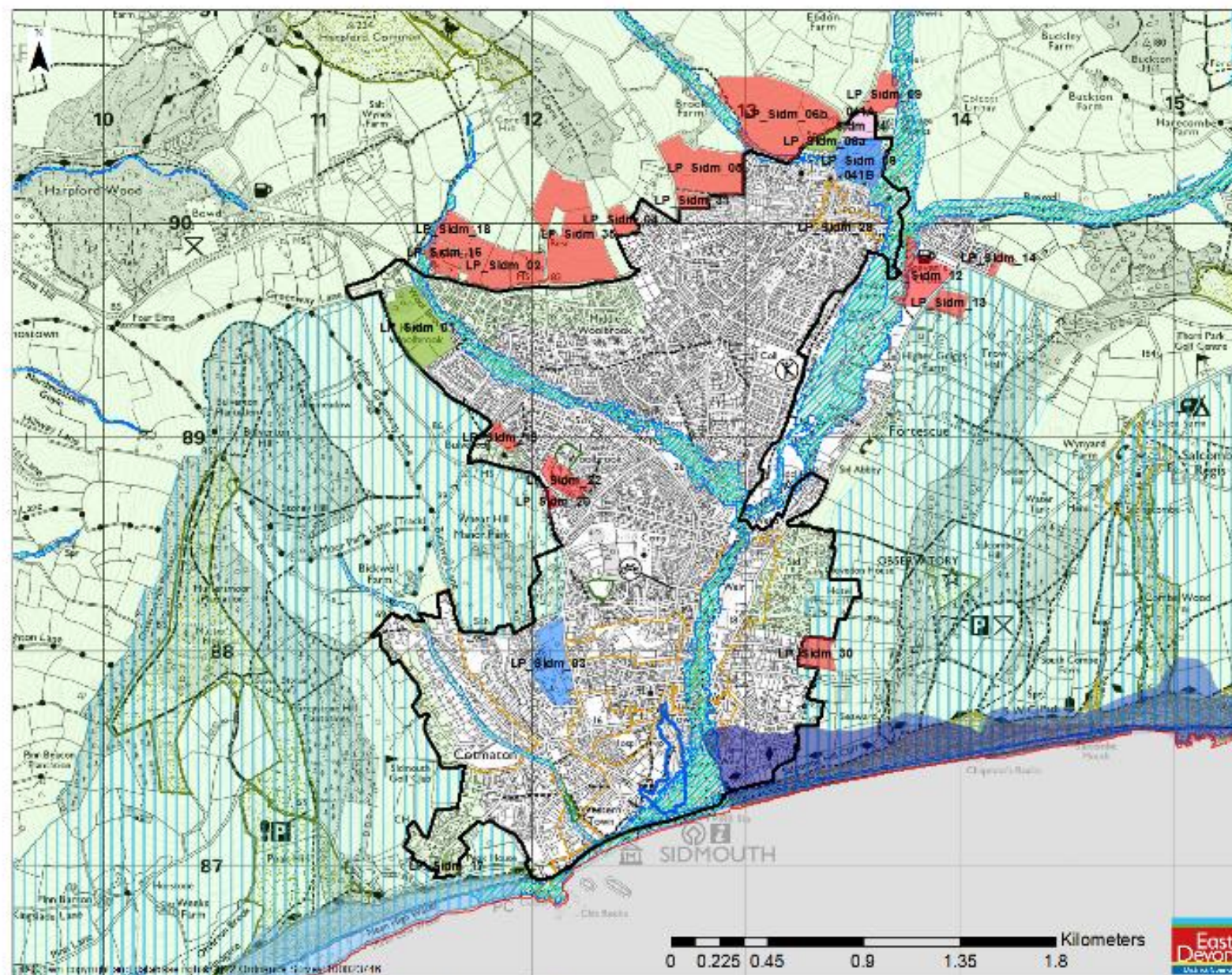
Sidmouth

Legend

Housing and Mixed Use Allocations

Preference

- Preferred
- Rejected
- Planning permission granted
- Employment Allocations
- Settlement Boundaries
- Coastal Change Management Areas
- Town Centre Areas
- Coastal Preservation Areas
- Land of Local Amenity Importance
- Floodzone 2 - 0.1%
- Floodzone 3 - 1%
- AONBs
- Conservation Areas
- Scheduled Ancient Monument
- Historic Park or Garden
- Sites of Special Scientific Interest
- Special Areas of Conservation
- County Wildlife Sites
- Outside FLOOD boundary



n.b. Items in the Legend that appear in regular type are for consultation; items in italics are for information only

Reasonable alternatives

- Sidm_01 – Land south west of Woolbrook Road
- Sidm_02 - Land at Sidford High Street, Sidmouth
- Sidm_04 - Land to the east of The Lookout Coreway Sidford, EX109SD
- Sidm_06 - Land west of Two Bridges Road, Sidford
- Sidm_09 - Land east of Two Bridges Road, Sidford
- Sidm_12 - The Hams, Fortescue Road, Sidford
- Sidm_13 - Land adjoining Fortescue Road, Sidmouth, EX10
- Sidm_14 - Land adj Stevens Cross Close, Sidford (east side), EX10 9QJ
- Sidm_17 - Peak Coach House, (Numbers 1-3 Belfry Cottages), Cotmaton Road, Sidmouth, Devon, EX10 8SY and The Belvedere, Peak Hill Road, Sidmouth, EX10 0NW
- Sidm_19 - Land at Dark Lane, Sidmouth, EX10 9DR
- Sidm_20 - Station Yard, Station Road, Sidmouth, Devon, EX10 8NN
- Sidm_22 - Alexandria Industrial Estate, Alexandria Road, Sidmouth, EX10 9HG
- Sidm_28 - EDDC carpark serving local shops south of Church Street, Sidford
- Sidm_30 – Land east of Redwood Road, Sidmouth
- Sidm_31 - Land east of Burscombe Lane, to south of track, Sidmouth
- Sidm_35 - Land to east of Core Hill Road, north of Sidford High Street, Sidmouth

Outline of reasons for selecting the alternatives

The reasonable alternatives listed above have all been assessed as suitable, available and achievable in the HELAA, which provides evidence that they have potential to be delivered (subject to further consideration through the planning process). A number of alternative options were dismissed in accordance with the sifting criteria, for reasons including the site being not adjacent or well-related to the settlement, sites having gained planning permission, or sites being of a small scale below established thresholds.

Sites: Sidmouth																				
Site SA Objective	Sidm_01	Sidm_02	Sidm_04	Sidm_06	Sidm_09	Sidm_12	Sidm_13	Sidm_14	Sidm_17	Sidm_19	Sidm_20	Sidm_22	Sidm_28	Sidm_30	Sidm_31	Sidm_35				
1. Biodiversity	-	-	-	-	-	-	-	-	0	-	0	0	0	-	-	-				
Biodiversity commentary	All sites in Sidmouth are within the Beer Quarry and Caves SAC bat consultation zone, and the East Devon Pebblebed Heaths SAC HRA mitigation zone, so have a negative effect as a minimum. Sidm_01, 02, 06, 09, 12, 13, 17, 22 include or are in close proximity to a Nature Recovery Network Area with a significant negative effect being likely. Sidm_17 is also in close proximity to a County Wildlife Site - Significant moderate adverse effect predicted. Sidm_01, 06, 09, 14, 19, 20, and 22 are all within 100m of an unconfirmed wildlife site with a significant moderate adverse effect being likely. Sidm_06, 09, 12, 13, 17, 20, and 22 are within 100m of a Section 41 (S41) Habitat of Principle Importance - Significant moderate adverse effect predicted. Sidm_01, 04, 06, 14, and 19 feature habitat rich areas where impact on biodiversity would be increased. Sidm_17, 20, 22 and 28 are brownfield sites where, despite the identified constraints, the impact on biodiversity from development is considered neutral.																			
2. Landscape	--	--	--	--	--	--	--	--	--	--	+	+	+	--	--	--				

Sites: Sidmouth																				
Site SA Objective	Sidm_01	Sidm_02	Sidm_04	Sidm_06	Sidm_09	Sidm_12	Sidm_13	Sidm_14	Sidm_17	Sidm_19	Sidm_20	Sidm_22	Sidm_28	Sidm_30	Sidm_31	Sidm_35				
Landscape commentary	East Devon AONB both surrounds and also features within the BUAB of Sidmouth. This special landscape is a significant constraint on development. With the exception of sites Sidm_12, 20, 22 and 28, all sites are set entirely within the AONB, with varying levels of intervisibility and impact. Whilst Sidm_01 is set adjacent to built-up areas, and is better screened than alternative sites situated on high ground, the site remains sensitive to development. Site Sidm_12 is highly sensitive, being set within the Byes, a locally important landscape. Sidm_20 and 22 are industrial estates where a landscape enhancement is likely.																			
3. Hist. built env	-	0	-	--	-	--	0	0	-	-	0	0	--	0	0	0				
Hist. built env. commentary	- Sidm_01 – Grade II listed Stowford Farmhouse 62m to north, but intervening dwelling and mature vegetation limit views into site. Grade II listed Fairpark House around 80m east but again there are intervening dwellings mean that it is not possible to view the site from this asset. HER Refs on site including MDV80279 - Prehistoric Flint and Chert Find, MDV117529 - The site of a possible former structure is indicated by a field name within the 19th century Tithe Apportionment, MDV 80283 - Buried Soil Layers North of Higher Woolbrook Park. Minor impact - Limited change to elements that contribute to the significance of assets and their setting, where harm is minimal. - Sidm_02 - Two Grade II listed buildings around 200-250m to south, but numerous existing buildings mean no intervening views. No Change - No change to assets or their settings.																			

Sites: Sidmouth																				
Site SA Objective	Sidm_01	Sidm_02	Sidm_04	Sidm_06	Sidm_09	Sidm_12	Sidm_13	Sidm_14	Sidm_17	Sidm_19	Sidm_20	Sidm_22	Sidm_28	Sidm_30	Sidm_31	Sidm_35				
	- Sidm_04 - Nearest designated heritage asset is Grade II* listed Manstone Manor 561m to south, but topography and numerous existing dwellings mean there is no intervisibility. Minor impact - Limited change to elements that contribute to the significance of assets and their setting, where harm is minimal. - Sidm_06 - Grade II listed Brook Farm 18m to West, Sidford Conservation Area 129m away has views into the eastern edge of site, Sidbury Castle Scheduled Monument to north west with intervisibility and impact on setting, HER MDV39001 - 1930s allotments, HER MDV37758 - Prehistoric enclosure to the Southeast of Brook Farm, HER MDV117731 - Field boundaries visible on aerial photograph, one circular, possibly around a quarry pit. Major - Considerable change affecting the special character of assets including their setting, where the significance of those elements is substantially harmed or lost. - Sidm_09 - Grade II listed building and Sidford Conservation Area just over 200m to south west, both having views into site so potential impact upon their setting. Views to site are available from Sidbury Castle Scheduled Monument to north west. Designated assets outside of site / HER ref MDV62991 - A number of prehistoric flint artefacts were noted on the field surface (1999 survey), both tools + flint debris, with concentrations at ngr sy13. Moderate - Change affecting the special character of assets, where elements which contribute to their significance and their setting are harmed. - Sidm_12 - Sidford Bridge is Grade II listed and a Scheduled Monument, located on north west edge of site. Sidford Conservation Area adjoins north west edge of site. These heritage assets all have open views into site, so potential impact upon their setting. Major - Considerable change affecting the special character of assets including their setting, where the significance of those elements is substantially harmed or lost. - Sidm_13 - Sidford Bridge is Grade II listed and a Scheduled Monument, located 300m north west of the site. No Change - No change to assets or their settings.																			

Sites: Sidmouth																				
Site SA Objective	Sidm_01	Sidm_02	Sidm_04	Sidm_06	Sidm_09	Sidm_12	Sidm_13	Sidm_14	Sidm_17	Sidm_19	Sidm_20	Sidm_22	Sidm_28	Sidm_30	Sidm_31	Sidm_35				
	- Sidm_14 - Views of site are available from Sidbury Castle Scheduled Monument to north west, but distance and small scale of site mean limited impact. No Change - No change to assets or their settings. - Sidm_17 - Potential for adverse impact upon Grade II listed Peak House 24m to east, which has open views into site. Minor - Limited change to elements that contribute to the significance of assets and their setting, where harm is minimal. - Sidm_19 - Six Grade II listed buildings within around 100m, the closest of which is just across the road (Dark Lane) and overlooks the site. Major - Considerable change affecting the special character of assets including their setting, where the significance of those elements is substantially harmed or lost. - Sidm_20 - Cluster of six Grade II listed buildings to north west, closest of which is 118m away. Views from this asset to the site are likely, but intervening vegetation obscures views to some degree. No Change - No change to assets or their settings. - Sidm_22 - Cluster of six Grade II listed buildings to west, closest of which is 87m away. Views from this asset to the site, but intervening vegetation obscures views to some degree. No Change - No change to assets or their settings. - Sidm_28 – Adjacent and partly within Sidford Conservation Area – potential for major impact - Considerable change affecting the special character of assets including their setting, where the significance of those elements is substantially harmed or lost. - Sidm_30 – Site is over 200m from heritage assets / conservation area - No Change - No change to assets or their settings. - Sidm_31 – Site is over 200m from heritage assets / conservation area - No Change - No change to assets or their settings. - Sidm_35 - Site is over 200m from heritage assets / conservation area - No Change - No change to assets or their settings.																			

Sites: Sidmouth																				
Site SA Objective	Sidm_01	Sidm_02	Sidm_04	Sidm_06	Sidm_09	Sidm_12	Sidm_13	Sidm_14	Sidm_17	Sidm_19	Sidm_20	Sidm_22	Sidm_28	Sidm_30	Sidm_31	Sidm_35				
4. Climate change carbon emissions	+	0	0	0	0	+	0	+	+	0	+	+	0	+	0	0				
Climate change carbon emissions commentary	An accessibility assessment undertaken for the site selection work identified a total of 12 services, facilities and employment sites. Sites assessed at and around Sidmouth generally performed well in terms of accessibility to facilities. Sites Sidm_17, 19, 20, 22, 30 are all within 1,600 metres of Sidmouth town centre and as such they meet proximity 'tests' of having access to a good range of facilities in the centre and elsewhere in the town (actual numerical measurements of facilities for these sites has not been undertaken). These sites have been given a positive score. Of the sites where measurements have been taken: ○ Sidm_13 has 7 facilities within 1600 metres ○ Sidm_09, and 31 have 8 facilities within 1600 metres. ○ Sidm_01, 14, 17, and 28 have 9 facilities within 1,600 metres. ○ Sidm_02, 04, 06, 12, 35 have 10 facilities within 1,600 metres. ○ Sidm_19, 20, 22 have 11 facilities within 1,600 metres. On account of proximity of facilities all of these sites can be seen to meet a basic proximity test. The remaining site Sidm_30 is within 1600m of the town centre and is reasonably assumed to be within 1600m of a range of services and facilities. Notwithstanding the																			

Sites: Sidmouth																				
Site SA Objective	Sidm_01	Sidm_02	Sidm_04	Sidm_06	Sidm_09	Sidm_12	Sidm_13	Sidm_14	Sidm_17	Sidm_19	Sidm_20	Sidm_22	Sidm_28	Sidm_30	Sidm_31	Sidm_35				
	facilities available to Sidm_02, 04, 06, 19, and 35, the location of these sites means that development would be likely to increase car usage.																			
5. Climate change adaptation	+	+	+	0	0	0	+	+	+	+	+	+	+	+	+	+				
Climate change adaptation commentary	None of these sites are located in a critical drainage area and in general sites offer the potential to cope with heat, drought and extreme storms through appropriate design and incorporation of sustainable drainage, for example. Parts of some of the sites are however in floodplains and in these cases, Sidm_06, 09, and 12 have been given a neutral rating though this has been taken into account in respect of adjustments to possible yields.																			
6. Land resources	- ?	- ?	- ?	- ?	- ?	- ?	- ?	- ?	+	+	+	+	+	- ?	- ?	- ?				
Land resources commentary	Most of the sites at Sidmouth are wholly or largely Greenfield sites, the others, are those that are wholly or contain large Brownfield components. Sidm_17, 20, 22, 28 - these sites, being brownfield sites, achieve a high suitability for development against this measure of sustainability. In contrast the Greenfield sites are recorded with negative assessments. All sites fall outside mineral consultation areas. All of the Greenfield sites are wholly or mostly in Agricultural Grade land 3 (though a distinction is not drawn between 3A and 3B).																			
7. Water resources	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?				

Sites: Sidmouth																				
SA Objective \ Site	Sidm_01	Sidm_02	Sidm_04	Sidm_06	Sidm_09	Sidm_12	Sidm_13	Sidm_14	Sidm_17	Sidm_19	Sidm_20	Sidm_22	Sidm_28	Sidm_30	Sidm_31	Sidm_35				
Water resources commentary	Development at the sites are unlikely to have any significant effects on water quality and quantity as none are located within a groundwater source protection zone and no other potential for adverse impacts are noted other than there is uncertainty on the capacity of local sewage treatment works to accommodate additional demand from new housing. This means an uncertain neutral effect for all sites.																			
8. Homes	++	++	+	++	+	+	+	+	+	+	+	+	+	+	+	++				
Homes commentary	Sidm_01, 02, 06, and 35 have a maximum yield in the HELAA at or over 100 dwellings, meaning a significant positive. All other sites identified for housing have potential to deliver up to 100 dwellings, so will have a positive effect. An appropriate mix of tenures and sizes including affordable housing is assumed for all sites.																			
9. Health and well-being	-	-	-	-	-	-	-	-	+	-	+	+	-	-	-	-				
Health and well-being commentary	According to the indices of deprivation 2019, all sites are located in areas being in the range of 10% - 50% least deprived areas in the country. None of the sites are within 800m of an area featuring higher than average deprivation. There are open space and /or play areas within 1,600 metres of sites. A number of the sites are in close proximity to A roads, including Sim_01, 02, 04, 06, 09, 12, 13, 14, 28, 30, 35 where open spaces would also be lost. Sidm_17, 20, 22 are brown field sites away from A roads where open spaces are not jeopardised, resulting in a positive impact overall. Sidm_19 and 30 are a greenfield sites in the 20% least deprived areas in the country where negative scores are appropriate.																			

Sites: Sidmouth																				
Site SA Objective	Sidm_01	Sidm_02	Sidm_04	Sidm_06	Sidm_09	Sidm_12	Sidm_13	Sidm_14	Sidm_17	Sidm_19	Sidm_20	Sidm_22	Sidm_28	Sidm_30	Sidm_31	Sidm_35				
10. Access to services	+	+	+	+	+	+	+	+	-	+	+	+	+	+	+	+				
Access to services commentary	All sites are within 1,600m of a range of services/facilities (primary school, shop, community hall and/or GP surgery/library) where there are limited issues relating to safety, quality and/or topography of route for pedestrians/cyclists. Sidm_17 suffers from poor proximity to either a primary or secondary school, also being over 800m from most facilities, and scores less well as a result.																			
11. Jobs and employment	-	-	-	-	-	-	-	-	-	-	--	--	-	-	-	-				
Jobs/employment commentary	Sites Sidm_12, 20, 22, 28 are outside of the AONB. Sites Sidm_20 and 21 are existing employment sites where net employment use loss would occur. Sidm_12 is identified as a locally important landscape, being adjacent to the AONB and within the Byes. Sidm_28 is a small site with limited potential. All other sites are within the AONB where potential development including employment uses would be highly constrained.																			

Sites: Sidmouth																					
Site SA Objective	Sidm_01	Sidm_02	Sidm_04	Sidm_06	Sidm_09	Sidm_12	Sidm_13	Sidm_14	Sidm_17	Sidm_19	Sidm_20	Sidm_22	Sidm_28	Sidm_30	Sidm_31	Sidm_35					
12. Town centres	-	-	-	-	-	-	-	-	+	+	+	+	-	++	-	-					
Town centres commentary	Sites within 800m of town centres are scored ++, sites within 801-1600m are scored +, sites over 1600m are scored -.																				
13. Connectivity and transport	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++					
Connectivity and transport commentary	Broadband speeds vary but all relevant areas are recorded as exceeding 40 mbps and so all sites are assumed (at this stage) to have access to superfast broadband. No sites are within 800 metres of a train station. All sites fall within 800 metres of an hourly or better bus service (For transparency, Sidm_17 is 805m but is included).																				
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: • Appropriate landscaping at all AONB or locally sensitive sites (including Sidm_12 in the Byes) would be required due to significant negative effects upon the landscape, but their sensitivity is such that a significant negative effect is likely to remain. • The significant negative historic environment effect for Sidm_06 can be lessened by reducing the site area in the setting of the Scheduled Monument, but negative uncertain effect would remain until appropriate surveys are undertaken. • High quality design across all sites can reduce negative effects and maximise beneficial effects on the built environment. • Noise attenuation will lessen the negative health and well-being effect for those sites adjacent or close to the A3052 or A375.																					

Sites: Sidmouth																			
Site	Sidm_01	Sidm_02	Sidm_04	Sidm_06	Sidm_09	Sidm_12	Sidm_13	Sidm_14	Sidm_17	Sidm_19	Sidm_20	Sidm_22	Sidm_28	Sidm_30	Sidm_31	Sidm_35			
SA Objective																			
- All sites have relatively good access to facilities, but these beneficial effects can be maximised by enhancing sustainable travel links e.g. create bus stops near to the site, pedestrian/cycle links. - Designing new development for low water use and requiring sustainable drainage systems can help turn neutral uncertain effects on water resources into positive uncertain effects. - Positive effects for all sites in relation to jobs and employment could be maximised by providing on-site employment opportunities alongside new housing, where reasonable.																			
Preferred alternative: Sidm_01, Sidm_06 (partial), Sidm_17.																			
Reasons for alternatives being preferred or rejected: - Sidm_01 – Land south west of Woolbrook Road - The scale of development (127 max yield) on this site would help deliver the district-wide housing requirement in a manner that is consistent with the spatial strategy. Good access to facilities and employment, high/medium landscape sensitivity (Located entirely within East Devon AONB however set in the context of modern residential development), and minor heritage impact. Ecological impacts relating to the unconfirmed wildlife site, nature recovery network area, and the site's location within both the Beer Quarry and Caves SAC bat consultation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone will need to be addressed in bringing the site forward. PREFERRED - Sidm_02 - Land at Sidford High Street, Sidmouth - Development of the site (124 max yield) would have a high landscape impact (Site within AONB with high intervisibility), no heritage impact, significant moderate adverse effect on ecology. Good access to facilities and employment. Poor access to narrow lane with no current access to A3052. Adjacent site to east has come forward as part of call for sites (Sidm_35). Combination of Sidm_01, Sidm_02, 'land north of Sidford High Street to the east of site reference Sidm_02' has potential for significant delivery of housing / considered northern																			

Sites: Sidmouth																				
Site	Sidm_01	Sidm_02	Sidm_04	Sidm_06	Sidm_09	Sidm_12	Sidm_13	Sidm_14	Sidm_17	Sidm_19	Sidm_20	Sidm_22	Sidm_28	Sidm_30	Sidm_31	Sidm_35				
SA Objective																				
extension with improved access to A3052 (total yield 127+124+80(esitimate lower site). Clear landscape implications (adverse impact - high) with all sites in the AONB and being on high exposed ground over A3052. REJECTED - Sidm_04 - Land to the east of The Lookout Coreway Sidford, EX109SD - Development of the site (30 max yield) would have a high landscape impact (Site within AONB with high intervisibility), minor heritage impact, minor adverse effect on ecology. Good access to facilities and employment. REJECTED - Sidm_06 - Land west of Two Bridges Road, Sidford - Development of the site (268 max yield) would have a high landscape impact (Site within AONB with high intervisibility), major heritage impact, significant moderate adverse effect on ecology. Good access to facilities and employment. PART REJECTED (6b) / Reduced site area adjacent to allocated employment site and local development fringe is PREFERRED (6a) - Sidm_09 - Land east of Two Bridges Road, Sidford - Limited industrial development to east, extant economic development permission on adjacent site to south. Residential development of the site would have a high landscape impact (within AONB with limited context of built form including industrial water treatment units to the east), major heritage impact (setting / appearance Sidbury Castle Scheduled Monument), significant moderate adverse effect on ecology. Good access to facilities and employment. REJECTED - Sidm_12 - The Hams, Fortescue Road, Sidford - Development of the site (62 max yield) would have a high landscape impact (Site within Byes, adjacent to PROW / river Sid), major heritage impact, significant moderate adverse effect on ecology. Good access to facilities and employment. REJECTED - Sidm_13 – Site to south east of Fortescue Road, Sidford - Development of the site for houses and a hotel (around 60 dwellings max yield though proposed for 43) would have a high landscape impact (site within AONB and on high ground adjacent to the Byes) - REJECTED - Sidm_14 - Land adj Stevens Cross Close, Sidford (east side), EX10 9QJ - Development of the site (15 max yield) would have a high landscape impact (Site within AONB with high intervisibility), no heritage impact, significant moderate adverse effect on ecology. Good access to facilities and employment. Valued view in Neighbourhood Plan would be impacted. REJECTED																				

Sites: Sidmouth																				
Site	Sidm_01	Sidm_02	Sidm_04	Sidm_06	Sidm_09	Sidm_12	Sidm_13	Sidm_14	Sidm_17	Sidm_19	Sidm_20	Sidm_22	Sidm_28	Sidm_30	Sidm_31	Sidm_35				
SA Objective																				
- Sidm_17 - Peak Coach House, (Numbers 1-3 Belfry Cottages), Cotmaton Road, Sidmouth, Devon, EX10 8SY and The Belvedere, Peak Hill Road, Sidmouth, EX10 0NW- The scale of development (11 max yield) on this site would help deliver the district-wide housing requirement in a manner that is consistent with the spatial strategy. Development would have a medium landscape impact (Site within AONB however set in the context of existing residential use / presence of sporadic dwellings in vicinity which provide context of limited built form), minor heritage impact (subject to development that conserves / enhances adjacent heritage value), significant moderate adverse effect on ecology. Good access to facilities and employment. Ecological impact relating to the identified features including the site's location within both the Beer Quarry and Caves SAC bat consultation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone will need to be addressed in bringing the site forward. PREFERRED - Sidm_19 - Land at Dark Lane, Sidmouth, EX10 9DR - Development of the site (26 max yield) would have a high landscape impact (Site within AONB with high intervisibility), major heritage impact, significant moderate adverse effect on ecology. Poor access with narrow lanes adjacent to heritage. REJECTED - Sidm_20 - Station Yard, Station Road, Sidmouth, Devon, EX10 8NN - Development of the site (14 max yield) would have a medium / low landscape impact (impact upon AONB across the road (B3176) to west is a constraint), beneficial heritage impact, significant moderate adverse effect on ecology. Good access to facilities and employment. Loss of active employment site is a significant constraint on development. REJECTED - Sidm_22 - Alexandria Industrial Estate, Alexandria Road, Sidmouth, EX10 9HG - Development of the site (43 max yield) would have a medium / low landscape impact (impact upon AONB across the road (B3176) to west is a constraint), beneficial heritage impact, significant moderate adverse effect on ecology. Good access to facilities and employment. Loss of active employment site is a significant constraint on development. REJECTED - Sidm_28 – EDDC carpark serving local shops south of Church Street, Sidford - Rejected due to concerns about the loss of the existing use and the lack of public benefit / contribution to housing delivery of site allocation, being a small site at 0.16 Ha (4 max yield). REJECTED - Sidm_30 - Land east of Redwood Road, Sidmouth - Development of the site for houses (65 dwellings max yield) would have a high landscape impact (site within AONB and on high ground). Good access to facilities and employment. - REJECTED																				

Sites: Sidmouth																				
Site	Sidm_01	Sidm_02	Sidm_04	Sidm_06	Sidm_09	Sidm_12	Sidm_13	Sidm_14	Sidm_17	Sidm_19	Sidm_20	Sidm_22	Sidm_28	Sidm_30	Sidm_31	Sidm_35				
SA Objective																				
- Sidm_31 – Land to the east of Burscombe Lane, Sidford - Development of the site (30 max yield) would have a high landscape impact (Site within AONB with high intervisibility), minor heritage impact, minor adverse effect on ecology. Good access to facilities and employment. REJECTED - Sidm_35 - Land at Sidford High Street, Sidmouth - Development of the site (80 max yield est) would have a high landscape impact (Site within AONB with high intervisibility), no heritage impact, significant moderate adverse effect on ecology. Good access to facilities and employment. Poor access to narrow lane with no current access to A3052. Adjacent site to west (Sidm_02). Combination of Sidm_01, Sidm_02, 'land north of Sidford High Street to the east of site reference Sidm_02' has potential for significant delivery of housing / considered northern extension with improved access to A3052 (total yield 127+124+80(estimate lower site). Clear landscape implications (adverse impact - high) with all sites in the AONB and being on high exposed ground over A3052. REJECTED																				

Settlement:

Broadclyst

n.b. Items in the Legend that appear in regular type are for consultation; items in italics are for information only

Reasonable alternatives

- Brcl_09 – Land at Heathfield (south east of Woodbury View)
- Brcl_12 - Land west of Whimble Road, Broadclyst, Exeter, EX5 3BX
- Brcl_22 - Land at Jarvishayes Farm
- Brcl_29 - Land to east of Town End, Broadclyst

Outline of reasons for selecting the alternatives

The reasonable alternatives listed above have all been assessed as suitable, available and achievable in the HELAA, which provides evidence that they have potential to be delivered (subject to further consideration through the planning process). A number of alternative options were dismissed in accordance with the sifting criteria, for reasons including the site being not adjacent or well-related to the settlement, sites having gained planning permission, or sites being of a small scale below established thresholds.

Brcl_18 - Site is within a conservation area and surrounded on all sides by listed buildings, including the grade I listed St John the Baptist Church. In this instance, it is felt the combination of these factors makes the site wholly unacceptable to be developed on heritage grounds alone.

Sites: Broadclyst																					
Site SA Objective	Brcl_09	Brcl_12	Brcl_22	Brcl_29																	
1. Biodiversity	-	-	-	-																	

Sites: Broadclyst																					
Site SA Objective	Brc1_09	Brc1_12	Brc1_22	Brc1_29																	
Biodiversity commentary	- Brc1_09 – Site is a greenfield arable site adjacent to Broadclyst village, sloping up towards the south, with mature trees and hedgerow to surround. Site is adjacent to a small area of Nature Recovery Network (1m). Site is within both the Exe Estuary SPA HRA mitigation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, significant moderate adverse effect predicted. - Brc1_12 - Nature Recovery Network (1m), Section 41 (S41) Habitat of Principle Importance (including rivers and streams, excluding hedgerows) (1m). Site is within both the Exe Estuary SPA HRA mitigation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, significant moderate adverse effect predicted. - Brc1_22 – Site is within both the Exe Estuary SPA HRA mitigation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, significant moderate adverse effect predicted - Brc1_29 - Site is within both the Exe Estuary SPA HRA mitigation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, significant moderate adverse effect predicted																				
2. Landscape	-	-	-	-																	
Landscape commentary	- Brc1_09 – Outside of AONB. Comprised of a single agricultural field adjacent to Broadclyst village, sloping up towards the south, with mature trees and hedgerow to surround. Multiple TPOs to borders. Overall, the site has a medium landscape sensitivity to new development. - Brc1_12 - Outside of AONB. Comprised of six small and medium fields with mature hedgerows and mature trees. Residential development to west provides some context of built form when viewing but site is otherwise bordered by agricultural fields. PROW (public footpath) crosses site east to west. Overall, the site has medium landscape sensitivity to new development.																				

Sites: Broadclyst																				
Site SA Objective	Brcl_09	Brcl_12	Brcl_22	Brcl_29																
	- Brcl_22 - Outside of AONB. An area of green field at 0.92 Ha. Site is comprised of a single greenfield site with mature hedgerows and trees to borders. Grade 1 agricultural land. Residential development to north, east, and west provide some context of built form. Overall, the site has medium / low landscape sensitivity to new development. - Brcl_29 - Outside of AONB. An area of green field at 0.96 Ha, adjacent to Brcl_12. Site is comprised of a single greenfield site with mature hedgerows and trees to borders. Grade 1 agricultural land and outside of the AONB. Residential development to west provides some context of built form but site is otherwise bordered by agricultural fields. Overall, the site has medium landscape sensitivity to new development.																			
3. Hist. built env	0	-	--	-																
Hist. built env. commentary	- Brcl_09 – Assets Present: Grade II Listed Heath Gardens to north (105m), Grade II Listed 2 Station Road 156m to south. Overall, no change - No change to assets or their settings. - Brcl_12 - Assets Present: Grade II listed Lake House (20m), Grade II listed College Cottage (105m), multiple listed buildings and Broadclyst Conservation Area 130-150m distant with screening / separation. Overall, moderate - Change affecting the special character of assets, where elements which contribute to their significance and their setting are harmed. - Brcl_22 - Assets Present: Grade II listed Priors Court (20m), multiple Grade II listed buildings and Broadclyst Conservation Area adjacent. Overall, Major - Considerable change affecting the special character of assets including their setting, where the significance of those elements is substantially harmed or lost. - Brcl_29 - Assets Present: Grade II listed Lake House (20m), Grade II listed Hackworthy Cottage (105m), multiple listed buildings and Broadclyst Conservation Area 130-150m distant with screening / separation. Overall, moderate - Change affecting the special character of assets, where elements which contribute to their significance and their setting are harmed.																			

Sites: Broadclyst																					
Site SA Objective	Brc1_09	Brc1_12	Brc1_22	Brc1_29																	
4. Climate change carbon emissions	0	0	0	0																	
Climate change carbon emissions commentary	An accessibility assessment undertaken for the site selection work identified a total of 12 services, facilities and employment sites. Individual sites are listed below including the number of services and proximity of key facilities. - Brc1_09 – 8 out of 12 facilities within 1,600m of site. Nearest train station 1669m, nearest less than hourly bus stop / service 7m, nearest hourly bus stop / service 250m, nearest primary 785m, nearest convenience store 607m. - Brc1_12 - 8 out of 12 facilities within 1,600m of site. Nearest train station 1767m, nearest less than hourly bus stop / service 207m, nearest hourly bus stop / service 328m, nearest primary 309m, nearest convenience store 406m. - Brc1_22 - 8 out of 12 facilities within 1,600m of site. Nearest train station 1867m, nearest less than hourly bus stop / service 1m, nearest hourly bus stop / service 1m, nearest primary 430m, nearest convenience store 526m. - Brc1_29 - 8 out of 12 facilities within 1,600m of site. Nearest train station 1827m, nearest less than hourly bus stop / service 287m, nearest hourly bus stop / service 408m, nearest primary 369m, nearest convenience store 486m. On account of proximity of facilities all of these sites can be seen to meet a basic proximity test. Notwithstanding the facilities available, the location of these sites means that development would be likely to increase car usage.																				
5. Climate change adaptation	+	0	+	+																	

Sites: Broadclyst																					
Site SA Objective	Brc1_09	Brc1_12	Brc1_22	Brc1_29																	
Climate change adaptation commentary	None of these sites are located in a critical drainage area and in general sites offer the potential to cope with heat, drought and extreme storms through appropriate design and incorporation of sustainable drainage, for example. Part of Brc1_12 is in floodplain 2 and has subsequently been given a neutral rating though this has been taken into account in respect of adjustments to possible yields.																				
6. Land resources	-- ?	-- ?	-- ?	-- ?																	
Land resources commentary	All sites are greenfield. All sites are Grade 1 agricultural land, so a significant negative uncertain effect is likely.																				
7. Water resources	0 ?	0 ?	0 ?	0 ?																	
Water resources commentary	Development at the sites is unlikely to have any significant effects on water quality and quantity as none are located within a groundwater source protection zone. There is uncertainty on the capacity of local sewage treatment works to accommodate additional demand from new housing. This means an uncertain neutral effect for all sites.																				
8. Homes	+	++	+	+																	

Sites: Broadclyst																					
Site SA Objective	Brc1_09	Brc1_12	Brc1_22	Brc1_29																	
Homes commentary	- Brc1_09 – 15 max yield - Brc1_12 - 136 max yield - Brc1_22 – 27 max yield - Brc1_29 – 24 max yield Significant positive where site offers maximum yield >100. All other sites have potential to deliver up to 100 dwellings with a marked positive effect. An appropriate mix of tenures and sizes including affordable housing is assumed for all sites.																				
9. Health and well-being	+	+	+	+																	
Health and well-being commentary	- Brc1_09 – Open Space 0m distant, Play Area 451m distant, away from noise sources - Brc1_12 - Open Space 99m distant, Play Area 303m distant, away from noise sources - Brc1_22 - Open Space 147m distant, Play Area 229m distant, away from noise sources - Brc1_29 - Open Space 99m distant, Play Area 303m distant, away from noise sources																				
10. Access to services	+	+	+	+																	
Access to services commentary	Brc1_09 – 8 out of 12 facilities within 1,600m of site. Nearest train station 1669m, nearest less than hourly bus stop / service 7m, nearest hourly bus stop / service 250m, nearest primary 785m, nearest convenience store 607m.																				

Sites: Broadclyst																					
Site SA Objective	Brc1_09	Brc1_12	Brc1_22	Brc1_29																	
	- Brc1_12 - 8 out of 12 facilities within 1,600m of site. Nearest train station 1767m, nearest less than hourly bus stop / service 207m, nearest hourly bus stop / service 328m, nearest primary 309m, nearest convenience store 406m. - Brc1_22 - 8 out of 12 facilities within 1,600m of site. Nearest train station 1867m, nearest less than hourly bus stop / service 1m, nearest hourly bus stop / service 1m, nearest primary 430m, nearest convenience store 526m. - Brc1_29 - 8 out of 12 facilities within 1,600m of site. Nearest train station 1827m, nearest less than hourly bus stop / service 287m, nearest hourly bus stop / service 408m, nearest primary 369m, nearest convenience store 486m.																				
11. Jobs and employment	+	+	-	+																	
Jobs/employment commentary	- Brc1_09 – Employment site 1400m distant, no potential for employment provision on site - Brc1_12 - Employment site 1589m distant, potential for employment provision on site - Brc1_22 - Employment site 1900m distant, no potential for employment provision on site - Brc1_29 - Employment site 1550m distant, potential for employment provision on site																				
12. Town centres	-	-	-	-																	
Town centres commentary	Beyond 1,600 metres of a town centre.																				

Sites: Broadclyst																					
Site SA Objective	BrcI_09	BrcI_12	BrcI_22	BrcI_29																	
13. Connectivity and transport	+	+	+	+																	
Connectivity and transport commentary	• BrcI_09 – Nearest train station 1669m, nearest less than hourly bus stop / service 7m, nearest hourly bus stop / service 250m. • BrcI_12 - Nearest train station 1767m, nearest less than hourly bus stop / service 207m, nearest hourly bus stop / service 328m. • BrcI_22 - Nearest train station 1867m, nearest less than hourly bus stop / service 1m, nearest hourly bus stop / service 1m, • BrcI_29 - Nearest train station 1827m, nearest less than hourly bus stop / service 287m, nearest hourly bus stop / service 408m. Broadband speeds vary with 30-102 Mbps median speeds for area, all sites are assumed (at this stage) to have access to superfast broadband.																				
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: • High quality design across all sites can reduce negative effects and maximise beneficial effects on the built environment. • All sites have relatively good access to facilities, but these beneficial effects can be maximised by enhancing sustainable travel links e.g. create bus stops near to the site, pedestrian/cycle links. • Designing new development for low water use and requiring sustainable drainage systems can help turn neutral uncertain effects on water resources into positive uncertain effects.																					

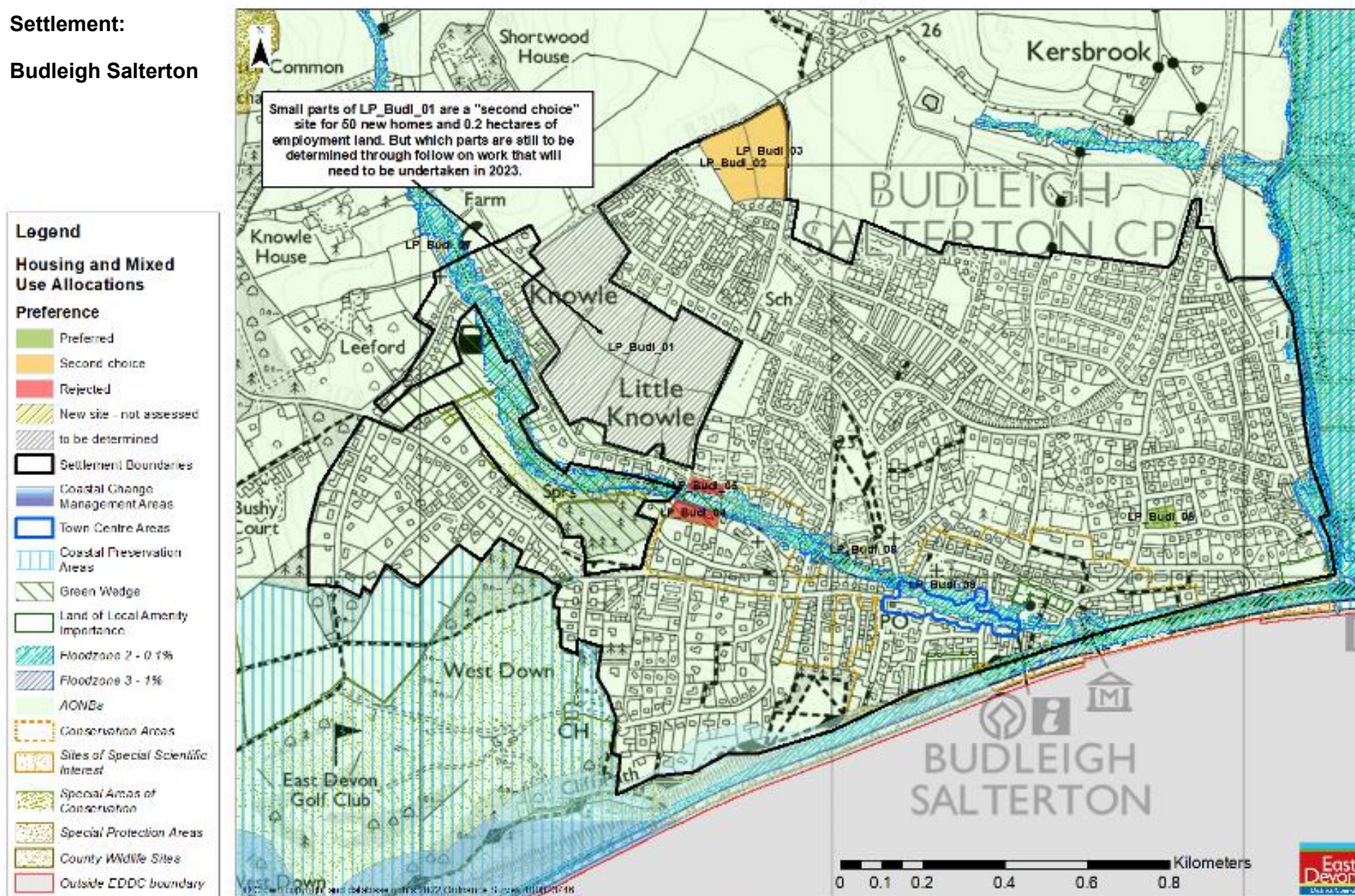
Sites: Broadclyst																					
Site	BrcI_09	BrcI_12	BrcI_22	BrcI_29																	
SA Objective																					
Positive effects for all sites in relation to jobs and employment could be maximised by providing on-site employment opportunities alongside new housing, where reasonable.																					
Preferred alternative: BrcI_09, BrcI_12, BrcI_29																					
Reasons for alternatives being preferred or rejected: - BrcI_09 – Preferred - Small greenfield site adjacent to and opposite existing built form. Grade 1 agricultural land. Outside of AONB. Comprised of a single agricultural field adjacent to Broadclyst village, sloping up towards the south, with mature trees and hedgerow to surround. Multiple TPOs to borders. Site is adjacent to a small area of Nature Recovery Network (1m). Site is within both the Exe Estuary SPA HRA mitigation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, the site has a medium landscape sensitivity to new development. Development of the site is unlikely to impact on any heritage assets. With regard to ecology, significant moderate adverse effect predicted. Site is considered appropriate for development, subject to final detailed scheme and proportionate mitigation. - BrcI_12 – Preferred - Site is comprised of six small and medium fields with mature hedgerows and trees to borders. Grade 1 agricultural land outside of the AONB. Residential development to west provides some context of built form but site is otherwise bordered by agricultural fields. PROW (public footpath) crosses site east to west. Site is within both the Exe Estuary SPA HRA mitigation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, the site has a medium landscape sensitivity to new development, moderate heritage sensitivity where change would affect the special character of assets, where elements which contribute to their significance and their setting are harmed. With regard to ecology, significant moderate adverse effect is predicted. Site is considered appropriate for development, subject to final detailed scheme and appropriate Exe Estuary and Pebblebed Heath mitigation. Figure of 160 homes considered appropriate in combination with new adjacent site BrcI_29.																					

Sites: Broadclyst																					
Site	Brc1_09	Brc1_12	Brc1_22	Brc1_29																	
SA Objective																					
- Brc1_22 – Rejected - Site is surrounded to three sides by the conservation area with a high presence of listed buildings. Gateway to Broadclyst conservation area with typical yellow estate properties to the east that overlook the site. In this instance, and with the presence of available alternative sites to meet local need, the site is considered unacceptable for future development. - Brc1_29 – Preferred - An area of green field at 1 Ha, adjacent to Brc1_12. Site is comprised of a single greenfield site with mature hedgerows and trees to borders. Grade 1 agricultural land and outside of the AONB. Residential development to west provides some context of built form but site is otherwise bordered by agricultural fields. Site is within both the Exe Estuary SPA HRA mitigation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, the site has a medium landscape sensitivity to new development, moderate heritage sensitivity where change would affect the special character of assets, where elements which contribute to their significance and their setting are harmed. With regard to ecology, significant moderate adverse effect is predicted. Site is considered appropriate for development, subject to final detailed scheme and proportionate mitigation. Site provides an alternative access option to Brc1_12. Figure of 160 homes considered appropriate in combination with adjacent site Brc1_12.																					

East Devon Local Plan 2020-2040 - Budleigh Salterton

Settlement:

Budleigh Salterton



Reasonable alternatives

- Budl_01 – land adjacent to Clyst Hayes farmhouse
- Budl_02 – land at Barn Lane, Knowle
- Budl_03 – land at Barn Lane
- Budl_05 – Little Knowle
- Budl_06 – Budleigh Salterton Community Hospital
- Budl_08 – Lower Station Road car park

Outline of reasons for selecting the alternatives

The reasonable alternatives listed above have all been assessed as suitable, available and achievable in the HELAA, which provides evidence that they have potential to be delivered (subject to further consideration through the planning process). Budl_07 is not adjacent to the settlement and in accordance with the site selection methodology was not assessed. Budl_04 and 09 did not pass the HELAA.

Sites: Budleigh Salterton																				
Site SA Objective	Budl_01	Budl_02	Budl_03	Budl_05	Budl_06	Budl_08														
1. Biodiversity	--	--	--	--	--	--														
Biodiversity commentary	All sites are within the Exe Estuary and Pebblebed Heaths mitigation zones and so have a negative impact as a minimum. Budl_01 and 05 are also near to a county wildlife site.																			
2. Landscape	--	--	--	--	+	+														

Sites: Budleigh Salterton																					
Site SA Objective	Budl_01	Budl_02	Budl_03	Budl_05	Budl_06	Budl_08															
Landscape commentary	Budl_01, 02, 03 and 05 are within the East Devon AONB and are highly sensitive to change. Budl_06 and 08 are also in the AONB, which washes over the town, but given the urban context there is potential for landscape improvement.																				
3. Hist. built env	-	-	-	-	0	0															
Hist. built env. commentary	With the exception of Budl_06 and 08 all the sites have the potential to have a negative impact on designated heritage assets.																				
4. Climate change carbon emissions	+	+	+	+	++	++															
Climate change carbon emissions commentary	An accessibility assessment undertaken for the Site Selection work identified a total of 12 services, facilities and employment sites ⁹⁵ – the findings are referenced for each site in this commentary. All of the Budleigh Salterton sites are within 1600 metres of 8 of these, generally along safe and convenient pedestrian and cycle routes, although for Budl_05 the only option is to use narrow lanes with no pavement. Budl_06 and 08 are particularly well related to the town centre.																				
5. Climate change adaptation	+	+	+	0	+	+															

⁹⁵ Namely: train station, hourly or better bus route, primary school, secondary school, convenience store/shop, Post Office, Community hall, Pub, Open space/allotment, children's play area, GP, employment site (identified in the Employment Land Review).

Sites: Budleigh Salterton																					
Site SA Objective	Budl_01	Budl_02	Budl_03	Budl_05	Budl_06	Budl_08															
Climate change adaptation commentary	None of these sites is located in a critical drainage area. In general, all sites offer the potential to cope with heat, drought and extreme storms through appropriate design and incorporation of sustainable drainage, for example. A significant part of Budl_05 is within the floodplain, reducing the potential yield of the site, but not in itself restricting all development.																				
6. Land resources	--	--	--	-	++	++															
Land resources commentary	Budl_01, 02 and 03 are Grade 1 agricultural land. The whole Budl_02 and 03 and a small part of Budl_01 are within a water source protection zone. Budl_05 is a greenfield site and Budl_06 and 08 are brownfield sites in the urban area.																				
7. Water resources	-	-	-	0 ?	0 ?	0 ?															
Water resources commentary	There is uncertainty on the capacity of local sewage treatment works to accommodate additional demand from new housing. This means an uncertain neutral effect for all sites, except Budl_01, 02 and 03 which are in water source protection zones.																				
8. Homes	+	+	+	+	+	+															
Homes commentary	Only Budl_01 has a maximum yield in the HELAA of over 100 dwellings and this has been reduced to 50 through site assessment work. so a positive effect is given to all sites. An appropriate mix of tenures and sizes including affordable housing is assumed for all sites.																				

Sites: Budleigh Salterton																				
Site SA Objective	Budl_01	Budl_02	Budl_03	Budl_05	Budl_06	Budl_08														
9. Health and well-being	+	+	+	+	+	+														
Health and well-being commentary	None of the sites is within 800 metres of a 50% most deprived neighbourhood. All sites are within 800 metres of a children's play area and areas of open space have good air quality and limited noise and light pollution.																			
10. Access to services	+	+	+	+	+	+														
Access to services commentary	There is no secondary school in Budleigh Salterton, so all secondary aged pupils will need to travel elsewhere. All sites are within 1600 metres of within 1,600m of a range of services/facilities (primary school, shop, community hall and/or GP surgery/library) with Limited issues relating to safety, quality and/or topography of route for pedestrians/cyclists, so a minor positive effect.																			
11. Jobs and employment	+	+	+	+	+	+														
Jobs/employment commentary	All sites are within 1600 metres of an employment site and the town centre.																			
12. Town centres	++	+	+	++	++	++														
Town centres commentary	All sites are within 800 metres of the town centre, except for Budl_02 and 03 which are just outside.																			

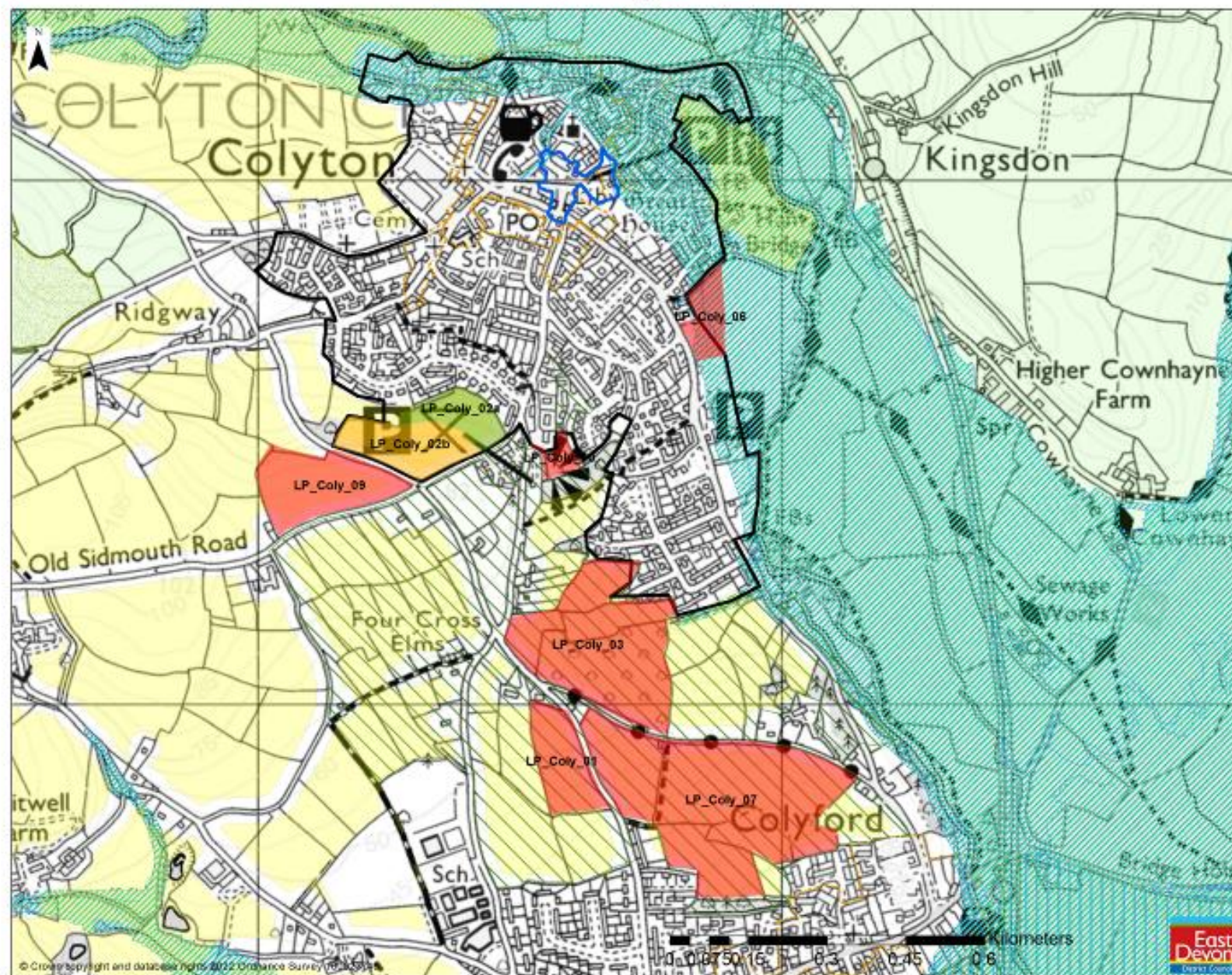
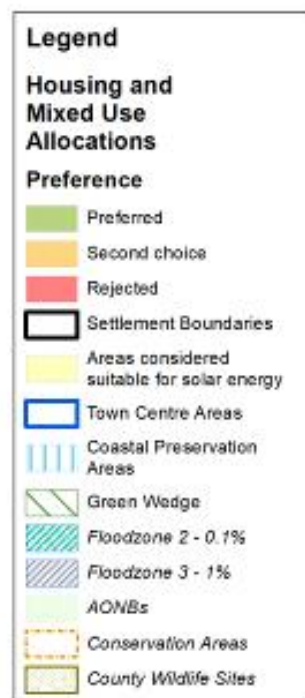
Sites: Budleigh Salterton																				
Site SA Objective	Budl_01	Budl_02	Budl_03	Budl_05	Budl_06	Budl_08														
13. Connectivity and transport	+	+	+	+	+	+														
Connectivity and transport commentary	Budleigh Salterton has an average broadband speed of 47 mbps, so all sites are assumed to have access to superfast broadband. All sites are within 1600 metres of an hourly bus route and a recognised cycle route, but there are no A roads so a minor positive effect only is possible.																			
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: - Considerable landscaping at Budl_01, 02, and 03 would be required due to significant negative effects upon the landscape, but their sensitivity is such that a significant negative effect is likely to remain. - Mitigate impact upon Exe Estuary and Pebblebed Heaths SPAs – to be considered in the Habitats Regulations Assessment Further mitigation measures may be necessary on Budl_01 and 05 given their proximity to a county wildlife site. - Considerable landscaping at Budl_01, 02, 03 and 05 would be required due to significant negative effects upon the landscape, but their sensitivity is such that a significant negative effect is likely to remain. - The minor negative effect on the historic environment on Budl_01, 02, 03 and 05 can be reduced through good design and avoiding development on parts of the site if shown to be necessary. High quality design across all sites can reduce negative effects and maximise beneficial effects on the built environment. - All sites have relatively good access to facilities, but these beneficial effects can be maximised by enhancing sustainable travel links e.g. create bus stops near to the site, pedestrian/cycle links. - Designing new development for low water use and requiring sustainable drainage systems can help turn neutral uncertain effects on water resources into positive uncertain effects. - Measures required to protect ground water on sites in source protection zone.																				

Sites: Budleigh Salterton																				
Site	Budl_01	Budl_02	Budl_03	Budl_05	Budl_06	Budl_08														
SA Objective																				
Positive effects for all sites in relation to jobs and employment could be maximised by providing on-site employment opportunities alongside new housing, where reasonable.																				
Preferred alternative: Budl_06 with Budl_01, 02 and 03 as ‘second best’ choices																				
Reasons for alternatives being preferred or rejected: - Budl_01 – land adjacent to Clyst Hayes farmhouse preferred as a second choice as consistent with spatial strategy with good access to facilities although concerns regarding impacts on landscape, water quality, best and most versatile agricultural land, ecology and heritage assets. - Budl_02 – land at Barn Lane, Knowle preferred as a second choice as consistent with spatial strategy with good access to facilities although concerns regarding impacts on landscape, water quality, best and most versatile agricultural land, and heritage assets. - Budl_03 – land at Barn Lane preferred as a second choice as consistent with spatial strategy with good access to facilities although concerns regarding impacts on landscape, water quality, best and most versatile agricultural land, and heritage assets. - Budl_05 – Little Knowle rejected due to constraints that limit the site capacity to less than 5. - Budl_06 – Budleigh Salterton Community Hospital preferred as consistent with spatial strategy, good access to facilities and makes use of brownfield site. - Budl_08 – Lower Station Road car park rejected due to concerns about the loss of the existing use, although well related to facilities and may be a suitable allocation if these issues can be resolved.																				

East Devon Local Plan 2020-2040 - Colyton

Settlement:

Colyton



n.b. Items in the Legend that appear in regular type are for consultation; items in italics are for information only

Reasonable alternatives

- Coly_01 – land west of Fair View Lane
- Coly_02 – land at Hillhead
- Coly_03 – land adjacent Fair View Lane
- Coly_06 – land north and south of Colyford
- Coly_07 – land east of Fair View Lane
- Coly_09 – land adjoining Clay Lane

Outline of reasons for selecting the alternatives

The reasonable alternatives listed above have all been assessed as suitable, available and achievable in the HELAA, which provides evidence that they have potential to be delivered (subject to further consideration through the planning process). Coly_01, 07 and 09 were sifted out at Stage 2 as not being well related to Colyton. Coly_06 was ruled out being in flood zone 3. Sites Coly_02 and Coly_03 were assessed.

Sites: Colyton																					
Site	Coly_02	Coly_03																			
SA Objective																					
1. Biodiversity	--	--																			
Biodiversity commentary	Both sites are within the Beer Quarry Caves SAC consultation area.																				
2. Landscape	-	-																			

Sites: Colyton																					
Site SA Objective	Coly_02	Coly_03																			
Landscape commentary	Both sites have a medium high sensitivity to changes and there is inter-visibility with the East Devon AONB.																				
3. Hist. built env	0	0																			
Hist. built env. commentary	Coly_03 is within 100 metres of a Grade II listed building, but this is already surrounded by modern development so limited impact.																				
4. Climate change carbon emissions	+	+																			
Climate change carbon emissions commentary	An accessibility assessment undertaken for the Site Selection work identified a total of 12 services, facilities and employment sites ⁹⁶ – the findings are referenced for each site in this commentary. Both sites are within 1600 metres of 10 of these, although the nearest train station and non-selective secondary school are seven miles away in Axminster.																				
5. Climate change adaptation	+	+																			

⁹⁶ Namely: train station, hourly or better bus route, primary school, secondary school, convenience store/shop, Post Office, Community hall, Pub, Open space/allotment, children's play area, GP, employment site (identified in the Employment Land Review).

Sites: Colyton																					
Site SA Objective	Coly_02	Coly_03																			
Climate change adaptation commentary	Neither site is located in a flood risk or critical drainage area. The sites offer the potential to cope with heat, drought and extreme storms through appropriate design and incorporation of sustainable drainage, for example.																				
6. Land resources	- ?	- ?																			
Land resources commentary	Both sites are greenfield sites on Grade 3 agricultural land, which could be 3a (best and most versatile) so uncertain negative effect.																				
7. Water resources	0 ?	0 ?																			
Water resources commentary	Development at the sites is unlikely to have any significant effects on water quality and quantity as none are located within a groundwater source protection zone or the River Axe SAC phosphates catchment. There is uncertainty on the capacity of local sewage treatment works to accommodate additional demand from new housing. This means an uncertain neutral effect for all sites.																				
8. Homes	+	+																			
Homes commentary	Both sites have the potential to provide new homes (less than 100 dwellings), with an appropriate mix of tenures and sizes including affordable housing.																				
9. Health and well-being	+	+																			

Sites: Colyton																				
Site SA Objective	Coly_02	Coly_03																		
Health and well-being commentary	Neither site is within 800 metres of a 50% most deprived neighbourhood, but they are in areas of good air quality and within 800 metres of a children's play area and an allotment.																			
10. Access to services	+	+																		
Access to services commentary	Both sites are within 800 metres of key services and facilities, but steep hills limit attractiveness for walking and cycling.																			
11. Jobs and employment	+	+																		
Jobs/employment commentary	Both sites are within 1600 metres of an employment site and Colyton Town Centre.																			
12. Town centres	+	+																		
Town centres commentary	Both sites are within 800 metres of a town centre, but it is very small with a limited range of shops and other uses.																			
13. Connectivity and transport	+	+																		

Sites: Colyton																				
Site \ SA Objective	Coly_02	Coly_03																		
Connectivity and transport commentary	Average broadband speeds are not consistently over 30 mbps but both sites are within 1600 metres of an hourly bus route, an A road and a national cycle route.																			
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: - Mitigate impact on Beer Quarry Cave bats to be considered in the Habitats Regulations Assessment. - Considerable landscaping of both sites would be required due to negative effects upon the landscape, but the sensitivity is such that a negative effect is likely to remain. - Sustainable drainage systems to minimise flood risk.																				
Preferred alternative: Coly_02 (part of) as a preferred option with the remainder of the site as a ‘second best’ option.																				
Reasons for alternatives being preferred or rejected: - Coly_02 – Land at Hillhead (north eastern) is a preferred option because it consistent with spatial strategy, has good access to services/facilities and minimises the landscape impact because it is on lower ground. - Coly_02 – Land at Hillhead (south west) is a second choice site because, although it is consistent with spatial strategy and good access to services/facilities, it has a greater landscape impact that the rest of the site as it is on higher ground. - Coly_03 – land adjacent Fair View Lane is rejected on landscape grounds.																				

East Devon Local Plan 2020-2040 - Lympstone

Settlement:

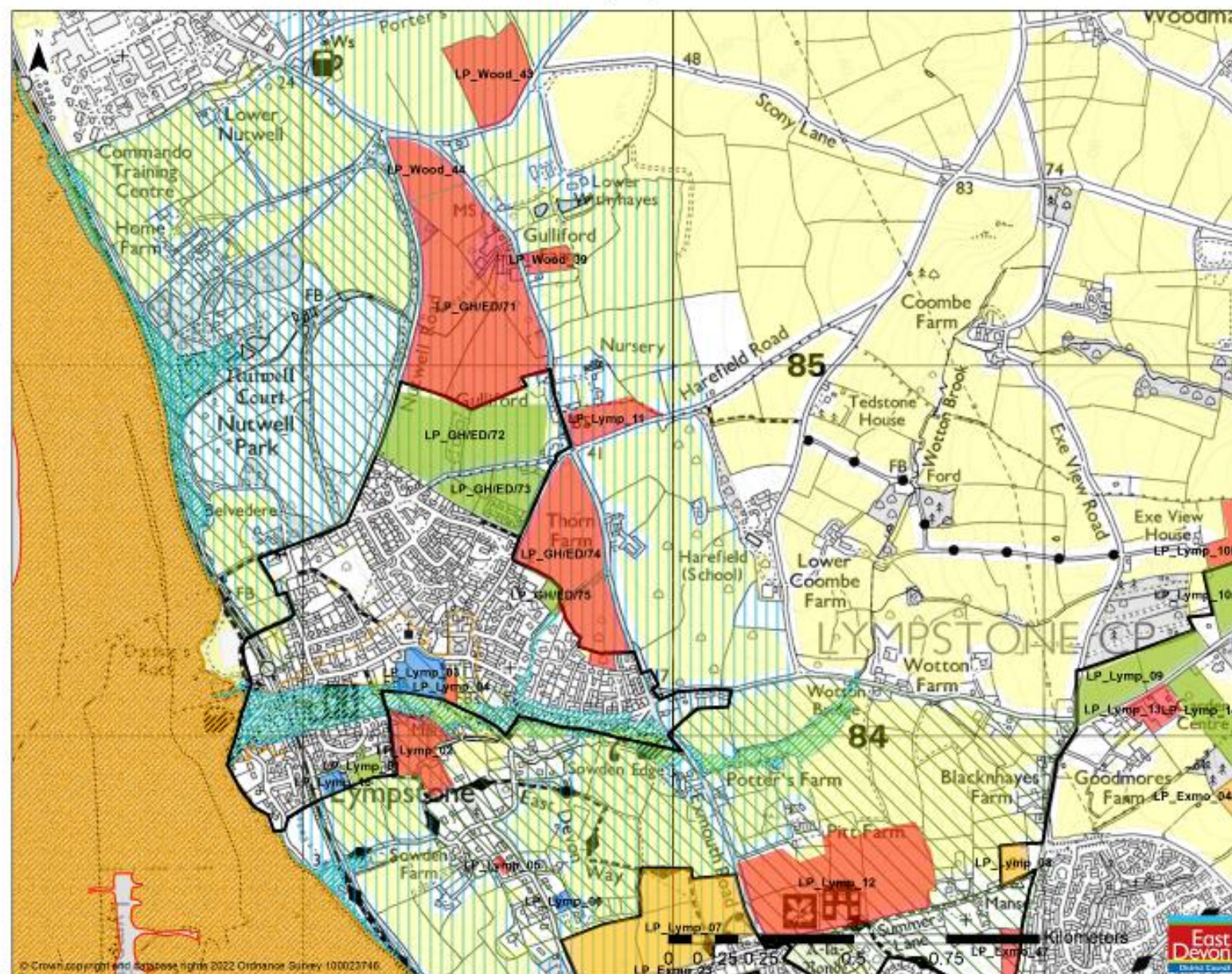
Lympstone

Legend

Housing and Mixed Use Allocations

Preference

- Preferred
- Second choice
- Rejected
- Planning permission granted
- Settlement Boundaries
- Areas considered suitable for solar energy
- Coastal Preservation Areas
- Green Wedge
- Floodzone 2 - 0.1%
- Floodzone 3 - 1%
- Conservation Areas
- Historic Park or Garden
- Sites of Special Scientific Interest
- Special Protection Areas
- County Wildlife Sites
- Ramsar Sites
- Outside EDDC boundary



n.b. Items in the Legend that appear in regular type are for consultation; items in italics are for information only

Reasonable alternatives

- Lymp_01 – Little Paddocks, 22 Underhill Crescent
- GH/ED/71 - Gulliford Farm, Exmouth Road, Lympstone
- GH/ED/72 - Land at Meeting Lane, Lympstone
- GH/ED/73 - Land north west of Strawberry Hill, Lympstone
- GH/ED/74 - Land at Strawberry Hill, Lympstone
- GH/ED/75 - Land off Grange Close, Lympstone

Outline of reasons for selecting the alternatives

The reasonable alternatives listed above have all been assessed as suitable, available and achievable in the HELAA, which provides evidence that they have potential to be delivered (subject to further consideration through the planning process). A number of alternative options were dismissed in accordance with the sifting criteria, for reasons including the site being not adjacent or well-related to the settlement, sites having gained planning permission, or sites being of a small scale below established thresholds.

Lymp_02 - Land lying to the north of Clay Lane, Lympstone – Did not pass HELAA

Lymp_03 - Lympstone Nurseries, Church Road, Lympstone, EX8 5JU – Extant permission on site

Lymp_04 - Land to the south of Meadowgate Cottage, Church Road, Lympstone, EX8 5JU – Did not pass HELAA

Lymp_05 - Land to the southwest of Dawlish Park Terrace, Lympstone, EX8 5AA - Did not pass HELAA

Lymp_06 - Hollywell Nurseries, Courtlands Lane, Lympstone, EX8 5AB - Did not pass HELAA

Lymp_16 - Temporary carpark, end of Underhill Crescent, Lympstone, Devon, EX8 5JF – Existing permission on site

Sites: Lympstone																				
Site SA Objective	Lymp_01	GH/ED/71	GH/ED/72	GH/ED/73	GH/ED/74	GH/ED/75														
1. Biodiversity	-	-	-	-	-	-														
Biodiversity commentary	- Lymp_01 – Nature Recovery Network (75m), Section 41 (S41) Habitat of Principle Importance (including rivers and streams, excluding hedgerows) (75.6m). Site is within both the Exe Estuary SPA HRA mitigation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, significant moderate adverse effect predicted. - GH/ED/71 - Unconfirmed Wildlife Site (1m), Nature Recovery Network (two parcels on site), Section 41 (S41) Habitat of Principle Importance (including rivers and streams, excluding hedgerows) (on site). Site is within both the Exe Estuary SPA HRA mitigation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, significant moderate adverse effect predicted. - GH/ED/72 - Unconfirmed Wildlife Site (1m), Nature Recovery Network (two parcels on site), Section 41 (S41) Habitat of Principle Importance (including rivers and streams, excluding hedgerows) (on site). Site is within both the Exe Estuary SPA HRA mitigation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, significant moderate adverse effect predicted. - GH/ED/73 – Unconfirmed Wildlife Site (1m), Nature Recovery Network (25m). Site is within both the Exe Estuary SPA HRA mitigation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, significant moderate adverse effect predicted. - GH/ED/74 - Unconfirmed Wildlife Site (0m), Nature Recovery Network (25m), Section 41 (S41) Habitat of Principle Importance (including rivers and streams, excluding hedgerows) (23m). Site is within both the Exe Estuary SPA HRA mitigation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, significant moderate adverse effect predicted.																			

Sites: Lympstone																				
Site SA Objective	Lymp_01	GH/ED/71	GH/ED/72	GH/ED/73	GH/ED/74	GH/ED/75														
	GH/ED/75 - Unconfirmed Wildlife Site (1m). Site is within both the Exe Estuary SPA HRA mitigation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, significant moderate adverse effect predicted.																			
2. Landscape	-	--	--	-	--	-														
Landscape commentary	- Lymp_01 – Outside of AONB. Fairly level garden and field adjacent to Lympstone village. Site adjacent to / borders Coastal Preservation Area. Site features multiple small parcels of land with some garden areas. Mature trees across site, mature hedgerows throughout. Overall, the site has a medium landscape sensitivity to new development. - GH/ED/71 - Outside of AONB but entirely within the Coastal Preservation Area. Site made up of around 10 field parcels and Grade II listed Gulliford farm with curtilage. Site is poorly related to development further to the south. Multiple parcels of agricultural land with mature trees and hedgerows throughout. Grade II* listed assets and curtilage associated with Nutwell Park to the west. Highly exposed site from multiple viewpoints including A376 to north east. Further views of the site are highly likely from the East Devon AONB. A small copse is also located to the north-west of the site. Access is off the two-lane A376 and the single lane Nutwell Road. Overall, the site has a high/medium landscape sensitivity to new development. - GH/ED/72 - Outside of AONB but entirely within the Coastal Preservation Area. Site comprises two rectangular agricultural fields on a gentle slope upwards from south to north. Bounded by mature trees and hedgerows. Accessed off the single track Meeting Lane. Site is less exposed than sites to the north and closely related to built form to the near south and immediate west. Views of the site from the East Devon AONB. Overall, the site has a high/medium landscape sensitivity to new development. - GH/ED/73 – Outside of AONB but entirely within the Coastal Preservation Area. Three level irregularly shaped fields bounded by hedgerows and mature trees. Partially covered by permitted planning application for 10 dwellings currently in																			

Sites: Lympstone																				
Site SA Objective	Lymp_01	GH/ED/71	GH/ED/72	GH/ED/73	GH/ED/74	GH/ED/75														
	development. Accessed via the single track Strawberry Hill to south and Meeting Lane to north. Good opportunity for high site permeability. The site may provide an appropriate scale opportunity for extension of the existing development at Lympstone. Grade II Listed burial ground and Boundary Cottage to north east. Overall, the site has a medium landscape sensitivity to new development. - GH/ED/74 - Outside of AONB but entirely within the Coastal Preservation Area. Two large and highly exposed agricultural fields sloping down to a watercourse running through the centre of the site. Views of the site from the East Devon AONB. Accessed off the two-lane A376 to east or Strawberry Hill to north. Mature trees to borders and freestanding / mature hedgerows to borders. Overall, the site has a high/medium landscape sensitivity to new development. - GH/ED/75 - Outside of AONB but entirely within the Coastal Preservation Area. Site may be visible from the East Devon AONB. Includes hedgerows bordering the field boundaries and a number of mature trees. Overall, the site has a medium landscape sensitivity to new development.																			
3. Hist. built env	0	--	-	-	-	0														
Hist. built env. commentary	- Lymp_01 – Assets Present: Grade II listed Sanctuary (47m) is well screened from the site by residential property. Overall, no change - No change to assets or their settings. - GH/ED/71 - Assets Present: Grade II listed Gulliford Farm (on site), Grade II listed Gulliford Cottages (10m), Grade II* listed Nutwell Cottages (500m), Grade II* listed Nutwell Court (500m), outbuilding, and curtilage adjacent to site. Overall, Major - Considerable change affecting the special character of assets including their setting, where the significance of those elements is substantially harmed or lost.																			

Sites: Lympstone																				
Site SA Objective	Lymp_01	GH/ED/71	GH/ED/72	GH/ED/73	GH/ED/74	GH/ED/75														
	- GH/ED/72 - Assets Present: Grade II listed Gulliford Farm (410m) and curtilage, Grade II listed Boundary Cottage (53m), Grade II Listed Burial Ground (18m), Grade II listed Gulliford Cottages (83m), Grade II* listed Nutwell Cottages (569m), Grade II* listed Nutwell Court (459m), outbuilding, and curtilage adjacent to site. Site is however well screened to/from the most significant assets. Overall, Moderate - Change affecting the special character of assets, where elements which contribute to their significance and their setting are harmed. - GH/ED/73 – Assets Present: Grade II listed Boundary Cottage (100m), Grade II Listed Burial Ground (45m), Grade II listed Gulliford Cottages (227m), Grade II* listed Nutwell Cottages (807m), Grade II* listed Nutwell Court (653m), outbuilding, and curtilage. Overall, Moderate - Change affecting the special character of assets, where elements which contribute to their significance and their setting are harmed. - GH/ED/74 - Assets Present: Grade II listed Boundary Cottage (51m), Grade II Listed Burial Ground (25m), Grade II listed Thorn Farm (27m), Grade II listed Crooks Court (34m). Overall, Moderate - Change affecting the special character of assets, where elements which contribute to their significance and their setting are harmed. - GH/ED/75 - Assets Present: No assets within 175m of site. No Change - No change to assets or their settings.																			
4. Climate change carbon emissions	+	+	+	+	+	+														
Climate change carbon emissions commentary	An accessibility assessment undertaken for the site selection work identified a total of 12 services, facilities and employment sites. Individual sites are listed below including the number of services and proximity of key facilities where available. Lymp_01 – 8 out of 12 facilities within 1,600m of site. Nearest train station 320m, nearest bus stop / service 668m, nearest hourly bus stop / service 626m, nearest primary 318m, nearest convenience store 233m.																			

Sites: Lympstone																					
Site	SA Objective	Lymp_01	GH/ED/71	GH/ED/72	GH/ED/73	GH/ED/74	GH/ED/75														
		- GH/ED/71 - 8 out of 12 facilities within 1,600m of site. The site is on an existing bus route with a 15 minute service to Exeter City Centre. The nearest public train station is located approximately 850m away in Lympstone Village. Nearest primary 700m, nearest convenience store 900m. - GH/ED/72 - 8 out of 12 facilities within 1,600m of site. The site is on an existing bus route with a 15 minute service to Exeter City Centre. The nearest public train station is located approximately 650m away in Lympstone Village. Nearest primary 600m, nearest convenience store 650m. - GH/ED/73 – 8 out of 12 facilities within 1,600m of site. The site is on an existing bus route with a 15 minute service to Exeter City Centre. The nearest public train station is located approximately 650m away in Lympstone Village. Nearest primary 500m, nearest convenience store 550m. - GH/ED/74 - 8 out of 12 facilities within 1,600m of site. The site is on an existing bus route with a 15 minute service to Exeter City Centre. The nearest public train station is located approximately 650m away in Lympstone Village. Nearest primary 500m, nearest convenience store 550m. - GH/ED/75 - 8 out of 12 facilities within 1,600m of site. Nearest train station 650m, nearest bus stop / service 7m, nearest hourly bus stop / service 250m, nearest primary 785m, nearest convenience store 550m. On account of proximity of facilities all of these sites can be seen to meet a basic proximity test. The location of these sites in close proximity to regular bus and rail services to main employment centres means that development of the sites offers potential to reduce car travel, with sustainable travel links.																			

Sites: Lympstone																					
Site SA Objective	Lymp_01	GH/ED/71	GH/ED/72	GH/ED/73	GH/ED/74	GH/ED/75															
5. Climate change adaptation	+	+	+	+	0	0															
Climate change adaptation commentary	None of these sites are located in a critical drainage area and in general sites offer the potential to cope with heat, drought and extreme storms through appropriate design and incorporation of sustainable drainage, for example. Sites GH/ED/74 and GH/ED/75 have a neutral mark as the site area is partially located in an area of flood risk, but development can avoid this area.																				
6. Land resources	- ?	-- ?	-- ?	-- ?	- ?	- ?															
Land resources commentary	• Lymp_01 – The site comprises Grade 3 agricultural land. Uncertain negative effect. • GH/ED/71 - The site comprises mix of Grade 1 and Grade 3 agricultural land. Uncertain double negative effect. • GH/ED/72 - The site comprises mix of Grade 1 and Grade 3 agricultural land. Uncertain double negative effect. • GH/ED/73 – The site comprises mix of Grade 1 and Grade 3 agricultural land. Uncertain double negative effect. • GH/ED/74 - The site comprises Grade 3 agricultural land. Uncertain negative effect. • GH/ED/75 - The site comprises Grade 3 agricultural land. Uncertain negative effect.																				
7. Water resources	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?															
Water resources commentary	Development at the sites is unlikely to have any significant effects on water quality and quantity as none are located within a groundwater source protection zone. There is uncertainty on the capacity of local sewage treatment works to accommodate additional demand from new housing. This means an uncertain neutral effect for all sites.																				

Sites: Lympstone																					
Site SA Objective	Lymp_01	GH/ED/71	GH/ED/72	GH/ED/73	GH/ED/74	GH/ED/75															
8. Homes	+	++	++	+	++	+															
Homes commentary	• Lymp_01 – 14 dwellings max yield • GH/ED/71 – 281 dwellings max yield • GH/ED/72 - 131 dwellings max yield • GH/ED/73 – 46 dwellings max yield • GH/ED/74 – 141 dwellings max yield • GH/ED/75 – 6 dwellings max yield Significant positive where site offers maximum yield >100. All other sites have potential to deliver up to 100 dwellings with a marked positive effect. An appropriate mix of tenures and sizes including affordable housing is assumed for all sites.																				
9. Health and well-being	-	-	-	-	-	-															
Health and well-being commentary	• Lymp_01 – Open Space 98m distant, Play Area 381m distant, 100m from railway with noise • GH/ED/71 - Open Space 800m distant, Play Area 400m distant, close proximity to busy A376 with noise • GH/ED/72 - Open Space 600m distant, Play Area 200m distant, close proximity to busy A376 with noise • GH/ED/73 – Open Space 500m distant, Play Area 200m distant, close proximity to busy A376 with noise • GH/ED/74 - Open Space 500m distant, Play Area 300m distant, close proximity to busy A376 with noise • GH/ED/75 - Open Space 500m distant, Play Area 300 m distant, close proximity to busy A376 with noise																				

Sites: Lympstone																					
Site SA Objective	Lymp_01	GH/ED/71	GH/ED/72	GH/ED/73	GH/ED/74	GH/ED/75															
10. Access to services	++	+	++	++	++	++															
Access to services commentary	- Lymp_01 – 8 out of 12 facilities within 1,600m of site. Nearest train station 320m, nearest bus stop / service 668m, nearest hourly bus stop / service 626m, nearest primary 318m, nearest convenience store 233m. - GH/ED/71 - 8 out of 12 facilities within 1,600m of site. The site is on an existing bus route with a 15 minute service to Exeter City Centre. The nearest public train station is located approximately 850m away in Lympstone Village. Nearest primary 700m, nearest convenience store 900m. - GH/ED/72 - 8 out of 12 facilities within 1,600m of site. The site is on an existing bus route with a 15 minute service to Exeter City Centre. The nearest public train station is located approximately 650m away in Lympstone Village. Nearest primary 600m, nearest convenience store 650m. - GH/ED/73 – 8 out of 12 facilities within 1,600m of site. The site is on an existing bus route with a 15 minute service to Exeter City Centre. The nearest public train station is located approximately 650m away in Lympstone Village. Nearest primary 500m, nearest convenience store 550m. - GH/ED/74 - 8 out of 12 facilities within 1,600m of site. The site is on an existing bus route with a 15 minute service to Exeter City Centre. The nearest public train station is located approximately 650m away in Lympstone Village. Nearest primary 500m, nearest convenience store 550m. - GH/ED/75 - 8 out of 12 facilities within 1,600m of site. Nearest train station 650m, nearest bus stop / service 7m, nearest hourly bus stop / service 250m, nearest primary 785m, nearest convenience store 550m.																				

Sites: Lympstone																					
Site SA Objective	Lymp_01	GH/ED/71	GH/ED/72	GH/ED/73	GH/ED/74	GH/ED/75															
11. Jobs and employment	-	+	+	+	+	+															
Jobs/employment commentary	• Lymp_01 – No employment sites are within 1,600m or likely to be delivered on site. • GH/ED/71 - The site has realistic potential to accommodate employment on site due to scale of site with potential for good access, acceptable landscape impact, and acceptable impact on amenity subject to final detail. • GH/ED/72 - The site has realistic potential to accommodate employment on site due to scale of site with potential for good access, acceptable landscape impact, and acceptable impact on amenity subject to final detail. • GH/ED/73 – The site has realistic potential to accommodate employment on site due to scale of site with potential for good access, acceptable landscape impact, and acceptable impact on amenity subject to final detail. • GH/ED/74 - The site has realistic potential to accommodate employment on site due to scale of site with potential for good access, acceptable landscape impact, and acceptable impact on amenity subject to final detail. • GH/ED/75 - The site has realistic potential to accommodate employment on site due to scale of site with potential for good access, acceptable landscape impact, and acceptable impact on amenity subject to final detail.																				
12. Town centres	-	-	-	-	-	-															
Town centres commentary	• Lymp_01 – Beyond 1,600 metres of a town centre. • GH/ED/71 - Beyond 1,600 metres of a town centre. • GH/ED/72 - Beyond 1,600 metres of a town centre. • GH/ED/73 – Beyond 1,600 metres of a town centre.																				

Sites: Lympstone																				
Site SA Objective	Lymp_01	GH/ED/71	GH/ED/72	GH/ED/73	GH/ED/74	GH/ED/75														
	- GH/ED/74 - Beyond 1,600 metres of a town centre. - GH/ED/75 - Beyond 1,600 metres of a town centre.																			
13. Connectivity and transport	++	+	++	++	++	++														
Connectivity and transport commentary	- Lymp_01 – Nearest train station 320m, nearest bus stop / service 668m, nearest hourly bus stop / service 626m. - GH/ED/71 - The site is on an existing bus route with a 15 minute service to Exeter City Centre. The nearest public train station is located approximately 850m away in Lympstone Village. - GH/ED/72 - The site is on an existing bus route with a 15 minute service to Exeter City Centre. The nearest public train station is located approximately 650m away in Lympstone Village. - GH/ED/73 – The site is on an existing bus route with a 15 minute service to Exeter City Centre. The nearest public train station is located approximately 650m away in Lympstone Village. - GH/ED/74 - The site is on an existing bus route with a 15 minute service to Exeter City Centre. The nearest public train station is located approximately 650m away in Lympstone Village. - GH/ED/75 - Nearest train station 650m, nearest bus stop / service 7m, nearest hourly bus stop / service 250m. Broadband speeds vary with 35-80 Mbps median speeds for area, all sites are assumed (at this stage) to have access to superfast broadband. Sites have negative marks due to proximity																			
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: Appropriate landscaping for all sites would be required for all sites due to negative effects upon the landscape.																				

Sites: Lympstone																				
Site	Lymp_01	GH/ED/71	GH/ED/72	GH/ED/73	GH/ED/74	GH/ED/75														
SA Objective																				
- High quality design across all sites can reduce negative effects and maximise beneficial effects on the built environment. - Noise attenuation will lessen the negative health and well-being effect for those sites adjacent or close to the A376 - All sites have relatively good access to facilities, but these beneficial effects can be maximised by enhancing sustainable travel links e.g. create bus stops near to the site, pedestrian/cycle links. - Designing new development for low water use and requiring sustainable drainage systems can help turn neutral uncertain effects on water resources into positive uncertain effects. - Positive effects for all sites in relation to jobs and employment could be maximised by providing on-site employment opportunities alongside new housing, where reasonable.																				
Preferred alternative: Lymp_01, GH/ED/72, GH/ED/73, GH/ED/75 Reasons for alternatives being preferred or rejected: Lymp_01 – PREFERRED Lympstone village. Site adjacent to / borders Coastal Preservation Area. Site features multiple small parcels of land with some garden areas. Mature trees across site, mature hedgerows throughout. Grade II listed ‘Sanctuary’ (47m) is well screened from the site by residential property. Nature Recovery Network (75m), Section 41 (S41) Habitat of Principle Importance (including rivers and streams, excluding hedgerows) (75.6m). Site is within both the Exe Estuary SPA HRA mitigation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, the site has a medium landscape sensitivity to new development. Development would not adversely impact heritage assets or their settings but may have a significant moderate adverse effect with regard to ecology. Site is considered appropriate for development, subject to final detailed scheme and proportionate mitigation.																				

Sites: Lympstone																				
Site	Lymp_01	GH/ED/71	GH/ED/72	GH/ED/73	GH/ED/74	GH/ED/75														
SA Objective																				
- GH/ED/71 – REJECTED Outside of AONB but entirely within the Coastal Preservation Area. Site made up of around 10 field parcels and Grade II listed Gulliford farm with curtilage. Site is poorly related to development further to the south and has a distinct rural character. Multiple parcels of agricultural land with mature trees and hedgerows throughout. Grade II* listed assets and curtilage associated with Nutwell Park to the west. Highly exposed site from multiple viewpoints including A376 to north east. Further views of the site from the East Devon AONB. A small copse is also located to the north-west of the site. Access is off the two-lane A376 and the single lane Nutwell Road. Grade II listed Gulliford Farm (on site), Grade II listed Gulliford Cottages (10m), Grade II* listed Nutwell Cottages (500m), Grade II* listed Nutwell Court (500m), outbuilding, and curtilage adjacent to site. Unconfirmed Wildlife Site (1m), Nature Recovery Network (two parcels on site), Section 41 (S41) Habitat of Principle Importance (including rivers and streams, excluding hedgerows) (on site). Site is within both the Exe Estuary SPA HRA mitigation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, the site has a high/medium landscape sensitivity to new development. Development of the site considered to have a major heritage impact with a significant moderate adverse effect on ecology predicted. The site constraints do not support allocation at this stage. - GH/ED/72 – PREFERRED Outside of AONB but entirely within the Coastal Preservation Area. Site comprises two rectangular agricultural fields on a gentle slope upwards from south to north. Bounded by mature trees and hedgerows. Accessed off the single track Meeting Lane. Site is less exposed than sites to the north and better related to built form to the near south and immediate west. Field parcel to the west currently including agricultural barn particularly well screened. Improved access could be achieved as part of a coherent scheme covering sites 72 and 73. Heritage assets present include Grade II listed Gulliford Farm (410m) and curtilage, Grade II listed Boundary Cottage (53m), Grade II Listed Burial Ground (18m), Grade II listed Gulliford Cottages (83m), Grade II* listed Nutwell Cottages (569m), Grade II* listed Nutwell Court (459m), outbuilding, and curtilage adjacent to site. Site is however well screened to/from the most significant assets. Unconfirmed Wildlife Site (1m), Nature Recovery Network (12m), Section 41 (S41) Habitat of Principle Importance (including rivers and streams, excluding hedgerows) (12m). Site is within both the Exe Estuary SPA HRA mitigation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, the site																				

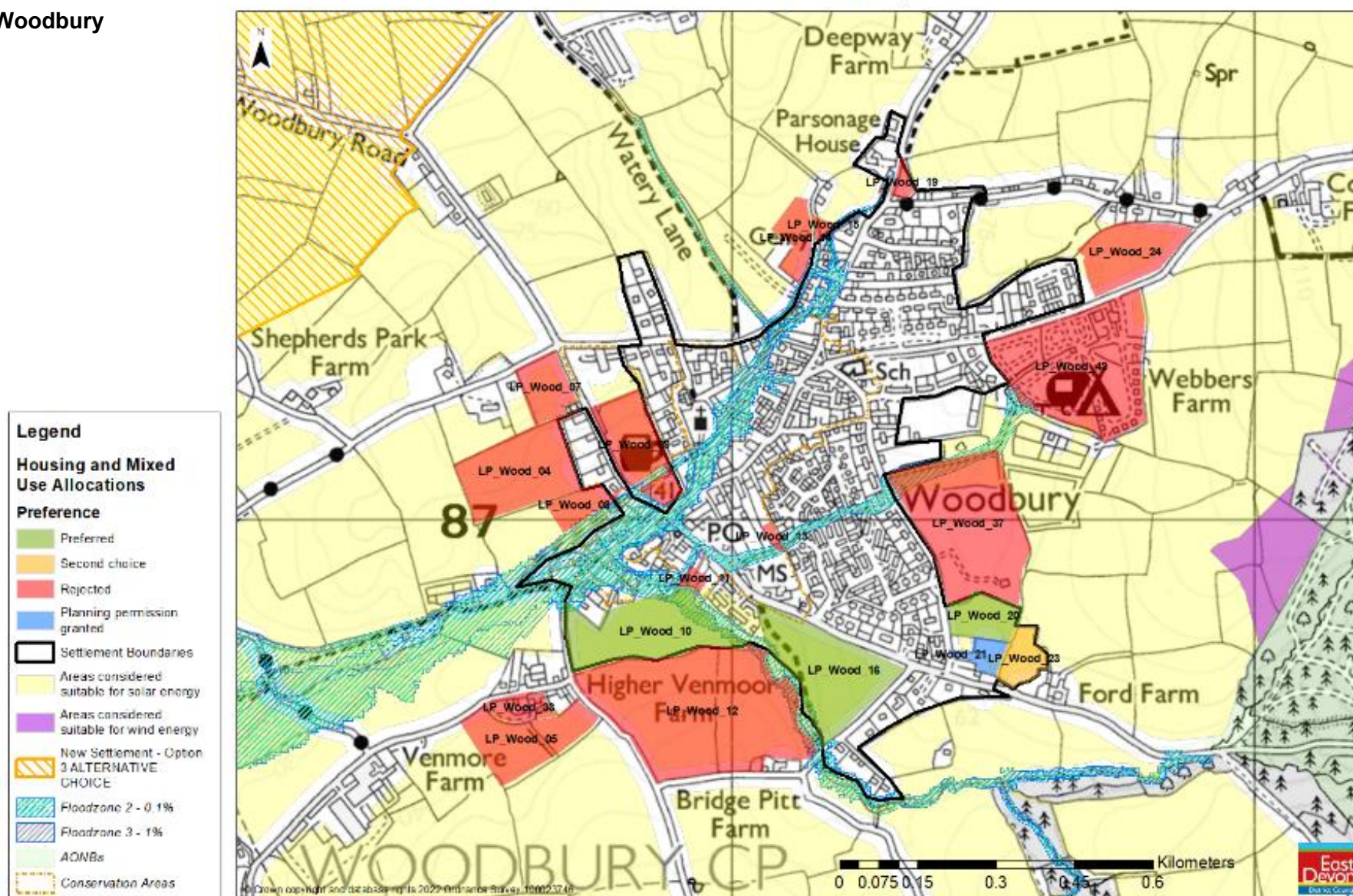
Sites: Lympstone																				
Site	Lymp_01	GH/ED/71	GH/ED/72	GH/ED/73	GH/ED/74	GH/ED/75														
SA Objective																				
has a high/medium landscape sensitivity to new development. Development of the site considered to have a moderate impact affecting the special character of heritage assets, where elements which contribute to their significance and their setting are harmed. With regard to ecology, a significant moderate adverse effect is predicted. Site is considered appropriate for development, subject to a final detailed scheme that minimises impact on nearby heritage assets and provides proportionate ecology mitigation. - GH/ED/73 – PREFERRED Outside of AONB but entirely within the Coastal Preservation Area. Three level irregularly shaped fields bounded by hedgerows and mature trees. Partially covered by permitted planning application for 10 dwellings. Accessed via the single track Strawberry Hill to south and Meeting Lane to north. Good opportunity for high site permeability. Heritage assets present include Grade II listed Boundary Cottage (100m), Grade II Listed Burial Ground (45m), Grade II listed Gulliford Cottages (227m), Grade II* listed Nutwell Cottages (807m), Grade II* listed Nutwell Court (653m), outbuilding, and curtilage. With regard to ecology, assets present include - unconfirmed Wildlife Site (1m), Nature Recovery Network (25m). Site is within both the Exe Estuary SPA HRA mitigation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, the site has a medium landscape sensitivity to new development. Development of the site considered to have a moderate impact affecting the special character of heritage assets, where elements which contribute to their significance and their setting are harmed. With regard to ecology, a significant moderate adverse effect is predicted. Site is considered appropriate for development, subject to a final detailed scheme that minimises impact on nearby heritage assets and provides proportionate ecology mitigation. - GH/ED/74 – REJECTED Outside of AONB but entirely within the Coastal Preservation Area. Two large and highly exposed agricultural fields sloping down to a watercourse running through the centre of the site. Views of the site from the East Devon AONB. Accessed off the two-lane A376 to east or Strawberry Hill to north. Mature trees to borders and freestanding / mature hedgerows to borders. Grade II listed Boundary Cottage (51m), Grade II Listed Burial Ground (25m), Grade II listed Thorn Farm (27m), Grade II listed Crooks Court (34m). With regard to ecology, assets present include - Unconfirmed Wildlife Site (0m), Nature Recovery Network (25m), Section 41 (S41) Habitat of Principle Importance (including rivers and streams, excluding hedgerows) (23m). Site is within both the Exe Estuary SPA HRA mitigation zone and the																				

Sites: Lympstone																				
Site	Lymp_01	GH/ED/71	GH/ED/72	GH/ED/73	GH/ED/74	GH/ED/75														
SA Objective																				
East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, the site has a high/ medium landscape sensitivity to new development. Development of the site considered to have a moderate impact affecting the special character of heritage assets, where elements which contribute to their significance and their setting are harmed. With regard to ecology, a significant moderate adverse effect is predicted. The site is not considered appropriate for allocation as alternative sites provide more sustainable opportunities with reduced adverse impact. GH/ED/75 – PREFERRED Outside of AONB but entirely within the Coastal Preservation Area. Site may be visible from the East Devon AONB. Includes hedgerows bordering the field boundaries and a number of mature trees. Heritage Assets Present: No assets within 175m of site. With regard to ecology, assets present include - Unconfirmed Wildlife Site (1m), Site is within both the Exe Estuary SPA HRA mitigation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, the site has a medium landscape sensitivity to new development and is not considered to impact on heritage. With regard to ecology, a significant moderate adverse effect is predicted. Site is considered appropriate for development, subject to a final detailed scheme that provides mitigation.																				

Settlement:

Woodbury

East Devon Local Plan 2020-2040 - Woodbury



n.b. Items in the Legend that appear in regular type are for consultation; items in italics are for information only

Reasonable alternatives

- Wood_04 – Land off Globe Hill
- Wood_07 – Land off Globe Hill
- Wood_08 – Land to the rear of Orchard House, Globe Hill
- Wood_09 – Land off Globe Hill
- Wood_10 – Land at Gilbrook
- Wood_11 – Land at rear of Escot Cottages, Broadway
- Wood_12 – Land to the east of Higher Venmore Farm
- Wood_14 – Land west of Pound Lane
- Wood_16 – Land off Broadway
- Wood_19 – Land on the east of Parsonage Way
- Wood_20 – Land at Town Lane
- Wood_23 – Ford Farm
- Wood_24 – Land north east of Webbers' Meadow, Castle Lane
- Wood_37 – Cricket field off Town Lane
- Wood_42 – Webbers Farm, Castle Lane

Outline of reasons for selecting the alternatives

The reasonable alternatives listed above have all been assessed as suitable, available and achievable in the HELAA, which provides evidence that they have potential to be delivered (subject to further consideration through the planning process). The sites are all located within or adjacent to Woodbury, a Local Centre, reflecting the settlement strategy in the Preferred Options consultation draft Local Plan.

With regards to sites not identified as reasonable alternatives, Wood_05 and Wood_33 are not reasonable alternatives as they are not adjacent or well-related to Woodbury, so do not reflect the settlement strategy. Wood_06 overlaps with Wood_08 so is not considered a reasonable alternative by itself.

Wood_13 and 15 are not reasonable alternatives as they were not suitable, available and/or achievable in the HELAA. Finally, Wood_21 is not a reasonable alternative as it already has planning permission, so is not being considered for allocation in the Local Plan.

Sites: Woodbury																
Site SA Objective	Wood_04	Wood_07	Wood_08	Wood_09	Wood_10	Wood_11	Wood_12	Wood_14	Wood_16	Wood_19	Wood_20	Wood_23	Wood_24	Wood_37	Wood_42	
1. Biodiversity	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Biodiversity commentary	All sites are within 10km of both the Exe Estuary and Pebblebed Heaths SPAs, and past evidence (South east Devon European Site Mitigation Strategy, 2014) indicates a likely significant effect that must be mitigated through planning obligations. This suggest a negative effect for all sites. However, there are no international, national or local designated biodiversity sites within 1km of Woodbury, so a likely minor negative rather than major negative effect. Wood_04, 07, 08, 10, 12, 16, and 24 are all agricultural fields with limited biodiversity value. Wood_09 is unimproved grassland with several mature trees, with an ancient tree in the eastern boundary, and a potential veteran tree in the north east of the site, so minor negative effect. Mature trees are present on the boundaries of Wood_12, 14, 16, 19, and 24; and a small woodland is present on Wood_37 and to the north of Wood_20 (part of the draft Nature Recovery Network) so development has the potential for a minor negative effect.															
2. Landscape	--	--	--	--	-	+	--	-	-	-	-	-	--	-	+	
Landscape commentary	Wood_04, 07 and 08 in the north west of Woodbury all have a generally rural context, located adjacent to fields with little presence of built form, in a sensitive landscape. Wood_07 is in a particularly prominent location, on the north western entrance to Woodbury with open short and long distance views of the site. Development at Wood_04, 07 and 08 is likely to have a major negative landscape effect. Wood_09 is an attractive 'park land' with several mature trees, with the entire site covered by a TPO. Views of site have context of built form being close to the centre of the settlement, albeit with an historic context given location within															

Sites: Woodbury															
Site	Wood_04	Wood_07	Wood_08	Wood_09	Wood_10	Wood_11	Wood_12	Wood_14	Wood_16	Wood_19	Wood_20	Wood_23	Wood_24	Wood_37	Wood_42
SA Objective															
	Conservation Area and Grade I listed overlooking site to east. This makes Wood_09 a sensitive landscape, and likely major negative effect. Wood_10 and Wood_16 adjoin the southern edge of Woodbury, with the presence of existing buildings along their northern and eastern boundaries providing context of built form, albeit with fields to the south providing a rural character, leading to a minor negative effect for these sites. Wood_12 is located beyond Wood_10 and 16, in a prominent location on rising land, surrounded by fields, so a major negative effect. Wood 11 is near to the centre of Woodbury, in an urban context of existing dwellings to the east, north and west with limited views into the site, leading to a low landscape sensitivity and therefore minor positive effect. Wood_14 has open short distance views of site from Pound Lane to east and south, but surrounding topography limits long distance views of site. The presence of existing dwellings to east provides some context of built form, but generally fields, mature trees and hedgerow surround the site, meaning a minor negative landscape effect for Wood_14. Wood_19 adjoins dwellings to the south, with public views limited into site due to boundary trees and thick hedgerow, and a rural character leading to a minor negative effect. Wood_24 has limited context of built form provided by modern dwellings adjoining the western edge, albeit screened by vegetation, and low density dwellings along north east of the site. The promontory location with regards to the existing settlement means that the main context is a sensitive, rural landscape character, resulting in a major negative effect. Wood_42 rises from west to east with views towards the Exe Estuary, and is a camping and caravan site with caravans, tents, internal roads, hardstanding and associated small buildings (reception, toilet block etc) providing a high level of human disturbance. This makes it partly previously developed land, and reduces its landscape sensitivity, leading to a minor positive effect. Wood_20, 37 and 23 are all located on the eastern edge of Woodbury. Wood_20 is a single field that rises from west to east, with new dwellings adjacent to south, and existing dwellings to west provide some built form as context. A mature hedgerow helps to screen the site from surrounding views, and overall a minor negative effect for Wood_20. Wood_37 is largely comprised of the cricket field; existing dwellings along Town Lane to west provide some built form as context, but the site itself has an open, rural character a minor negative effect for Wood_37. Wood_23 is a field on the eastern entrance to Woodbury, with countryside to the														

Sites: Woodbury																
Site SA Objective	Wood_04	Wood_07	Wood_08	Wood_09	Wood_10	Wood_11	Wood_12	Wood_14	Wood_16	Wood_19	Wood_20	Wood_23	Wood_24	Wood_37	Wood_42	
	north, east and south, apart from the farm house to south east, meaning it appears as a rural landscape albeit with some intrusive human activity from dwellings and B3179. The AONB is around 500m to the east. Overall, a minor negative effect for Wood_23.															
3. Hist. built env	-	-	-	--	-	-	-	-	-	0	0	-	-	-	-	
Hist. built env. commentary	In general, all sites offer the potential to promote high quality design and accessibility, subject to identified constraints. Woodbury has a historic core covered by a Conservation Area and numerous listed buildings, most notably the Grade I listed church. Wood_04, 07, 08, 10, 16 all adjoin the Conservation Area, with Grade II listed buildings also in close proximity, meaning a minor negative effect for these sites. Wood_09 is a field, wholly within the Conservation Area, overlooked by the Grade I listed church 65m to the east. Therefore, Wood_09 has potential for a major negative effect. Wood_11 is also entirely within the Conservation Area, but set behind existing dwellings with limited wider impact on this designated asset, leading to a minor negative effect. The close proximity of Wood_12 to the Grade II listed building across the road to the west means potential for minor negative effect. The Conservation Area and listed building 60m to the south of Wood_14 have limited views of the site, so a minor negative effect. Intervening large trees and mature hedgerow mean it is not likely to affect Grade II listed Parsonage House 44m to the west, so a neutral effect for Wood_19. Intervening dwellings mean Wood_20 will not affect Grade II listed Knoll Cottage, 60m to south, so a neutral effect. The views from Grade II listed Knoll Cottage 36m west of the Wood_23 are obscured by trees and hedgerow, but development could affect its setting, so a minor negative. Long distance views from Grade I listed church to Wood_24 and 42 leads to a likely minor negative effects for these sites. Intervening mature trees and hedgerow between the site and Grade II listed dwelling to north west limit intervisibility with Wood_37, but close proximity (23m) means development could affect its setting, so a minor negative effect is likely.															
4. Climate change carbon emissions	+	+	+	+	0	+	-	+	+	+	0	0	0	0	0	

Sites: Woodbury																
Site	Wood_04	Wood_07	Wood_08	Wood_09	Wood_10	Wood_11	Wood_12	Wood_14	Wood_16	Wood_19	Wood_20	Wood_23	Wood_24	Wood_37	Wood_42	
SA Objective																
Climate change carbon emissions commentary	All sites in Woodbury are located within 1,600m of 10 out of the 12 services, facilities and employment in the accessibility assessment undertaken for the Site Selection work,⁹⁷ so offer the opportunity to minimise greenhouse gas emissions from travel. However, there are limited job opportunities in Woodbury, which makes travel to work outside the settlement to access work likely. Wood_04, 07, 08, 09 and 11 are all close to the settlement centre where there are shops, pubs, and an hourly or better bus service to Exmouth/Exeter, as well as the primary school around 500m away to the east. Wood_10 is only 100m from the settlement centre as the crow flies, but there are currently no pedestrian links, so a neutral effect is likely. Similar findings for Wood_12 although it is detached from Woodbury leading to a minor negative effect. Wood_14 and 19 are further from the settlement centre, around 500m away, but closer to the primary school, so a minor positive overall. Wood_16 is around 250m to the settlement centre, which can be accessed along a pavement that runs along the B3179. The primary school is around 750m away though, so a minor positive effect. Wood_20 and 37 are within walkable distance to the centre and the primary school, but both are located off Town Lane which is narrow and lacks pavement – for these reasons a neutral effect is noted. Similarly, Wood_23 is only 700m from the settlement, but lacks a section of pavement, with the same difficulties for pedestrians along Town Lane, leading to a neutral effect. Wood_24 benefits from a continuous footway to the primary school, 500m to the west (assuming access through Webbers Meadow), but is further (900m) to the settlement centre where pavement is narrow and lacking in places – overall a neutral effect. Same effect for Wood_42 across the road to the south off Wood_24.															

⁹⁷ Namely: train station, hourly or better bus route, primary school, secondary school, convenience store/shop, Post Office, Community hall, Pub, Open space/allotment, children's play area, GP, employment site (identified in the Employment Land Review).

Sites: Woodbury																
Site SA Objective	Wood_04	Wood_07	Wood_08	Wood_09	Wood_10	Wood_11	Wood_12	Wood_14	Wood_16	Wood_19	Wood_20	Wood_23	Wood_24	Wood_37	Wood_42	
5. Climate change adaptation	+	+	0	0	0	0	0	+	0	+	+	+	+	0	0	
Climate change adaptation commentary	Wood_04 and 07 are not located in an area of flood risk, so likely positive effect. The southern parts of Wood_08, 09 and 42 are within flood zone 3 and also have high surface water flood risk, but development can avoid these areas so a neutral effect overall. Flood zone 3 and high surface water flood risk also extends into the edges of Wood_10, 11, 12, 16 but, again, it is possible for development to avoid these areas, meaning a neutral effect. The northern section of Wood_37 is within flood zone 3, with small areas of high surface water flood risk. As with the other sites, a neutral effect is likely as development can avoid this area. The remaining sites Wood_14, 19, 20, 23 and 24 are not affected by flood risk, so will have a positive effect.															
6. Land resources	-	-	-	-	- ?	-	- ?	-	- ?	-	- ?	- ?	- ?	- ?	+ ?	
Land resources commentary	Wood_42 is partly previously developed land (currently occupied by a camping and caravan park), on Grade 3 agricultural land, which could be 3a (best and most versatile), so uncertain positive effect. The remaining sites are greenfield, several of which (Wood_04, 07, 08, 09, 14, 19) are located on Grade 2 (best and most versatile) agricultural land, meaning a negative effect. Wood_10, 12, 16, 20, 23, 24, 37, 42 are all greenfield sites on Grade 3 agricultural land, which could be 3a (best and most versatile), so uncertain negative effect for these sites.															
7. Water resources	- ?	- ?	- ?	- ?	- ?	- ?	- ?	- ?	- ?	- ?	- ?	- ?	- ?	- ?	- ?	
Water resources commentary	None of the sites are located within a groundwater source protection zone, but run-off from development into the water body that travels into the Exe Estuary SPA/Ramsar 3km to the west could adversely affect water quality, meaning a negative effect given its															

Sites: Woodbury																
Site SA Objective	Wood_04	Wood_07	Wood_08	Wood_09	Wood_10	Wood_11	Wood_12	Wood_14	Wood_16	Wood_19	Wood_20	Wood_23	Wood_24	Wood_37	Wood_42	
	sensitivity and classification as “moderate” quality. There is uncertainty on the capacity of local sewage treatment works to accommodate additional demand from new housing. This means an uncertain negative effect for all sites.															
8. Homes	+	+	+	+	+	+	++	+	+	+	+	+	+	+	++	
Homes commentary	Wood_12 and Wood_42 can both provide over 100 dwellings, so will have a likely major positive effect for this objective. Each of the remaining sites can deliver less than 100 dwellings, so will see a positive effect. An appropriate mix of tenures and sizes including affordable housing is assumed for all sites.															
9. Health and well-being	+	+ / -	+ / -	+ / -	+	+	+	+	+ / -	+	+	+ / -	+	-	+	
Health and well-being commentary	All sites are in an area of the least deprived 10% neighbourhoods in England, so development will not be located in an area of higher deprivation. All sites are within 800m of a children’s play area and open space/allotment, offering opportunities to support healthy lifestyles and therefore a positive effect. Wood_07, 08, 09, 16 and 23 are located adjacent to the B3179, meaning potential noise and air pollution from traffic, including HGVs which use this route, so will see a mixed positive and negative effect. Wood_37 would result in a loss of the cricket field, so likely to have a negative effect.															
10. Access to services	+	+	+	+	+ / -	+	+ / -	+ / -	+	+	+	+ / -	+	+ / -	+	
Access to services commentary	Woodbury is lacking some strategic facilities (e.g. train station, secondary school), so residents will need to travel elsewhere for some services.															

Sites: Woodbury																
Site SA Objective	Wood_04	Wood_07	Wood_08	Wood_09	Wood_10	Wood_11	Wood_12	Wood_14	Wood_16	Wood_19	Wood_20	Wood_23	Wood_24	Wood_37	Wood_42	
	All sites are within 800m of the primary school, community hall, shop, pub, and GP surgery. This means all sites are walkable distance to a range of services, and therefore a minor positive effect. However, there are issues for pedestrians/cyclists from some sites to particular services – for example, there are no existing footpaths from Wood_10, 12, 14, 23 (at site or across the road from site). There are also sections on the route for some sites where footpaths are missing, such as along Town Lane (affecting Wood_20 and 37). For these reasons, Wood_10, 12, 14, 20, 23 and 37 all have a mixed positive and negative effect.															
11. Jobs and employment	+	+	+	+	+	+	+	+	+	+	+	+	+	+	--	
Jobs/employment commentary	All sites will provide short-term positive effects from job opportunities during construction. There are relatively few employment opportunities in Woodbury, but all sites are within 1,600m of the employment site at Woodbury Business Park – this is located to the west of Woodbury with no footpath links, although there is an hourly bus service from the settlement. The larger sites (Wood_10, 12, 16, 24, 37) may have potential to provide on-site employment, although adverse landscape impact and poor road access may preclude Wood_12 and 24 from doing so. Overall, a minor positive effect for all sites, apart from a major negative for Wood_42 due to the loss of an existing employment use (Webbers Park caravan and camping park).															
12. Town centres	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Town centres commentary	It is noted that development will support the vitality and viability of the shops, pubs, and other services in the centre of Woodbury, but all sites are more than 1,600m from an existing town centre, so minor negative effect for all.															
13. Connectivity and transport	+	+	+	+	+ / -	+ / -	+ / -	+ / -	+	+	+	+ / -	+	+ / -	+	

Sites: Woodbury																
Site SA Objective	Wood_04	Wood_07	Wood_08	Wood_09	Wood_10	Wood_11	Wood_12	Wood_14	Wood_16	Wood_19	Wood_20	Wood_23	Wood_24	Wood_37	Wood_42	
Connectivity and transport commentary	Woodbury has an average broadband speed of 44 mbps, so all sites are assumed to have access to superfast broadband. All sites are within 800m of an hourly or better bus service which provides links to Exeter and Exmouth, but further than 1,600m from an ‘A’ road, train station, and recognised cycle route. Exton train station is around 2.5km away, the A376 is around 2km to the west, and the M5 is 5.5km to the north west. A minor positive effect is therefore likely for most sites, apart from Wood_10, 12, 14, 20, 23 and 37 which all have a mixed positive and negative effect due to the lack of existing walking links from these sites. Wood_11 has a mixed positive and major negative due to unsuitable highways access.															
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: • Mitigate impact upon Exe Estuary and Pebblebed Heaths SPAs – to be considered in the Habitats Regulations Assessment. • Wood_09 – entire site is subject to TPO, but ensure development protects existing trees. • Significant landscaping would be required for sites Wood_04, 07, 08, 09, 12 and 24, but major negative effect is still likely. Limiting the site area to adjoin existing built form at Wood_04, 08, 24 could reduce effect to minor negative. A minor negative landscape effect for the other sites means that appropriate landscaping should be incorporated although, as all sites are currently greenfield, a negative effect would remain. • High quality design to minimise adverse impacts upon listed buildings. Very limited scale of development may reduce major negative to minor negative for Wood_09. • Sustainable drainage systems to minimise flood risk. • Designing new development for low water use and requiring sustainable drainage systems can help turn neutral uncertain effects on water resources into positive uncertain effects. • Noise buffer to B3179 for Wood_07, 08, 09, 16 and 23. • To encourage walking: construct a pedestrian link from Wood_10 northwards to settlement centre; a pedestrian link from Wood_23 to link up with existing footpath to west; and improve pedestrian links along Town Lane.																
In general, these mitigation measures will reduce adverse effects.																

Sites: Woodbury															
Site	Wood_04	Wood_07	Wood_08	Wood_09	Wood_10	Wood_11	Wood_12	Wood_14	Wood_16	Wood_19	Wood_20	Wood_23	Wood_24	Wood_37	Wood_42
SA Objective															
Preferred alternative: Wood_10, Wood_16, Wood_20. In addition, Wood_23 is a second choice allocation in the Preferred Options Consultation Draft Local Plan. Reasons for alternatives being preferred or rejected: - Wood_04 – Land off Globe Hill rejected due to adverse landscape impact, harm to heritage assets, loss of best and most versatile agricultural land and location within high pressure gas pipeline zones. - Wood_07 – Land off Globe Hill rejected due to adverse landscape impact, harm to heritage assets and loss of best and most versatile agricultural land. - Wood_08 – Land to the rear of Orchard House, Globe Hill rejected due to adverse landscape impact, harm to heritage assets and loss of best and most versatile agricultural land. - Wood_09 – Land off Globe Hill rejected due to adverse landscape impact, harm to heritage assets. - Wood_10 – Land at Gilbrook preferred due to low landscape sensitivity and good access to facilities (assuming pedestrian/cycle link can be created through development adjoining to the north). - Wood_11 – Land at rear of Escot Cottages, Broadway rejected due to unsuitable highways access, potential adverse heritage impact. - Wood_12 – Land to the east of Higher Venmore Farm rejected due to adverse landscape impact and scale of development being inconsistent with the spatial strategy when combined with other preferable sites at Woodbury. - Wood_14 – Land west of Pound Lane rejected due to adverse landscape impact and loss of best and most versatile agricultural land. - Wood_16 – Land off Broadway preferred due to low landscape sensitivity and good access to facilities and services (assuming pedestrian/cycle link can be created through development adjoining to the north). - Wood_19 – Land on the east of Parsonage Way rejected due to adverse landscape impact arising from necessary loss of trees, loss of best and most versatile agricultural land and location within high pressure gas pipeline zones. - Wood_20 – Land at Town Lane preferred as moderate landscape impact, good access to facilities and services, no change to heritage assets, and limited ecological impact.															

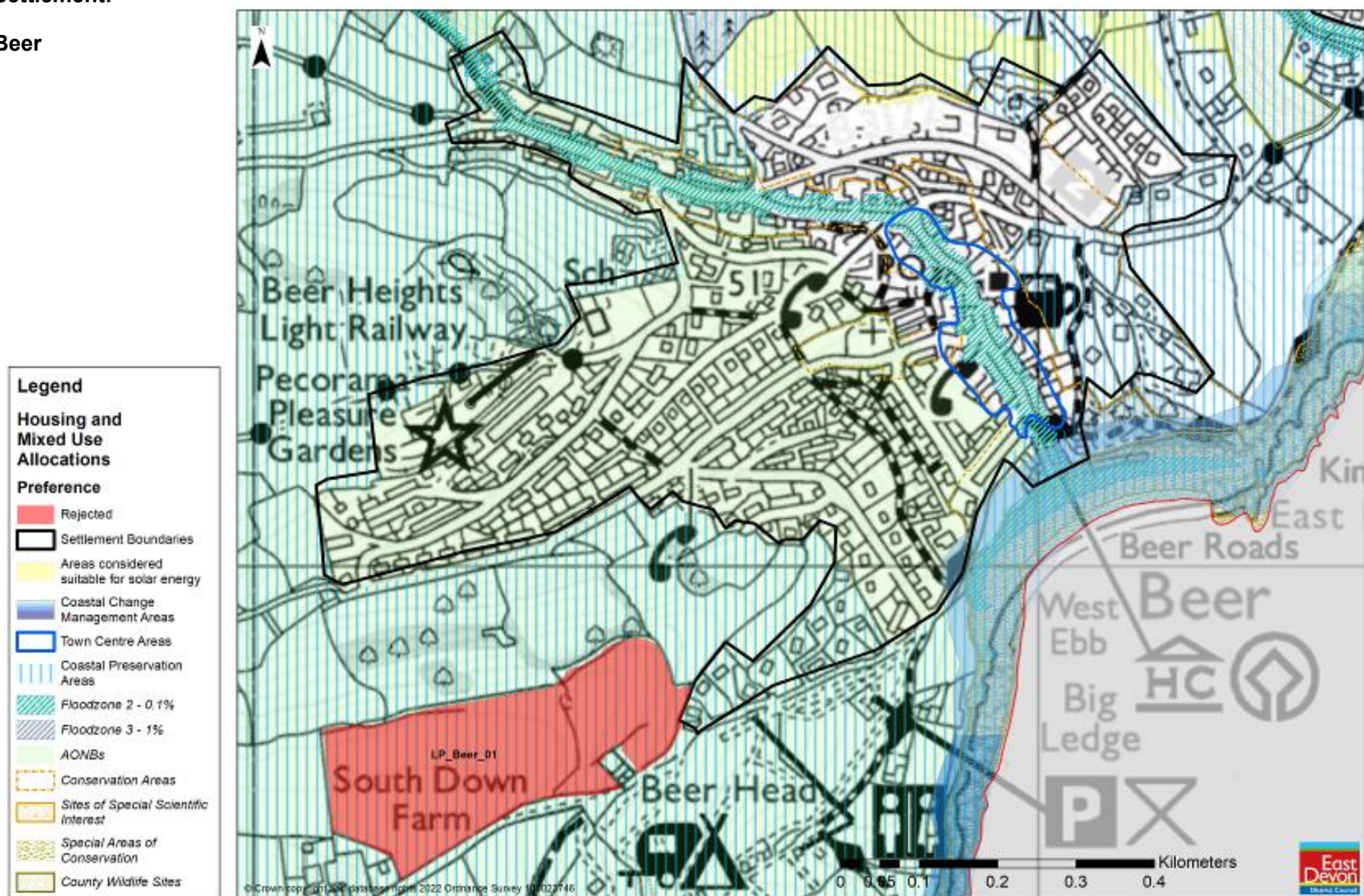
Sites: Woodbury															
Site	Wood_04	Wood_07	Wood_08	Wood_09	Wood_10	Wood_11	Wood_12	Wood_14	Wood_16	Wood_19	Wood_20	Wood_23	Wood_24	Wood_37	Wood_42
SA Objective															
- Wood_23 – Ford Farm preferred as second choice as moderate landscape impact, good access to facilities and services, and limited ecological impact. - Wood_24 – Land north east of Webbers' Meadow, Castle Lane rejected due to adverse landscape impact. - Wood_37 – Cricket field off Town Lane rejected as would result in loss of cricket pitch, flood risk in northern field, and adverse ecological impact. - Wood_42 – Webbers Farm, Castle Lane rejected as would result in loss of Webbers Park caravan and camping site, to the detriment of the local economy.															

Tier Four – Service Villages

Settlement:

Beer

East Devon Local Plan 2020-2040 - Beer



n.b. Items in the Legend that appear in regular type are for consultation; items in italics are for information only

Reasonable alternatives

- Beer_01

Outline of reasons for selecting the alternatives

This site was the only site at Beer to be submitted to the HELAA / Call for Sites process. It passed Stage A and B assessment by the HELAA panel but was noted to be “probably unachievable due to access and topography” which was noted would impact viability. The HELAA panel also noted concerns about impact on Beer Quarry bats (flight paths and feeding grounds). The site passed EDDC Officer Stage 2 sifting but is not recommended for allocation based following Stage 3 assessment. There are currently no identified reasonable alternative sites for allocation at Beer.

Sites: Beer																					
Site SA Objective	Beer_01																				
1. Biodiversity	- -																				
Biodiversity commentary	The site itself is predominantly agricultural grazing, with boundary hedgerows which contain some large/mature trees. The site itself is not the subject of any biodiversity/ecological designations. However, the site lies within the Beer Quarry & Caves Consultation Zones, located less than 0.5km from this SAC and County Wildlife Site. This indicates a negative effect as a minimum. It is also within 350m of the Sidmouth to West Bay SAC/SSSI. The site lies immediately adjacent to a swathe of semi-improved grassland s41 Priority Habitat which is also a Core Nature Area under Nature Recovery Network data.																				
2. Landscape	- -																				

Sites: Beer																					
Site SA Objective	Beer_01																				
Landscape commentary	Landscape sensitivity is considered to be a high. The site occupies a coastal plateau above the village of Beer, with extensive and expansive views from the eastern part of the site particularly, over Beer and around the coastline to Dorset. The sites lies within the East Devon AONB, Heritage Coast and Coastal Protection Area, and whilst there is a caravan park in the foreground, and existing houses along the access road leading up to the site, residential development of any scale here be above the existing skyline and significantly impact the open and exposed character of the landscape.																				
3. Hist. built env	-																				
Hist. built env. commentary	The site is set back by less than 400m from the Jurassic Coast World Heritage Site designation, which in part is designated for its landscape value, and to which this site contributes to setting in its current state. The site also lies entirely within an artefacts scatter and part of the site is also recorded as a relict field system of possible later prehistoric to medieval date, visible on aerial photographs. The site does not lie is close proximity to any listed buildings, but due its vantage point over Beer at the eastern end, there is long range inter-visibility with this historic village, which has a large conservation area containing 40 listed buildings. There would be potential moderate adverse impact on historic environment from introducing residential development in this location.																				
4. Climate change carbon emissions	-																				
Climate change carbon emissions commentary	The HELAA assessment recorded that the site has access to public transport and 8 named facilities / services within 1600m. The nearest 'hourly or better than hourly service' is just over 600m from the site, with the nearest bus stop just over 150m away. The 8 types of facilities/services comprise primary school, convenience shop(s), public house(s), post office, allotments, community hall, children's play area, GP practice, the nearest of which is the allotments. However, as noted by DCC Highways, access to this site																				

Sites: Beer																					
Site SA Objective	Beer_01																				
	would be from a private track off Common Hill – this is steep and remote from Beer village centre, with little or no cycle/footway provision. Due to the nature of the access, it would be reasonable to expect that most journeys would be made by private car for daily needs if this site were to be developed for housing. N.b. there is an area of solar panel installation on site at the moment which indicates potential suitable conditions for renewable energy generation but the overall effect of development in this location is considered to be negative.																				
5. Climate change adaptation	-																				
Climate change adaptation commentary	The site occupies a coastal plateau, of high ground in agricultural use situated above Beer Head Caravan Park to the immediate south and overlooking the village of Beer to the east and north. It is not within an area of flood risk. The village of Beer to the east below includes areas of 'Floodzone 2' (c.370m from the site), and in relatively close proximity to the site (within 200m away to the north and south-east) and on lower ground are watercourses recorded as having a 1:100 year flood risk. The site is however in an exposed location in terms of wind and exposure to the sun.																				
6. Land resources	?																				
Land resources commentary	The site is greenfield land on Grade 3 agricultural land, which could be 3a (best and most versatile) so uncertain negative effect is recorded. N.b. Sites also lies c.100m from a Mineral Consultation Area.																				
7. Water resources	0 ?																				

Sites: Beer																					
Site SA Objective	Beer_01																				
Water resources commentary	Development at the site is unlikely to have any significant effects on water quality and quantity as the site does not lie within a groundwater source protection zone or the River Axe SAC phosphates catchment. Noted the site lies c.500m south of a drinking water source protection zone. There is uncertainty on the capacity of local sewage treatment works to accommodate additional demand from new housing. This means an overall uncertain / neutral effect for the site.																				
8. Homes	++																				
Homes commentary	The HELAA recorded potential for the site to deliver approximately 109 dwellings. A yield of over 100 dwellings indicates a significant positive effect. An appropriate mix of tenures and sizes including affordable housing is assumed. However, the assessment also raised doubts over achievability, for reasons of access and supporting infrastructure.																				
9. Health and well-being	+ / -																				
Health and well-being commentary	The site lies within a neighbourhood recorded under the Indices of Multiple Deprivation of being amongst the 30% <u>least</u> deprived nationally and does not lie in close proximity to areas of higher deprivation. It is not in close proximity to sources of significant noise and light pollution. It lies within 1600m of open space (the nearest being amenity grassland beside Common Hill car park less than 150m away) and allotments (c. 300-400m away). There are 2 children's play areas, the closest being approximately 650m from the site via the shortest route. As noted elsewhere however, access on foot is along the steep narrow access lane and highway beyond with little or no foot/cycle way provision.																				
10. Access to services	-																				

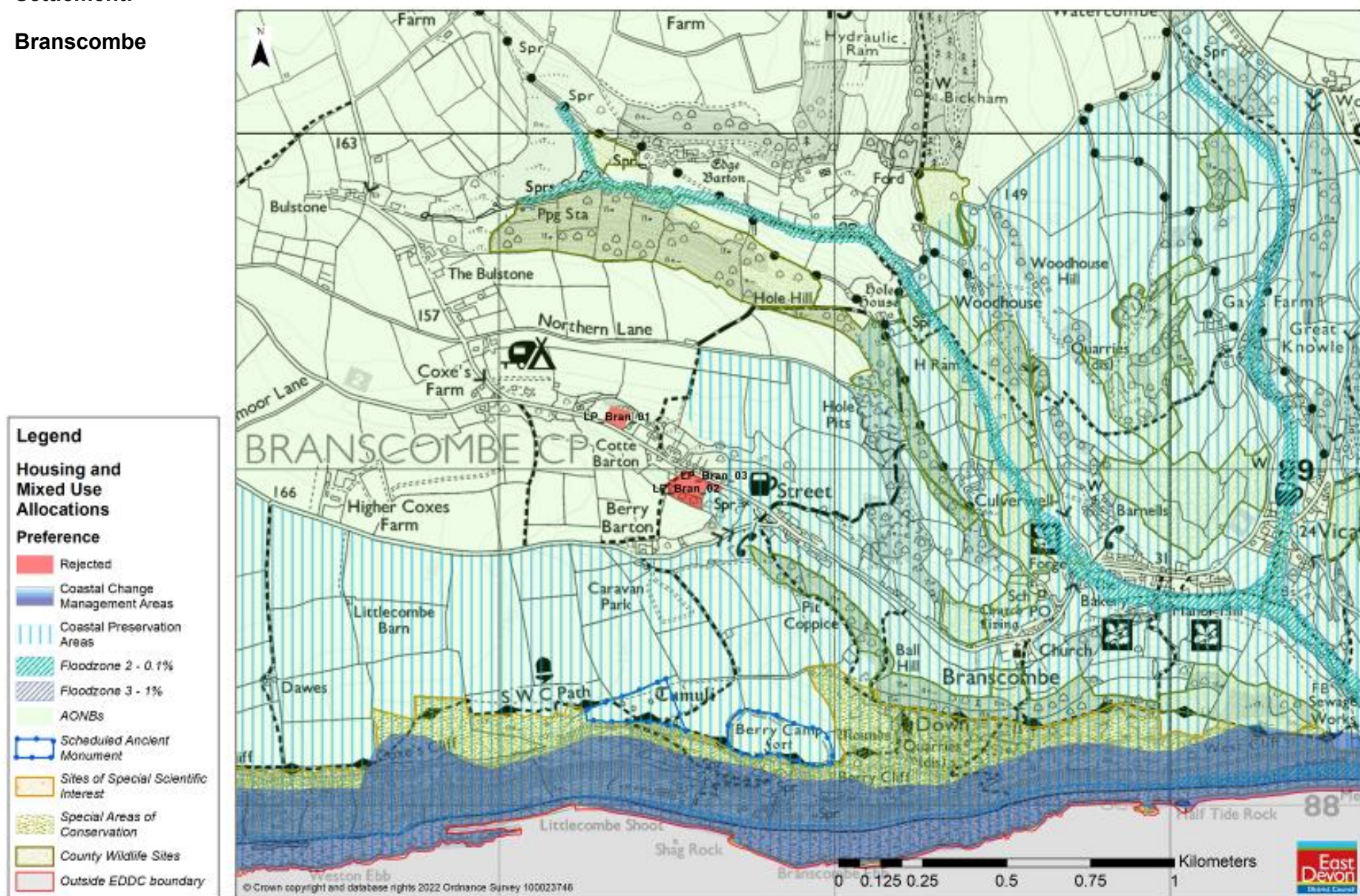
Sites: Beer																					
Site SA Objective	Beer_01																				
Access to services commentary	The site is within 1,600m of various services/facilities including a primary school, shops, community hall, post office, health centre, pubs, open spaces/allotments, children's play areas, and hourly or better bus service, but there are significant issues relating to the route for pedestrians/cyclists as noted for the HELAA assessment by DCC Highways and from the Officer site assessment due to both the steep topography and the little or no foot/cycle way provision along the access. There is also limited capacity at the primary school.																				
11. Jobs and employment	-																				
Jobs/employment commentary	The HELAA assessment considered the site to be suitable for employment use but concluded this was probably unachievable due to access, and topography which would impact on viability, as well as the impact on Beer Quarry bats (flight paths and feeding grounds). If it could be developed for residential use, this would provide short-term positive effects from job opportunities during construction. The site is not within 1600m of an employment site as defined within the Local Plan and monitored under the Employment Land Review. The nearest of these sites are located at the nearby coastal town of Seaton (Harbour Road and Harepath Industrial Estates) approx. 3km away. The site is however within 1600m of various job and employment opportunities in the immediate local community of Beer, many of which relate to the seasonal tourism industry.																				
12. Town centres	++																				
Town centres commentary	The site is located within 800m of the Village Centre of Beer which has a defined 'vitality and shopping area' and associated Village Centre Vitality policy through the adopted Villages Plan that forms part of the current development plan. Development of the site for residential use could reasonably be expected to support the vitality of the town centre to some degree, although the less than ideal access and the limited local employment opportunities, could reduce this to a minor positive effect.																				

Sites: Beer																					
Site SA Objective	Beer_01																				
13. Connectivity and transport	+																				
Connectivity and transport commentary	The site is located within 800m of ‘an hourly or better than’ bus service, as well as several routes offering 5 or more journeys a day all of which depart from the village centre at the bottom of the hill. There is no train station in the village (the nearest is over 11,500km away). The nearest ‘A’ road is the A3052 connecting the village of Beer with the nearby towns of Sidmouth and Seaton and onwards towards Exeter in the west and Lyme Regis to the east. This is approximately 2.6km away as the crow flies, but closer to at least 4km via the winding road network. The site is located within 800m of National Cycle Route 002 which traverses minor roads, providing cycle access to the town of Seaton and beyond to the east, and Sidmouth and beyond to the west. This is predominantly a recreational route. According to Constituency data and speeds provided by the House of Commons Library, superfast broadband is not currently available for addresses in this postcode (EX12 3HB). The median download speed is 10 Mbps, with superfast broadband available in the nearby village centre.																				
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: Theoretically as this is a large site (7.5 ha net developable), there could be some mitigation of the negative effects identified in terms of landscape and heritage impact, and to a lesser extent biodiversity, for instance by siting and design of any development. However, it is considered that fundamentally the prominence and location of the site, divorced by the steep topography and narrow access from the main settlement and its facilities, would remain as significant negatives in sustainability terms.																					
Preferred alternative: None currently identified Reasons for alternatives being preferred or rejected: Beer_01 – is rejected primarily because of the steep and narrow access which impedes access to services and the prominent location in the landscape on a coastal plateau with long-range open views to and from the sea.																					

Settlement:

Branscombe

East Devon Local Plan 2020-2040 - Branscombe



n.b. Items in the Legend that appear in regular type are for consultation; items in italics are for information only

Reasonable alternatives

- Bran_01
- Bran_02

Outline of reasons for selecting the alternatives

The reasonable alternatives listed above have all been assessed as suitable, available and achievable in the HELAA, which provides evidence that they have potential to be delivered (subject to further consideration through the planning process). In addition, a smaller site (Bran_03) was sifted out as not being suitable for housing or employment through the HELAA process and at Stage 2 site assessment due to its size.

Sites: Branscombe																					
Site SA Objective	Bran_01	Bran_02																			
1. Biodiversity	-	--																			
Biodiversity commentary	Both sites are areas of unimproved pasture bounded by hedgerow with mature trees, lying within the Beer Quarry and Caves SAC consultation zones which means a negative effect as a minimum. Bran_01 is not the subject of any site specific ecology designations, but lies across the lane from an area of grassland which is s41 Priority Habitat. Bran_02 includes and is adjoining an area of deciduous woodland identified as s41 priority habitat. Within the site, this is a band of woodland c.30m deep stretching the full length of the site, along the southern boundary (back) of the site.																				
2. Landscape	--	--																			

Sites: Branscombe																				
Site SA Objective	Bran_01	Bran_02																		
Landscape commentary	Both site lie entirely within the East Devon AONB on opposite sides of the lower slopes of a steep coombe valley side and are attractive fields that contribute to the rural tranquillity. Overall landscape sensitivity is assessed to be medium-high for both sites which have some intervisibility from across and through the valley, in both directions. Bran_02 lies opposite existing post-war housing and is viewed in the context of it, however the existing ribbon development is mainly on the opposite side or along one side of the lane, and the site provides a rural backdrop/setting. Bran_01 stands apart from the existing ribbon housing development, at the start of the very western extremity of Branscombe village. The mature boundary hedges along the site frontages contribute to local character and both sites are sloping away from the road so that development would be visible.																			
3. Hist. built env	-	-																		
Hist. built env. commentary	Bran_01 lies in close proximity (70m away) from a Grade II listed building (Higher House Farm). Although the Higher Farm annex and parking area and the field boundary vegetation are intervening, the site can be seen as part of the rural setting of the listed farmhouse, providing a countryside/agricultural context and lying between it and the start of the more modern ribbon development of housing beyond that marks the start of the outskirts of Branscombe. Bran_01 also lies 127m away from a second Grade II listed building but with limited direct relationship/intervisibility. Bran_02 impact also lies close to (68m from) a grade II listed building, and just under a 100m from a second. There is limited direct relationship/intervisibility with these nearest identified heritage assets and their settings. Both sites are also in close proximity to the boundary of the Heritage Coast designation, with Bran_02 within 100m of this boundary.																			
4. Climate change carbon emissions	--	--																		

Sites: Branscombe																				
Site SA Objective	Bran_01	Bran_02																		
Climate change carbon emissions commentary	Both sites were recorded in the HELAA as having up to 7 community facilities and services within 1600m (primary school, children's play area, convenience store, post office, community hall, pub, open space/allotment). However, the shop has in fact now closed and the PO is only open for a few hours a week. Moreover, the sites lie at the western extremity of the linear settlement of Branscombe, which here contains almost solely residential /holiday accommodation uses. It is only the pub (Fountain Head) which is in the immediate vicinity. With a 'less than hourly' bus service (albeit 5 or more journeys per day on the Seaton to Sidmouth route) and narrow winding lanes with no pavement (and no opportunities to provide any), for the route to the majority of the facilities (clustered in the vicinity of the village hall over 1700m away), it is not considered an accessible/sustainable location and would be reasonable to assume a majority of services would be accessed by car.																			
5. Climate change adaptation	0 ?	0 ?																		
Climate change adaptation commentary	Both sites are currently greenfield sites. Neither is close to a critical drainage area or areas of flood zone 2 or 3. However, there is a band of surface water flood risk (1 in 30 and 1 in 100 year) along the lane which forms the boundary of both sites. This extends down the lane into land occupied by residential and other buildings as you proceed further into Branscombe. The relationship between this and development of the sites, including the removal that would be required of the boundary hedgerows for creation of access, would require consideration. The sites offer the potential to cope with heat, drought and extreme storms through appropriate design and incorporation of sustainable drainage, for example. Overall effects are considered to be neutral/uncertain.																			
6. Land resources	- ?	-																		

Sites: Branscombe																					
Site SA Objective	Bran_01	Bran_02																			
Land resources commentary	Bran_01 includes both Grade 3 and Grade 4 agricultural land. Grade 3 agricultural land could be 3a (best and most versatile) so uncertain negative effect. Bran_02 is entirely within Grade 4 agricultural land. Whilst this is not best and most versatile agricultural land it is still an entirely greenfield site.																				
7. Water resources	0 ?	0 ?																			
Water resources commentary	Development at the sites is unlikely to have any significant effects on water quality and quantity as neither are located within a groundwater source protection zone or flood zone, nor within the River Axe SAC phosphates catchment or River Exe Habitat Zones buffer area. There is however uncertainty on the capacity of local sewage treatment works to accommodate additional demand from new housing. This means an uncertain / neutral effect for both sites.																				
8. Homes	+	+																			
Homes commentary	The HELAA assessed both sites as probably achievable for housing (less than 100 dwellings) therefore an overall positive effect. The maximum yield for Bran_01 is 10 dwellings, but the HELAA considered it more likely this would be reduced to 5 due to the topography which would impact potential for the inclusion of affordable tenures. The maximum yield for Bran_02 is 21 dwellings.																				
9. Health and well-being	+ / -	+ / -																			
Health and well-being commentary	The sites will not deliver new development in an area of high deprivation – both lie within an area which the Indices of Multiple Deprivation record as being in 30% least deprived nationally. They lie in areas of good air quality and away from sources of light and noise pollution, including A roads, although the narrow lane along that runs along the site boundaries can be congested in the																				

Sites: Branscombe																				
Site	Bran_01	Bran_02																		
SA Objective																				
	summer months due to tourism. The nearest open space/allotment and children's play area recorded on the HELAA assessment are all within 1600m of both sites (c. 1.3km from Bran_01 and c.1km from Bran_02). However, this is not easily accessible on foot due to the narrow lanes. Effects are therefore mixed positive and negative.																			
10. Access to services	-	-																		
Access to services commentary	As noted above, the HELAA recorded both sites as being within 1,600 metres of 7 local facilities but over 1,600 metres from a train station or bus route with an hourly or better service. It is noted that the bus route along the lane which fronts these sites and provides access to Seaton and Sidmouth has 5 or more journeys per day. However, these sites are located in the very western extremity of Branscombe which is characterised by sporadic ribbon development along narrow unpaved lanes. The only facility in the immediate vicinity of the sites is one pub. The other facilities/services are in the core of Branscombe roughly 1.5km away. The village shop here is noted to have closed and the post office is only open one day a week. The other facilities are a primary school, village hall, children's play area and open space/allotment. The sites are very remote from these services and with no pavement along the narrow lanes and no opportunity to provide any.																			
11. Jobs and employment	-	-																		
Jobs/employment commentary	The sites are not within 1600m of an employment site as defined within the Local Plan and monitored under the Employment Land Review. The nearest of these sites are located at the nearby coastal town of Seaton over 8km away.																			
12. Town centres	-	-																		

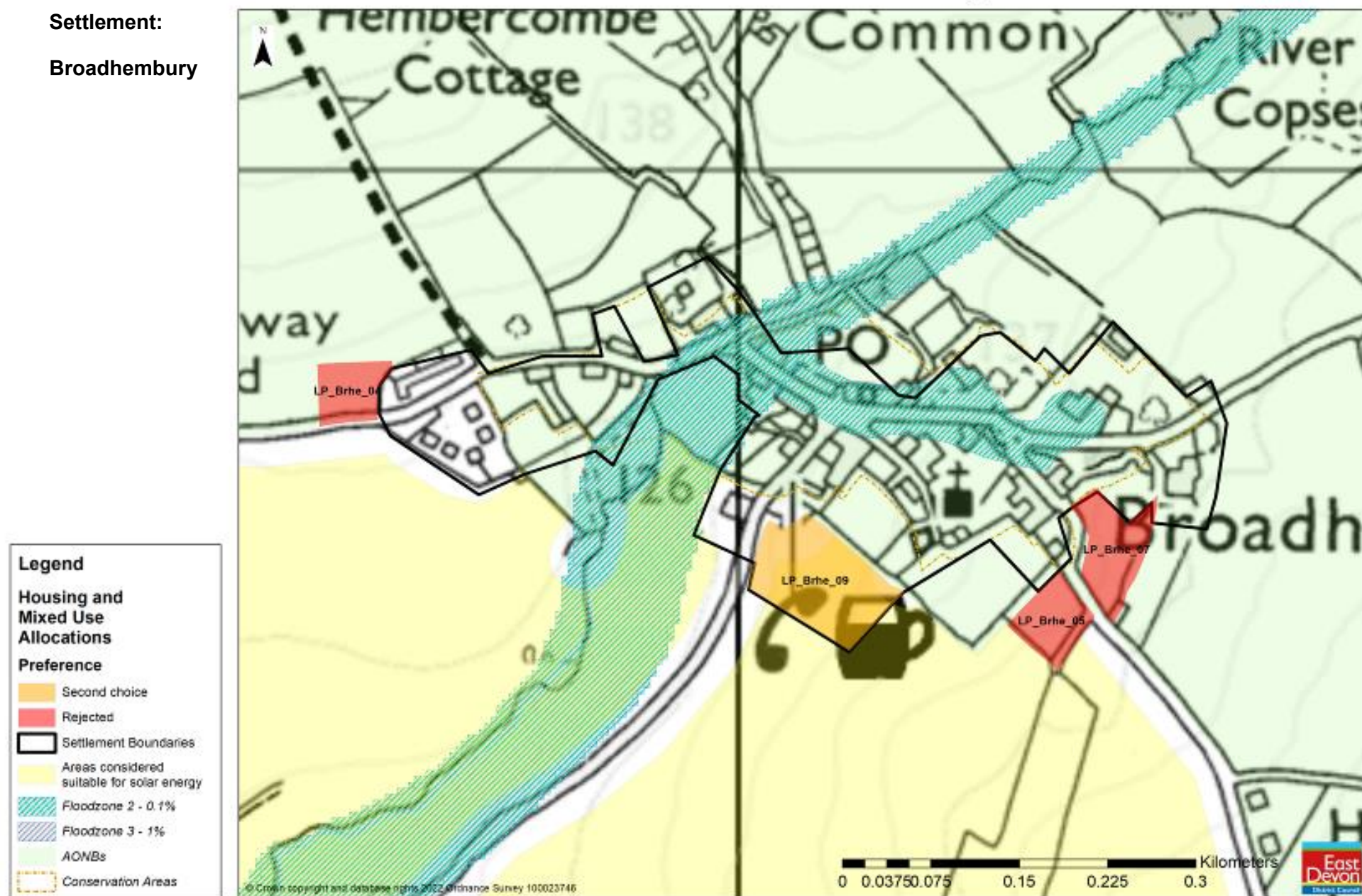
Sites: Branscombe																					
Site SA Objective	Bran_01	Bran_02																			
Town centres commentary	Neither of the sites are within 1600 metres of a town centre.																				
13. Connectivity and transport	-	-																			
Connectivity and transport commentary	Both sites are located on a narrow lane, more than 1600m from the nearest A road (the A3052), train station or bus route with an hourly or better service. The bus route which passes the sites does however provides access between Sidmouth and Seaton and is a ‘5 journeys a day or more’ provision, with bus stops a few hundred metres from each site, although with no connecting pavement or opportunity to provide any. The services in the core of Branscombe are c.1500m away along the narrow unpaved lanes. The lane is part of Sustrans National Cycle Road 002 – this connects to the next village of Beer and on the town of Seaton and beyond to the east, and to Sidmouth and beyond to the west. This is however an on-road route and as noted, the lanes are narrow, and steep. In terms of broadband, no premises in this postcode have access to superfast broadband according to House of Commons constituency data. The median download speed is 10 Mbps therefore it is indicated that standard broadband is potentially available.																				
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: Development at both sites could be limited to the lower slopes only. This would reduce the negative impact on the landscape in particular but would not overcome other adverse effects identified, particularly with regards to the remote location and access to services.																					
Preferred alternative: None.																					
Reasons for alternatives being preferred or rejected:																					

Sites: Branscombe																				
Site	Bran_01	Bran_02																		
SA Objective																				
- Bran_01 - this small site slopes up steeply to the north and would, at most, offer potential for road frontage orientated development only. The site comprises of an especially attractive field that contributes to the rural quality and tranquillity of the village and which is very much at the western extremity of Branscombe. The site is within the East Devon AONB and is remote from most of the very limited facilities the village offers. - Bran_02 - this small site slopes up steeply to the south and would, at most, offer potential for road frontage orientated development only. Whilst the site is well screened it does comprise of a very attractive field that contributes to the rural quality and tranquillity of the village. The site is within the East Devon AONB and is remote from most of the very limited facilities the village offers.																				

East Devon Local Plan 2020-2040 - Broadhembury

Settlement:

Broadhembury



n.b. Items in the Legend that appear in regular type are for consultation; items in *italics* are for information only

Reasonable alternatives

- Brhe_04, Causeway End
- Brhe_05, The Old Orchard
- Brhe_07, Land South of the Vicarage
- Brhe_09, Land opposite the village hall

Outline of reasons for selecting the alternatives

Sifting takes forward all of the sites on the map, Brhe_04, 05, 07 and 09 because they are well related to the existing built area of the village and not subject to any of the constraints outlined at step 2. Other sites were ruled out due to distance from the existing village but these are beyond the map extent.

Sites: Broadhembury																					
Site SA Objective	Brhe_04	Brhe_05	Brhe_07	Brhe_09																	
1. Biodiversity	0	0	0	0																	
Biodiversity commentary	All of the sites are bounded on at least one side by mature, traditional hedgerows which should be retained in any development. There are some mature trees within them. All of the sites are improved grassland of limited habitat value.																				
2. Landscape	--	--	--	-																	

Sites: Broadhembury																				
Site SA Objective	Brhe_04	Brhe_05	Brhe_07	Brhe_09																
Landscape commentary	Brhe_04,05 and 07 lie within the AONB so any development is considered to have a significant adverse effect. Site Brhe_09 lies outside, but adjacent, to the AONB so impact is less significant but still harmful.																			
3. Hist. built env	0	--	--	0																
Hist. built env. commentary	Sites Brhe_05 and 07 are within the setting of the Grade 1 listed Church and development would have a significant impact. Site Brhe_01 also has historic earthworks within its boundary. The other sites are close to, but do not directly impact upon, Grade 11 listed buildings.																			
4. Climate change carbon emissions	+	+	+	+																
Climate change carbon emissions commentary	All of the sites adjoin the village, so have reasonable access to the school, pub, tearoom/post office and village hall. They all have access to a bus stop within 220m, although the bus service is less than hourly. Access to all facilities is via narrow, unpaved and unlit country lanes.																			
5. Climate change adaptation	+	+	+	+																

Sites: Broadhembury																					
Site SA Objective	Brhe_04	Brhe_05	Brhe_07	Brhe_09																	
Climate change adaptation commentary	None of the sites are vulnerable to flooding.																				
6. Land resources	-	-	-	-																	
Land resources commentary	All of the sites are greenfield and are Grade 11 Agricultural land, which is considered to be best and most versatile. This means that developing any of the sites would result in a negative impact.																				
7. Water resources	0	0	0	0																	
Water resources commentary	Water in the northern part of the District comes from the reservoir at Wimbleball lake. Any new development will create a demand for additional water supply and treatment of waste water.																				
8. Homes	+	+	+	+																	
Homes commentary	All sites have potential to deliver less than 100 dwellings, so will have a positive effect. An appropriate mix of tenures and sizes including affordable housing is assumed for all sites, however it should be noted that, as a rural settlement, the threshold of 10 dwellings may not be met and therefore affordable housing may not be required on site.																				

Sites: Broadhembury																					
Site SA Objective	Brhe_04	Brhe_05	Brhe_07	Brhe_09																	
9. Health and well-being	+	+	+	+																	
Health and well-being commentary	None of the sites lie on a railway track or main road. None of the sites are within 1600m of a healthcare or medical facility. All of the sites are within 400m of an open space or play area.																				
10. Access to services	+	+	+	+																	
Access to services commentary	Broadhembury is a very small village, so although it has a limited range of services, all four of the sites are within 400m of them, although it should be noted that access is via unpaved, unlit narrow country lanes.																				
11. Jobs and employment	-	-	-	-																	
Jobs/employment commentary	None of the sites are within 1600m of an employment site. There is no scope to require mixed use development on the allocations due to their small size.																				
12. Town centres	-	-	-	-																	

Sites: Broadhembury																					
Site SA Objective	Brhe_04	Brhe_05	Brhe_07	Brhe_09																	
Town centres commentary	None of the sites are within 1600m of a town centre																				
13. Connectivity and transport	-	-	-	-																	
Connectivity and transport commentary	Broadhembury does not have 100% gigabit availability. None of the sites are within 800 metres of a railway station, an A road and a recognised cycle route.																				
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: - The ecology impacts on all sites could be mitigated through the retention of the existing boundary hedgerows and safeguarding any mature hedgerow trees. Ecology status could be improved through the provision of species rich open space within the sites and wildlife corridors to the surrounding farmland/hedgerows. - Brhe_05 and 07 heritage impacts could be reduced through careful design and a reduction in density. It is inevitable that some harm will still occur due to the proximity of the Church tower and its importance as a Grade 1 listed structure. - Landscape impacts on all of the sites could be reduced by careful design, a reduction in density and long-term landscaping/screening, however negative effects cannot be completely mitigated due to the sensitivity of the AONB landscape.																					
Preferred alternative: None of the sites are a preferred location for new development, however Brhe_09 is a second choice site for 10 houses.																					

Sites: Broadhembury																				
Site	Brhe_04	Brhe_05	Brhe_07	Brhe_09																
SA Objective																				
Reasons for alternatives being preferred or rejected: - Brhe_04- Rejected- This site lies in the AONB and comprises the corner of a very large and open agricultural field. It is on the eastern periphery of the village, adjacent a small group of houses. If this site were to be developed care would be needed to ensure that the scheme reflected the small-scale character and pattern of existing housing in the village. There would be some landscape harm. 8 houses would not deliver on-site affordable housing. Whilst the site has some possible suitability for development it is not at this stage identified as a 2nd Best Choice. - Brhe_05- Rejected- Small paddock close to the centre of the village. High landscape value as it lies in the AONB and significant impact on the setting of the Grade 1 listed Church. - Brhe_07- Rejected- Small paddock close to the centre of the village. Rising land so development would be prominent. High landscape value as it lies in the AONB and moderate impact on the adjoining listed buildings and some impact on the setting of the Grade 1 listed Church. - Brhe_09- Preferred as a second choice site for 10 houses- Greenfield site comprising the corner of a larger field. Outside but adjoining the AONB, close to the conservation area and several listed buildings but reasonably well screened. Close to the village centre. Potential yield is 17 houses but this is reduced to reflect local character and need for landscaping. Could deliver on-site affordable housing.																				

East Devon Local Plan 2020-2040 - Chardstock

Settlement:

Chardstock



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Reasonable alternatives

- Char_01 - Green Lane Farm, Chardstock
- Char_03 - Chubbs Yard, Chardstock
- Char_04 - Land off Green Land, Chardstock

Outline of reasons for selecting the alternatives

The reasonable alternatives listed above have all been assessed as suitable, available and achievable in the HELAA, which provides evidence that they have potential to be delivered (subject to further consideration through the planning process). No further sites were presented in this settlement.

Sites: Chardstock																					
Site SA Objective	Char_01	Char_03	Char_04																		
1. Biodiversity	-	-	-																		
Biodiversity commentary	• Char_01 - Within River Axe SAC Nutrient catchment area. Overall, significant moderate adverse effect predicted. • Char_03 – Nature Recovery Network (24m), Section 41 (S41) Habitat of Principle Importance (including rivers and streams, excluding hedgerows) (86m), within River Axe SAC Nutrient catchment area. Overall, significant moderate adverse effect predicted. • Char_04 - County Wildlife Site (1m), Nature Recovery Network (1m), Section 41 (S41) Habitat of Principle Importance (including rivers and streams, excluding hedgerows) (1m), within River Axe SAC Nutrient catchment area. Overall, significant moderate adverse effect predicted.																				

Sites: Chardstock																					
Site SA Objective	Char_01	Char_03	Char_04																		
2. Landscape	--	--	-																		
Landscape commentary	- Char_01 - Located entirely within Blackdown Hills AONB, on rising land east of Chardstock. Comprised of a two small fields with mature tree lined hedgerows. Many medium-long distance views into site, including from elsewhere in the AONB. Residential development to south west provides some context of built form when viewing but site is otherwise bordered by agricultural fields. Overall, the site has a high landscape sensitivity to new development. - Char_03 – Located entirely within Blackdown Hills AONB, on brownfield site (builders yard with active employment use) to centre of Chardstock. Adjacent to Chardstock conservation area and in close proximity to multiple heritage assets. Overall, the site has a high landscape sensitivity to new development. - Char_04 - Located outside of, but adjacent to, Blackdown Hills AONB, on rising land east of Chardstock. Comprised of a three small fields with mature hedgerows and a few mature trees. Many medium-long distance views into site, including from the AONB. Residential development to west provides some context of built form when viewing but site is otherwise bordered by agricultural fields. Overall, the site has a medium landscape sensitivity to new development.																				
3. Hist. built env	-	-	-																		
Hist. built env. commentary	- Char_01 - Assets Present: The Chardstock Conservation Area containing multiple listed buildings lies 83 metres to the west of the site but is separated from it by modern development. Overall, minor - Limited change to elements that contribute to the significance of assets and their setting, where harm is minimal. - Char_03 – Assets present: The site adjoins the Chardstock Conservation Area with a number of listed buildings. Grade II listed Yew Tree Cottage (2m), Grade II listed The Old House (14m), Grade II listed The priory (44m), Grade II listed Rose																				

Sites: Chardstock																					
Site SA Objective	Char_01	Char_03	Char_04																		
	Cottage (10m), Grade II* Goerge Inn (39m), Grade II listed St Andrews School House (61m). Potential for adverse heritage impacts could therefore be a constraint on development. Overall, moderate - Change affecting the special character of assets, where elements which contribute to their significance and their setting are harmed. Char_04 - Assets Present: The Chardstock Conservation Area containing multiple listed buildings lies 98 metres to the west of the site but is separated from it by modern development. Overall, minor - Limited change to elements that contribute to the significance of assets and their setting, where harm is minimal.																				
4. Climate change carbon emissions	-	-	-																		
Climate change carbon emissions commentary	An accessibility assessment undertaken for the site selection work identified a total of 12 services, facilities and employment sites. Individual sites are listed below including the number of services and proximity of key facilities. - Char_01 - 6 out of 12 facilities within 1,600m of site. Nearest train station 6472m, nearest bus stop / service 1182m, nearest hourly bus stop / service 4946m, nearest primary 286m, nearest convenience store 200m. - Char_03 – 6 out of 12 facilities within 1,600m of site. Nearest train station 6529m, nearest bus stop / service 1415m, nearest hourly bus stop / service 5043m, nearest primary 455m, nearest convenience store 384m. - Char_04 - 6 out of 12 facilities within 1,600m of site. Nearest train station 6316m, bus stop / service 971m, nearest hourly bus stop / service 4783m, nearest primary 123m, nearest convenience store 37m.																				

Sites: Chardstock																					
Site SA Objective	Char_01	Char_03	Char_04																		
	On account of proximity of facilities all of these sites can be seen to meet a basic proximity test. Notwithstanding the facilities available, the location of these sites means that development would be likely to increase car usage.																				
5. Climate change adaptation	+	+	+																		
Climate change adaptation commentary	None of these sites are located in a critical drainage area and in general sites offer the potential to cope with heat, drought and extreme storms through appropriate design and incorporation of sustainable drainage, for example.																				
6. Land resources	- ?	- ?	- ?																		
Land resources commentary	All three sites are greenfield, Grade 3 agricultural land, so uncertain negative effect for these sites.																				
7. Water resources	0 ?	0 ?	0 ?																		
Water resources commentary	Development at the sites is unlikely to have any significant effects on water quality and quantity as none are located within a groundwater source protection zone. There is uncertainty on the capacity of local sewage treatment works to accommodate additional demand from new housing. This means an uncertain neutral effect for all sites.																				

Sites: Chardstock																					
Site SA Objective	Char_01	Char_03	Char_04																		
8. Homes	+	+	+																		
Homes commentary	- Char_01 – 44 max yield - Char_03 – 5 max yield - Char_04 – 30 max yield Significant positive where site offers maximum yield >100. All other sites have potential to deliver up to 100 dwellings with a marked positive effect. An appropriate mix of tenures and sizes including affordable housing is assumed for all sites.																				
9. Health and well-being	-	-	-																		
Health and well-being commentary	- Char_01 - Open Space 225m distant, Play Area 5173m distant, away from noise sources - Char_03 – Open Space 25m distant, Play Area 5275m distant, away from noise sources - Char_04 - Open Space 71m distant, Play Area 5010m distant, away from noise sources																				
10. Access to services	+	+	+																		

Sites: Chardstock																					
Site SA Objective	Char_01	Char_03	Char_04																		
Access to services commentary	- Char_01 - 6 out of 12 facilities within 1,600m of site. Nearest train station 6472m, nearest bus stop / service 1182m, nearest hourly bus stop / service 4946m, nearest primary 286m, nearest convenience store 200m. - Char_03 – 6 out of 12 facilities within 1,600m of site. Nearest train station 6529m, nearest bus stop / service 1415m, nearest hourly bus stop / service 5043m, nearest primary 455m, nearest convenience store 384m. - Char_04 - 6 out of 12 facilities within 1,600m of site. Nearest train station 6316m, bus stop / service 971m, nearest hourly bus stop / service 4783m, nearest primary 123m, nearest convenience store 37m.																				
11. Jobs and employment	-	-	-																		
Jobs/employment commentary	No employment sites within 1,600 metres and unlikely to be delivered on sites.																				
12. Town centres	-	-	-																		
Town centres commentary	- Char_01 - Beyond 1,600 metres of a town centre. - Char_03 – Beyond 1,600 metres of a town centre. - Char_04 - Beyond 1,600 metres of a town centre.																				

Sites: Chardstock																					
Site SA Objective	Char_01	Char_03	Char_04																		
13. Connectivity and transport	-	-	-																		
Connectivity and transport commentary	- Char_01 - Nearest train station 6472m, nearest bus stop / service 1182m, nearest hourly bus stop / service 4946m. - Char_03 – Nearest train station 6529m, nearest bus stop / service 1415m, nearest hourly bus stop / service 5043m. - Char_04 - Nearest train station 6316m, bus stop / service 971m, nearest hourly bus stop / service 4783m. Broadband speeds vary with 30-50 Mbps median speeds for area, all sites are assumed (at this stage) to have access to superfast broadband. Sites have negative marks due to proximity																				
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: - Appropriate landscaping for all sites would be required for all sites due to negative effects upon the landscape and local heritage. - High quality design across all sites can reduce negative effects and maximise beneficial effects on the built environment. - All sites have relatively good access to facilities, but these beneficial effects can be maximised by enhancing sustainable travel links e.g. create bus stops near to the site, pedestrian/cycle links. - Designing new development for low water use and requiring sustainable drainage systems can help turn neutral uncertain effects on water resources into positive uncertain effects. - Positive effects for all sites in relation to jobs and employment could be maximised by providing on-site employment opportunities alongside new housing, where reasonable.																					
Preferred alternative: Char_04																					

Sites: Chardstock

Site	Char_01	Char_03	Char_04																	
SA Objective																				

Reasons for alternatives being preferred or rejected:

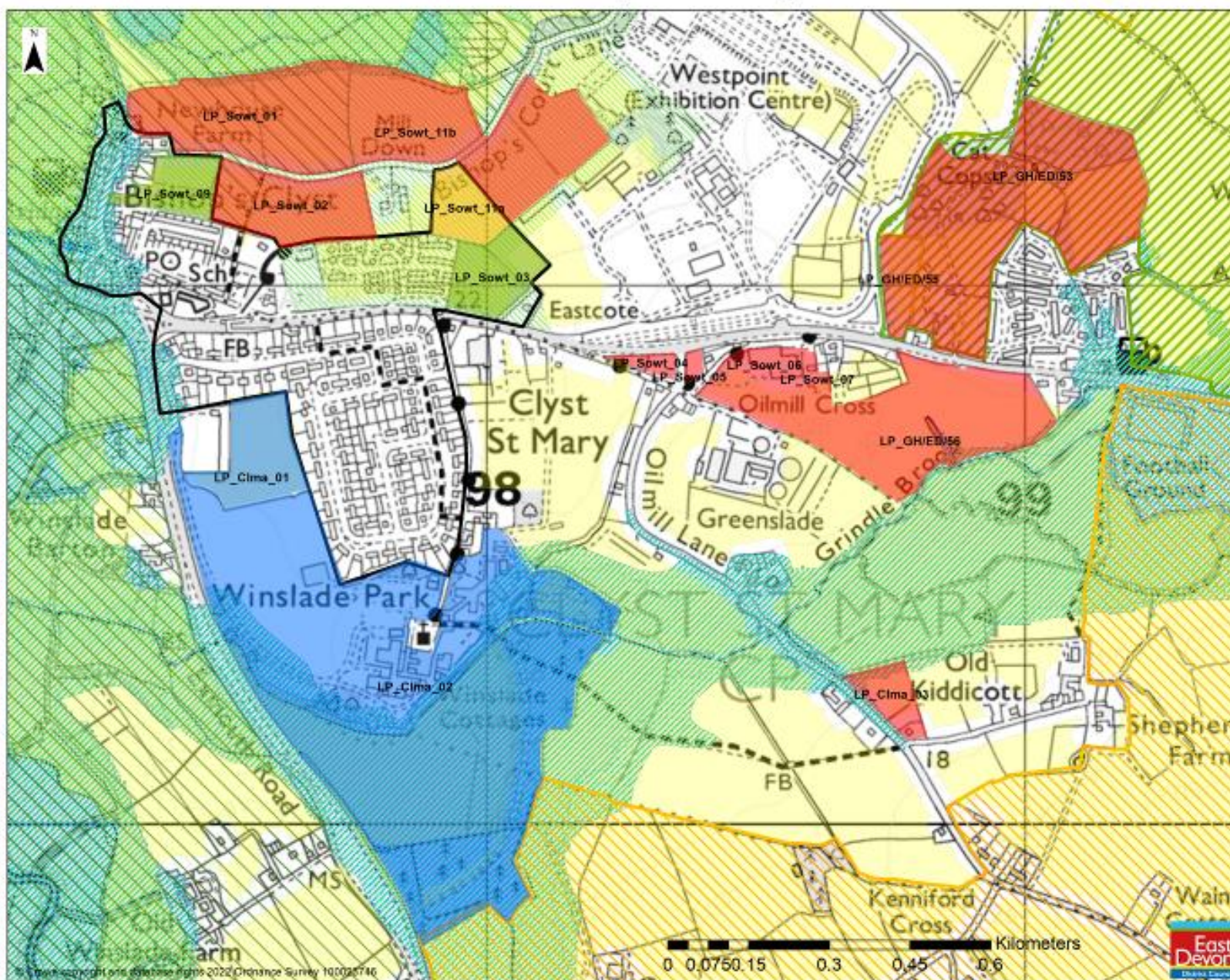
- Char_01 – REJECTED Located entirely within Blackdown Hills AONB, on rising land east of Chardstock. Comprised of a two small fields with mature tree lined hedgerows. Many medium-long distance views into site, including from elsewhere in the AONB. Residential development to south west provides some context of built form when viewing but site is otherwise bordered by agricultural fields. Heritage assets present - the Chardstock Conservation Area containing multiple listed buildings lies 83 metres to the west of the site but is separated from it by modern development. Within River Axe SAC Nutrient catchment area. Overall, the site has a high landscape sensitivity to new development with minor heritage impact where harm is minimal. With regard to Ecology, a significant moderate adverse effect is predicted. Site access is poor. The site constraints do not support allocation at this stage.
- Char_03 - REJECTED Located entirely within Blackdown Hills AONB, on brownfield site (builders yard with active employment use) to centre of Chardstock. Adjacent to Chardstock conservation area and in close proximity to multiple heritage assets. Heritage assets present - the site adjoins the Chardstock Conservation Area with a number of listed buildings. Grade II listed Yew Tree Cottage (2m), Grade II listed The Old House (14m), Grade II listed The priory (44m), Grade II listed Rose Cottage (10m), Grade II* George Inn (39m), Grade II listed St Andrews School House (61m). Potential for adverse heritage impacts could therefore be a constraint on development. With regard to ecology, Nature Recovery Network (24m), Section 41 (S41) Habitat of Principle Importance (including rivers and streams, excluding hedgerows) (86m), within River Axe SAC Nutrient catchment area. Overall, the site has a high landscape sensitivity to new development with potential for a moderate heritage impact. With regard to Ecology, a significant moderate adverse effect is predicted. The loss of the active employment site in addition to the constraints identified do not support development of the site.
- Char_04 – PREFERRED Located outside of, but adjacent to, Blackdown Hills AONB, on rising land east of Chardstock. Comprised of a three small fields with mature hedgerows and a few mature trees. Many medium-long distance views into site, including from the AONB. Residential

Sites: Chardstock																					
Site	Char_01	Char_03	Char_04																		
SA Objective																					
development to west provides some context of built form when viewing but site is otherwise bordered by agricultural fields. Heritage assets present - the Chardstock Conservation Area containing multiple listed buildings lies 98 metres to the west of the site but is separated from it by modern development. With regard to ecology, County Wildlife Site (1m), Nature Recovery Network (1m), Section 41 (S41) Habitat of Principle Importance (including rivers and streams, excluding hedgerows) (1m), within River Axe SAC Nutrient catchment area. Overall, the site has a medium landscape sensitivity to new development with minor heritage impact where potential harm is minimal. With regard to Ecology, a significant moderate adverse effect is predicted. Potential yield is 74 houses but this is reduced to reflect local character and site/area constraints identified.																					

East Devon Local Plan 2020-2040 - Clyst St Mary

Settlement:

Clyst St Mary



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Reasonable alternatives

- Sowt_01 - Land at Bishops Court Lane, Clyst St Mary
- Sowt_02 - Land south of Bishops Court Road, Clyst St Mary
- Sowt_03 - Land north of Sidmouth Road, Clyst St Mary
- Sowt_09 - 3.69 acres Bishops Court Lane, Clyst St Mary
- Sowt_11 - Land at Bishops Court Lane, Clyst St Mary

Outline of reasons for selecting the alternatives

The reasonable alternatives listed above have all been assessed as suitable, available and achievable in the HELAA, which provides evidence that they have potential to be delivered (subject to further consideration through the planning process). A number of alternative options were dismissed in accordance with the sifting criteria, for reasons including the site being not adjacent or well-related to the settlement, sites having gained planning permission, or sites being of a small scale below established thresholds.

Clma_01 – Agricultural field gradually sloping down to the west adjacent to Clyst St Mary Village. Now with permission for 39 dwellings under 20/1001/MOUT.

Clma_02 – Winslade Park and former offices. Now with permission for business, 94 dwellings and leisure uses under 20/1001/MOUT.

Sites: Clyst St Mary																				
Site SA Objective	Sowt_01	Sowt_02	Sowt_03	Sowt_09	Sowt_11															
1. Biodiversity	-	0	0	-	0															
Biodiversity commentary	- Sowt_01 - Unconfirmed Wildlife Site (1m), Nature Recovery Network (on site to northern section), Section 41 (S41) Habitat of Principle Importance (including rivers and streams, excluding hedgerows) (on site to northern section). Site is within both the Exe Estuary SPA HRA mitigation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, significant moderate adverse effect predicted. - Sowt_02 - Site is within both the Exe Estuary SPA HRA mitigation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, minor adverse effect predicted (not significant) - Sowt_03 - Site is within both the Exe Estuary SPA HRA mitigation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, minor adverse effect predicted (not significant) - Sowt_09 - Unconfirmed Wildlife Site (43m), Nature Recovery Network (43m), Section 41 (S41) Habitat of Principle Importance (including rivers and streams, excluding hedgerows) (48m). Site is within both the Exe Estuary SPA HRA mitigation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, significant moderate adverse effect predicted. - Sowt_11 - Site is within both the Exe Estuary SPA HRA mitigation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, minor adverse effect predicted (not significant).																			
2. Landscape	--	--	-	-	--															
Landscape commentary	Sowt_01 - Outside of AONB. Agricultural fields adjacent to Clyst St Mary Village. Site slopes fairly steeply up to the south. Mature tree-lined hedgerows with some very large oaks. Highly exposed from multiple viewpoints including PROWs to south and west. Adjacent heritage asset and curtilage to south west corner. Narrow sunken lane limiting access with pinch point																			

Sites: Clyst St Mary																				
Site SA Objective	Sowt_01	Sowt_02	Sowt_03	Sowt_09	Sowt_11															
	through village to west. Priority habitat forms part of the site and adjacent to north. Overall, the site has a high/medium landscape sensitivity to new development. • Sowt_02 - Outside of AONB. Agricultural fields adjacent to Clyst St Mary Village. Site rises above the village with gradual slope. Mature tree-lined hedgerows with some very large oaks. Highly exposed from multiple viewpoints including PROWs to centre of site and to the west. Narrow sunken lane limiting access with pinch point through village to west. TPOs to south of site along PROW. Overall, the site has a high/medium landscape sensitivity to new development. • Sowt_03 - Outside of AONB. Two mown grassland agricultural fields adjacent to Clyst St Mary village. Gently slopes up towards the north. Site is bordered to the south by A3052 with garden centre opposite, to the west by modern residential development, to the east by large detached property and Devon County Showground beyond. Agricultural land to north. Grade II listed Red Lodge over A3052 to south west. Overall, the site has a medium/low landscape sensitivity to new development. • Sowt_09 - Outside of AONB. Agricultural fields, dwelling and garden adjacent to Clyst St Mary village. Site slopes up towards the east. Site features stables and mature hedgerows with trees. Set within the context of the village core with multiple potential access points. Residential gardens to south and west. Overall, the site has a medium/low landscape sensitivity to new development. • Sowt_11 - Outside of AONB. Three grassland agricultural fields in part adjacent to Clyst St Mary village. Site is north of the ridgeline with limited visible development. Site is bordered to the west by large detached property with Devon County Showground in close proximity to the east. Agricultural land to north. Overall, the site has a high/medium landscape sensitivity to new development.																			

Sites: Clyst St Mary																					
Site SA Objective	Sowt_01	Sowt_02	Sowt_03	Sowt_09	Sowt_11																
3. Hist. built env	-	0	-	-	-																
Hist. built env. commentary	- Sowt_01 - Assets Present: Grade II listed Newhouse (17m). Overall, Moderate - Change affecting the special character of assets, where elements which contribute to their significance and their setting are harmed. - Sowt_02 - Assets Present: Grade II listed Craig's Cottages (98m). Overall, No Change - No change to assets or their settings. - Sowt_03 - Assets Present: Grade II listed Red lodge (27m). Heritage asset is on opposite side of main road. New development would have a minor impact only. Overall, minor - Limited change to elements that contribute to the significance of assets and their setting, where harm is minimal. - Sowt_09 - Assets Present: Scheduled Ancient Monument Clyst St Mary Bridge (88m), Grade II listed Newhouse (13m), Grade II listed Maltsters Arms (90m), Grade II listed Craig's Cottages (95m). Overall, Moderate - Change affecting the special character of assets, where elements which contribute to their significance and their setting are harmed. - Sowt_11 - Assets Present: Grade II listed Red lodge (158m). Heritage asset is on opposite side of ridge beyond main road. New development would have a minor impact only. Overall, minor - Limited change to elements that contribute to the significance of assets and their setting, where harm is minimal.																				
4. Climate change carbon emissions	0	0	0	0	0																

Sites: Clyst St Mary																				
Site SA Objective	Sowt_01	Sowt_02	Sowt_03	Sowt_09	Sowt_11															
Climate change carbon emissions commentary	An accessibility assessment undertaken for the site selection work identified a total of 12 services, facilities and employment sites. Individual sites are listed below including the number of services and proximity of key facilities. - Sowt_01 - 7 out of 12 facilities within 1,600m of site. Nearest train station 1272m, nearest bus stop / service 285m, nearest hourly bus stop / service 264m, nearest primary 265m, nearest convenience store 235m. - Sowt_02 - 7 out of 12 facilities within 1,600m of site. Nearest train station 1458m, nearest bus stop / service 143m, nearest hourly bus stop / service 132m, nearest primary 146m, nearest convenience store 180m. - Sowt_03 - 7 out of 12 facilities within 1,600m of site. Nearest train station 1908m, nearest bus stop / service 6m, nearest hourly bus stop / service 11m, nearest primary 487m, nearest convenience store 599m. - Sowt_09 - 7 out of 12 facilities within 1,600m of site. Nearest train station 1270m, nearest bus stop / service 193m, nearest hourly bus stop / service 180m, nearest primary 146m, nearest convenience store 116m. - Sowt_11 - 7 out of 12 facilities within 1,600m of site. Nearest train station 1681m, nearest bus stop / service 133m, nearest hourly bus stop / service 139m, nearest primary 402m, nearest convenience store 472m. On account of proximity of facilities all of these sites can be seen to meet a basic proximity test. Notwithstanding the facilities available, the location of these sites means that development would be likely to increase car usage.																			
5. Climate change adaptation	0	+	+	0	0															

Sites: Clyst St Mary																				
Site SA Objective	Sowt_01	Sowt_02	Sowt_03	Sowt_09	Sowt_11															
Climate change adaptation commentary	None of these sites are located in a critical drainage area and in general sites offer the potential to cope with heat, drought and extreme storms through appropriate design and incorporation of sustainable drainage, for example. Sites Sowt_01, Sowt_09 and Sowt_11 have a neutral mark as the site area is partially located in an area of flood risk, but development can avoid this area.																			
6. Land resources	- ?	- ?	-- ?	- ?	- ?															
Land resources commentary	- Sowt_01 - The site comprises grade 2 agricultural land. Uncertain negative effect. - Sowt_02 - The site comprises a mix of grade 2 and grade 3b agricultural land. Uncertain negative effect. - Sowt_03 - Grade 1 agricultural land in strategic assessment. Uncertain double negative effect. - Sowt_09 - Comprises grade 2 agricultural land. Uncertain negative effect. - Sowt_11 - Comprises mainly grade 2 agricultural land. Uncertain negative effect.																			
7. Water resources	0 ?	0 ?	0 ?	0 ?	0 ?															
Water resources commentary	Development at the sites is unlikely to have any significant effects on water quality and quantity as none are located within a groundwater source protection zone. There is uncertainty on the capacity of local sewage treatment works to accommodate additional demand from new housing. This means an uncertain neutral effect for all sites.																			
8. Homes	++	+	+	+	+															

Sites: Clyst St Mary																					
Site SA Objective	Sowt_01	Sowt_02	Sowt_03	Sowt_09	Sowt_11																
Homes commentary	- Sowt_01 – 107 max yield - Sowt_02 - 64 max yield - Sowt_03 - 37 max yield - Sowt_09 - 35 max yield - Sowt_11 – 30 max yield Significant positive where site offers maximum yield >100. All other sites have potential to deliver up to 100 dwellings with a marked positive effect. An appropriate mix of tenures and sizes including affordable housing is assumed for all sites.																				
9. Health and well-being	-	-	-	-	-																
Health and well-being commentary	- Sowt_01 - Open Space 126m distant, Play Area 186m distant, 160m to A3052 background road noise, M5 600m white noise - Sowt_02 - Open Space 0m distant, Play Area 43m distant, 130m to A3052 background road noise, M5 600m white noise - Sowt_03 - Open Space 226m distant, Play Area 276m distant, adjacent to A3052 high road noise, M5 1100m white noise - Sowt_09 - Open Space 133m distant, Play Area 145m distant, 130m to A3052 background road noise M5 600m white noise - Sowt_11 - Open Space 164m distant, Play Area 242 m distant, , 130m to A3052 background road noise, M5 920m white noise																				
10. Access to services	++	++	++	++	++																

Sites: Clyst St Mary																				
Site SA Objective	Sowt_01	Sowt_02	Sowt_03	Sowt_09	Sowt_11															
Access to services commentary	- Sowt_01 - 7 out of 12 facilities within 1,600m of site. Nearest train station 1272m, nearest bus stop / service 285m, nearest hourly bus stop / service 264m, nearest primary 265m, nearest convenience store 235m. - Sowt_02 - 7 out of 12 facilities within 1,600m of site. Nearest train station 1458m, nearest bus stop / service 143m, nearest hourly bus stop / service 132m, nearest primary 146m, nearest convenience store 180m. - Sowt_03 - 7 out of 12 facilities within 1,600m of site. Nearest train station 1908m, nearest bus stop / service 6m, nearest hourly bus stop / service 11m, nearest primary 487m, nearest convenience store 599m. - Sowt_09 - 7 out of 12 facilities within 1,600m of site. Nearest train station 1270m, nearest bus stop / service 193m, nearest hourly bus stop / service 180m, nearest primary 146m, nearest convenience store 116m. - Sowt_11 - 7 out of 12 facilities within 1,600m of site. Nearest train station 1681m, nearest bus stop / service 133m, nearest hourly bus stop / service 139m, nearest primary 402m, nearest convenience store 472m.																			
11. Jobs and employment	+	+	++	+	++															
Jobs/employment commentary	- Sowt_01 - The site is within 1,600m of an employment site - Sowt_02 - The site is within 1,600m of an employment site - Sowt_03 - The site is within 800m of an employment site; and may offer limited opportunities for on-site employment - Sowt_09 - The site is within 1,600m of an employment site - Sowt_11 - The site is within 800m of an employment site; and may offer limited opportunities for on-site employment in combination with Sowt_03.																			

Sites: Clyst St Mary																					
Site SA Objective	Sowt_01	Sowt_02	Sowt_03	Sowt_09	Sowt_11																
12. Town centres	-	-	-	-	-																
Town centres commentary	- Sowt_01 - Site is beyond 1,600m of an existing town centre. - Sowt_02 - Site is beyond 1,600m of an existing town centre. - Sowt_03 - Site is beyond 1,600m of an existing town centre. - Sowt_09 - Site is beyond 1,600m of an existing town centre. - Sowt_11 - Site is beyond 1,600m of an existing town centre.																				
13. Connectivity and transport	+	+	+	+	+																
Connectivity and transport commentary	- Sowt_01 - Nearest train station 1272m, nearest bus stop / service 285m, nearest hourly bus stop / service 264m. - Sowt_02 - Nearest train station 1458m, nearest bus stop / service 143m, nearest hourly bus stop / service 132m. - Sowt_03 - Nearest train station 1908m, nearest bus stop / service 6m, nearest hourly bus stop / service 11m. - Sowt_09 - Nearest train station 1270m, nearest bus stop / service 193m, nearest hourly bus stop / service 180m. - Sowt_11 - Nearest train station 1681m, nearest bus stop / service 133m, nearest hourly bus stop / service 139m. Broadband speeds range from 32-55 Mbps median speeds for postcodes in local area, all sites are assumed (at this stage) to have access to superfast broadband.																				
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects:																					

Sites: Clyst St Mary																				
Site	Sowt_01	Sowt_02	Sowt_03	Sowt_09	Sowt_11															
SA Objective																				
- Appropriate landscaping for all sites would be required for all sites due to negative effects upon the landscape. The sensitivity of sites Sowt_01 and 02 and Sowt_11 is such that a significant negative effect is likely to remain. - High quality design across all sites can reduce negative effects and maximise beneficial effects on the built environment. - Noise attenuation will lessen the negative health and well-being effect for those sites adjacent or close to the A3052 - All sites have relatively good access to facilities, but these beneficial effects can be maximised by enhancing sustainable travel links e.g. create bus stops near to the site, pedestrian/cycle links. - Designing new development for low water use and requiring sustainable drainage systems can help turn neutral uncertain effects on water resources into positive uncertain effects. - Positive effects for all sites in relation to jobs and employment could be maximised by providing on-site employment opportunities alongside new housing, where reasonable.																				
Preferred alternative: Sowt_03, Sowt_09, part Sowt_11																				
Reasons for alternatives being preferred or rejected: Sowt_01 – REJECTED - Outside of AONB. Agricultural fields adjacent to Clyst St Mary Village. Site slopes fairly steeply up to the south. Mature tree-lined hedgerows with some very large oaks. Highly exposed from multiple viewpoints including PROWs to south and west. Adjacent heritage asset and curtilage to south west corner. Narrow sunken lane limiting access with pinch point through village to west. Priority habitat forms part of the site and adjacent to north. Overall, the site has a high/medium landscape sensitivity to new development. Heritage assets present: Grade II listed Newhouse (17m). Overall, Moderate - Change affecting the special character of assets, where elements which contribute to their significance and their setting are harmed. Unconfirmed Wildlife Site (1m), Nature Recovery Network (on site to northern section), Section																				

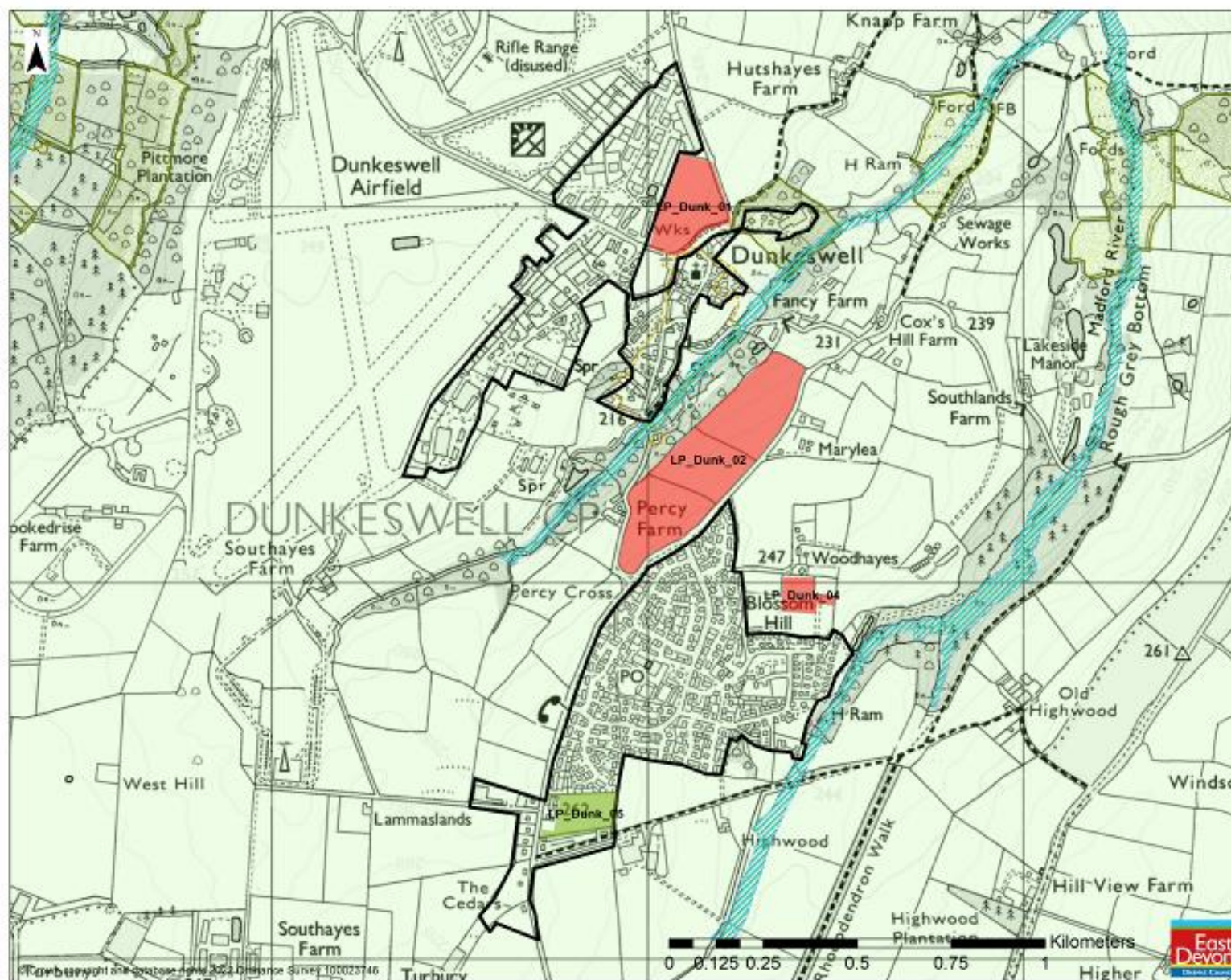
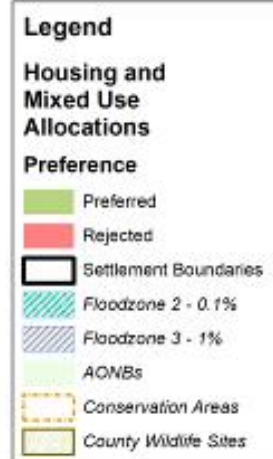
Sites: Clyst St Mary																				
Site	Sowt_01	Sowt_02	Sowt_03	Sowt_09	Sowt_11															
SA Objective																				
41 (S41) Habitat of Principle Importance (including rivers and streams, excluding hedgerows) (on site to northern section). Site is within both the Exe Estuary SPA HRA mitigation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, significant moderate adverse effect predicted. This prominent and exposed site on the north side of the ridgeline has multiple constraints. Officers do not recommend allocation at this stage. - Sowt_02 – REJECTED - Outside of AONB. Agricultural fields adjacent to Clyst St Mary Village. Site rises above the village with gradual slope. Mature tree-lined hedgerows with some very large oaks. Highly exposed from multiple viewpoints including PROWs to centre of site and to the west. Narrow sunken lane limiting access with pinch point through village to west. TPOs to south of site along PROW. Overall, the site has a high/medium landscape sensitivity to new development. Assets Present: Grade II listed Craig's Cottages (98m). Overall, No Change - No change to assets or their settings. Site is within both the Exe Estuary SPA HRA mitigation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, minor adverse effect predicted (not significant). This prominent and exposed site spans the ridgeline where development would dominate the existing built-up area. Officers do not recommend allocation at this stage - Sowt_03 – PREFERRED - Outside of AONB. Two mown grassland agricultural fields adjacent to Clyst St Mary village. Gently slopes up towards the north. Site is bordered to the south by A3052 with garden centre opposite, to the west by modern residential development, to the east by large detached property and Devon County Showground beyond. Agricultural land to north. Grade II listed Red Lodge over A3052 to south west. Overall, the site has a medium/low landscape sensitivity to new development. Assets Present: Grade II listed Red lodge (27m). Heritage asset is on opposite side of main road. New development would have a minor impact only. Overall, minor - Limited change to elements that contribute to the significance of assets and their setting, where harm is minimal. Site is within both the Exe Estuary SPA HRA mitigation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, minor adverse effect predicted (not significant). Site is considered appropriate for development, subject to final detailed scheme and proportionate mitigation.																				

Sites: Clyst St Mary																				
Site	Sowt_01	Sowt_02	Sowt_03	Sowt_09	Sowt_11															
SA Objective																				
- Sowt_09 – PREFERRED - Outside of AONB. Agricultural fields, dwelling and garden adjacent to Clyst St Mary village. Site slopes up towards the east. Site features stables and mature hedgerows with trees. Set within the context of the village core with multiple potential access points. Residential gardens to south and west. Overall, the site has a medium/low landscape sensitivity to new development. Assets Present: Scheduled Ancient Monument Clyst St Mary Bridge (88m), Grade II listed Newhouse (13m), Grade II listed Maltsters Arms (90m), Grade II listed Craig's Cottages (95m). Overall, Moderate - Change affecting the special character of assets, where elements which contribute to their significance and their setting are harmed. Unconfirmed Wildlife Site (43m), Nature Recovery Network (43m), Section 41 (S41) Habitat of Principle Importance (including rivers and streams, excluding hedgerows) (48m). Site is within both the Exe Estuary SPA HRA mitigation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, significant moderate adverse effect predicted. Site is considered appropriate or development, subject to final detailed scheme and proportionate mitigation - Sowt_11 – PART PREFERRED / PART REJECTED - Outside of AONB. Three grassland agricultural fields in part adjacent to Clyst St Mary village. Site is north of the ridgeline with limited visible development. Site is bordered to the west by large detached property with Devon County Showground in close proximity to the east. Agricultural land to north. Overall, the site has a high/medium landscape sensitivity to new development. Assets Present: Grade II listed Red lodge (158m). Heritage asset is on opposite side of ridge beyond main road. New development would have a minor impact only. Overall, minor - Limited change to elements that contribute to the significance of assets and their setting, where harm is minimal. Site is within both the Exe Estuary SPA HRA mitigation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, minor adverse effect predicted (not significant). Part of the site may be appropriate for limited development where a clear public benefit can be achieved. The site has a maximum yield of 162 dwellings. This figure is significantly reduced due to the constraints present and the exposed nature of the site. Development would be limited to the south of the site adjacent to Sowt_03 potentially to Bishops Court Road access.																				

East Devon Local Plan 2020-2040 - Dunkeswell

Settlement:

Dunkeswell



n.b. Items in the Legend that appear in regular type are for consultation; items in italics are for information only

Reasonable alternatives

- Dunk_01 - Land at Hutshayes Farm Dunkeswell
- Dunk_02 - Land East of Manleys Farm, Dunkeswell
- Dunk_05 - Broomfields Dunkeswell

Outline of reasons for selecting the alternatives

The reasonable alternatives listed above have all been assessed as suitable, available and achievable in the HELAA, which provides evidence that they have potential to be delivered (subject to further consideration through the planning process). A number of alternative options were dismissed in accordance with the sifting criteria, for reasons including the site being not adjacent or well-related to the settlement, sites having gained planning permission, or sites being of a small scale below established thresholds.

Dunk_03 – Land North of Highfield, Dunkeswell - NGR ST142073 - nearest postcode EX14 4XG - not adjacent to the settlement

Dunk_04 – Land North of Louis Way, Dunkeswell, EX14 4XT - not adjacent to the settlement

Sites: Dunkeswell																					
Site SA Objective	Dunk_01	Dunk_02	Dunk_05																		
1. Biodiversity	-	-	0																		

Sites: Dunkeswell																					
Site SA Objective	Dunk_01	Dunk_02	Dunk_05																		
Biodiversity commentary	- Dunk_01 - County Wildlife Site (8m), Unconfirmed Wildlife Site (1m), Nature Recovery Network (1m), Section 41 (S41) Habitat of Principle Importance (including rivers and streams, excluding hedgerows) (1m). Overall, significant moderate adverse effect predicted. - Dunk_02 - Unconfirmed Wildlife Site (12m), Nature Recovery Network (on site), Section 41 (S41) Habitat of Principle Importance (including rivers and streams, excluding hedgerows) (partially on site to norther border). Overall, significant moderate adverse effect predicted. - Dunk_05 - Nature Recovery Network (Grassland covering entire site). Overall, Minor adverse effect predicted (not significant).																				
2. Landscape	--	--	--																		
Landscape commentary	- Dunk_01 - Located entirely within Blackdown Hills AONB, this site is a triangular field adjoining former airfield/employment site. Overall, the site has a high/medium landscape sensitivity to new development. - Dunk_02 - Located entirely within Blackdown Hills AONB, this site is a triangular field, gently sloping. Overall, the site has a high landscape sensitivity to new development. - Dunk_05 - Located entirely within Blackdown Hills AONB, this site is a flat field in agricultural use but may be used as playing feld (visible pitch markings), set behind frontage development but well related to nearby housing and good access. Overall, the site has a high landscape sensitivity to new development.																				
3. Hist. built env	--	0	0																		

Sites: Dunkeswell																					
Site SA Objective	Dunk_01	Dunk_02	Dunk_05																		
Hist. built env. commentary	- Dunk_01 - Assets Present: Adjacent, and on higher ground to Dunkeswell Conservation area with listed buildings - Grade 2 listed Spring Cottage (55m), Grade II listed St Nicholas' Church (70m), Grade II listed Bramble Cottage (85m) and Grade II* listed Connetts Farm (120m). Overall, moderate - Change affecting the special character of assets, where elements which contribute to their significance and their setting are harmed. - Dunk_02 - Assets Present: Within 50m of the conservation area including a number of listed buildings. Grade II listed Autumn Cottage (60m). Significant screening and separation due to topography and intervening woodland. Overall, no change - No change to assets or their settings. - Dunk_05 - Assets present: Over 400m from any listed building or conservation area. Overall, no change - No change to assets or their settings.																				
4. Climate change carbon emissions	--	--	--																		
Climate change carbon emissions commentary	An accessibility assessment undertaken for the site selection work identified a total of 12 services, facilities and employment sites. Individual sites are listed below including the number of services and proximity of key facilities. - Dunk_01 - 6 out of 12 facilities within 1,600m of site. Nearest train station 7890m, nearest bus stop / service 80m, nearest hourly bus stop / service 7520m, nearest primary 5013m, nearest convenience store 1091m. - Dunk_02 - 6 out of 12 facilities within 1,600m of site. Nearest train station 7126m, nearest bus stop / service 185m, nearest hourly bus stop / service 6757m, nearest primary 4451m, nearest convenience store 246m. - Dunk_05 - 6 out of 12 facilities within 1,600m of site. Nearest train station 6512m, nearest bus stop / service 183m, nearest hourly bus stop / service 6143m, nearest primary 3918m, nearest convenience store 76m.																				

Sites: Dunkeswell																					
Site SA Objective	Dunk_01	Dunk_02	Dunk_05																		
	On account of proximity of facilities all of these sites can be seen to meet a basic proximity test. Notwithstanding the facilities available, the location of these sites means that development would be likely to significantly increase car usage.																				
5. Climate change adaptation	+	+	+																		
Climate change adaptation commentary	None of these sites are located in a critical drainage area and in general sites offer the potential to cope with heat, drought and extreme storms through appropriate design and incorporation of sustainable drainage, for example.																				
6. Land resources	- ?	- ?	- ?																		
Land resources commentary	- Dunk_01 - The site comprises Grade 3 agricultural land. Uncertain negative effect. - Dunk_02 - The site comprises Grade 3 agricultural land. Uncertain negative effect. - Dunk_05 - The site comprises Grade 3 agricultural land. Uncertain negative effect.																				
7. Water resources	0 ?	0 ?	0 ?																		
Water resources commentary	Development at the sites is unlikely to have any significant effects on water quality and quantity as none are located within a groundwater source protection zone. There is uncertainty on the capacity of local sewage treatment works to accommodate additional demand from new housing. This means an uncertain neutral effect for all sites.																				

Sites: Dunkeswell																					
Site SA Objective	Dunk_01	Dunk_02	Dunk_05																		
8. Homes	+	++	+																		
Homes commentary	- Dunk_01 – 64 max yield - Dunk_02 – 196 max yield - Dunk_05 – 43 max yield Significant positive where site offers maximum yield >100. All other sites have potential to deliver up to 100 dwellings with a marked positive effect. An appropriate mix of tenures and sizes including affordable housing is assumed for all sites.																				
9. Health and well-being	-	+	+																		
Health and well-being commentary	- Dunk_01 - Open Space 9m distant, Play Area 21m distant, adjacent to industrial estate and airfield - Dunk_02 - Open Space 175m distant, Play Area 244m distant, 500-700m to industrial estate and airfield (potential distant noise – not significant) - Dunk_05 - Open Space 0m distant, Play Area 259m distant, 1000m to industrial estate and airfield (potential distant noise – not significant)																				
10. Access to services	-	-	-																		

Sites: Dunkeswell																					
Site SA Objective	Dunk_01	Dunk_02	Dunk_05																		
Access to services commentary	- Dunk_01 - 6 out of 12 facilities within 1,600m of site. Nearest train station 7890m, nearest bus stop / service 80m, nearest hourly bus stop / service 7520m, nearest primary 5013m, nearest convenience store 1091m. - Dunk_02 - 6 out of 12 facilities within 1,600m of site. Nearest train station 7126m, nearest bus stop / service 185m, nearest hourly bus stop / service 6757m, nearest primary 4451m, nearest convenience store 246m. - Dunk_05 - 6 out of 12 facilities within 1,600m of site. Nearest train station 6512m, nearest bus stop / service 183m, nearest hourly bus stop / service 6143m, nearest primary 3918m, nearest convenience store 76m.																				
11. Jobs and employment	+	+	+																		
Jobs/employment commentary	- Dunk_01 - The site is within 1,600m of an employment site; and may offer limited potential for employment on site. - Dunk_02 - The site is within 1,600m of an employment site; and may offer limited potential for employment on site. - Dunk_05 - The site is within 1,600m of an employment site; and may offer limited potential for employment on site.																				
12. Town centres	-	-	-																		
Town centres commentary	Beyond 1, 600 metres of a town centre.																				
13. Connectivity and transport	-	-	-																		

Sites: Dunkeswell																					
Site SA Objective	Dunk_01	Dunk_02	Dunk_05																		
Connectivity and transport commentary	- Dunk_01 - Nearest train station 7890m, nearest bus stop / service 80m, nearest hourly bus stop / service 7520m. - Dunk_02 - Nearest train station 7126m, nearest bus stop / service 185m, nearest hourly bus stop / service 6757m. - Dunk_05 - Nearest train station 6512m, nearest bus stop / service 183m, nearest hourly bus stop / service 6143m. Broadband speeds range from 35-66 Mbps median speeds for postcodes in local area, all sites are assumed (at this stage) to have access to superfast broadband. Sites score a negative due to lack of sustainable travel options.																				
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: - Appropriate landscaping for all sites would be required for all sites due to negative effects upon the landscape and local heritage. - High quality design across all sites can reduce negative effects and maximise beneficial effects on the built environment. - Noise attenuation will lessen the negative health and well-being effect for those sites adjacent or close to the airfield. - All sites have relatively good access to facilities, but these beneficial effects can be maximised by enhancing sustainable travel links e.g. create bus stops near to the site, pedestrian/cycle links. - Designing new development for low water use and requiring sustainable drainage systems can help turn neutral uncertain effects on water resources into positive uncertain effects. - Positive effects for all sites in relation to jobs and employment could be maximised by providing on-site employment opportunities alongside new housing, where reasonable.																					
Preferred alternative: Dunk_05																					
Reasons for alternatives being preferred or rejected:																					

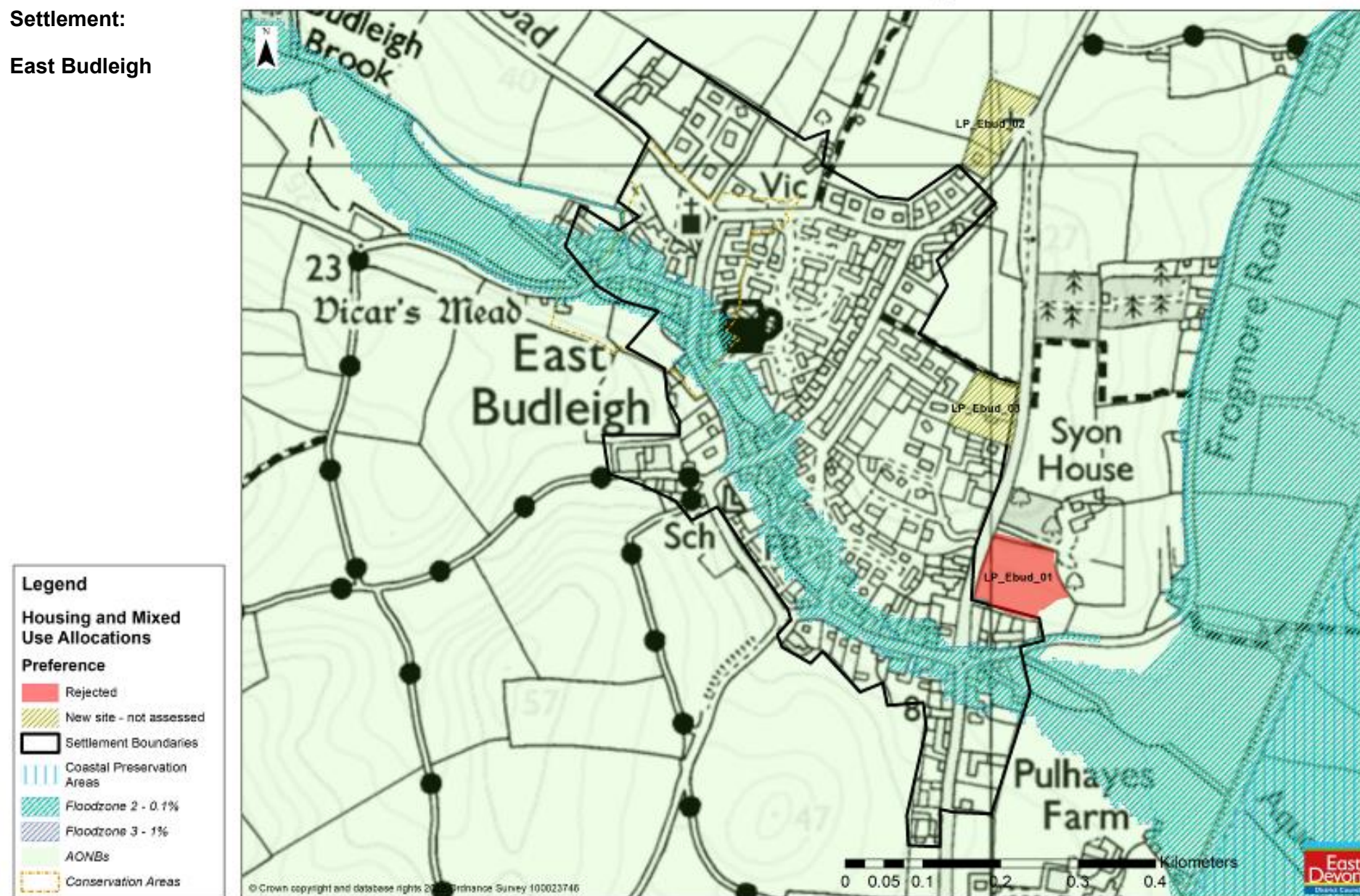
Sites: Dunkeswell																					
Site	Dunk_01	Dunk_02	Dunk_05																		
SA Objective																					
- Dunk_01 – REJECTED - Located entirely within Blackdown Hills AONB, this site is a triangular field adjoining former airfield/employment site. Overall, the site has a high/medium landscape sensitivity to new development. Assets Present: Adjacent, and on higher ground to Dunkeswell Conservation area with listed buildings - Grade 2 listed Spring Cottage (55m), Grade II listed St Nicholas' Church (70m), Grade II listed Bramble Cottage (85m) and Grade II* listed Connetts Farm (120m). Overall, moderate - Change affecting the special character of assets, where elements which contribute to their significance and their setting are harmed. Ecology: County Wildlife Site (8m), Unconfirmed Wildlife Site (1m), Nature Recovery Network (1m), Section 41 (S41) Habitat of Principle Importance (including rivers and streams, excluding hedgerows) (1m). Overall, significant moderate adverse effect predicted. Due to the local topography and context of the site, development is considered to introduce built form that would have a significant impact on the setting, character, and appearance of those identified heritage assets. The site constraints do not support allocation at this stage. - Dunk_02 – REJECTED - Located entirely within Blackdown Hills AONB, this site is a triangular field, gently sloping. The north of the site is not well related to the existing built-up area, the south of the site features a sports ground. Overall, the site has a high landscape sensitivity to new development. Heritage assets present: Within 50m of the conservation area including a number of listed buildings. Grade II listed Autumn Cottage (60m). Significant screening and separation due to topography and intervening woodland. Overall, no change - No change to assets or their settings. Ecology: Unconfirmed Wildlife Site (12m), Nature Recovery Network (on site), Section 41 (S41) Habitat of Principle Importance (including rivers and streams, excluding hedgerows) (partially on site to norther border). Overall, significant moderate adverse effect predicted. The site context and constraints do not support allocation at this stage. - Dunk_05 – PREFERRED - Located entirely within Blackdown Hills AONB, this site is a flat field in agricultural use but may be used as playing field (visible pitch markings), set behind frontage development but well related to nearby housing and good access. Overall, the site has a high landscape sensitivity to new development. Heritage assets present: Over 400m from any listed building or conservation area. Overall, no																					

Sites: Dunkeswell																					
Site	Dunk_01	Dunk_02	Dunk_05																		
SA Objective																					
change - No change to assets or their settings. Ecology: Nature Recovery Network (Grassland covering entire site). Overall, minor adverse effect predicted (not significant). Site is deemed suitable for allocation.																					

East Devon Local Plan 2020-2040 - East Budleigh

Settlement:

East Budleigh



n.b. Items in the Legend that appear in regular type are for consultation; items in italics are for information only

Reasonable alternatives

- Ebud_01
- Ebud_02
- Ebud_03

Outline of reasons for selecting the alternatives

The reasonable alternatives listed above have all been assessed as suitable, available and achievable in the HELAA, which provides evidence that they have potential to be delivered (subject to further consideration through the planning process). The sites are all located within or adjacent to East Budleigh, a Service Village, reflecting the settlement strategy in the Preferred Options consultation draft Local Plan.

Sites: East Budleigh																					
Site SA Objective	Ebud_01	Ebud_02	Ebud_03																		
1. Biodiversity	--	--	--																		
Biodiversity commentary	All sites are in the Exe Estuary and Pebblebed Heaths Mitigation Zones. Ebud_01 is close to nature recovery areas and priority habitat sites.																				
2. Landscape	--	--	--																		

Sites: East Budleigh																					
Site SA Objective	Ebud_01	Ebud_02	Ebud_03																		
Landscape commentary	All sites are within the East Devon AONB and highly sensitive to change.																				
3. Hist. built env	-	--	0																		
Hist. built env. commentary	Ebud_01 has the potential to affect the setting of designated and non-designated heritage assets. Ebud_02 surrounds three sides of a Grade II* listed building and development would have a major negative impact on this important heritage asset.																				
4. Climate change carbon emissions	0	0	-																		
Climate change carbon emissions commentary	An accessibility assessment undertaken on the site selection work identified a total of 12 services, facilities and employment sites ⁹⁸ and East Budleigh has six of these, including a pub, primary school and convenience store. All the sites are within 800 metre of these and an hourly bus route. However, no sites have safe access to the facilities without sharing road surfaces with cars and the only access to Ebud_03 appears to be along the busy B3178, which lacks a pavement to link the site to the village centre.																				

⁹⁸ Namely: train station, hourly or better bus route, primary school, secondary school, convenience store/shop, Post Office, Community hall, Pub, Open space/allotment, children's play area, GP, employment site (identified in the Employment Land Review).

Sites: East Budleigh																					
Site SA Objective	Ebud_01	Ebud_02	Ebud_03																		
5. Climate change adaptation	++	++	++																		
Climate change adaptation commentary	No sites appear to be at risk of flooding.																				
6. Land resources	--	--	--																		
Land resources commentary	All sites are Grade 1 agricultural land.																				
7. Water resources	--	--	--																		
Water resources commentary	All sites are in a ground water protection zone.																				
8. Homes	+	+	+																		

Sites: East Budleigh																					
Site SA Objective	Ebud_01	Ebud_02	Ebud_03																		
Homes commentary	All sites under 100 homes.																				
9. Health and well-being	+	+	+																		
Health and well-being commentary	Close to open space, but no play area and away from noise sources.																				
10. Access to services	+	+	+																		
Access to services commentary	Close to limited range of services but there are issues with safe pedestrian access.																				
11. Jobs and employment	-	-	-																		
Jobs/employment commentary	No employment sites within 1, 600 metres and unlikely to be delivered on site.																				

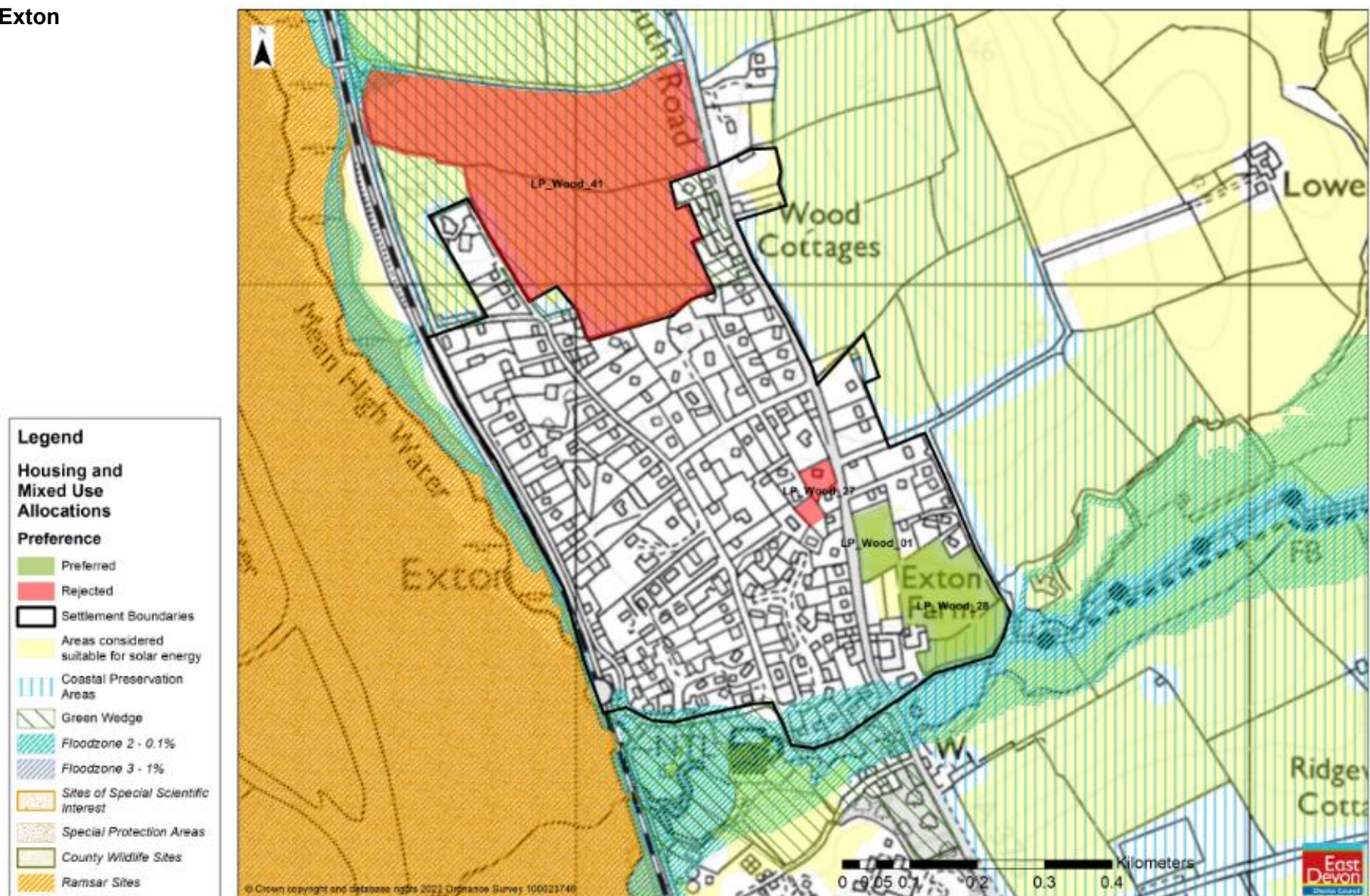
Sites: East Budleigh																					
Site SA Objective	Ebud_01	Ebud_02	Ebud_03																		
12. Town centres	-	-	-																		
Town centres commentary	Beyond 1, 600 metres of a town centre.																				
13. Connectivity and transport	+	+	+																		
Connectivity and transport commentary	All sites close to hourly bus route and within 1, 600 metres of recognised cycle route and with broadband speeds over 10 mbps.																				
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: - Considerable landscaping would be required for all sites due to significant negative effects upon the landscape, but their sensitivity is such that a significant negative effect is likely to remain. - Mitigate impact upon Exe Estuary and Pebblebed Heaths SPAs – to be considered in the Habitats Regulations Assessment. - It would be very difficult to mitigate the major negative effects of Ebud_02. - The minor negative effect on the historic environment on Ebud_01 may be reduced through good design and avoiding development on parts of the site, but the landscape setting of Syon House is likely to be detrimentally affected. - High quality design across all sites can reduce negative effects and maximise beneficial effects on the built environment.																					

Sites: East Budleigh																					
Site	Ebud_01	Ebud_02	Ebud_03																		
SA Objective																					
Designing new development for low water use and requiring sustainable drainage systems can help turn neutral uncertain effects on water resources into positive uncertain effects.																					
Preferred alternative: No sites identified. Reasons for alternatives being preferred or rejected: - Ebud_01 is rejected due to negative landscape, heritage and accessibility impacts - Ebud_02 is rejected due to very significant heritage and negative landscape impacts - Ebud_03 is rejected due to negative landscape and very significant accessibility impacts.																					

Settlement:

East Devon Local Plan 2020-2040 - Exton

Exton



n.b. Items in the Legend that appear in regular type are for consultation; items in italics are for information only

Reasonable alternatives

- Wood_01 – Field 4583, Exmouth Road
- Wood_28 – Land to the north and east of Exton Farm
- Wood_41 – Land adjacent A376, north of Exton

Outline of reasons for selecting the alternatives

The reasonable alternatives listed above have all been assessed as suitable, available and achievable in the HELAA, which provides evidence that they have potential to be delivered (subject to further consideration through the planning process). The sites are all located within or adjacent to Exton, a Service Village, reflecting the settlement strategy in the Preferred Options consultation draft Local Plan.

Wood_27 is not a reasonable alternative as it is not large enough to be considered as a Local Plan allocation.

Sites: Exton				
Site SA Objective	Wood_01	Wood_28	Wood_41	
1. Biodiversity	-	-	-	
Biodiversity commentary	All sites are within 10km of both the Exe Estuary and Pebblebed Heaths SPAs, and past evidence ⁹⁹ indicates a likely significant effect that must be mitigated through planning obligations. Wood_01 and Wood_28 are comprised of agriculturally improved			

⁹⁹ [se-devon-mitigation-strategy.pdf \(eastdevon.gov.uk\)](#)

Sites: Exton				
Site SA Objective	Wood_01	Wood_28	Wood_41	
	grassland of limited biodiversity value, with Exe Estuary SPA and Ramsar just over 400m to west. A minor negative effect is therefore noted for both. Wood_41 is very close to Exe Estuary SPA and Ramsar, just 30m to the west, which is also a s.41 habitat, so a significant negative effect is likely.			
2. Landscape	-	-	--	
Landscape commentary	Wood_01 is a single field adjacent to the A376 to the west, low density dwellings to north and east, and a field to the south, providing general context of built form. Medium sensitivity means a minor negative effect is likely. Wood_28 has low density dwellings to the north, south east, and west but generally set within a rural landscape, leading to a minor negative effect. Wood_41 is two large fields, with limited existing context of built form is provided by low density dwellings the south, but this is generally a prominent, large-scale site with medium to medium-high landscape sensitivity. Human disturbance from adjacent A376, but significant negative effect remains.			
3. Historic and built environment	-	-	-	
Hist. built env. commentary	Grade II* listed Exton Farm 87m to south has windows on its northern side that offer views of Wood_01, but separated by hedgerow and field, limiting the effect on this asset. Grade II* listed Exton House 110m to south/south west but adjoined by dwellings to north and there is thick hedgerow (along eastern side of A376) which limit intervening views, meaning a minor negative overall. Wood_28 is 46m away from Grade II* listed Exton Farm to the west, but intervening farm buildings limit views of the site. Two Grade II listed dwellings to south/south west have glimpsed views of site, but intervening trees and hedgerow limit these views. Overall, minor negative effects. The closest heritage asset to Wood_41 is Grade II listed 1 Mount Ebford which overlooks the site 250m to the north, resulting in a minor negative effect.			

Sites: Exton				
Site SA Objective	Wood_01	Wood_28	Wood_41	
4. Climate change and carbon emissions	0	0	0	
Climate change carbon emissions commentary	Wood_01 and Wood_28 both have 7 out of 12 facilities within 1,600m of site, including include Exton train station approximately 400m to the west, convenience store at the petrol station 500m to the north, and job opportunities at industrial estate 1400m to the north, and Darts Farm slightly further. These can be accessed by pavement, although it is narrow and along busy A376 which could deter pedestrians. Half hourly bus service to Exeter/Exmouth from stop on A376 adjacent to the site. Close to Exe Estuary Trail which offers convenient walking/cycling access to other settlements nearby. However, Exton lacks a primary school and a range of shops, so overall neutral effect for Wood_01 and Wood_28. Wood_41 also has 7 out of 12 facilities within 1,600m of site, including the convenience store adjacent to the east, train station 550m to the south, and job opportunities at industrial estate 700m to the north, with Darts Farm slightly further. These can be accessed by pavement, although it is narrow. Half hourly bus service to Exeter/Exmouth from stop on A376. South west part of site is adjacent to Exe Estuary Trail offering convenient walking/cycling access to other settlements nearby. Given all this, a neutral effect overall for Wood_41.			
5. Climate change adaptation	0	0	+	
Climate change adaptation commentary	Low surface water flood risk (1/100 year) along A376 just beyond the western boundary of Wood_01, so a neutral effect. Similarly, Wood_28 is adjoined by Flood zone 3 and high surface water flood risk along Mill Lane along the southern boundary of site, also leading to a neutral effect. Wood_41 is not affected by flood risk, resulting in a positive effect for this site.			
6. Land resources	- ?	- ?	- - ?	

Sites: Exton				
Site SA Objective	Wood_01	Wood_28	Wood_41	
Land resources commentary	All three sites are greenfield. Wood_01 and Wood_28 are both Grade 3 agricultural land, so uncertain negative effect for these sites. Wood_28 Wood_41 is mostly Grade 1 agricultural land, with the remainder Grade 3 with the potential to be Grade 3a, so a significant negative uncertain effect is likely.			
7. Water resources	- ?	- ?	- ?	
Water resources commentary	None of the sites are located within a groundwater source protection zone, but run-off from development into the adjacent Exe Estuary SPA/Ramsar to the west could adversely affect water quality, meaning a negative effect given its proximity sensitivity and classification as “moderate” quality. There is uncertainty on the capacity of local sewage treatment works to accommodate additional demand from new housing. This means an uncertain negative effect for all sites.			
8. Homes	+	+	++	
Homes commentary	Wood_01 and Wood_28 can both provide up to 100 dwellings, so will have a positive effect on this objective. Wood_41 is a large with a potential yield of around 225 dwellings, so will have a significant positive effect. An appropriate mix of tenures and sizes including affordable housing is assumed for all sites.			
9. Health and well-being	+ / -	+ / -	+ / -	
Health and well-being commentary	All sites are in an area of the least deprived 20% neighbourhoods in England, so development will not be located in an area of higher deprivation. All sites are within 800m of a children’s play area and open space/allotment, offering opportunities to support healthy lifestyles. Wood_01 and Wood_41 are adjacent to the busy A376, so affected by noise pollution. Noise from this road is			

Sites: Exton				
Site SA Objective	Wood_01	Wood_28	Wood_41	
	also audible from Wood_28 but to a lesser degree. Wood_41 offers direct access to recreation on the Exe Estuary Trail with Wood_01 and Wood_28 slightly further. Given all this, a mixed positive and negative effect for all sites.			
10. Access to services	+	+	+	
Access to services commentary	Wood_01 and Wood_28 are both around 500m to a shop, 200m to a community hall, 300m to a pub, adjacent to a ½ hourly bus service, and 400m to the train station and Exe Estuary Trail. The journey for pedestrians is poor quality, largely along narrow pavements next to the busy A376. In addition, these sites are just over 2km to the nearest primary school. On balance, a positive effect is likely for Wood_01 and Wood_28. Wood_41 is adjacent to the shop and Exe Estuary Trail, 600m to the pub, community hall and train station, adjacent to an hourly or better bus service, and around 1,600m to the nearest primary school at Clyst St George. This again results in a minor positive effect for Wood_41.			
11. Jobs and employment	+	+	+	
Jobs/employment commentary	All sites will provide short-term positive effects from job opportunities during construction, and are within 1,600m of Darts Business Park, which can be accessed via sustainable travel links using the Exe Estuary Trail or ½ hourly bus service. These links plus the train station enable sustainable access to significant employment opportunities elsewhere (e.g. Exeter, Exmouth). The small size of Wood_01 and Wood_28 limit potential to provide on-site employment. Whilst the large scale of Wood_41 would enable on-site employment to be provided, with easy access on to the A376, adverse landscape impact limits its acceptability. Overall, a minor positive effect for Wood_01, Wood_28 and Wood_41.			

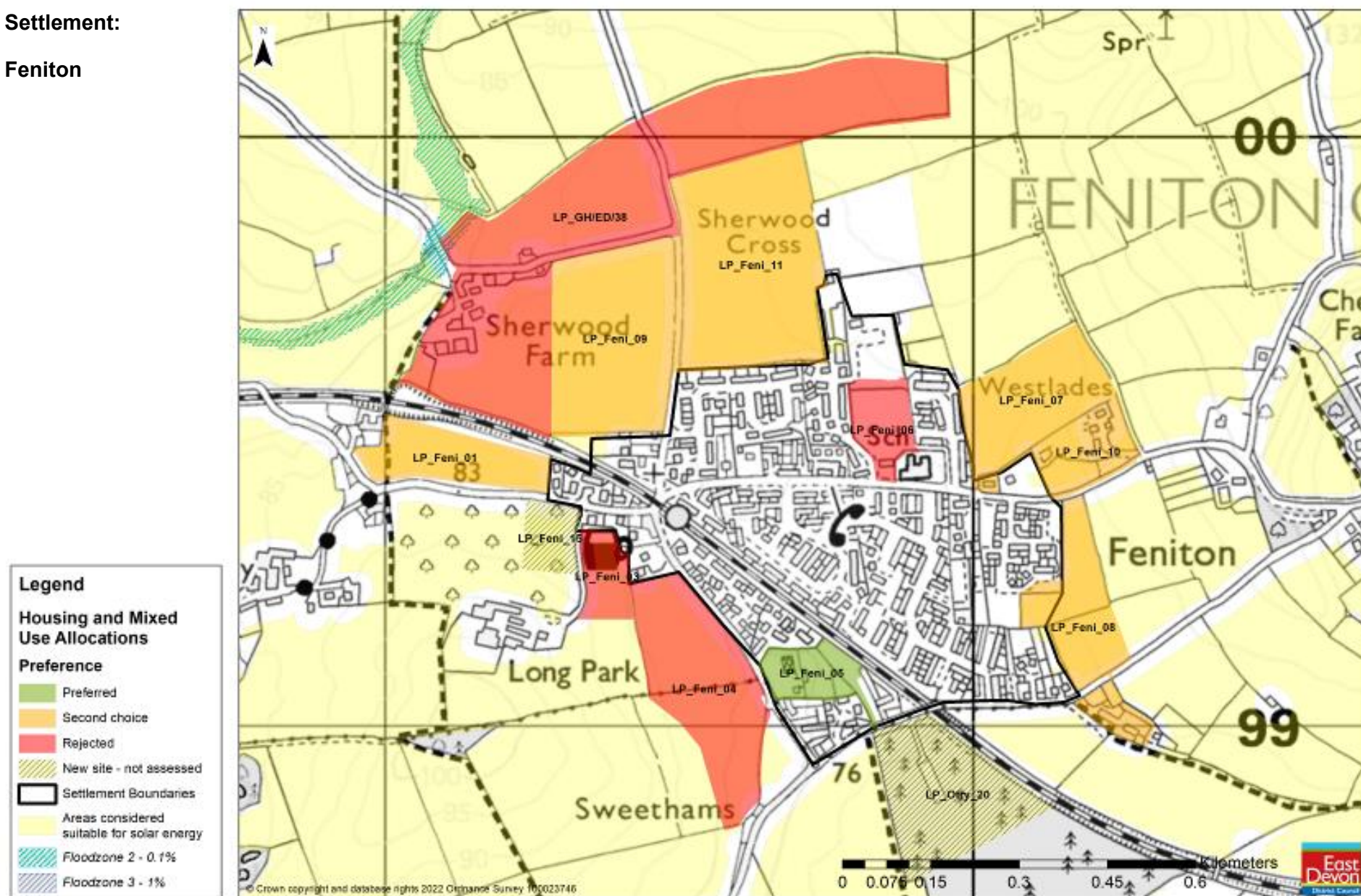
Sites: Exton				
Site SA Objective	Wood_01	Wood_28	Wood_41	
12. Town centres	-	-	-	
Town centres commentary	Wood_01, Wood_28 and Wood_41 are all beyond 1,600m of an existing town centre, and are not of sufficient scale to provide their own centre, meaning a minor negative effect for all three sites.			
13. Connectivity and transport	++	++ / -	++	
Connectivity and transport commentary	Exton has an average broadband speed of 44 mbps, so all sites are assumed to have access to superfast broadband. All sites are located within 800m of a train station, ½ hourly bus service, an ‘A’ road (A376), and a recognised cycle route (Exe Estuary Trail). In addition, superfast broadband is available in the area. Given all this, a significant positive effect is likely for all sites, with a mixed negative at Wood_28 due to the current lack of walking link from this site.			
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: • Mitigate impact upon Exe Estuary and Pebblebed Heaths SPAs – to be considered in the Habitats Regulations Assessment. • Considerable landscaping at Wood_41 would be required due to significant negative effects upon the landscape, but the sensitivity is such that a significant negative effect is likely to remain. A minor negative landscape effect for the other sites means that appropriate landscaping should be incorporated, although as all sites are currently greenfield, a negative effect would remain. • High quality design to minimise impacts upon listed buildings. • Sustainable drainage systems to minimise flood risk. • Designing new development for low water use and requiring sustainable drainage systems can help turn neutral uncertain effects on water resources into positive uncertain effects. • Noise buffer to A376.				

Sites: Exton				
Site	Wood_01	Wood_28	Wood_41	
SA Objective				
These mitigation measures should reduce the negative effects to neutral effects.				
Preferred alternative: Wood_01, Wood_28				
Reasons for alternatives being preferred or rejected: - Wood_01 – Field 4583, Exmouth Road preferred as consistent with spatial strategy, good access to services/facilities and jobs, excellent sustainable travel links. - Wood_28 – Land to the north and east of Exton Farm preferred as consistent with spatial strategy, good access to services/facilities and jobs, excellent sustainable travel links. - Wood_41 – Land adjacent A376, north of Exton rejected due to large scale site that is inconsistent with spatial strategy, close proximity to Exe Estuary SPA/Ramsar, adverse landscape impact, and comprised of mostly Grade 1 agricultural land.				

East Devon Local Plan 2020-2040 - Feniton

Settlement:

Feniton



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Reasonable alternatives

- Feni_01 - Land at Feniton forming part of Sherwood Farm,
- Feni_03 and new call for sites (will become Feni_12) - Land at Long Park Farm
- Feni_04 and new call for sites Feni_14 - Land off Ottery Road
- Feni_05 - Land and buildings at Burland Mead
- Feni_06 - F P F A Club, Station Road
- Feni_07 - Lyndale
- Feni_08 - Land Southeast of Beechwood
- Feni_09 - Land at Sherwood Cross
- Feni_11 - Land at Sherwood Cross
- GH/ED/38 - Land at Sherwood Cross
- Feni_10 - Westlades
- Feni_15 - a new 2022 call for sites submission - Long Park Farm
- Otry_20 - a new 2022 call for sites submission - Land to the south-east of Bridge Cottages

Outline of reasons for selecting the alternatives

The reasonable alternatives listed above have all been assessed as suitable, available and achievable in the HELAA, which provides evidence that they have potential to be delivered (subject to further consideration through the planning process). This SA work has been extended, however, to also include Feni_03 and Feni_04 despite mineral safeguarding concerns being identified as a constraint in development.

In the SA table below we have shown separate assessment for Feni_09, Feni_11 and GH/ED/38 though these sites are complicated by overlaps. The original HELAA site submission was GH/ED/38 and this covered the area that also included Sites Feni_09 and Feni_11 as shown on the mapping. However for the purposes of SA work (and as shown on consultation draft local plan maps) we have taken GH/ED/38 to be the northerly area only. At the next call for sites Feni_09 was submitted and this included the area we show as Feni_09 on the map we have taken as the westerly field, even though a HELAA

submission covered it and also Feni_11. Feni_09 assessment relates to just the area shown as Feni_09 on the map. Feni_11 came through in the final call for sites and relates just to the area as shown on the map.

Otry_20 was submitted in the 2022 call for sites for employment uses and has been assessed on this basis.

Sites: Feniton																				
Site	Feni_01	Feni_03	Feni_04	Feni_05	Feni_06	Feni_07	Feni_08	Feni_09	Feni_11	GH/ED/38	Feni_10	Feni_15	Otry_20							
SA Objective																				
1. Biodiversity	0	0	0	0	0	0	0	0	0	0	0	0	0							
Biodiversity commentary	All sites at Feniton fall within the 10 km Pebblebed Heaths 10km buffer zone though they are not in the immediate vicinity of the designated sites. Other than this there are no designated biodiversity sites that are at or close to allocated sites. All sites have been attributed with a neutral/zero rating, most predominantly comprise of improved grassland, though noting that on some sites there may be features or assets that may be of some small scale local wildlife value, including at hedgerow boundaries.																			
2. Landscape	0	-	-	+	0	0	0	0	0	-	0	0	0							
Landscape commentary	Feniton lies to the west of the East Devon AONB which at its closest point is around 2.5 kilometres away. This separation and the relatively flat and lower lying landform around the village means that assessed site record lower levels of adverse impacts in landscape terms. Most sites are attributed with a neutral score. However the most sensitive sites in respect of potential for adverse landscape impacts are those on rising land where development could rise up to or toward ridgelines, these are Feni_03, Feni_04 and GH/ED/38. Feni_05, was previously used as a plant nursery and has a slightly derelict character and as such is																			

Sites: Feniton																				
Site SA Objective	Feni_01	Feni_03	Feni_04	Feni_05	Feni_06	Feni_07	Feni_08	Feni_09	Feni_11	GH/ED/38	Feni_10	Feni_15	Otry_20							
	afforded a single positive as development could offer some scope for enhancement, albeit mature vegetation on the site is of some visual appeal.																			
3. Hist. built env	0	0	-	0	0	0	0	-	0	-	0	0	0							
Hist. built env. commentary	There are only a limited number of listed buildings or other designated assets in and around Feniton and the limited older buildings (not listed) form a small core of Victorian development associated with the coming of the railway at the village. There is a listed building to the south of Feni_04 giving this site a negative for potential impacts and this consideration also applies to GH/ED/38 and Feni_09. Other less significant possible adverse heritage impacts are associated with the railway and more localised features, but they are not deemed to be significant.																			
4. Climate change carbon emissions	0	0	0	0	0	0	0	0	0	0	0	0	0							
Climate change carbon emissions commentary	Feniton benefits from having a railway station on the Exeter-Waterloo line with 10 trains per day to Exeter. This is in favour of the village in carbon emission terms and all assessed sites are within a reasonable walking distance of the station with no apparent constraints in respect of quality of footpaths. Bus services are, however, less good and there is existing high car dependency in the village. There are comparatively basic services and facilities in the village that are also within walking distance of all of the assessed sites. However going beyond the basics would entail travelling to locations and centres with a greater range of facilities.																			

Sites: Feniton																				
Site SA Objective	Feni_01	Feni_03	Feni_04	Feni_05	Feni_06	Feni_07	Feni_08	Feni_09	Feni_11	GH/ED/38	Feni_10	Feni_15	Otry_20							
5. Climate change adaptation	0	0	0	0	0	0	0	0	0	0	0	0	0							
Climate change adaptation commentary	There have been flooding events in Feniton though it is understood that these should be alleviated by ongoing works. Concerns over risk of flooding do, however, remain a live issue and the whole village is shown as falling in a Critical Drainage Area. Very small parts of some of the assessed sites show up as falling in areas susceptible to surface water flooding and a floodplain, however these are assessed as peripheral considerations with limited direct bearing on general site suitability for development.																			
6. Land resources	-	-	-	-	--	--	--	-	--	-	--	-	-							
Land resources commentary	Agricultural land quality at and around Feniton is high with Grade 1 land to the north east of the village and Grade 2 land to the south west. The assessed sites on the eastern side of Feniton, specifically Feni_06, Feni_07, Feni_08, Feni_1 and Feni_10 fall wholly or nearly all within this highest grade classification and as such are attributed with a double negative adverse impact. All other sites fall within Grade 2 land (bar a small part of Feni_01) and as such achieve a single negative score.																			
7. Water resources	-	-	-	-	-	-	-	-	-	-	-	-	-							
Water resources commentary	All of the assessed sites, in their totality (bar small parts of Feni_01 and GH/ED/38) are identified as falling in a Drinking Water Source Protection Zone 'Total Catchment' area category. On this basis they are afforded a negative score, though it remains unclear if or how significant this consideration would really be.																			

Sites: Feniton																				
Site SA Objective	Feni_01	Feni_03	Feni_04	Feni_05	Feni_06	Feni_07	Feni_08	Feni_09	Feni_11	GH/ED/38	Feni_10	Feni_15	Otry_20							
8. Homes	+	+	+	+	+	+	+	+	+	+	+	+	+							
Homes commentary	All of the sites (bar the employment promoted site of Otry_20) will accommodate housing but less than 100 units and so in each case they have been attributed with a single positive. It should be noted that GH/ED/83, in its original HELAA submission size would accommodate more and on this basis would achieve a double positive.																			
9. Health and well-being	0	0	0	0	0	0	0	0	0	0	0	0	0							
Health and well-being commentary	All of the sites assessed fall within areas at or below the 40% least deprived in the country. Feniton itself benefits from access to open space and facilities and this applies to all assessed sites. There are no significant noise or other polluting concerns identified, though noting that the train through the village, close up, is quite loud and this could have some degree of adverse impacts on smaller parts of site Feni_01, Feni05, Feni_09 and GH/ED/83, but not enough too impact on the overall neutral scoring.																			
10. Access to services	+	+	+	+	+	+	+	+	+	+	+	+	+							

Sites: Feniton																				
Site SA Objective	Feni_01	Feni_03	Feni_04	Feni_05	Feni_06	Feni_07	Feni_08	Feni_09	Feni_11	GH/ED/38	Feni_10	Feni_15	Otry_20							
Access to services commentary	All of the sites are within good accessibility, under 800 metres, of the basic range of services and facilities that Feniton has to offer. These include a primary school and the village has a railway station as well as shops and sports facilities. A positive impact is noted for all sites, noting that for a greater range of services and facilities there is the need to travel elsewhere.																			
11. Jobs and employment	0	0	0	0	0	0	0	0	0	0	0	0	++							
Jobs/employment commentary	All sites will provide short-term positive effects from job opportunities during construction, and benefit from rail links to access jobs elsewhere, notably Exeter. However, there is an existing pattern of out-commuting from Feniton with comparatively limited jobs in the village or immediate surrounding areas. Many of the assessed sites are of sufficient size such that they could accommodate some employment uses as part of a mixed use development. However at this stage all sites are given a neutral rating, with one exception Otry_20 which is promoted for employment uses and is given a double positive. However, this score would only be applicable if any gains in employment outweighed and possible losses that may arise from the loss of the existing uses of the land.																			
12. Town centres	-	-	-	-	-	-	-	-	-	-	-	-	-							
Town centres commentary	All sites at Feniton are beyond 1,600m of an existing town centre, and are not of sufficient scale to provide their own centre, meaning a minor negative effect for all sites.																			

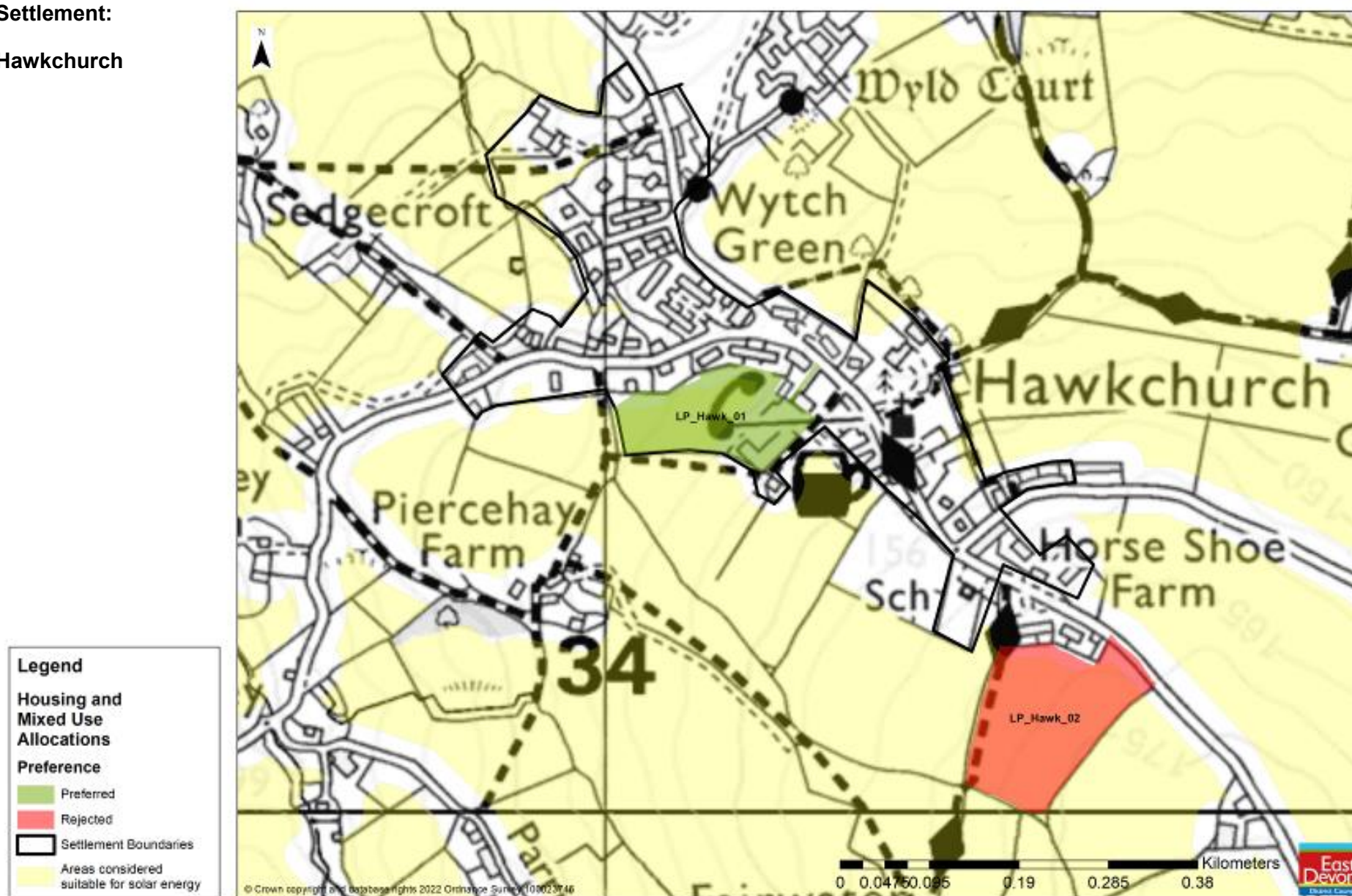
Sites: Feniton																				
Site SA Objective	Feni_01	Feni_03	Feni_04	Feni_05	Feni_06	Feni_07	Feni_08	Feni_09	Feni_11	GH/ED/38	Feni_10	Feni_15	Otry_20							
13. Connectivity and transport	+	+	+	+	+	+	+	+	+	+	+	+	+							
Connectivity and transport commentary	All sites in Feniton are with within 800 metres of a railway station but are beyond this distance to an A road, the village is served by country lanes Whilst information is not currently available on broadband speeds the presence of a railway station accounts for all sites being afforded a positive score.																			
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: - Generally speaking sites in Feniton perform reasonably well and as such mitigation for possible adverse impacts in respect of or in landscape, heritage and biodiversity are likely to be smaller scale and comparatively less challenge. A key would be to achieve high quality development, though noting some sites are of greater sensitivity than others, to include Feni_04 and GH/ED/38. - A concern in Feniton, that would have a relevance for all sites, is the comparative lack of employment opportunities at the village and services and facilities. Securing mixed use developments would be desirable in terms of mitigation for impacts and, for example, not adding to existing patterns of out-commuting.																				
Preferred alternative: The preferred choice is to allocate site Feni_05 only. This site has an infill character and is currently somewhat unsightly.																				
Reasons for alternatives being rejected:																				

Sites: Feniton																				
Site	Feni_01	Feni_03	Feni_04	Feni_05	Feni_06	Feni_07	Feni_08	Feni_09	Feni_11	GH/ED/38	Feni_10	Feni_15	Otry_20							
SA Objective																				
The Draft Local Plan, at November 2022, does not have a strategy for accommodating larger scale or strategic growth at Feniton. If there were such a strategy then there are a number of sites that could be reasonably looked upon as potentially good choices for development. However, as things stand the allocation of Feni_05 is proportionate and appropriate in respect of future growth of the village and the shape of the currently emerging plan. In respect of currently rejected sites the following observations are noted: - Feni_01 - Land at Feniton forming part of Sherwood Farm – site is reasonably discreet and well screened. - Feni_03 and new call for sites (will become Feni_12) - Land at Long Park Farm – site is of some prominence in landscape terms. - Feni_04 and new call for sites Feni_14 - Land off Ottery Road – site has a listed building to the south and of some landscape prominence. - Feni_06 - F P F A Club, Station Road – existing community facility would be lost (assuming it was not replaced) should development go ahead. - Feni_07 – Lyndale – site is not especially prominent in landscape terms and quite well screened. - Feni_08 - Land Southeast of Beechwood – site is moderately open and exposed in landscape terms. - Feni_09 - Land at Sherwood Cross – Site is moderately open and exposed in landscape terms. - Feni_11 - Land at Sherwood Cross – Site is moderately open and exposed in landscape terms. - GH/ED/38 - Land at Sherwood Cross – northern parts of the site are open and quite exposed whilst western edges have a sense of remoteness from existing Feniton development and there are listed buildings within the site. - Feni_10 – Westlades – The site is reasonably well screened but may have some on site local biodiversity interest. - Feni_15 - a new 2022 call for sites submission - Long Park Farm - Otry_20 - a new 2022 call for sites submission - Land to the south-east of Bridge Cottages – site is well screened.																				

East Devon Local Plan 2020-2040 - Hawkchurch

Settlement:

Hawkchurch



n.b. Items in the Legend that appear in regular type are for consultation; items in italics are for information only

Reasonable alternatives

- Hawk_01 - Norton Store, Hawkchurch, Axminster, Devon, EX13 5XW
- Hawk_02 - Field south-east of Hawkchurch School, behind and adjacent to School Close, EX13 5GL

Outline of reasons for selecting the alternatives The reasonable alternatives listed above have all been assessed as suitable, available and achievable in the HELAA, which provides evidence that they have potential to be delivered (subject to further consideration through the planning process). No alternative options were dismissed in accordance with the sifting criteria.

Sites: Hawkchurch																					
Site SA Objective	Hawk_01	Hawk_02																			
1. Biodiversity	-	-																			
Biodiversity commentary	• Hawk_01 - Nature Recovery Network (2m), Section 41 (S41) Habitat of Principle Importance (including rivers and streams, excluding hedgerows) (88m), within River Axe SAC Nutrient catchment area. Site is within the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, significant moderate adverse effect predicted. • Hawk_02 - Nature Recovery Network (25m), within River Axe SAC Nutrient catchment area. Site is within the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, significant moderate adverse effect predicted.																				
2. Landscape	-	-																			

Sites: Hawkchurch																					
Site SA Objective	Hawk_01	Hawk_02																			
Landscape commentary	- Hawk_01 - Outside of AONB. Agricultural field with active employment use behind housing. Mature trees and hedgerow to south, west, east borders, mature tree in field. Set in context of residential and industrial development. PROW to west, south, east (footpaths). Overall, the site has a medium/low landscape sensitivity to new development. - Hawk_02 - Outside of AONB. Field in agricultural use to south of Hawkchurch, adjoins an exception site. Mature hedgerow to surround with occasional mature tree. Overall, the site has a medium landscape sensitivity to new development.																				
3. Hist. built env	-	0																			
Hist. built env. commentary	- Hawk_01 - Assets present: Grade II listed 1 Wytch Green (44m to north), Grade I listed St John the Baptist Church, row of Grade II buildings including the Old Bakery, the Old Inn, Fir View, Rose Cottage, Windwhistle Cottage. Currently light industrial units in closest area to heritage assets. Asset to the north separated from the site by residential development. Residential development may enhance the setting of the assets to the east rather than causing harm, subject to final detailed scheme. Overall, minor - Limited change to elements that contribute to the significance of assets and their setting, where harm is minimal. - Hawk_02 - Assets Present: Over 200m from nearest listed buildings. Overall, no change - No change to assets or their settings.																				

Sites: Hawkchurch																					
Site SA Objective	Hawk_01	Hawk_02																			
4. Climate change carbon emissions	-	-																			
Climate change carbon emissions commentary	An accessibility assessment undertaken for the site selection work identified a total of 12 services, facilities and employment sites. Individual sites are listed below including the number of services and proximity of key facilities. - Hawk_01 - 5 out of 12 facilities within 1,600m of site. Nearest train station 5222m, nearest bus stop / service 25m, nearest hourly bus stop / service 3480m, nearest primary 244m, nearest convenience store 1m. - Hawk_02 - 5 out of 12 facilities within 1,600m of site. Nearest train station 5429m, nearest bus stop / service 314m, nearest hourly bus stop / service 3748m, nearest primary 68m, nearest convenience store 344m. On account of proximity of facilities all of these sites can be seen to meet a basic proximity test. Notwithstanding the facilities available, the location of these sites means that development would be likely to increase car usage.																				
5. Climate change adaptation	+	+																			
Climate change adaptation commentary	None of these sites are located in a critical drainage area and in general sites offer the potential to cope with heat, drought and extreme storms through appropriate design and incorporation of sustainable drainage, for example.																				

Sites: Hawkchurch																					
Site SA Objective	Hawk_01	Hawk_02																			
6. Land resources	- ?	- ?																			
Land resources commentary	- Hawk_01 - The site comprises Grade 3 agricultural land. Uncertain negative effect. - Hawk_02 - The site comprises Grade 3 agricultural land. Uncertain negative effect.																				
7. Water resources	0 ?	0 ?																			
Water resources commentary	Development at the sites is unlikely to have any significant effects on water quality and quantity as none are located within a groundwater source protection zone. There is uncertainty on the capacity of local sewage treatment works to accommodate additional demand from new housing. This means an uncertain neutral effect for all sites.																				
8. Homes	+	+																			
Homes commentary	- Hawk_01 – 38 max yield - Hawk_02 – 41 max yield Significant positive where site offers maximum yield >100. All other sites have potential to deliver up to 100 dwellings with a marked positive effect. An appropriate mix of tenures and sizes including affordable housing is assumed for all sites.																				

Sites: Hawkchurch																					
Site SA Objective	Hawk_01	Hawk_02																			
9. Health and well-being	+	+																			
Health and well-being commentary	- Hawk_01 - Open Space 2m distant, Play Area 3581m distant, away from noise sources - Hawk_02 - Open Space 26m distant, Play Area 3840m distant, away from noise sources																				
10. Access to services	+	+																			
Access to services commentary	- Hawk_01 - 5 out of 12 facilities within 1,600m of site. Nearest train station 5222m, nearest bus stop / service 25m, nearest hourly bus stop / service 3480m, nearest primary 244m, nearest convenience store 1m. - Hawk_02 - 5 out of 12 facilities within 1,600m of site. Nearest train station 5429m, nearest bus stop / service 314m, nearest hourly bus stop / service 3748m, nearest primary 68m, nearest convenience store 344m.																				
11. Jobs and employment	+	-																			
Jobs/employment commentary	Hawk_01 – Small employment area should be retained, limited opportunities for expansion / on-site provision.																				

Sites: Hawkchurch																					
Site SA Objective	Hawk_01	Hawk_02																			
	Hawk_02 – Small employment area to north, limited opportunities for expansion / on-site provision.																				
12. Town centres	-	-																			
Town centres commentary	Beyond 1, 600 metres of a town centre.																				
13. Connectivity and transport	-	-																			
Connectivity and transport commentary	- Hawk_01 - Nearest train station 5222m, nearest bus stop / service 25m, nearest hourly bus stop / service 3480m. - Hawk_02 - Nearest train station 5429m, nearest bus stop / service 314m, nearest hourly bus stop / service 3748m. Broadband speeds range from 39-80 Mbps median speeds for postcodes in local area, all sites are assumed (at this stage) to have access to superfast broadband. Sites are scored with a negative due to lack of sustainable transport options.																				
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: - Appropriate landscaping for all sites would be required for all sites due to negative effects upon the landscape. - High quality design across all sites can reduce negative effects and maximise beneficial effects on the built environment. - All sites have relatively good access to facilities, but these beneficial effects can be maximised by enhancing sustainable travel links e.g. create bus stops near to the site, pedestrian/cycle links.																					

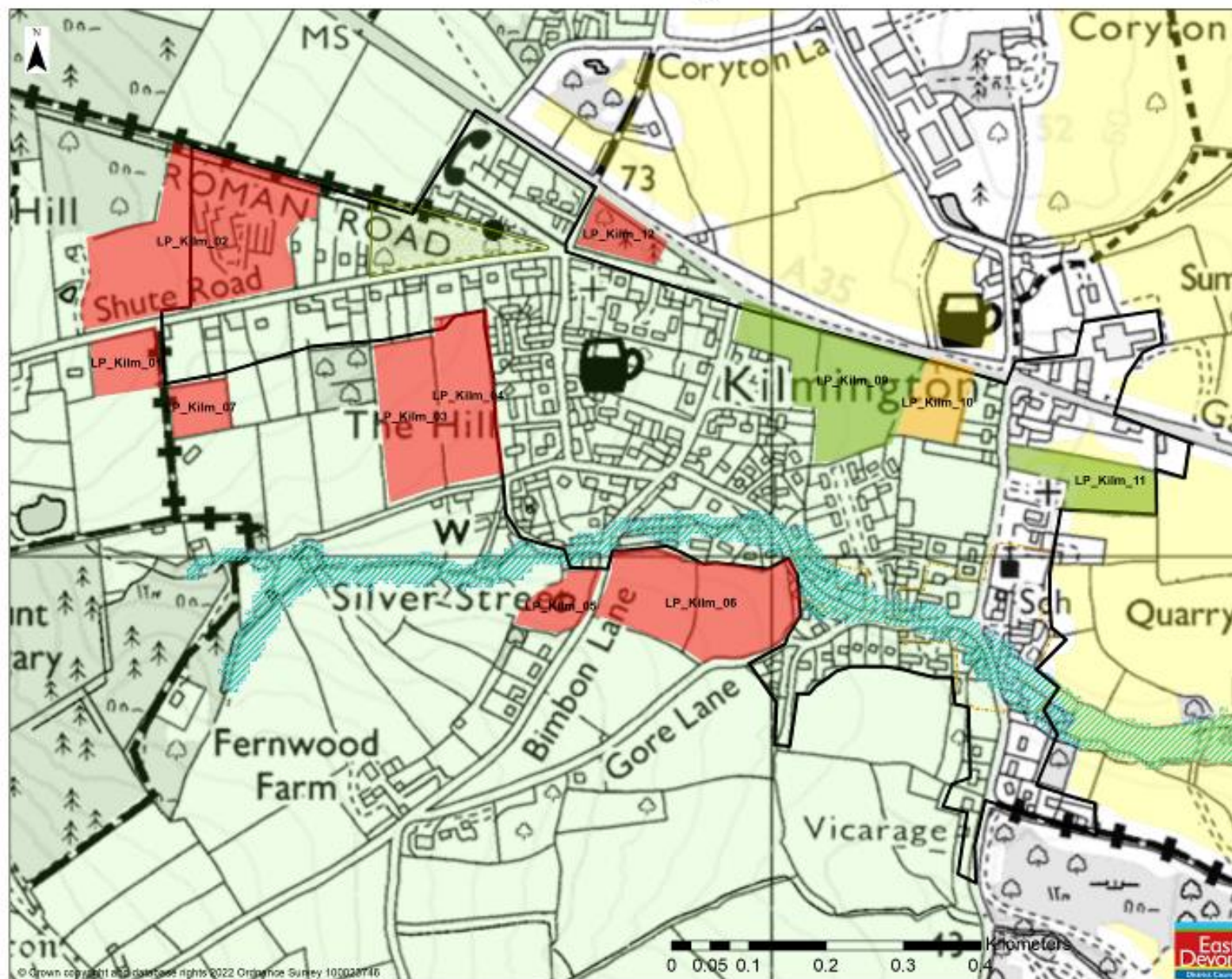
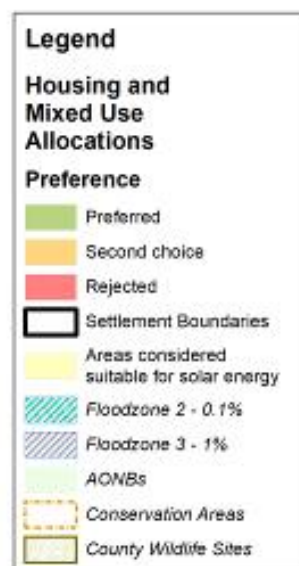
Sites: Hawkchurch																				
Site	Hawk_01	Hawk_02																		
SA Objective																				
- Designing new development for low water use and requiring sustainable drainage systems can help turn neutral uncertain effects on water resources into positive uncertain effects. - Positive effects for all sites in relation to jobs and employment could be maximised by providing on-site employment opportunities alongside new housing, where reasonable.																				
Preferred alternative: Hawk_01																				
Reasons for alternatives being preferred or rejected: - Hawk_01 – PREFERRED - Outside of AONB. Agricultural field with active employment use behind housing. Mature trees and hedgerow to south, west, east borders, mature tree in field. Set in context of residential and industrial development. PROW to west, south, east (footpaths). Overall, the site has a medium/low landscape sensitivity to new development. Heritage assets present: Grade II listed 1 Wytch Green (44m to north), Grade I listed St John the Baptist Church, row of Grade II buildings including the Old Bakery, the Old Inn, Fir View, Rose Cottage, Windwhistle Cottage. Currently light industrial units in closest area to heritage assets. Asset to the north separated from the site by residential development. Residential development may enhance the setting of the assets to the east rather than causing harm, subject to final detailed scheme. Overall, minor - Limited change to elements that contribute to the significance of assets and their setting, where harm is minimal. Ecology: Nature Recovery Network (2m), Section 41 (S41) Habitat of Principle Importance (including rivers and streams, excluding hedgerows) (88m), within River Axe SAC Nutrient catchment area. Site is within the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, significant moderate adverse effect predicted. - Hawk_02 – REJECTED - Outside of AONB. Field in agricultural use to south of Hawkchurch, adjoins an exception site. Mature hedgerow to surround with occasional mature tree. Overall, the site has a medium landscape sensitivity to new development. Assets Present: Over 200m																				

Sites: Hawkchurch																					
Site	Hawk_01	Hawk_02																			
SA Objective																					
from nearest listed buildings. Overall, no change - No change to assets or their settings. Nature Recovery Network (25m), within River Axe SAC Nutrient catchment area. Site is within the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, significant moderate adverse effect predicted. The site has a rural, agricultural character adjacent to an exception site only. The site context does not support allocation at this stage.																					

East Devon Local Plan 2020-2040 - Kilminster

Settlement:

Kilminster



n.b. Items in the Legend that appear in regular type are for consultation; items in *italics* are for information only

Reasonable alternatives

- Kilm_01 Land off Shute Road, Kilminster
- Kilm_02 Birchwood Farm, Shute Road, Kilminster
- Kilm_03 Land off Springhead Lane, Kilminster
- Kilm_04 Paddock off Springhead Lane, Kilminster
- Kilm_05 Land At Pit Orchard, Bim Bom Lane, Kilminster
- Kilm_06 Land at Gore Lane, Kilminster
- Kilm_07 Land adjoining Breach, Kilminster
- Kilm_09 Land east of George Lane, Kilminster
- Kilm_10 Land to the west and south west of the Old Inn, Kilminster
- Kilm_11 Land to the east of and off Whitford Road, between Ashes Farm and The Beacon Chapel, Kilminster
- Kilm_12 Land on the north side of Shute Road (Gapemouth Corner), Kilminster

Outline of reasons for selecting the alternatives

The reasonable alternatives listed above have all been assessed as suitable, available and achievable in the HELAA, which provides evidence that they have potential to be delivered (subject to further consideration through the planning process). Kilm_08 is not reasonable alternatives as already have planning permission, so is not being considered as allocations in the Local Plan.

Sites: Kilmington																				
Site SA Objective	Kilm_01	Kilm_02	Kilm_03	Kilm_04	Kilm_05	Kilm_06	Kilm_07	Kilm_09	Kilm_10	Kilm_11	Kilm_12									
1. Biodiversity	0	-	-	-	-	0	0	0	0	0	-									
Biodiversity commentary	Kilm_01, Kilm_06 and Kilm_10 covered by improved grassland, Trees and vegetation on the edge of the site boundary. No ecological designations within 100m of the site, so not likely to have positive or negative effects on any designated biodiversity site or sever green infrastructure. Kilm_02 is an existing farm covered by Unimproved grassland, grazed by cows with trees and vegetation on the edge of the site boundary, adjoining to a woodland. Section 41 (S41) Habitat of Principle Importance and County Wildlife Site (CWS) within 100m of the site. Development in the site would have a negative impact. Kilm_03, Kilm_04 and Kilm_09 are agricultural lands covered by crops, Trees and vegetation on the edge of the site boundary. No ecological designations within 100m of the site Kilm_05 and Kilm_12 covered by various vegetation, trees and unimproved grassland including overgrown grass, Trees and vegetation surrounded the site. Kilm_05 is located close to woodlands And Section 41 (S41) Habitat of Principle Importance and County Wildlife Site (CWS) within 100m of Kilm_12. So both would have a negative impact. Kilm_07 covered by unimproved grassland, including overgrown, vegetation on the edge of the site boundary. Section 41 (S41) Habitat of Principle Importance within 100m of the site, however, it has a certain degree of human disturbance as it is located close to a few existing residential developments. So it is unlikely to have positive or negative effects on any designated biodiversity site or sever green infrastructure. Kilm_11 covered by Unimproved grassland, grazed by sheep with trees and vegetation on the edge of the site boundary. No ecological designations within 100m of the site. So not likely to have positive or negative effects on any designated biodiversity site or sever green infrastructure.																			

Sites: Kilmington																				
Site SA Objective	Kilm_01	Kilm_02	Kilm_03	Kilm_04	Kilm_05	Kilm_06	Kilm_07	Kilm_09	Kilm_10	Kilm_11	Kilm_12									
2. Landscape	--	--	--	--	--	--	--	--	--	-	--									
Landscape commentary	Except for Kilm_11, the rest of the sites are within AONB, so a major negative effect would be applied to all of them, Kilm_11 located just outside the AONB which is across the road (The Green) to the west. Medium visibility. The site might have a visual impact to the AONB, especially from the Recreation ground to the south. The site has medium landscape sensitivity. So negative impact.																			
3. Hist. built env	0	0	0	0	0	-	0	-	--	--	0									
Hist. built env. commentary	Kilm_01, Kilm_02, Kilm_03, and Kilm_07 No significant effect because there are no designated heritage asset within 100m that would be affected by developing the site. Substantial existing development in between Kilm_04 and the Grade II listed dwellings (95m to south of site), No significant effect because there are no designated heritage asset that would be affected by developing the site. Existing trees and hedgerow obscure views between Kilm_05 and the Grade II listed dwellings (46m to north west of site). No significant effect because there are no designated heritage asset that would be affected by developing the site. Kilm_06, The Conservation Area runs along the eastern edge of the site, Grade II listed dwellings 14m to east of site and Grade II listed Old Ruggs Farm around 90m to east of site. Development would have negative effects on historic environment. Kilm_09 Three Grade II listed buildings within 40m(Grade II listed The Old Inn around 28m to east of site; Grade II listed George Farmhouse 37m to west of site and Grade II listed The War Memorial 30m to west), Development would have negative effects on historic environment																			

Sites: Kilminster																					
Site SA Objective	Kilm_01	Kilm_02	Kilm_03	Kilm_04	Kilm_05	Kilm_06	Kilm_07	Kilm_09	Kilm_10	Kilm_11	Kilm_12										
	Kilm_10 Grade II listed The Old Inn located northern part of the site. Clear views from A35. Potential for a major negative effect on a designated heritage asset or an important non-designated heritage asset and/or their setting. Mitigation likely to be difficult. Kilm_11 Grade II listed Ashes Farm Cottage located west of the site. Clear views from public road. Conservation Area and Grade II listed St Giles Church to south. Clear views from the St Giles Church and the Conservation Area. Potential for a major negative effect on a designated heritage asset or an important non-designated heritage asset and/or their setting. Kilm_12 Grade II listed dwellings 70m to south of site, and Grade II listed War Memorial 89m to east of site. Existing buildings, trees and hedgerow obscure views. No significant effect because there are no designated heritage asset that would be affected by developing the site.																				
4. Climate change carbon emissions	-	-	-	-	-	-	-	-	-	-	-										
Climate change carbon emissions commentary	An accessibility assessment undertaken for the Site Selection work identified a total of 12 services, facilities and employment sites¹⁰⁰ – the findings are referenced for each site in this commentary All the sites in Kilminster have 7 out of 12 facilities within 1,600m, however no hourly bus/ railway services within 1,600m. So all the sites are not likely to minimise the need to travel, with limited opportunities for sustainable travel and use of renewable and low carbon energy.																				

¹⁰⁰ Namely: train station, hourly or better bus route, primary school, secondary school, convenience store/shop, Post Office, Community hall, Pub, Open space/allotment, children's play area, GP, employment site (identified in the Employment Land Review).

Sites: Kilmington																				
Site SA Objective	Kilm_01	Kilm_02	Kilm_03	Kilm_04	Kilm_05	Kilm_06	Kilm_07	Kilm_09	Kilm_10	Kilm_11	Kilm_12									
5. Climate change adaptation	+	+	+	+	+	+	+	+	+	+	+									
Climate change adaptation commentary	None of these sites is located in a critical drainage area. In general, all sites offer the potential to cope with the heat, drought and extreme storms through appropriate design and incorporation of sustainable drainage All the sites are not located in an area of flood risk, leading to a positive effect. Kilm_05 and Kilm_06 located close to flood risk, development could avoid those areas.																			
6. Land resources	- ?	- ?	- ?	- ?	- ?	- ?	- ?	- ?	- ?	- ?	- ?									
Land resources commentary	All the sites are greenfield sites on Grade 3 agricultural land, which could be 3a (best and most versatile) so uncertain negative effect.																			
7. Water resources	--	--	--	--	--	--	--	--	--	--	--									
Water resources commentary	All of the sites are within the River Axe SAC catchment and could cause major negative effects on water quality.																			
8. Homes	+	+	+	+	+	+	+	+	+	+	+									
Homes commentary	All the sites have potential to deliver less than 100 dwellings, so will have a positive effect. An appropriate mix of tenures and sizes including affordable housing is assumed for all sites.																			

Sites: Kilmington																				
Site SA Objective	Kilm_01	Kilm_02	Kilm_03	Kilm_04	Kilm_05	Kilm_06	Kilm_07	Kilm_09	Kilm_10	Kilm_11	Kilm_12									
9. Health and well-being	0	0	0	0	0	0	0	-	-	-	-									
Health and well-being commentary	All the site in Kilmington are within 1,600m of open space/allotment and a children's play area, but not within 800m to an area of higher deprivation (among 50% most deprived neighbourhoods in England), so Neutral effect as default. Kilm_09, Kilm_10, Kilm_11 and Kilm_12 adjacent to A35 road, so negative impact. The rest of the sites are neutral.																			
10. Access to services	-	-	-	-	-	-	-	-	-	-	-									
Access to services commentary	All the sites in Kilmington are within 1,600m from a primary school, shop, community hall, pub and post office, however no hourly bus/ railway services within 1,600m. All the sites in Kilmington lack of pedestrian crossing facilities and very limited footpaths to connect those services/facilities also noticed the lack of street lighting in the village which would be another safety concern at night for both pedestrians and cyclists. So all the sites in Kilmington are negative impacts.																			
11. Jobs and employment	+	+	+	+	+	+	+	+	+	+	+									
Jobs/employment commentary	All sites will provide short-term positive effects from job opportunities during construction. All the site are within 1,600m of an employment site, but due to the scale of development and the landscape impact, unlikely would have potential to accommodate employment on site. So All the site are minor positive effect																			

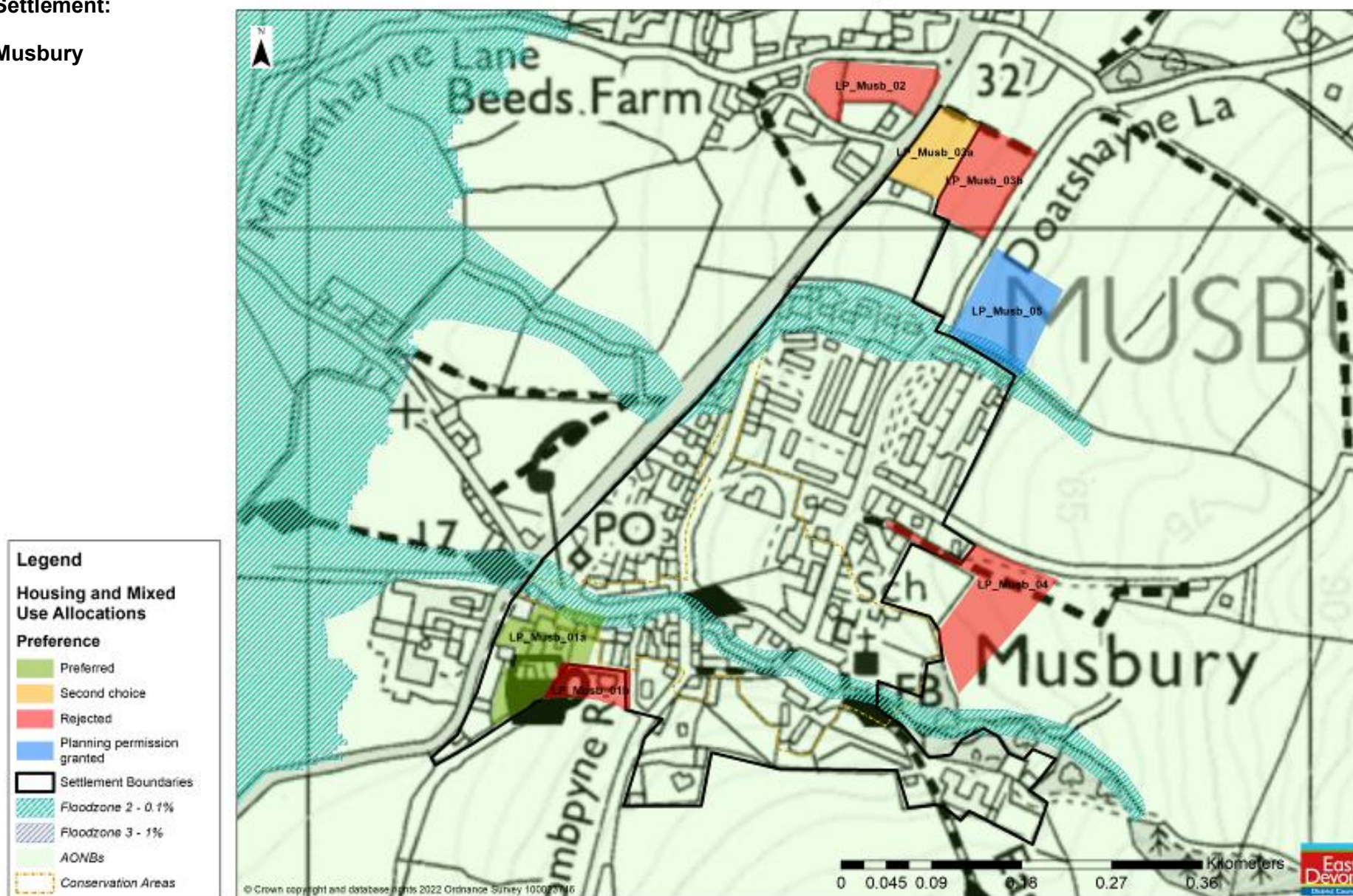
Sites: Kilmington																					
Site SA Objective	Kilm_01	Kilm_02	Kilm_03	Kilm_04	Kilm_05	Kilm_06	Kilm_07	Kilm_09	Kilm_10	Kilm_11	Kilm_12										
12. Town centres	+	+	++	++	++	++	+	++	++	++	++										
Town centres commentary	Kilm_01, Kilm_02 and Kilm_07 are beyond 800m but within 1,600m of Kilmington village centre, so minor positive effect. Rest of the sites are within 800m of Kilmington village centre, so major positive effect.																				
13. Connectivity and transport	-	-	-	-	-	-	-	-	-	-	-										
Connectivity and transport commentary	Kilmington should have coverage of superfast broadband, all the sites are assumed to have access to standard to superfast broadband. All the sites in Kilmington are located more than 1,600m from a train station or an hourly or better bus service, but within 800 from A35. So negative effect.																				
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: - All the sites either fall within AONB or have a visual impact to the AONB(Kilm_11), considerable landscaping would be required for all sites due to significant negative effects upon the landscape, but their sensitivity is such that a significant negative effect is likely to remain. - All sites lack of good sustainable travel links, any developments in the future should enhance sustainable travel links e.g. providing hourly bus services, creating bus stops near the site, and pedestrian/cycle links. - Noise attenuation will lessen the negative health and well-being effect for Kilm_09, Kilm_10, Kilm_11 and Kilm_12 caused by their location close to the A35. - Positive effects for all sites in relation to jobs and employment could be maximised by providing on-site employment opportunities alongside new housing, where reasonable.																					

Sites: Kilmington																				
Site	Kilm_01	Kilm_02	Kilm_03	Kilm_04	Kilm_05	Kilm_06	Kilm_07	Kilm_09	Kilm_10	Kilm_11	Kilm_12									
SA Objective																				
The negative historic environment effect at Kilm_12 can be lessened by reducing the site area to avoid the Scheduled Monument, and significant negative historic environment effects at Kilm_10 and Kilm_11 would be subject to further assessments.																				
Preferred alternative: Kilm_09, Kilm_10 and Kilm_11																				
Reasons for alternatives being preferred or rejected: - Kilm_01 Land off Shute Road rejected due to significant adverse landscape effect. - Kilm_02 Birchwood Farm, Shute Road rejected due to significant adverse landscape effect. - Kilm_03 Land off Springhead Lane rejected due to significant adverse landscape effect. - Kilm_04 Paddock off Springhead Lane rejected due to significant adverse landscape effect. - Kilm_05 Land At Pit Orchard, Bim Bom Lane rejected due to significant adverse landscape effect. - Kilm_06 Land at Gore Lane rejected due to significant adverse landscape effect. - Kilm_07 Land adjoining Breach rejected due to significant adverse landscape effect, and adverse biodiversity effect. - Kilm_09 Land east of George Lane preferred as consistent with neighbourhood plan, and the site has good access to facilities and employment. - Kilm_10 Land to the west and south west of the Old Inn preferred as consistent with neighbourhood plan, and the site has good access to facilities and employment, subject to heritage assessment. - Kilm_11 Land to the east of and off Whitford Road, between Ashes Farm and The Beacon Chapel preferred as consistent with neighbourhood plan, and the site has good access to facilities and employment, subject to heritage assessment. - Kilm_12 Land on the north side of Shute Road (Gapemouth Corner) rejected due to significant adverse landscape effect and adverse historical impact.																				

East Devon Local Plan 2020-2040 - Musbury

Settlement:

Musbury



n.b. Items in the Legend that appear in regular type are for consultation; items in italics are for information only

Reasonable alternatives

- Musb_01 – Baxter’s Farm
- Musb_03 – Churchpath Field
- Musb_04 Adcroft, Mounthill Lane

Outline of reasons for selecting the alternatives

The reasonable alternatives listed above have all been assessed as suitable, available and achievable in the HELAA, which provides evidence that they have potential to be delivered (subject to further consideration through the planning process). Musb_05 is not reasonable alternative because it already has planning permission, so is not being considered as an allocation in the Local Plan.

Sites: Musbury																					
Site SA Objective	Musb_01	Musb_03	Musb_04																		
1. Biodiversity	-	-	-																		
Biodiversity commentary	All sites are in the River Axe Nutrient Management Zone and the Beer Quarry Caves bat consultation zone. Musb_01 has former agricultural buildings that may be used by bat and barn owls and Musb_04 is adjacent to nature recovery networks and a core nature area.																				
2. Landscape	--	--	--																		
Landscape commentary	All sites are in the East Devon AONB and parts of them are highly sensitive to landscape change.																				

Sites: Musbury																					
Site SA Objective	Musb_01	Musb_03	Musb_04																		
3. Hist. built env	-	0	-																		
Hist. built env. commentary	Musb_01 and 04 have the potential to affect the setting of several designated and non-designated heritage assets.																				
4. Climate change carbon emissions	+	+	+																		
Climate change carbon emissions commentary	An accessibility assessment undertaken on the site selection work identified a total of 12 services, facilities and employment sites ¹⁰¹ and Musbury has seven of these. All sites benefit from good pedestrian access to facilities, although in the village centre this is along lanes with no separate footway.																				
5. Climate change adaptation	0	+	+																		

¹⁰¹ Namely: train station, hourly or better bus route, primary school, secondary school, convenience store/shop, Post Office, Community hall, Pub, Open space/allotment, children's play area, GP, employment site (identified in the Employment Land Review).

Sites: Musbury																					
Site SA Objective	Musb_01	Musb_03	Musb_04																		
Climate change adaptation commentary	The northern boundary of Musb_01 is at risk of flooding.																				
6. Land resources	- ?	- ?	- ?																		
Land resources commentary	All sites are Grade 3 agricultural land, so uncertain negative effect.																				
7. Water resources	0 ?	0 ?	0 ?																		
Water resources commentary	Development at the sites is unlikely to have any significant effects on water quality and quantity as none are located within a groundwater source protection zone. There is uncertainty on the capacity of local sewage treatment works to accommodate additional demand from new housing. This means an uncertain neutral effect for all sites.																				
8. Homes	+	+	+																		
Homes commentary	All sites have a capacity under 100.																				

Sites: Musbury																					
Site SA Objective	Musb_01	Musb_03	Musb_04																		
9. Health and well-being	-	+	-																		
Health and well-being commentary	No sites are within 1600 metres of a 50% most deprived neighbourhood and Musb_01 and 03 are adjacent to an A road. Musb_04 is not adjacent to a noise source and is within 800 metres of a play area and allotment.																				
10. Access to services	++	++	++																		
Access to services commentary	All sites are within 800 metres of a range of services with no significant issues relating to pedestrian accessibility.																				
11. Jobs and employment	+	-	-																		
Jobs/employment commentary	No employment sites are within 1,600m of any site and employment opportunities or likely to be delivered on either Musb_03 or 04. Due to the particular characteristics of Musb_01 employment is likely to be provided as part of the development of the site in accordance with the Baxter's Farm Development Brief.																				
12. Town centres	-	-	-																		

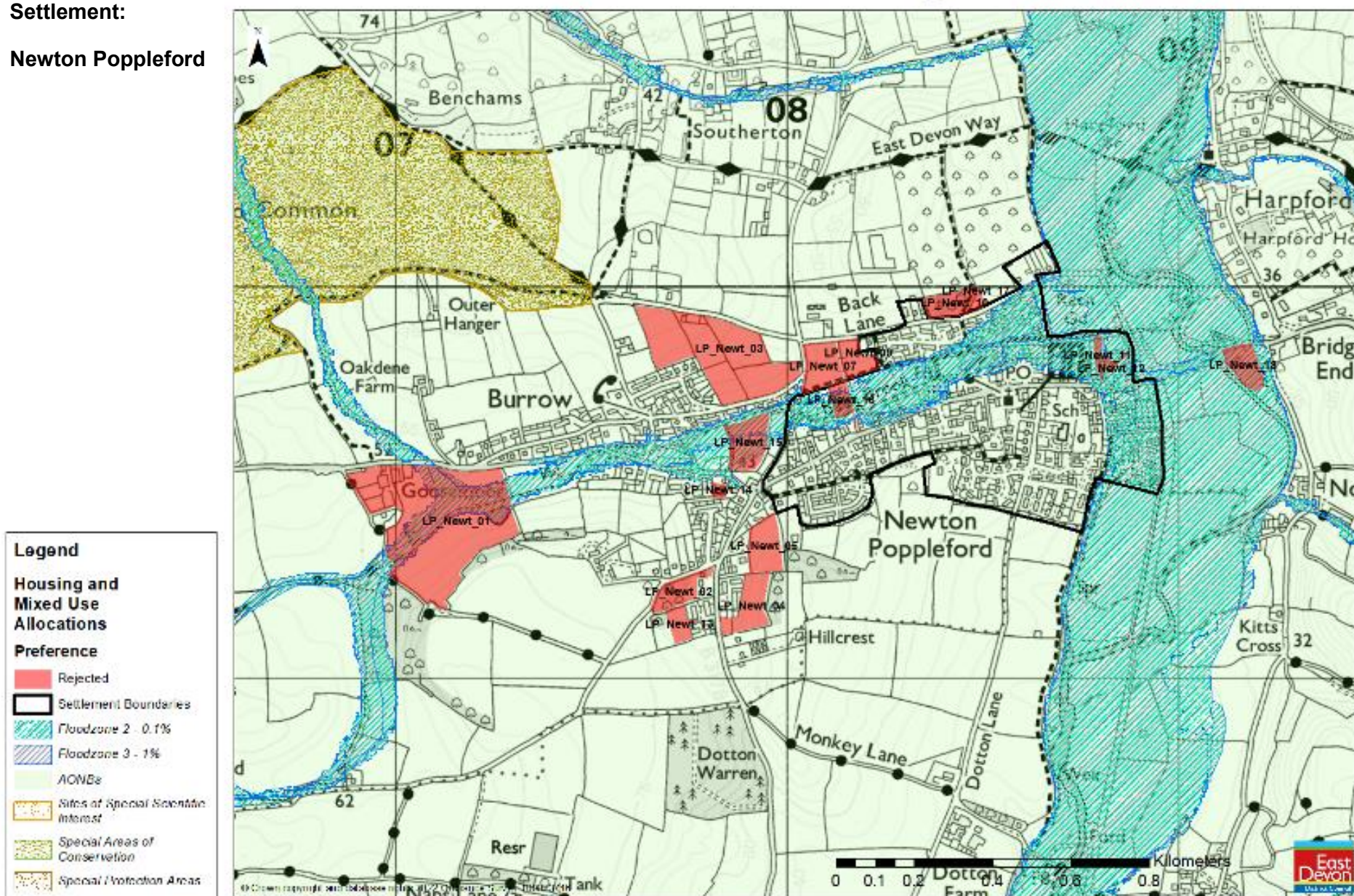
Sites: Musbury																					
Site SA Objective	Musb_01	Musb_03	Musb_04																		
Town centres commentary	None of the sites are within 1,600 metres of a town centre.																				
13. Connectivity and transport	-	-	-																		
Connectivity and transport commentary	All sites are close to an A road with an hourly bus service, but broadband speeds are less than 10 mbps.																				
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: - Mitigate impact upon River Axe nutrients and Beer Quarry Caves bats to be considered in the Habitats Regulations Assessment. - The landscape impacts of Musb_01 and 03 can reduced by developing only the lower parts of the site. - Impact on heritage impacts of development on Musb_01 can be mitigated by retaining some of the existing buildings as set out in the Baxter's Farm Development Brief. - Noise from the A road on Mus_01 and 03 can be reduced through site design and possibly landscaping.																					
Preferred alternative: Part of Musb_01 with part of Musb_03 as a 'second best' option																					
Reasons for alternatives being preferred or rejected:																					

Sites: Musbury																					
Site	Musb_01	Musb_03	Musb_04																		
SA Objective																					
- The western part of Musb_01 is preferred as it consistent with spatial strategy with good access to services/facilities and makes good use of existing building and former farmyard in village close to services and facilities. The fields on the higher slopes are rejected on landscape grounds. - The western part of Musb_3 is a second choice option because it is quite well related to the services and facilities in the village, but is in the AONB. The eastern part of the site is rejected on landscape grounds. - Musb_04 is rejected on landscape grounds.																					

East Devon Local Plan 2020-2040 - Newton Poppleford

Settlement:

Newton Poppleford



n.b. Items in the Legend that appear in regular type are for consultation; items in italics are for information only

Reasonable alternatives

- Newt_01 – Goosemoor Farm, Exeter Road
- Newt_02 – Littledown Farm
- Newt_04 – Land west of Badger Close
- Newt_05 – Land east of Exmouth Road
- Newt_13 – Land off Down Close
- Newt_14 – Seniors Farmyard

Outline of reasons for selecting the alternatives

The reasonable alternatives listed above have all been assessed as suitable, available and achievable in the HELAA, which provides evidence that they have potential to be delivered (subject to further consideration through the planning process). All sites that passed the HEELA were assessed, except for Newt_03, which is no longer available.

Sites: Newton Poppleford																				
Site SA Objective	Newt_01	Newt_02	Newt_04	Newt_05	Newt_13	Newt_14														
1. Biodiversity	--	--	--	--	--	--														
Biodiversity commentary	Newt_01, 02 and 13 are within both the Exe Estuary and Pebblebed Heaths mitigation zones. Newt_01 is adjacent to a nature recovery network and has a river flowing through it and the western half of Newt_02 is a woodland nature recovery network. Newt_04, 05 and 14 are in the Pebblebed Heaths. Newt_04 and 05 are also next to a nature recovery network.																			

Sites: Newton Poppleford																					
Site SA Objective	Newt_01	Newt_02	Newt_04	Newt_05	Newt_13	Newt_14															
2. Landscape	--	-	--	--	-	- / +															
Landscape commentary	All sites are within the East Devon AONB and are sensitive to landscape change, although Newt_14 is an existing farmyard surrounded by buildings so has the potential for a positive or negative impact. Newt_01, 04 and 05 are considered to be particularly sensitive to change that would be difficult to mitigate.																				
3. Hist. built env	-	0	0	-	0	-															
Hist. built env. commentary	Development of Newt_01 has the potential to impact the setting of a non-designated heritage asset, Newt_05 and 14 could affect the setting of listed buildings but no heritage assets are affected by Newt_02, 04 and 13.																				
4. Climate change carbon emissions	-	-	-	-	-	-															

Sites: Newton Poppleford																					
Site SA Objective	Newt_01	Newt_02	Newt_04	Newt_05	Newt_13	Newt_14															
Climate change carbon emissions commentary	An accessibility assessment undertaken for the Site Selection work identified a total of 12 services, facilities and employment sites ¹⁰² – the findings are referenced for each site in this commentary. Newton Poppleford has seven of these and all sites are within 1600 metres of the village centre. However, pedestrian and cycle routes are very difficult to the west of the village due to a 'pinch point' formed where a very busy A road has no pavement or room for large vehicles to pass. The lack of alternative walking routes which have a firm surface and lighting mean that none of the sites provide good opportunities for sustainable travel.																				
5. Climate change adaptation	0	+	+	+	+	0															
Climate change adaptation commentary	None of these sites is located in a critical drainage area. In general, all sites offer the potential to cope with heat, drought and extreme storms through appropriate design and incorporation of sustainable drainage, for example. Newt_02, 04, 05 and 13 are not located in an area of flood risk, leading to a positive effect. Newt_01 has areas of flood risk crossing the middle of the site and the access to Newt_14 is in flood zone 2.																				
6. Land resources	-	--	--	--	-	+															

¹⁰² Namely: train station, hourly or better bus route, primary school, secondary school, convenience store/shop, Post Office, Community hall, Pub, Open space/allotment, children's play area, GP, employment site (identified in the Employment Land Review).

Sites: Newton Poppleford																					
Site SA Objective	Newt_01	Newt_02	Newt_04	Newt_05	Newt_13	Newt_14															
Land resources commentary	Newt_02 and 03 are mainly Grade 2 with some Grade 1 agricultural land. Newt_04 and 05 are Grade 2 agricultural land. Newt_01 is partly Grade 2 and partly Grade 3 agricultural land and Newt_14 is Grade 3 and currently used as a farmyard in an urban area. None of the sites are in a minerals consultation zone or likely to be contaminated.																				
7. Water resources	-	-	-	-	-	-															
Water resources commentary	All sites are in a drinking water protection zone.																				
8. Homes	++	+	+	+	+	+															
Homes commentary	Only Newt_01 has a maximum capacity of over 100 dwellings.																				
9. Health and well-being	-	+	+	+	+	-															
Health and well-being commentary	All sites are within 1600 metres of open and play space. Newt_01 and 14 are adjacent to an A road. No sites are within 800 metres of an area of higher deprivation.																				

Sites: Newton Poppleford																				
Site SA Objective	Newt_01	Newt_02	Newt_04	Newt_05	Newt_13	Newt_14														
10. Access to services	-	-	-	-	-	-														
Access to services commentary	Whilst all sites are within 1600 metres of a range of services, there are significant issues relating to the safety of pedestrian and cycling links.																			
11. Jobs and employment	-	-	-	-	-	-														
Jobs/employment commentary	None of the sites is within 1600 metres of an employment site. Newt_01 is the only site large enough for employment on site and this would probably be unacceptable due to landscape impact.																			
12. Town centres	-	-	-	-	-	-														
Town centres commentary	All sites are more than 1600 metres from a town centre.																			
13. Connectivity and transport	++	++	++	++	++	++														

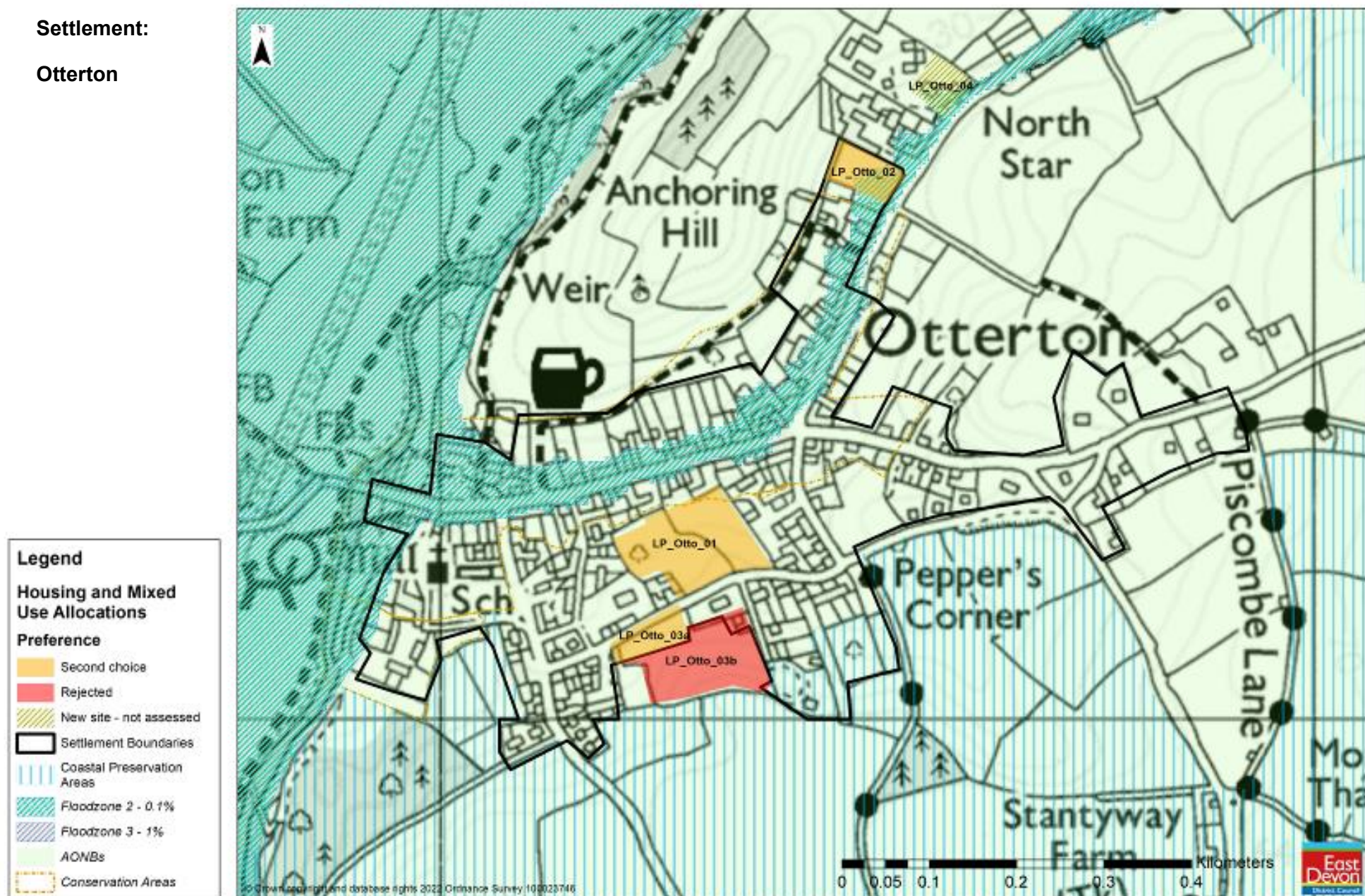
Sites: Newton Poppleford																				
Site SA Objective	Newt_01	Newt_02	Newt_04	Newt_05	Newt_13	Newt_14														
Connectivity and transport commentary	All sites are within 1600 metres of an hourly bus service, an A road, a recognised cycle route and the area has a 10 – 30 mbps broadband as a minimum.																			
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: • Mitigate impact upon Exe Estuary and Pebblebed Heaths SPAs – to be considered in the Habitats Regulations Assessment. • Considerable landscaping at Newt_01, 04 and 05 would be required due to significant negative effects upon the landscape, but the sensitivity is such that a significant negative effect is likely to remain. A minor negative landscape effect for Newt_02 and 13 means that appropriate landscaping should be incorporated, although, a negative effect would remain. • High quality design to minimise impacts upon listed buildings. • Sustainable drainage systems to minimise flood risk. • Noise buffer to A3052 for Newt_01 and 14. • Measures required to protect ground water on sites in source protection zone. • Positive effects for all sites in relation to jobs and employment could be maximised by providing on-site employment opportunities alongside new housing, although opportunities for this are limited by the relatively small site sizes.																				
Preferred alternative: There are no preferred or second best sites																				
Reasons for alternatives being preferred or rejected: • Newt_01 – Goosemoor Farm, Exeter Road – rejected because site is poorly related to the village with no safe pedestrian or cycling route to the village centre. Also significant detrimental landscape impacts on East Devon AONB.																				

Sites: Newton Poppleford																				
Site	Newt_01	Newt_02	Newt_04	Newt_05	Newt_13	Newt_14														
SA Objective																				
- Newt_02 – Littledown Farm - no safe and convenient pedestrian or cycling access to the services and facilities in the village centre. Highway, ecological, landscape and tree preservation order constraints. - Newt_04 – Land west of Badger Close - no safe and convenient pedestrian or cycling access to the services and facilities in the village centre. Grade 2 agricultural land, ecology and landscape. - Newt_05 – Land east of Exmouth Road - no safe and convenient pedestrian or cycling access to the services and facilities in the village centre. Grade 2 agricultural land, landscape constraints and potential impact on designated heritage assets. - Newt_13 – Land off Down Close - no safe and convenient pedestrian or cycling access to the services and facilities in the village centre. Grade 1 and 2 agricultural land, ecological and landscape constraints. - Newt_14 – Seniors Farmyard - no safe and convenient pedestrian or cycling access to the services and facilities in the village centre. Potential impact on heritage assets and flooding.																				

East Devon Local Plan 2020-2040 - Otterton

Settlement:

Otterton



n.b. Items in the Legend that appear in regular type are for consultation; items in italics are for information only

Reasonable alternatives

- Otto_01 – land east of Hayes Close
- Otto_02 – land adjacent to North Star
- Otto_03 - Land at Hayes Lane
- Otto_04 – Land north of Rydon Close

Outline of reasons for selecting the alternatives

All sites are considered suitable, available and achievable in the HELAA were considered.

Sites: Otterton																					
Site SA Objective	Otto_01	Otto_02	Otto_03	Otto_04																	
1. Biodiversity	--	--	--	--																	
Biodiversity commentary	All sites are within the Exe Estuary and Pebblebed Heath mitigation zones. Otto_03 is adjacent to a nature recovery network.																				
2. Landscape	--	--	--	--																	
Landscape commentary	All sites are within the East Devon AONB and are sensitive to change.																				

Sites: Otterton																					
Site SA Objective	Otto_01	Otto_02	Otto_03	Otto_04																	
3. Hist. built env	--	-	--	-																	
Hist. built env. commentary	All sites have the potential to affect the settings of designated heritage assets. Otto_01 is surrounded by many designated heritage assets and Otto_03 is on rising ground opposite a listed building so potential for major negative impacts for these two sites.																				
4. Climate change carbon emissions	+	+	+	+																	
Climate change carbon emissions commentary	An accessibility assessment undertaken for the Site Selection work identified a total of 12 services, facilities and employment sites ¹⁰³ . Otterton has six of these and all sites are located within 800 metres of them. The minor positive score reflects the limited range of facilities in Otterton.																				
5. Climate change adaptation	+	0	+	0																	

¹⁰³ Namely: train station, hourly or better bus route, primary school, secondary school, convenience store/shop, Post Office, Community hall, Pub, Open space/allotment, children's play area, GP, employment site (identified in the Employment Land Review).

Sites: Otterton																					
Site SA Objective	Otto_01	Otto_02	Otto_03	Otto_04																	
Climate change adaptation commentary	None of these sites is located in a critical drainage area. In general, all sites offer the potential to cope with heat, drought and extreme storms through appropriate design and incorporation of sustainable drainage, for example. Parts of Otto_02 and Otto_03 are at risk of flooding.																				
6. Land resources	?	-	?	-																	
Land resources commentary	Otto_01 and 03 are Grade 3 agricultural land. Otto_02 and 04 are Grade 2 agricultural land, but Otto_04 partly comprises an existing building.																				
7. Water resources	-	-	-	-																	
Water resources commentary	All of the sites are in a drinking water source protection zone.																				
8. Homes	+	+	+	+																	
Homes commentary	All sites have a capacity of less than 100 homes.																				

Sites: Otterton																					
Site SA Objective	Otto_01	Otto_02	Otto_03	Otto_04																	
9. Health and well-being	+	+	+	+																	
Health and well-being commentary	None of the sites are within 800 metres of an area of higher deprivation. All sites are within 800 metres of a play area and open space. All sites are in an area of good air quality and limited noise and light pollution.																				
10. Access to services	+	+	+	+																	
Access to services commentary	All sites are within 800 metres of a limited range of services including a primary school, pub and community hall.																				
11. Jobs and employment	-	-	-	--																	
Jobs/employment commentary	None of the sites are within 1600 metres of a mapped employment site, although there is an engineering plant at North Star. Otto_04 has planning permission for employment uses.																				
12. Town centres	-	-	-	-																	

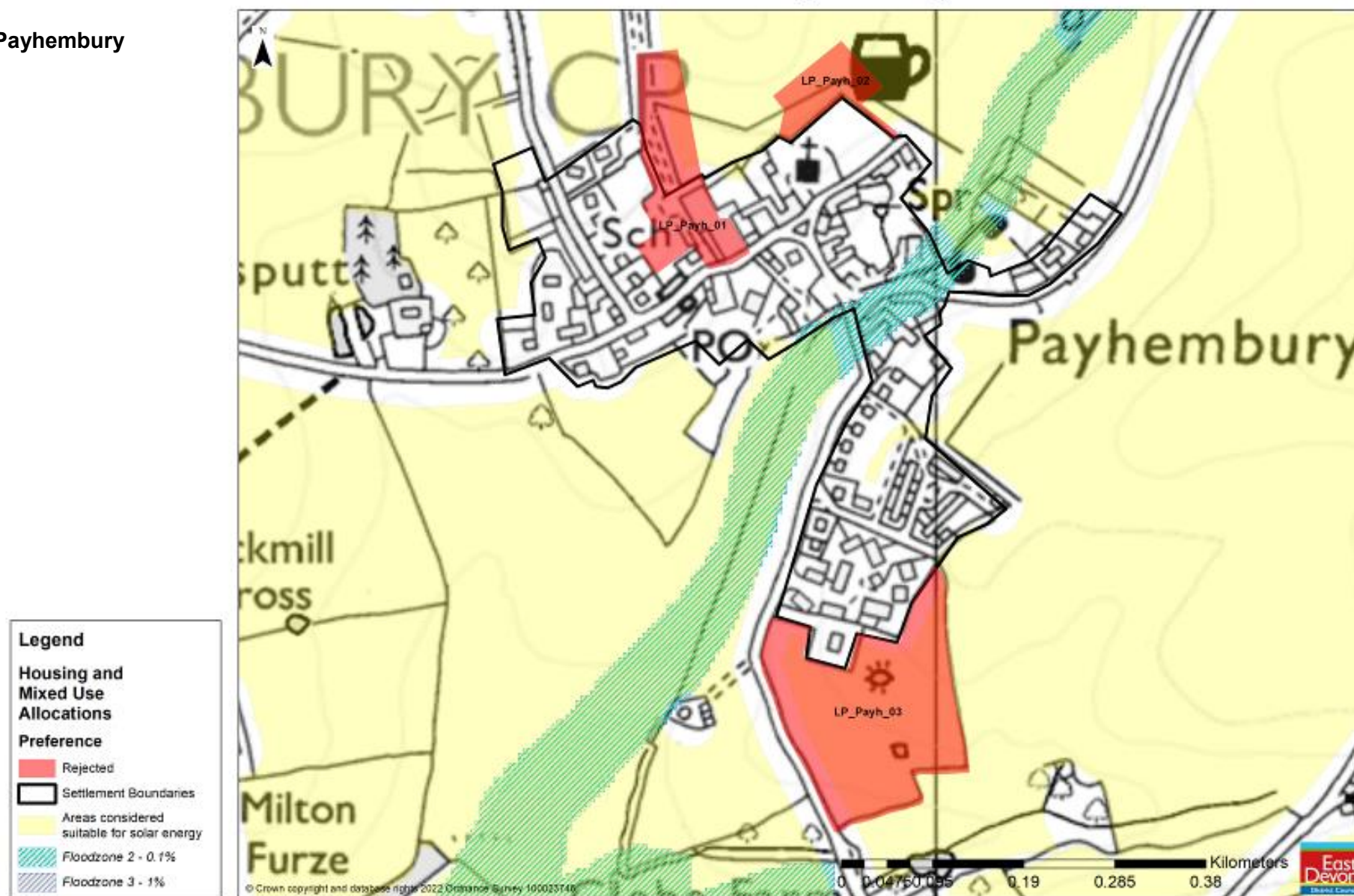
Sites: Otterton																					
Site SA Objective	Otto_01	Otto_02	Otto_03	Otto_04																	
Town centres commentary	None of the sites is within 1600 metres of a town centre.																				
13. Connectivity and transport	+	+	+	+																	
Connectivity and transport commentary	Otterton has average broadband speeds in excess of 30 mbps. All sites are within 1600 metres of an hourly bus service.																				
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: - Mitigate impact upon Exe Estuary and Pebblebed Heaths SPAs – to be considered in the Habitats Regulations Assessment. - Appropriate landscaping may minimise the impact of development on the AONB landscape, but negative impacts still anticipated. - Careful design could mitigate impact on heritage assets, but this may be difficult on Otto_01 and 03. - Measures required to protect ground water as all sites are in source protection zone.																					
Preferred alternative: There are no preferred sites, but Otto-01, 02 and 03 are identified as ‘second best’ sites.																					
Reasons for alternatives being preferred or rejected: Otto_01 – land east of Hayes Close - second choice site as consistent with spatial strategy with good access to facilities in village centre, but negative impacts on AONB landscape, designated heritage assets and highway constraints.																					

Sites: Otterton																					
Site	Otto_01	Otto_02	Otto_03	Otto_04																	
SA Objective																					
- Otto_02 – land adjacent to North Star - second choice site as consistent with spatial strategy with reasonable access to facilities in village centre, but negative impacts on AONB landscape and flood risk. - Otto_03 - Land at Hayes Lane - second choice site as consistent with spatial strategy with good access to facilities in village centre, but negative impacts on AONB landscape, designated heritage assets and highway constraints. - Otto_04 – Land north of Rydon Close – rejected as site has permission for employment use and flooding issues.																					

Settlement:

Payhembury

East Devon Local Plan 2020-2040 - Payhembury



n.b. Items in the Legend that appear in regular type are for consultation; items in italics are for information only

Reasonable alternatives

- Payh_01 - Slade Barton, EX14 3HR
- Payh_02 - Behind Playing fields, EX14 3HR
- Payh_03 - Markers Park, Payhembury

Outline of reasons for selecting the alternatives

The reasonable alternatives listed above have all been assessed as suitable, available and achievable in the HELAA, which provides evidence that they have potential to be delivered (subject to further consideration through the planning process). No alternative options were dismissed in accordance with the sifting criteria.

Sites: Payhembury																					
Site SA Objective	Payh_01	Payh_02	Payh_03																		
1. Biodiversity	-	-	-																		
Biodiversity commentary	• Payh_01 - Ecology: Nature Recovery Network (1m), Section 41 (S41) Habitat of Principle Importance (including rivers and streams, excluding hedgerows) (73m). Site is within the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, significant moderate adverse effect predicted. • Payh_02 - Ecology: Nature Recovery Network (1m). Site is within the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, significant moderate adverse effect predicted.																				

Sites: Payhembury																					
Site SA Objective	Payh_01	Payh_02	Payh_03																		
	Payh_03 - Ecology: Nature Recovery Network (5m). Site is within the East Devon Pebblebed Heaths SAC HRA mitigation zone. Mature trees and hedgerows to borders. Mature trees in open field. Ponds to centre of field. Overall, significant moderate adverse effect predicted.																				
2. Landscape	--	--	--																		
Landscape commentary	- Payh_01 - Outside of AONB. Units and agricultural field at slade barton in Payhembury village. Site slopes up towards the north. Current permission for 9 dwellings and relocated workshop on southern part of the site. Remainder of site is considered to have capacity for 5 dwellings. Remainder of the site to north is highly exposed and poorly related to the existing village development. Overall, the site has a high/medium landscape sensitivity to new development. - Payh_02 - Outside of AONB. Agricultural field adjoining Payhembury village recreation ground. Site slopes up towards the north. Highly exposed site to north of village adjacent to Grade I listed building and curtilage (St Mary's Church). Overall, the site has a high landscape sensitivity to new development. - Payh_03 - Outside of AONB. Highly prominent site with high intervisibility, notably from southern approach to Payhembury. Agricultural field adjoining Payhembury built-up area. Site slopes up towards the east. Overall, the site has a high landscape sensitivity to new development.																				
3. Hist. built env	-	--	0																		
Hist. built env. commentary	Payh_01 - Heritage assets present: Grade II Apple Tree Cottage (50m), Grade II Yeomans Cottage (72m), Grade II Payhembury VC School and School House (18m), Grade II Sunnyside (48m), Grade II Higher House (59m), Grade I St Mary's Church (75m). Potential for adverse heritage impact subject to final design and layout. Northern extent of site more																				

Sites: Payhembury																					
Site SA Objective	Payh_01	Payh_02	Payh_03																		
	exposed. Overall, moderate - Change affecting the special character of assets, where elements which contribute to their significance and their setting are harmed. - Payh_02 - Heritage assets present: Grade II Sunnyside (75m), Grade II Higher House (61m), Grade I St Mary's Church (45m). Likely significant heritage impact to adjacent Grade I listed church and curtilage. Overall, major - Considerable change affecting the special character of assets including their setting, where the significance of those elements is substantially harmed or lost. - Payh_03 - Heritage assets present: Grade II Glebe Farm to south (115m). Overall, minor - Limited change to elements that contribute to the significance of assets and their setting, where harm is minimal.																				
4. Climate change carbon emissions	-	-	-																		
Climate change carbon emissions commentary	An accessibility assessment undertaken for the site selection work identified a total of 12 services, facilities and employment sites. Individual sites are listed below including the number of services and proximity of key facilities. - Payh_01 - 5 out of 12 facilities within 1,600m of site. Nearest train station 2452m, nearest bus stop / service 27m, nearest hourly bus stop / service 4261m, nearest primary 24m, nearest convenience store 8m. - Payh_02 - 5 out of 12 facilities within 1,600m of site. Nearest train station 2537m, nearest bus stop / service 171m, nearest hourly bus stop / service 4240m, nearest primary 184m, nearest convenience store 116m. - Payh_03 - 5 out of 12 facilities within 1,600m of site. Nearest train station 2500m, nearest bus stop / service 500mm, nearest hourly bus stop / service 4600m, nearest primary 508m, nearest convenience store 483m.																				

Sites: Payhembury																					
Site SA Objective	Payh_01	Payh_02	Payh_03																		
	On account of proximity of facilities all of these sites can be seen to meet a basic proximity test. Notwithstanding the facilities available, the location of these sites means that development would be likely to increase car usage.																				
5. Climate change adaptation	+	+	+																		
Climate change adaptation commentary	None of these sites are located in a critical drainage area and in general sites offer the potential to cope with heat, drought and extreme storms through appropriate design and incorporation of sustainable drainage, for example.																				
6. Land resources	- ?	- ?	- ?																		
Land resources commentary	- Payh_01 - The site comprises Grade 3 agricultural land. Uncertain negative effect. - Payh_02 - The site comprises Grade 2 agricultural land. Uncertain negative effect. - Payh_03 - The site comprises Grade 3 agricultural land. Uncertain negative effect.																				
7. Water resources	0 ?	0 ?	0 ?																		
Water resources commentary	Development at the sites is unlikely to have any significant effects on water quality and quantity as none are located within a groundwater source protection zone. There is uncertainty on the capacity of local sewage treatment works to accommodate additional demand from new housing. This means an uncertain neutral effect for all sites.																				

Sites: Payhembury																					
Site SA Objective	Payh_01	Payh_02	Payh_03																		
8. Homes	+	+	+																		
Homes commentary	- Payh_01 - 34 dwellings max yield - Payh_02 - 14 dwellings max yield - Payh_03 – 65 dwellings max yield Significant positive where site offers maximum yield >100. All other sites have potential to deliver up to 100 dwellings with a marked positive effect. An appropriate mix of tenures and sizes including affordable housing is assumed for all sites.																				
9. Health and well-being	+	+	+																		
Health and well-being commentary	- Payh_01 - Open Space 1m distant, Play Area 2382m distant, away from noise sources - Payh_02 - Open Space 0m distant, Play Area 2448m distant, away from noise sources - Payh_03 - Open Space 500m distant, Play Area >2000m distant, away from noise sources																				
10. Access to services	+	+	+																		
Access to services commentary	Payh_01 - 5 out of 12 facilities within 1,600m of site. Nearest train station 2452m, nearest bus stop / service 27m, nearest hourly bus stop / service 4261m, nearest primary 24m, nearest convenience store 8m.																				

Sites: Payhembury																					
Site SA Objective	Payh_01	Payh_02	Payh_03																		
	- Payh_02 - 5 out of 12 facilities within 1,600m of site. Nearest train station 2537m, nearest bus stop / service 171m, nearest hourly bus stop / service 4240m, nearest primary 184m, nearest convenience store 116m. - Payh_03 - 5 out of 12 facilities within 1,600m of site. Nearest train station 2500m, nearest bus stop / service 500mm, nearest hourly bus stop / service 4600m, nearest primary 508m, nearest convenience store 483m.																				
11. Jobs and employment	--	-	-																		
Jobs/employment commentary	- Payh_01 - Developing the site would result in a net loss of existing employment uses. - Payh_02 – Small employment centre in close proximity (Payh_01), limited opportunities from scale of local employment and on site - Payh_03 – Small employment centre in close proximity (Payh_01) limited opportunities from scale of local employment and on site																				
12. Town centres	-	-	-																		
Town centres commentary	- Payh_01 - Site is beyond 1,600m of an existing town centre. - Payh_02 - Site is beyond 1,600m of an existing town centre. - Payh_03 - Site is beyond 1,600m of an existing town centre.																				
13. Connectivity and transport	-	-	-																		

Sites: Payhembury																					
Site SA Objective	Payh_01	Payh_02	Payh_03																		
Connectivity and transport commentary	- Payh_01 - Nearest train station 2452m, nearest bus stop / service 27m, nearest hourly bus stop / service 4261m. - Payh_02 - Nearest train station 2537m, nearest bus stop / service 171m, nearest hourly bus stop / service 4240m. - Payh_03 - Nearest train station 2500m, nearest bus stop / service 500mm, nearest hourly bus stop / service 4600m. Broadband speeds range from 55-78 Mbps median speeds for postcodes in local area, all sites are assumed (at this stage) to have access to superfast broadband. Sites are scored with a negative due to lack of sustainable transport options.																				
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: - Appropriate landscaping for all sites would be required for all sites due to negative effects upon the landscape. - Where employment uses exist on site, these should be retained as part of a considered scheme. - High quality design across all sites can reduce negative effects and maximise beneficial effects on the built environment. - All sites have relatively good access to facilities, but these beneficial effects can be maximised by enhancing sustainable travel links e.g. create bus stops near to the site, pedestrian/cycle links. - Designing new development for low water use and requiring sustainable drainage systems can help turn neutral uncertain effects on water resources into positive uncertain effects. - Positive effects for all sites in relation to jobs and employment could be maximised by providing on-site employment opportunities alongside new housing, where reasonable.																					
Preferred alternative: none																					
Reasons for alternatives being preferred or rejected:																					

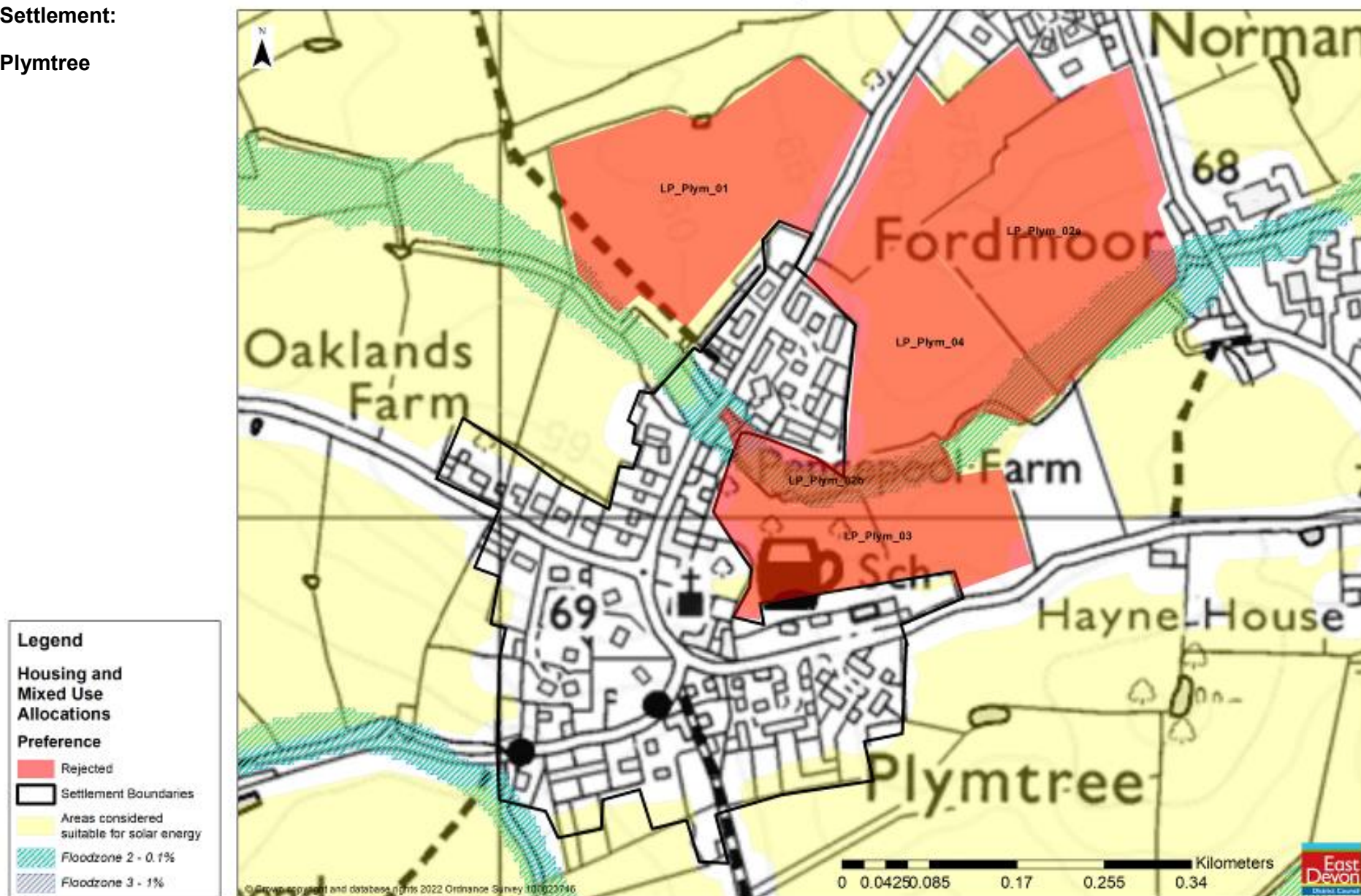
Sites: Payhembury																				
Site	Payh_01	Payh_02	Payh_03																	
SA Objective																				
- Pay_01 – REJECTED - Outside of AONB. Site slopes up towards the north. Current permission for 9 dwellings and relocated workshop on southern part of the site. Remainder of site is considered to have capacity for 5 dwellings. Remainder of the site to north is highly exposed and poorly related to the existing village development. Overall, the site has a high/medium landscape sensitivity to new development. Heritage assets present: Grade II Apple Tree Cottage (50m), Grade II Yeoman's Cottage (72m), Grade II Payhembury VC School and School House (18m), Grade II Sunnyside (48m), Grade II Higher House (59m), Grade I St Mary's Church (75m). Potential for adverse heritage impact subject to final design and layout. Northern extent of site more exposed. Overall, moderate - Change affecting the special character of assets, where elements which contribute to their significance and their setting are harmed. Ecology: Nature Recovery Network (1m), Section 41 (S41) Habitat of Principle Importance (including rivers and streams, excluding hedgerows) (73m). Site is within the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, significant moderate adverse effect predicted. Southern half of site has planning permission under ref. 22/0989/MRES. Northern half of site more exposed and poorly aligned to existing built form. The site context and constraints do not support allocation at this stage. - Pay_02 – REJECTED - Outside of AONB. Site slopes up towards the north. Highly exposed site to north of village adjacent to Grade I listed building and curtilage (St Mary's Church). Overall, the site has a high landscape sensitivity to new development. Heritage assets present: Grade II Sunnyside (75m), Grade II Higher House (61m), Grade I St Mary's Church (45m). Likely significant heritage impact to adjacent Grade I listed church and curtilage. Overall, major - Considerable change affecting the special character of assets including their setting, where the significance of those elements is substantially harmed or lost. Ecology: Nature Recovery Network (1m). Site is within the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, significant moderate adverse effect predicted. The site context and constraints do not support allocation at this stage. - Pay_03 – REJECTED - Outside of AONB. Highly prominent site with high intervisibility, notably from southern approach to Payhembury. Site slopes up towards the east. Overall, the site has a high landscape sensitivity to new development. Heritage assets present: Grade II Glebe Farm to south (115m). Overall, minor - Limited change to elements that contribute to the significance of assets and their setting, where harm is																				

Sites: Payhembury																					
Site	Payh_01	Payh_02	Payh_03																		
SA Objective																					
minimal. Ecology: Nature Recovery Network (5m). Site is within the East Devon Pebblebed Heaths SAC HRA mitigation zone. Mature trees and hedgerows to borders. Mature trees in open field. Ponds to centre of field. Overall, significant moderate adverse effect predicted. The site context and constraints do not support allocation at this stage.																					

East Devon Local Plan 2020-2040 - Plymtree

Settlement:

Plymtree



n.b. Items in the Legend that appear in regular type are for consultation; items in italics are for information only

Reasonable alternatives

- Plym_01 - Fordmore Farm, Plymtree, Cullompton, Devon
- Plym_03 – Land to west of Plymtree recreation ground
- Plym_04 – Land to north west of Plymtree recreation ground

Outline of reasons for selecting the alternatives

The reasonable alternatives listed above have all been assessed as suitable, available and achievable in the HELAA, which provides evidence that they have potential to be delivered (subject to further consideration through the planning process). An alternative site was dismissed in accordance with the sifting criteria:

Plym_02 - Fordmore Farm, Plymtree – superseded as includes sites Plym_03 and Plym_04

Sites: Plymtree																				
Site SA Objective	Plym_01	Plym_03	Plym_04																	
1. Biodiversity	0	-	-																	
Biodiversity commentary	• Plym_01 – No identified bio-diversity features of significance within 250m. Overall, minor adverse effect predicted (not significant) • Plym_03 – Nature Recovery Network (1m), Section 41 (S41) Habitat of Principle Importance (including rivers and streams, excluding hedgerows) (21m). Overall, significant moderate adverse effect predicted.																			

Sites: Plymtree																					
Site SA Objective	Plym_01	Plym_03	Plym_04																		
	Plym_04 – Nature Recovery Network (8m), Section 41 (S41) Habitat of Principle Importance (including rivers and streams, excluding hedgerows) (1m). Overall, significant moderate adverse effect predicted.																				
2. Landscape	--	-	--																		
Landscape commentary	- Plym_01 - Outside of AONB. Agricultural field adjoining the north west of Plymtree village. Site slopes gently down towards the west. The site is highly exposed to the west and is screened by low density residential dwellings and mature hedgerow to the east. The site features a PROW (footpath) that crosses the south. Overall, the site has a high landscape sensitivity to new development. - Plym_03 – Outside of AONB. Agricultural field adjoining Plymtree village to the north. Site gently slopes up towards the north. Includes part of site Plym_02. Site is adjacent to Grade I listed building and curtilage of St John the Baptist's Church in addition to two listed buildings to the south. Grade II* Pencepool Farm and curtilage 50m to north. Set within the context of low density housing to south, west and north west, recreational field to east, agricultural fields to north east. Mature tree lined hedgerow to borders with residential gardens to part of south border. Watercourse runs along northern border. Overall, the site has a medium/low landscape sensitivity to new development. - Plym_04 – Outside of AONB. Two agricultural fields between Plymtree village and Norman's Green. Site gently slopes up towards the north. Includes part of site Plym_02. Development could erode separation between Plymstock and Norman's Green. Highly exposed from access routes. Overall, the site has a high/medium landscape sensitivity to new development.																				

Sites: Plymtree																					
Site SA Objective	Plym_01	Plym_03	Plym_04																		
3. Hist. built env	-	--	-																		
Hist. built env. commentary	- Plym_01 - Heritage assets present: Grade II listed Penspool Cottage (55m), Grade II listed Pencepool Barn (75m), Grade II listed Pencepool Farm (85m). Overall, moderate - Change affecting the special character of assets, where elements which contribute to their significance and their setting are harmed. - Plym_03 – Heritage assets present: Site is located near to a series of listed buildings in Plymtree village, including the grade I listed church, which would need to be considered. Impact on the church in particular would need to be established through a more detailed assessment. - Plym_04 – Heritage assets present: Grade II listed Penspool Cottage (95m), Grade II listed Pencepool Barn (80m), Grade II listed Pencepool Farm (85m), Grade II listed The Old Forge (85m), Grade II listed Normans Green House (96m). Overall, moderate - Change affecting the special character of assets, where elements which contribute to their significance and their setting are harmed.																				
4. Climate change carbon emissions	--	--	--																		
Climate change carbon emissions commentary	An accessibility assessment undertaken for the site selection work identified a total of 12 services, facilities and employment sites. Individual sites are listed below including the number of services and proximity of key facilities. Plym_01 - 6 out of 12 facilities within 1,600m of site. Nearest train station 5730m, nearest bus stop / service 260m, nearest hourly bus stop / service 5185m, nearest primary 339m, nearest convenience store 127m.																				

Sites: Plymtree																					
Site SA Objective	Plym_01	Plym_03	Plym_04																		
	- Plym_03 – 6 out of 12 facilities within 1,600m of site. Nearest train station 5342m, nearest bus stop / service 59m, nearest hourly bus stop / service 5278m, nearest primary 29m, nearest convenience store 62m. - Plym_04 – 6 out of 12 facilities within 1,600m of site. Nearest train station 5451m, nearest bus stop / service 107m, nearest hourly bus stop / service 5405m, nearest primary 148m, nearest convenience store 178m. On account of proximity of facilities all of these sites can be seen to meet a basic proximity test. Notwithstanding the facilities available, the location of these sites means that development would be likely to significantly increase car usage.																				
5. Climate change adaptation	0	0	0																		
Climate change adaptation commentary	All sites have a neutral mark as the site area is partially located in an area of flood risk, but development can avoid this area.																				
6. Land resources	- ?	- ?	- ?																		
Land resources commentary	- Plym_01 - The site comprises Grade 3 agricultural land. Uncertain negative effect. - Plym_03 – The site comprises Grade 3 agricultural land. Uncertain negative effect. - Plym_04 – The site comprises Grade 3 agricultural land. Uncertain negative effect.																				

Sites: Plymtree																					
Site SA Objective	Plym_01	Plym_03	Plym_04																		
7. Water resources	0 ?	0 ?	0 ?																		
Water resources commentary	Development at the sites is unlikely to have any significant effects on water quality and quantity as none are located within a groundwater source protection zone. There is uncertainty on the capacity of local sewage treatment works to accommodate additional demand from new housing. This means an uncertain neutral effect for all sites.																				
8. Homes	+	+	+																		
Homes commentary	- Plym_01 – 80 dwellings max yield - Plym_03 – 51 dwellings max yield - Plym_04 – 84 dwellings max yield Significant positive where site offers maximum yield >100. All other sites have potential to deliver up to 100 dwellings with a marked positive effect. An appropriate mix of tenures and sizes including affordable housing is assumed for all sites.																				
9. Health and well-being	+	+	+																		
Health and well-being commentary	Plym_01 - Open Space 255m distant, Play Area 2097m distant (taken from mapping data however open recreation space offers plentiful play space), away from noise sources																				

Sites: Plymtree																					
Site SA Objective	Plym_01	Plym_03	Plym_04																		
	- Plym_03 – Open Space 0m distant, Play Area 1964m distant (taken from mapping data however open recreation space offers plentiful play space), away from noise sources - Plym_04 – Open Space 6m distant, Play Area 2143m distant (taken from mapping data however open recreation space offers plentiful play space), away from noise sources.																				
10. Access to services	+	+	+																		
Access to services commentary	- Plym_01 - 6 out of 12 facilities within 1,600m of site. Nearest train station 5730m, nearest bus stop / service 260m, nearest hourly bus stop / service 5185m, nearest primary 339m, nearest convenience store 127m. - Plym_03 – 6 out of 12 facilities within 1,600m of site. Nearest train station 5342m, nearest bus stop / service 59m, nearest hourly bus stop / service 5278m, nearest primary 29m, nearest convenience store 62m. - Plym_04 – 6 out of 12 facilities within 1,600m of site. Nearest train station 5451m, nearest bus stop / service 107m, nearest hourly bus stop / service 5405m, nearest primary 148m, nearest convenience store 178m.																				
11. Jobs and employment	-	-	-																		
Jobs/employment commentary	- Plym_01 – No significant employment sites in close proximity, limited opportunity for employment provision due to context of sites - Plym_03 – No significant employment sites in close proximity, limited opportunity for employment provision due to context of sites																				

Sites: Plymtree																					
Site SA Objective	Plym_01	Plym_03	Plym_04																		
	Plym_04 – No significant employment sites in close proximity, limited opportunity for employment provision due to context of sites																				
12. Town centres	-	-	-																		
Town centres commentary	Beyond 1, 600 metres of a town centre.																				
13. Connectivity and transport	-	-	-																		
Connectivity and transport commentary	- Plym_01 - Nearest train station 5730m, nearest bus stop / service 260m, nearest hourly bus stop / service 5185m. - Plym_03 – Nearest train station 5342m, nearest bus stop / service 59m, nearest hourly bus stop / service 5278m. - Plym_04 – Nearest train station 5451m, nearest bus stop / service 107m, nearest hourly bus stop / service 5405m. Broadband speeds range from 20-80 Mbps median speeds for postcodes in local area, all sites are assumed (at this stage) to have access to superfast broadband. Sites are scored with a negative due to lack of sustainable transport options.																				
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: - Appropriate landscaping for all sites would be required for all sites due to negative effects upon the landscape and local heritage. - High quality design across all sites can reduce negative effects and maximise beneficial effects on the built environment.																					

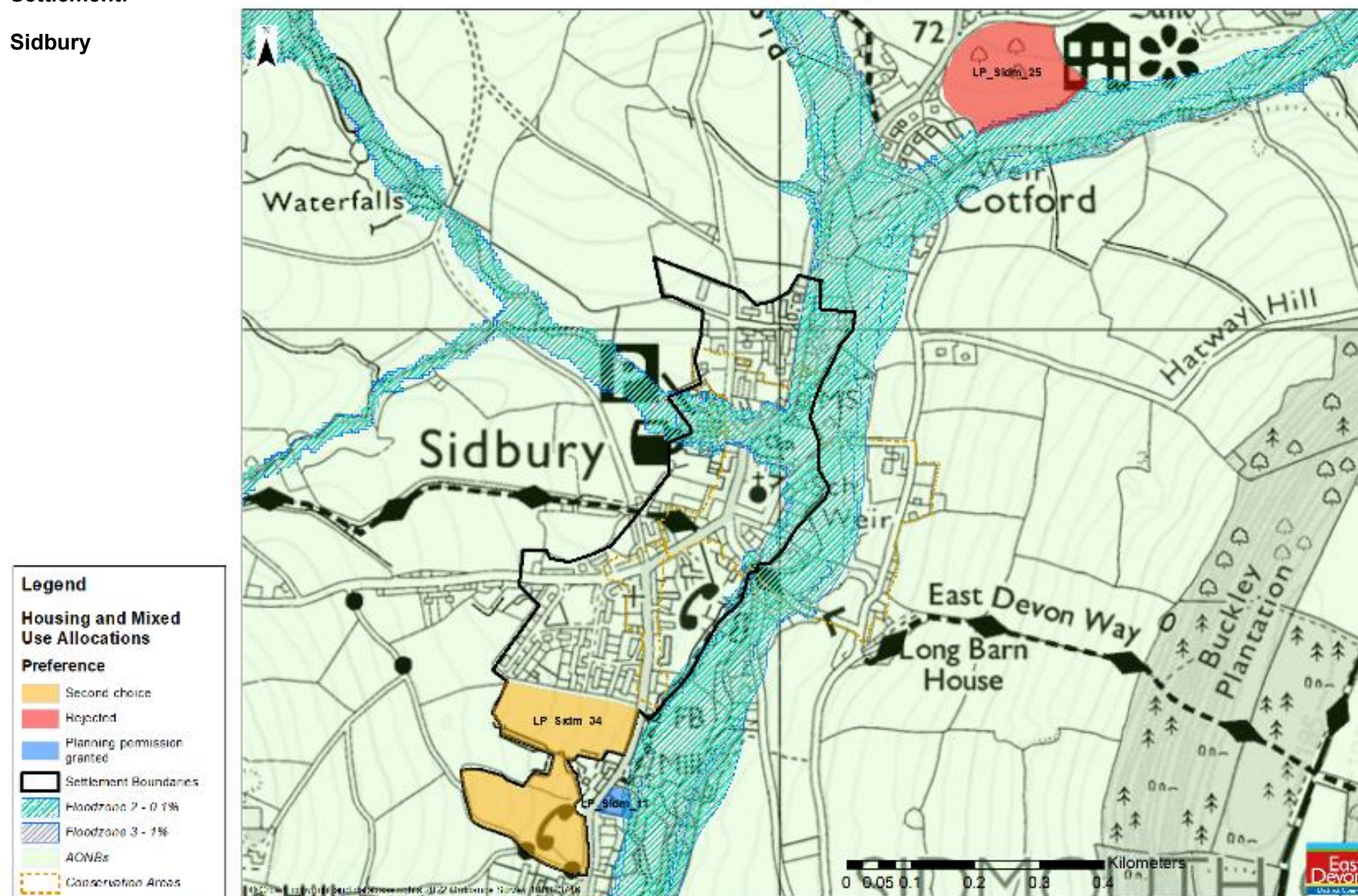
Sites: Plymtree																				
Site	Plym_01	Plym_03	Plym_04																	
SA Objective																				
- All sites have relatively good access to facilities, but these beneficial effects can be maximised by enhancing sustainable travel links e.g. create bus stops near to the site, pedestrian/cycle links. - Designing new development for low water use and requiring sustainable drainage systems can help turn neutral uncertain effects on water resources into positive uncertain effects. - Positive effects for all sites in relation to jobs and employment could be maximised by providing on-site employment opportunities alongside new housing, where reasonable.																				
Preferred alternative: none																				
Reasons for alternatives being preferred or rejected: - Plym_01 – REJECTED - Outside of AONB. Site slopes gently down towards the west. The site is highly exposed to the west and is screened by low density residential dwellings and mature hedgerow to the east. The site features a PROW (footpath) that crosses the south. Overall, the site has a high landscape sensitivity to new development. Heritage assets present: Grade II listed Penspool Cottage (55m), Grade II listed Pencepool Barn (75m), Grade II listed Pencepool Farm (85m). Overall, moderate - Change affecting the special character of assets, where elements which contribute to their significance and their setting are harmed. Ecology: No designated areas within 250m. Overall, minor adverse effect predicted (not significant). Development of the site has the potential to introduce coalescence with Norman's Green to the north. Development would be highly visible from the public footpath to the south. The site context and constraints do not support allocation at this stage. - Plym_03 - REJECTED - Outside of AONB. Site gently slopes up towards the north. Set within the context of low density housing to south, west and north west, recreational field to east, agricultural fields to north east. Mature tree lined hedgerow to borders with residential gardens to part of south border. Watercourse runs along northern border. Overall, the site has a medium/low landscape sensitivity to new development.																				

Sites: Plymtree																					
Site	Plym_01	Plym_03	Plym_04																		
SA Objective																					
Heritage assets present: Grade I listed St John the Baptist's Church (40m) and curtilage, Grade II* listed Pencepool Farm (62m), Grade II listed Pencepool Cottage (76m), Grade II listed Pencepool Barn (96m), Grade II listed Rose Cottage (52m), Grade II listed Knights Cottage (21m), Grade II listed Beech Cottage (24m). Likely significant heritage impact to adjacent Grade I listed church and curtilage. Overall, major - Considerable change affecting the special character of assets including their setting, where the significance of those elements is substantially harmed or lost. Ecology: Nature Recovery Network (1m), Section 41 (S41) Habitat of Principle Importance (including rivers and streams, excluding hedgerows) (21m). Overall, significant moderate adverse effect predicted. The east of the site is poorly related to the built-up area. The west of the site is better related to the built-up area. Opportunities for development of the west of the site are however constrained by the presence of significant GI and GII* heritage assets. The site constraints and context do not support allocation at this stage. Plym_04 - REJECTED - Outside of AONB. Site gently slopes up towards the north. Includes part of site Plym_02. Development could erode separation between Plymstock and Norman's Green. Highly exposed from access routes. Overall, the site has a high/medium landscape sensitivity to new development. Heritage assets present: Grade II listed Penspool Cottage (95m), Grade II listed Pencepool Barn (80m), Grade II listed Pencepool Farm (85m), Grade II listed The Old Forge (85m), Grade II listed Normans Green House (96m). Overall, moderate - Change affecting the special character of assets, where elements which contribute to their significance and their setting are harmed. Ecology: Nature Recovery Network (8m), Section 41 (S41) Habitat of Principle Importance (including rivers and streams, excluding hedgerows) (1m). Overall, significant moderate adverse effect predicted. Development of the site has the potential to introduce coalescence with Norman's Green to the north. Development would be highly visible. The site context and constraints do not support allocation at this stage.																					

Settlement:

Sidbury

East Devon Local Plan 2020-2040 - Sidbury



n.b. Items in the Legend that appear in regular type are for consultation; items in italics are for information only

Reasonable alternatives

- Sidm_34 - Land South of Furzehill, Sidbury

Outline of reasons for selecting the alternatives

The reasonable alternative listed above has been assessed as suitable, available and achievable in the HELAA, which provides evidence that it has potential to be delivered (subject to further consideration through the planning process). A number of alternative options were dismissed in accordance with the sifting criteria, for reasons including the site being not adjacent or well-related to the settlement, sites having gained planning permission, or sites being of a small scale below established thresholds.

Sidm_10 - Land South of Furzehill, Sidbury – Superseded by Sidm_34 / 100% overlap

Sidm_11 - Burnt Oak (existing garage block), Sidbury, EX10 0RD - Existing planning permission for 7 dwellings, 17/2904/OUT.

Sidm_25 – not within or adjacent to Sidbury.

Sites: Sidbury																					
Site SA Objective	Sidm_34																				
1. Biodiversity	-																				
Biodiversity commentary	Arable fields surrounded and divided by mature hedgerows and trees. Site is 10m from an unconfirmed wildlife site, 31m from a nature recovery network area, 35m from a habitat of principle importance. Site is within both the Beer Quarry and Caves SAC bat																				

Sites: Sidbury																					
Site	Sidm_34																				
SA Objective																					
	consultation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone. Overall, Significant moderate adverse effect predicted																				
2. Landscape	- -																				
Landscape commentary	Site is located entirely within AONB. Short distance views into site from A375 are limited due to topography and mature vegetation, but site is clearly visible from elsewhere in the AONB, for example from Buckley Road across the valley to east. A sensitive site in the AONB. Large 20thC residential estate to north may provide opportunity for improved access. Overall, the site has a high / medium landscape sensitivity to new development.																				
3. Hist. built env	-																				
Hist. built env. commentary	Heritage assets present: 1 - Grade II listed Furzehill Farm, 2 - Sidbury Conservation Area. Grade II listed Furzehill Farm 9m to south east, open views of site are available from this asset, currently view to agricultural field. Sidbury Conservation Area 13m to north east has views into southern part of the site. Potential impact on setting of these two heritage assets. Overall, Moderate - Change affecting the special character of assets, where elements which contribute to their significance and their setting are harmed.																				
4. Climate change carbon emissions	+																				

Sites: Sidbury																					
Site	Sidm_34																				
SA Objective																					
Climate change carbon emissions commentary	An accessibility assessment undertaken for the site selection work identified a total of 12 services, facilities and employment sites. Individual sites are listed below including the number of services and proximity of key facilities. Sidm_34 - 8 out of 12 facilities within 1,600m of site. Bus stop 95m on hourly or better service, primary school and store around 415m distant. Located in village of Sidbury, footway to north on A375. This site may provide an opportunity for limited development well aligned to existing built-up area. There may be an opportunity to provide improved pedestrian pathways from the Hillside Estate through to the village core.																				
5. Climate change adaptation	+																				
Climate change adaptation commentary	None of the site area is located in a critical drainage area and the site offers the potential to cope with heat, drought and extreme storms through appropriate design and incorporation of sustainable drainage, for example.																				
6. Land resources	- ?																				
Land resources commentary	The site comprises Grade 3 agricultural land. Uncertain negative effect.																				
7. Water resources	0 ?																				

Sites: Sidbury																					
Site SA Objective	Sidm_34																				
Water resources commentary	Development at this site is unlikely to have any significant effects on water quality and quantity as it is not located within a groundwater source protection zone. There is uncertainty on the capacity of local sewage treatment works to accommodate additional demand from new housing. This means an uncertain neutral effect.																				
8. Homes	+																				
Homes commentary	38 dwellings max yield. Significant positive where site offers maximum yield >100. All other sites have potential to deliver up to 100 dwellings with a marked positive effect. An appropriate mix of tenures and sizes including affordable housing is assumed for all sites.																				
9. Health and well-being	-																				
Health and well-being commentary	Open Space 23m distant, Play Area 89m distant, A375 adjacent																				
10. Access to services	+																				

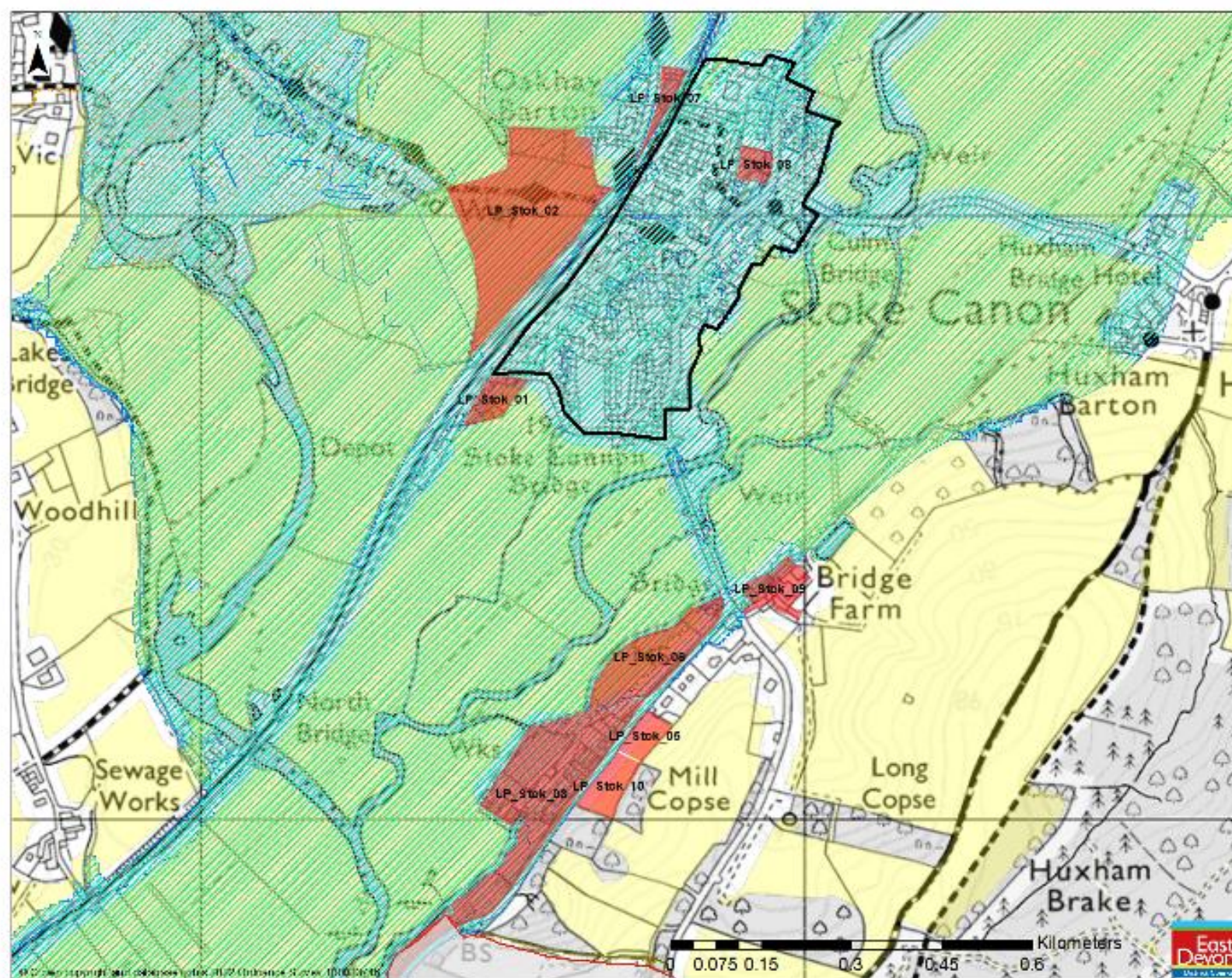
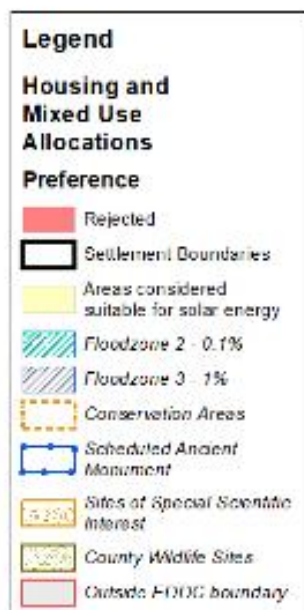
Sites: Sidbury																					
Site SA Objective	Sidm_34																				
Access to services commentary	Close to range of services and development may could provide improved pedestrian route for village. Sidm_34 - 8 out of 12 facilities within 1,600m of site. Bus stop 95m on hourly or better service, primary school and store around 415m distant. Located in village of Sidbury, footway to north on A375.																				
11. Jobs and employment	-																				
Jobs/employment commentary	Employment allocation 800m to south not yet developed. Site not considered appropriate for significant economic provision.																				
12. Town centres	-																				
Town centres commentary	Beyond 1, 600 metres of a town centre.																				
13. Connectivity and transport	+																				

Sites: Sidbury																					
Site	Sidm_34																				
SA Objective																					
Connectivity and transport commentary	Bus stop 95m to east hourly or better service.																				
	Broadband speeds range from 42-80 Mbps median speeds for postcodes in local area, all sites are assumed (at this stage) to have access to superfast broadband.																				
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: • Appropriate landscaping would be required due to negative effects upon the landscape and local heritage. • High quality design would reduce negative effects and maximise beneficial effects on the built environment. • Noise attenuation will lessen the negative health and well-being. • The site has relatively good access to facilities, but these beneficial effects could be maximised by enhancing sustainable travel links e.g. create bus stops near to the site, pedestrian/cycle links. • Designing new development for low water use and requiring sustainable drainage systems can help turn neutral uncertain effects on water resources into positive uncertain effects.																					
Preferred alternative: Sidm_34																					
Reasons for alternatives being preferred or rejected: • Sidm_34 - this site is preferred as it provides an opportunity for limited development, well aligned to the existing built-up area, consistent with the spatial strategy for Sidbury as a Service Village. There may an opportunity to provide improved pedestrian pathways from the Hillside Estate through to the village core. Heritage and landscape impact assessments of any future proposal would be required. The site yield is significantly reduced due to constraints present.																					

East Devon Local Plan 2020-2040 - Stoke Canon

Settlement:

Stoke Canon



n.b. Items in the Legend that appear in regular type are for consultation; items in *italics* are for information only

Reasonable alternatives

- None – see explanation below.

Outline of reasons for selecting the alternatives

A number of site options were dismissed in accordance with the sifting criteria:

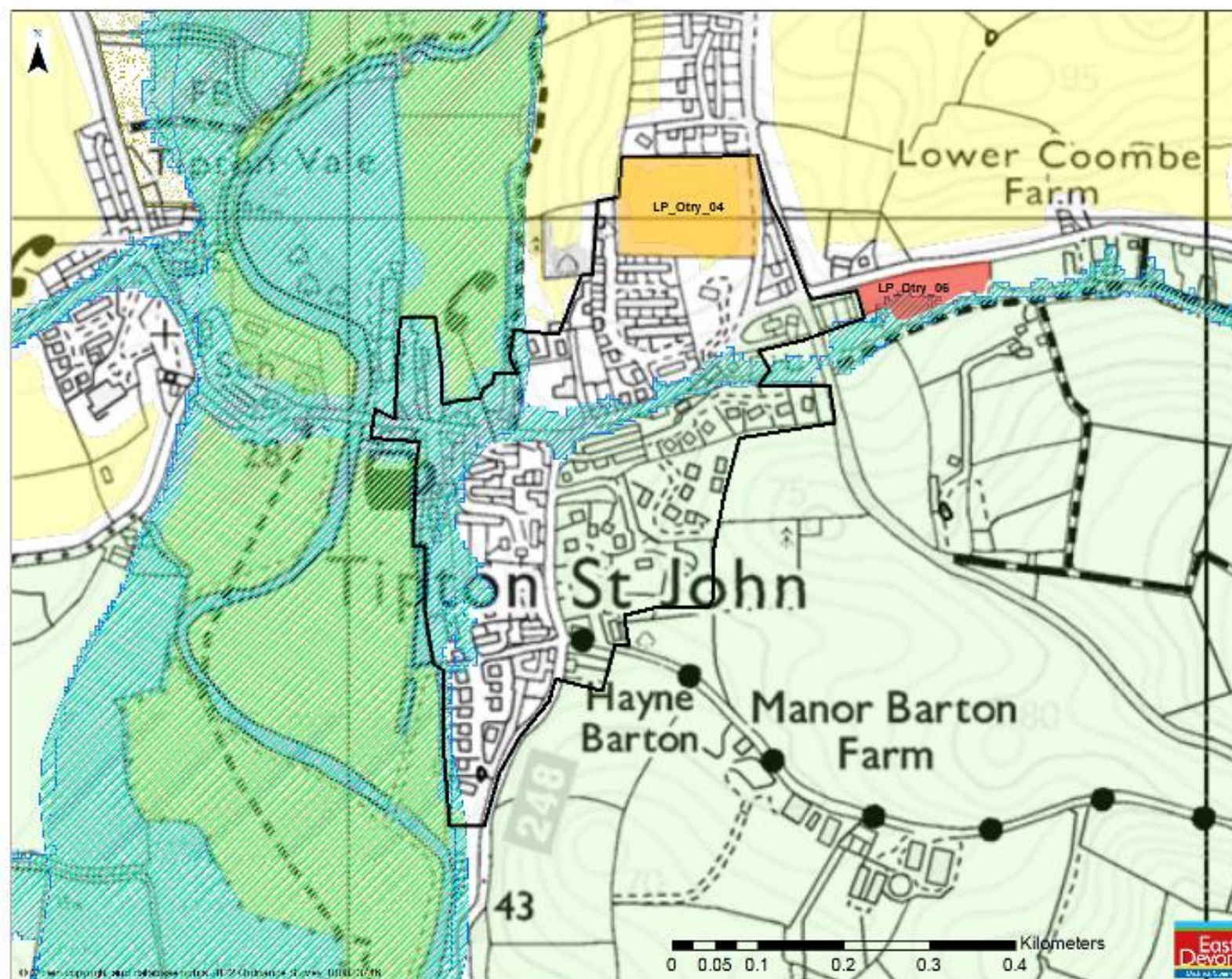
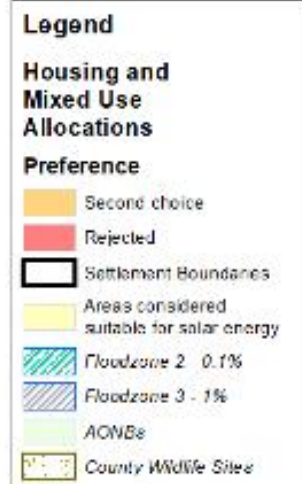
- Stok_01 - Land lying to the West of Chestnut Crescent, Stoke Canon. This site has not passed the Stage A Suitability Assessment for housing or for employment due to all the site being within Flood Zone 3.
- Stok_02 - Oakhay Barton, Stoke Canon, Exeter, EX5 4ED. This site has not passed the Stage A Suitability Assessment for housing or for employment due to 0.79 Ha of the site being within Flood Zone 3.
- Stok_05 - Field 7414, Stoke Road, Stoke Canon, EX5 4EG. Site not adjacent or well-related to the settlement.
- Stok_07 - Oakhay Barton, Stoke Canon, Exeter, EX5 4ED. This site has not passed the Stage A Suitability Assessment for housing or for employment due to all the site being within Flood Zone 3.
- Stok_08 - Land and buildings known as Stoke Cottage, Stoke Canon, Exeter, Devon, EX5 4AT. This site has not passed the Stage A Suitability Assessment for housing or for employment.
- Stok_10 - Field 6700 & 6907, Stoke Road, Stoke Canon, EX5 4EG. Site not adjacent or well-related to the settlement.

As there are no reasonable alternatives for sites at Stoke Canon, a Sustainability Appraisal matrix has not been completed.

East Devon Local Plan 2020-2040 - Tipton St John

Settlement:

Tipton St John



n.b. Items in the Legend that appear in regular type are for consultation; items in *italics* are for information only

Reasonable alternatives

- Otry_04, Land South of Otter Close
- Otry_06, Land next to 6 Coombe Vale

Outline of reasons for selecting the alternatives

Sifting takes forward both of the sites on the map because they are well related to the existing built area of the village and not subject to any of the constraints outlined at stage 2 of the site assessments.

Sites: Tipton St John																					
Site SA Objective	Otry_04	Otry_06																			
1. Biodiversity	0	-																			
Biodiversity commentary	Both sites are bounded on at least one side by mature, traditional hedgerows which should be retained in any development. There are some mature trees within the hedgerows. Both sites are improved grassland of limited habitat value. Otry_06 has a band of trees to the south of the site which are of ecological importance, warranting a negative score.																				
2. Landscape	-	--																			
Landscape commentary	Otry_06 lies within the AONB so any development is considered to have a significant adverse effect. Site Otry_04 lies outside, but adjacent, to the AONB so impact is less significant but still harmful.																				

Sites: Tipton St John																					
Site SA Objective	Otry_04	Otry_06																			
3. Hist. built env	0	0																			
Hist. built env. commentary	No particular heritage impacts have been identified.																				
4. Climate change carbon emissions	0	0																			
Climate change carbon emissions commentary	Both sites adjoin the village, so have reasonable access to the school, pub, shop and village hall. They do not have access to public transport. Access to all facilities is via narrow, unpaved and unlit country lanes.																				
5. Climate change adaptation	+	-																			
Climate change adaptation commentary	Otry_06 has a band of Floodzone2 and 3 land running across the southern section. This would limit the developable area.																				
6. Land resources	?	?																			

Sites: Tipton St John																					
Site SA Objective	Otry_04	Otry_06																			
Land resources commentary	Both sites are greenfield and are Grade 3 agricultural land, which could be 3a (best and most versatile) so uncertain negative effect.																				
7. Water resources	0	0																			
Water resources commentary	The water supply for the southern half of East Devon comes from deep underground boreholes. Drinking Water Safeguard Zones have been designated where the land use is causing pollution of the raw water. Groundwater bodies that fall into this category are located between Ottery St Mary and Otterton. Human health is not at risk from these sources because SWW provide extra treatment. New development will create a demand for additional water.																				
8. Homes	+	+																			
Homes commentary	Both sites have potential to deliver less than 100 dwellings, so will have a positive effect. An appropriate mix of tenures and sizes including affordable housing is assumed for all sites, however it should be noted that, as a rural settlement, the threshold of 10 dwellings may not be met on site Otry_06 and therefore affordable housing may not be required on site.																				
9. Health and well-being	-	-																			

Sites: Tipton St John																					
Site SA Objective	Otry_04	Otry_06																			
Health and well-being commentary	Neither of the sites lie on a railway track or main road. Neither of the sites are within 1600m of a healthcare or medical facility or an open space or play area.																				
10. Access to services	?	?																			
Access to services commentary	Tipton St John is a very small village, so although it has a limited range of services, both sites are within 400m of them, although it should be noted that access is via unpaved, unlit narrow country lanes. An uncertain impact is identified, however, because there are firm proposals to relocate the primary school to Ottery St Mary (it is within the floodplain currently), and this would leave the settlement with less than 4 facilities so that it would not meet the minimum requirements to be considered a sustainable tier 4 settlement.																				
11. Jobs and employment	?	-																			
Jobs/employment commentary	None of the sites are within 1600m of an employment site. There may be some scope to require mixed use development on Otry_04 but none on Otry_06 due to its small size.																				
12. Town centres	-	-																			

Sites: Tipton St John																					
Site SA Objective	Otry_04	Otry_06																			
Town centres commentary	Neither of the sites are within 1,600m of a town centre																				
13. Connectivity and transport	-	-																			
Connectivity and transport commentary	Tipton St John does not have 100% gigabit availability. Neither of the sites are within 800 metres of a railway station or an A road, however both sites are within 400m of a recognised Sustrans cycle route.																				
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: - The ecology impacts on both sites could be mitigated through the retention of the existing boundary hedgerows and safeguarding any mature hedgerow trees. Ecology status could be improved through the provision of species rich open space within the sites and wildlife corridors to the surrounding farmland/hedgerows. - Landscape impacts on both of the sites could be reduced by careful design, a reduction in density and long-term landscaping/screening, however negative effects cannot be completely mitigated due to the sensitivity of the AONB landscape.																					
Preferred alternative: Neither of the sites are a preferred location for new development, however Otry_04 is a second choice site for 45 houses.																					
Reasons for alternatives being preferred or rejected:																					

Sites: Tipton St John																					
Site	Otry_04	Otry_06																			
SA Objective																					
- Otry_04- Preferred as a second choice site for 45 houses- The site is located between two groups of existing houses but forms a rural backdrop to the village. It is just outside the AONB and has no particular ecological or heritage interest, although further assessment would be required as part of any application. The site should be considered as a 2nd best site due to the uncertainty around future school provision and the lack of a frequent bus service. - Otry_06- Rejected- The site is located close to facilities. It forms a rural edge to the village and lies within the AONB, in an area of landscape sensitivity. There is a band of trees to the south of the site which are of habitat importance. The site should not be allocated due to its landscape sensitivity, ecological importance and due to the uncertainty around future school provision and the lack of a frequent bus service.																					

East Devon Local Plan 2020-2040 - Uplyme

Settlement:

Uplyme



n.b. Items in the Legend that appear in regular type are for consultation; items in italics are for information only

Reasonable alternatives

- Uply_01 – Land at Sidmouth Road, Lyme Regis.

Outline of reasons for selecting the alternatives

The reasonable alternative listed above has been assessed as suitable, available and achievable in the HELAA, which provides evidence that it has the potential to be delivered (subject to further consideration through the planning process). Uply_04 is not a reasonable alternative as it is not well related to either Uplyme or Lyme Regis.

Sites: Uplyme																					
Site SA Objective	Uply_01																				
1. Biodiversity	0																				
Biodiversity commentary	No significant issues have been identified.																				
2. Landscape	- -																				
Landscape commentary	Site is located on the open coastal plateaux in the East Devon AONB, is highly sensitive to change and mitigation would be difficult.																				

Sites: Uplyme																					
Site SA Objective	Uply_01																				
3. Hist. built env	0																				
Hist. built env. commentary	No issues identified.																				
4. Climate change carbon emissions	--																				
Climate change carbon emissions commentary	An accessibility assessment undertaken for the Site Selection work identified a total of 12 services, facilities and employment sites ¹⁰⁴ . The site is within 1600 metres of services and facilities in both Uplyme and Lyme Regis, but there is no longer on an hourly bus route. Lack of continuous footways and very steep gradients severely limit the potential for walking and cycling and there are very limited sustainable travel options (four buses a day).																				
5. Climate change adaptation	+																				

¹⁰⁴ Namely: train station, hourly or better bus route, primary school, secondary school, convenience store/shop, Post Office, Community hall, Pub, Open space/allotment, children's play area, GP, employment site (identified in the Employment Land Review).

Sites: Uplyme																					
Site SA Objective	Uply_01																				
Climate change adaptation commentary	Site not at risk of flooding.																				
6. Land resources	- ?																				
Land resources commentary	Grade 3 agricultural land where it is not broken into a and b, so a negative uncertain effect as it could be best and most versatile.																				
7. Water resources	0																				
Water resources commentary	Site is not in a drinking water protection zone.																				
8. Homes	+																				
Homes commentary	Maximum yield is 92 so a positive effect. An appropriate mix of tenures and sizes including affordable housing is assumed.																				

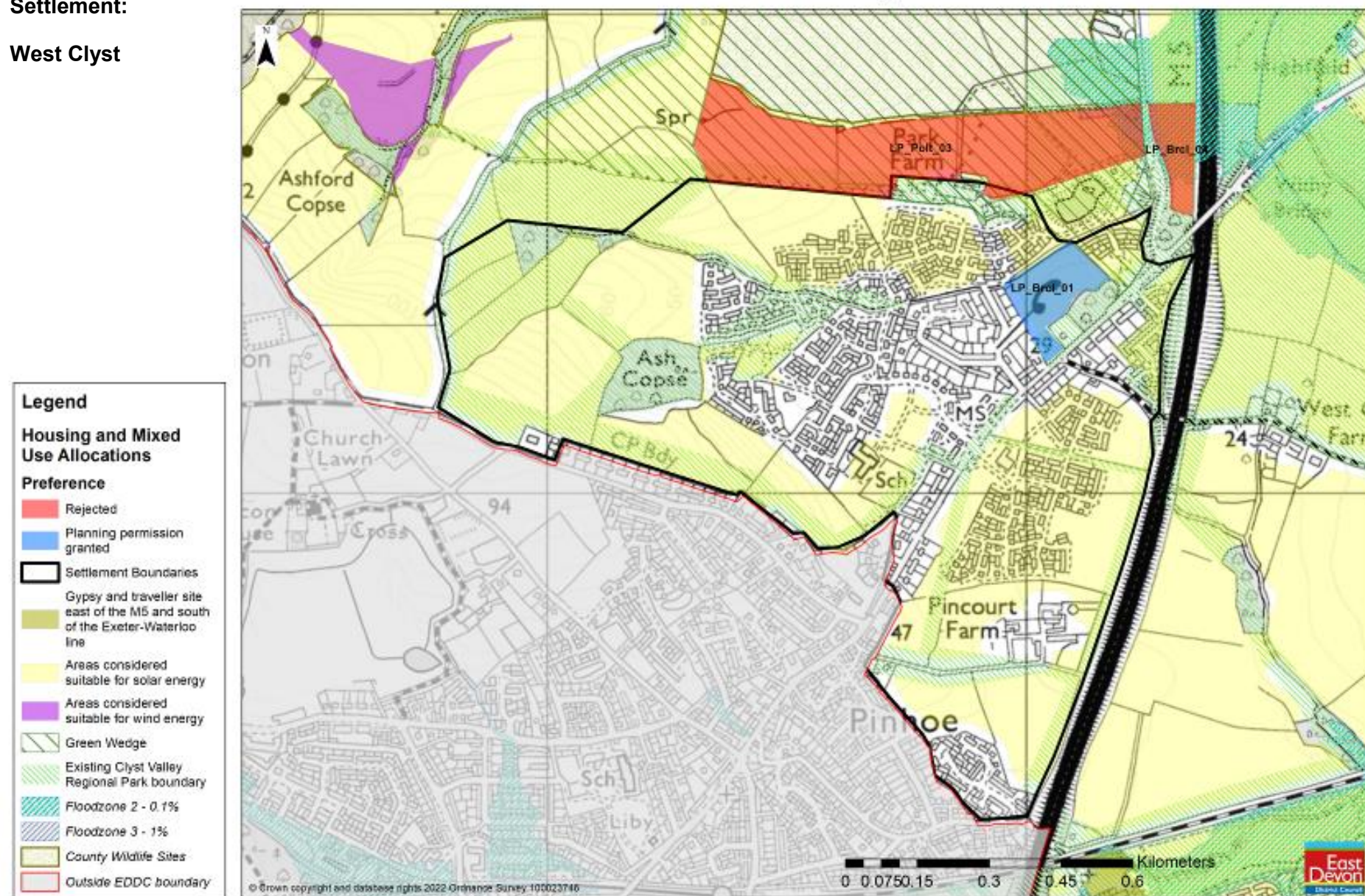
Sites: Uplyme																					
Site SA Objective	Uply_01																				
9. Health and well-being	-																				
Health and well-being commentary	Site is not within 1600 metres of an area with higher deprivation levels. Site is adjacent to an A road and, while it is within 1600 metres of open space and play areas, the play areas would be difficult to reach on foot.																				
10. Access to services	-																				
Access to services commentary	Site is within 1600 metres of a good range of facilities, but there are significant issues with the safety, quality and topography of the routes for pedestrians and cyclists.																				
11. Jobs and employment	+																				
Jobs/employment commentary	Site is within 1600 metres of employment sites.																				
12. Town centres	+																				

Sites: Uplyme																					
Site SA Objective	Uply_01																				
Town centres commentary	Site is within 1600 metres of a town centre.																				
13. Connectivity and transport	+																				
Connectivity and transport commentary	Site is adjacent to an A road and broadband speeds average over 10 mbps.																				
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: - Considerable landscaping would be required due to significant negative effects upon the landscape, but the sensitivity is such that a significant negative effect is likely to remain. - Noise buffer to A3052																					
Preferred alternative: There is no preferred alternative.																					
Reasons for alternatives being preferred or rejected: Uply_01 - rejected due to impact on AONB landscape and difficulty of walking or cycling to services and facilities in either Uplyme or Lyme Regis.																					

East Devon Local Plan 2020-2040 - West Clyst

Settlement:

West Clyst



n.b. Items in the Legend that appear in regular type are for consultation; items in italics are for information only

Reasonable alternatives

- Brcl_04
- Polt_03

Outline of reasons for selecting the alternatives

The reasonable alternatives listed above have all been assessed as suitable, available and achievable in the HELAA, which provides evidence that they have potential to be delivered (subject to further consideration through the planning process). Brcl_01 is not reasonable alternatives as it has planning permission, so are not being considered as allocations in the Local Plan.

Sites: Westclyst																					
Site SA Objective	Brcl_04	Polt_03																			
1. Biodiversity	--	--																			
Biodiversity commentary	Brcl_04 is agriculture land covered by crops and vegetation on the edge of the site boundary. The site falls in Exe Estuary & Pebbled Heath buffer zone, and Section 41 (S41) Habitat of Principle Importance, County Wildlife sites (CWS) and unconfirmed wildlife sites (UWS) within 100m of the site. So significant negative effect. Polt_03 is existing farmland covered by improved grassland, with trees and vegetation on the edge of the site boundary. Section 41 (S41) Habitat of Principle Importance and County Wildlife Site (CWS) adjoining to the site (North & Northeast). So significant negative effect.																				
2. Landscape	+	-																			

Sites: Westclyst																					
Site SA Objective	BrcI_04	Polt_03																			
Landscape commentary	BrcI_04 is a relatively flat agricultural field with medium-high visibility, located between Westclyst and the M5, adjoining new residential development and parkland. Low sensitivity means a likely minor positive effect for this site. Polt_03 is a steep slope agricultural field with medium-high visibility, located alongside M5, adjoining new residential development and parkland, the site retains a rural character and provides a green backdrop to views from Poltimore House and parkland. So it would have a negative landscape impact.																				
3. Hist. built env	0	- -																			
Hist. built env. commentary	BrcI_04 located on the edge of West Clyst has no designated heritage asset within 100m and the nearest heritage asset is Grade II listed, 202m to the North. No significant effect because there are no heritage assets that would be affected by developing the site. Polt_03 will be visible from the Grade II* listed Poltimore house (166m NE) and the associated surrounding parkland. High heritage impact upon the setting of the house, a Grade II* listed building, and parkland. Mitigation likely to be difficult. High-quality design and accessibility is unlikely. So major negative effect.																				
4. Climate change carbon emissions	+	+																			

Sites: Westclyst																				
Site SA Objective	BrcI_04	Polt_03																		
Climate change carbon emissions commentary	An accessibility assessment undertaken for the Site Selection work identified a total of 12 services, facilities and employment sites¹⁰⁵ – the findings are referenced for each site in this commentary BrcI_04 has 8 out of 12 facilities within 1,600m of the site, and within 1600m to Pinhoe rail station and the main road. Hourly or better bus service available. Overall positive effect. Polt_03 has 9 out of 12 facilities within 1,600m of the site, and within 1600m to Pinhoe rail station and the main road. Hourly or better bus service available. Overall positive effect.																			
5. Climate change adaptation	0	- -																		
Climate change adaptation commentary	Polt_03 has medium/high flood risk (zones 2 & 3) covering minor part of the site and development could avoid those area. BrcI_04 falls in zone 2 & 3 flood zones, and development of the site would find it difficult to avoid these constraints.																			
6. Land resources	- ?	-																		

¹⁰⁵ Namely: train station, hourly or better bus route, primary school, secondary school, convenience store/shop, Post Office, Community hall, Pub, Open space/allotment, children's play area, GP, employment site (identified in the Employment Land Review).

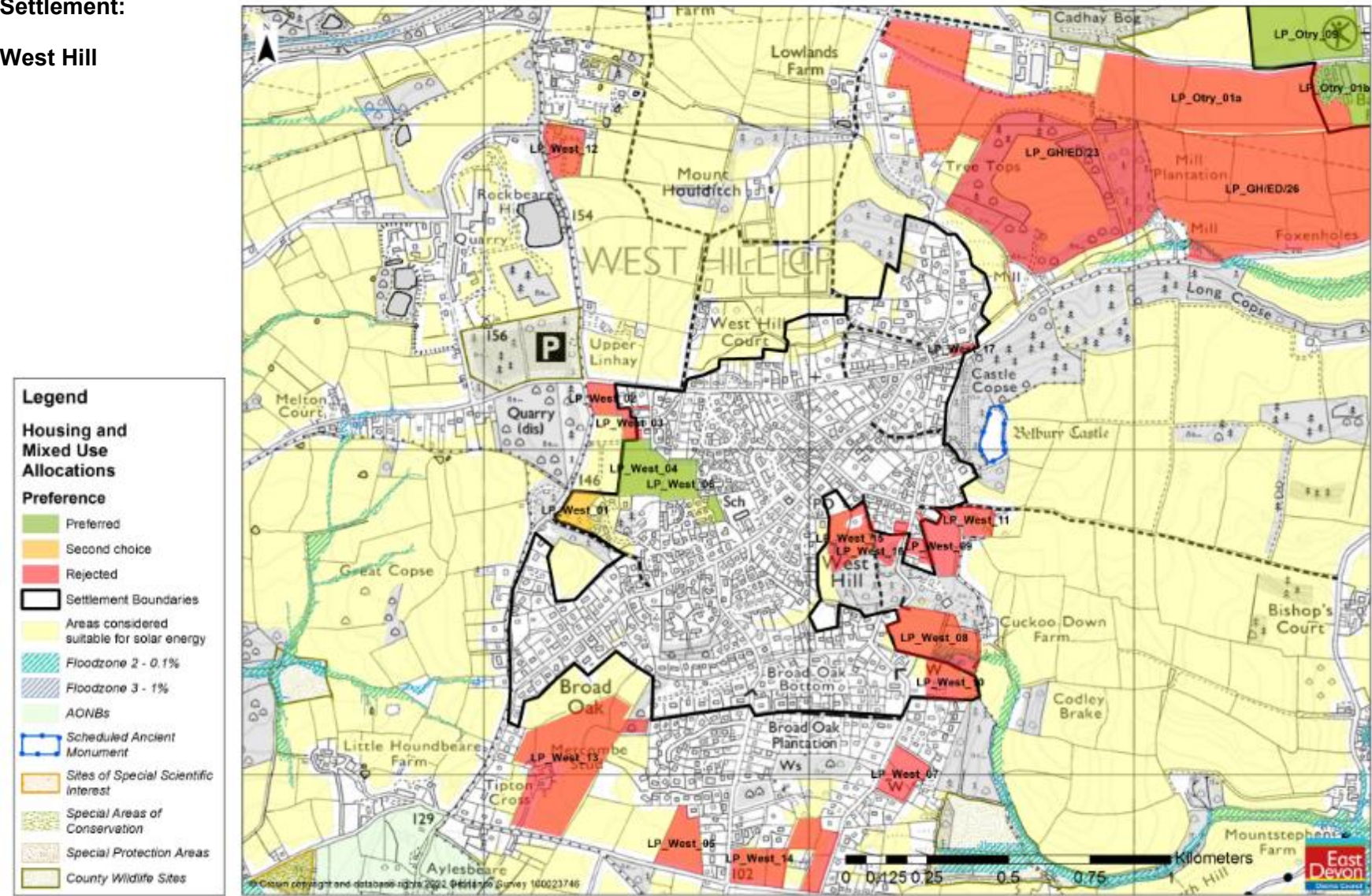
Sites: Westclyst																					
Site SA Objective	BrcI_04	Polt_03																			
Land resources commentary	BrcI_04 is greenfield site on Grade 3 agricultural land, which could be 3a (best and most versatile) so uncertain negative effect. Polt_03 is greenfield has Grade 1 agricultural land in the middle of the site and the rest is site on Grade 3 agricultural land, which could be 3a (best and most versatile), so negative effect.																				
7. Water resources	0	0																			
Water resources commentary	Development at the sites are unlikely to have any significant effects on water quality and quantity as none are located within a groundwater source protection zone or the River Axe SAC phosphates catchment																				
8. Homes	+	++																			
Homes commentary	BrcI_04 has potential to deliver less than 100 dwellings, so will have a positive effect, Polt_03 has a maximum yield in the HELAA of over 100 dwellings, meaning a significant positive effect.																				
9. Health and well-being	-	-																			
Health and well-being commentary	Both site are within 1,600m of open space/allotment and a children's play area but also adjacent to M5 road. So negative effect.																				
10. Access to services	+	+																			

Sites: Westclyst																				
Site SA Objective	BrcI_04	Polt_03																		
Access to services commentary	Both sites are within 1600m from a primary school, secondary school, pub, shop, community hall and post office, Polt_03 also within 1600m from GP, and BrcI_04 just over 1700m from GP, therefore a minor positive effect.																			
11. Jobs and employment	+	+																		
Jobs/employment commentary	BrcI_04 is within 1600m to job in Pinhoe main road, so minor positive effect Polt_03 is within 1600m to job in Pinhoe main road and has realistic potential to deliver on-site employment due to the scale of development, so minor positive effect.																			
12. Town centres	+	+																		
Town centres commentary	Both sites are beyond 800m but within 1,600m of Pinhoe town centre (Main Road). Therefore, a minor positive effect.																			
13. Connectivity and transport	+	+																		
Connectivity and transport commentary	Both sites are located within 1600m of a train station or an hourly or better bus service and M5. Westclyst should have good coverage of superfast broadband.																			
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects:																				

Sites: Westclyst																				
Site	Brcl_04	Polt_03																		
SA Objective																				
- Considerable landscaping at Plot_03 would be required due to significant negative effects upon the landscape, but the sensitivity is such that a significant negative effect is likely to remain. - Noise attenuation will lessen the negative health and well-being effect for both sites caused by their location close to the M5. - A flood risk assessment at Brcl_04 would be required due to significant negative effects of the flooding.																				
Preferred alternative: None																				
Reasons for alternatives being preferred or rejected: - Brcl_04 rejected due to large proportion of the site fall inside flood zone 3 - Polt_03 rejected due to significant adverse biodiversity, landscape and historical effects																				

Settlement:
West Hill

East Devon Local Plan 2020-2040 - West Hill



n.b. Items in the Legend that appear in regular type are for consultation; items in italics are for information only

Reasonable alternatives

- West_01 – Land at Westhayes/Hayes End Eastfield
- West_02 – Field at junction of B3180 and Bendarroch Road
- West_03 – Rear of Hasta-La-Vista, Windmill Lane
- West_04 – Land adjoining Wind Mill Lane
- West_05 – Land off Oak Road
- West_06 – Land north and east of Eastfield
- West_07 – Land at Lower Broad Oak Road
- West_08 – Land adjacent to Badgers Bend, Lower Broad Oak Road
- West_09 – Land adjoining The Gap, Lower Broad Oak Road
- West_10 – Land east of The Pygthle, Lower Broad Oak Road
- West_14 – Pikes Farm
- West_15 – Flower Cottage, Elsdon Lane
- West_16 – Elsdon House, Elsdon Lane
- West_17 – WI building and adjoining land

Outline of reasons for selecting the alternatives

The reasonable alternatives listed above have all been assessed as suitable, available and achievable in the HELAA, which provides evidence that they have potential to be delivered (subject to further consideration through the planning process). The sites are all located within or adjacent to West Hill, a Service Village, reflecting the settlement strategy in the Preferred Options consultation draft Local Plan.

West_11, 12 and 13 are not reasonable alternatives as they were not considered suitable, available and achievable in the HELAA. In addition, West_12 is in an isolated location, not adjacent or well-related to West Hill, so does not reflect the settlement strategy. Sites GH/ED/23 and Rock_15 are also in isolated locations, not adjacent or well-related to West Hill (or an existing business park for Rock_15), so do not reflect the settlement strategy.

Sites: West Hill															
Site SA Objective	West_01	West_02	West_03	West_04	West_05	West_06	West_07	West_08	West_09	West_10	West_14	West_15	West_16	West_17	
1. Biodiversity	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Biodiversity commentary	All sites are within 10km of Pebblebed Heaths SPAs, and past evidence (South east Devon European Site Mitigation Strategy, 2014) indicates a likely significant effect that must be mitigated through planning obligations. West_05 and West_14 are 400-500m from Pebblebed Heaths SPA and SSSI, but all other sites are more than 1km away from the nearest international or national biodiversity designation. West_02 and West_07 are in close proximity to County Wildlife Sites (20m and 80m). Section 41 (s.41) habitats of principle importance (excluding hedgerow which is common to most/all sites) are present on several sites, namely West_01, West_08, West_16. S.41 habitats adjoin West_02, West_05, West_06, West_07, West_09, West_10, West_14, West_15 and West_17. Therefore, all sites are likely to have a minor negative effect on biodiversity, due to the potential impacts of development.														
2. Landscape	--	-	-	-	--	-	--	--	--	--	--	--	--	+	
Landscape commentary	The presence of numerous trees across the settlement means that West Hill is well-screened from long distance views, including from AONB to the east and south of the settlement, 500m to 2km from the sites. West_01 adjoins existing development to the east, but on-site TPOs mean a likely negative effect. West_02, 03, 04 and 06 are in the north western part of the settlement. West_02 has limited context of existing built form, mostly surrounded by countryside with forest to the west, so a major negative effect. West_03 is similar, but with low density dwellings to north and east providing a slightly greater urban context, leading to a minor negative effect. West_04 is a large, open field, bounded by TPO trees to south. The urban context from dwellings to north and south mean a minor negative effect. West_06 is formed of two parcels of land, enclosed by existing development on three sides. TPO covers part of the site, meaning a minor negative effect. Thick, mature tree-lined boundary, covered by TPO, mean that West_05 has a remote feel, with little perception of dwellings to north and east, and therefore a major negative effect. West_07, 08 and 09 are tranquil, rural landscapes, with the entirety of West_08 and West_09 covered by a TPO. A major negative														

Sites: West Hill															
Site SA Objective	West_01	West_02	West_03	West_04	West_05	West_06	West_07	West_08	West_09	West_10	West_14	West_15	West_16	West_17	
	effect is likely for all three sites. West_10 is a prominent, sloping site located at the top of a valley, and development would again have a major negative effect. West_14 is comprised of five rectangular, undulating fields, bounded by large mature trees and low density dwellings to north and east. There is limited perception of built context, and a major negative effect. West_15 and 16 adjoin each other, both have mature woodland, including TPO trees – a major negative effect is likely for both. West_17 would involve developing on previously developed land with low landscape sensitivity, so a minor positive effect.														
3. Hist. built env	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Hist. built env. commentary	In general, all sites offer the potential to promote high quality design and accessibility, subject to identified constraints. There are just two designated heritage assets in West Hill: Belbury Castle Scheduled Monument and the Grade II listed St Michael's Church. None of the sites will affect heritage assets, so a neutral effect is noted for all.														
4. Climate change carbon emissions	+	0	0	0	-	+	-	-	+	-	-	+	+	0	
Climate change carbon emissions commentary	West_01 to 10 all have 6 out of 12 facilities within 1,600m of site, whilst the remaining sites West_14, 15, 16, 17 all have 7 out of 12 facilities within 1,600m of site, offering potential to minimise carbon emissions from travel. The construction of new development to minimise carbon emissions is the same for all sites, and is largely dealt with through building regulations. There is a footpath and street lights along most of the route to the primary school, village hall, and shop around 500m to east of West_01, and even closer for West_06, but there are some short gaps in the footpath along West Hill Road, meaning a minor positive effect for these sites. West_02, 03 and 04 are around 500-600m to shop/school “as the crow flies”, but the actual route along Bendarroch Road-School Lane-West Hill Road would be much longer, lacking pavement or street lighting along most of the														

Sites: West Hill															
Site SA Objective	West_01	West_02	West_03	West_04	West_05	West_06	West_07	West_08	West_09	West_10	West_14	West_15	West_16	West_17	
	route. An hourly or better bus route runs close by on Bendarroch Road, so overall a neutral effect. West_05 and 14 are just under 1km to shop/school/village hall, but route along Higher Broad Oak Road lacks pavements and street lighting. Also steep topography along this road meaning it would not be attractive to pedestrians, and a minor negative effect. Similarly, West_07, 08 and 10 are all 500m-1km from shop/school/village hall but the route lacks pavements and street lighting, and has steep topography, so a minor negative effect. West_09, 15 and 16 are all close to the shop/school/village hall (200-500m) – a short section along Elsdon Lane lacks pavement and street lighting, but overall a minor positive effect given close proximity to the facilities. West_17 is 700-800m from school/shop, but route is steep and lacks pavement for most of the route so would not be attractive to pedestrians. Bus stops with hourly or greater service adjacent to the site. Overall, a neutral effect for West_17.														
5. Climate change adaptation	+	+	+	+	+	+	0	-	0	+	+	0	+	--	
Climate change adaptation commentary	The only site that is affected by Flood Zone 3 is West_08. This site also has surface water flood risk, so a minor negative effect. West_07, 09, 15 are all partially covered by surface water flood risk, but development can avoid these areas, so a neutral effect. West_17 is almost entirely covered by surface water flood risk – as such a major negative effect is likely. The remaining sites are not located in an area of flood risk so have a minor positive effect.														
6. Land resources	- ?	- ?	- ?	- ?	- ?	- ?	- ?	- ?	- ?	- ?	- ?	- ?	- ?	+	
Land resources commentary	All sites are Grade 3 agricultural land (apart from West_17), so some uncertainty as to whether this is best and most versatile as not broken down into 3a and 3b. Mineral consultation areas cover West_01, 02, 03, 04, 05, 06 and southern part of West_14. However, in preparation of the HELAA and other subsequent comments, Devon County Council has stated the potential area of resource at these sites is small and already constrained by existing built development and therefore unlikely to be economic, so do														

Sites: West Hill															
Site SA Objective	West_01	West_02	West_03	West_04	West_05	West_06	West_07	West_08	West_09	West_10	West_14	West_15	West_16	West_17	
	not object to development. Given this, all sites are likely to have a negative uncertain effect, apart from West_17 which is a brownfield site and therefore will have a positive effect.														
7. Water resources	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	- ?	0 ?	0 ?	0 ?	
Water resources commentary	Development at the sites is unlikely to have any significant effects on water quality and quantity as none are located within a groundwater source protection zone, apart from a small section of West_14. There is uncertainty on the capacity of local sewage treatment works to accommodate additional demand from new housing. This means an uncertain neutral effect for all sites, and a negative uncertain effect for West_14.														
8. Homes	+	+	+	+	+	+	+	+	+	+	+	+	+	+	
Homes commentary	All sites have the potential to provide up to 100 new homes, so will have a positive effect on this objective. An appropriate mix of tenures and sizes including affordable housing is assumed for all sites.														
9. Health and well-being	+	+	+	+	+	+	+	+	+	+	+	+	+	+	
Health and well-being commentary	All sites are in an area of the least deprived 20% neighbourhoods in England, so development will not be located in an area of higher deprivation. All sites apart from West_05 and West_14 are within 800m of the children's play area, although the lack of footpaths and street lighting, and narrow roads mean this is difficult to access. Informal recreation opportunities are available from several public rights of way and woodland in the settlement. There is limited noise and air pollution in West Hill. On balance, all sites will have a minor positive effect against this objective.														

Sites: West Hill															
Site SA Objective	West_01	West_02	West_03	West_04	West_05	West_06	West_07	West_08	West_09	West_10	West_14	West_15	West_16	West_17	
10. Access to services	+	+	+	+	-	+	-	+	+	+	-	+	+	+	
Access to services commentary	All sites, apart from West_05, 07 and 14, are within 800m of the primary school, shop and community hall. West_01, 02, 03, 04, 06, 08, 09, 11, 12, 15 and 16 are all within 800m of an hourly or better bus service. The nearest GP is in Ottery St Mary. However, these distances are “as the crow flies” and routes are often longer than this, often along narrow, unlit lanes, with steep topography from services to the sites in the southern half of West Hill in particular. There is a footpath and street lights along most of the route to the primary school, village hall, and shop around 500m to east of West_01, and even closer for West_06, but there are some short gaps in the footpath along West Hill Road, meaning a minor positive effect for these sites. West_02, 03 and 04 are around 500-600m to shop/school “as the crow flies”, but the actual route along Bendarroch Road-School Lane-West Hill Road would be much longer, lacking pavement or street lighting along most of the route. An hourly or better bus route runs close by on Bendarroch Road. On balance a minor positive effect for sites West_01, 02, 03, 04 and 06. West_05, 07 and 14 are just under 1km to shop/school/village hall, but route along Higher Broad Oak Road lacks pavements and street lighting. Steep topography along this road meaning it would not be attractive to pedestrians, and a minor negative effect. Similarly, West_08 and 10 are all 500m-1km from shop/school/village hall and hourly or better bus service, but the route lacks pavements and street lighting, and has steep topography, so overall a minor positive effect. West_09, 15 and 16 are all close to the shop/school/village hall (200-500m) – a short section along Elsdon Lane lacks pavement and street lighting, but overall a minor positive effect given close proximity to the facilities. West_17 is 700-800m from school/shop, but route is steep and lacks pavement for most of the route so would not be attractive to pedestrians. Bus stops with hourly or greater service adjacent to the site mean overall, a positive effect for West_17.														

Sites: West Hill															
Site SA Objective	West_01	West_02	West_03	West_04	West_05	West_06	West_07	West_08	West_09	West_10	West_14	West_15	West_16	West_17	
11. Jobs and employment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Jobs/employment commentary	All sites will provide short-term positive effects from job opportunities during construction. There are no employment areas within 1,600m of the sites and, given the small size of most sites and relatively poor road network (country lanes) in the settlement, it is considered there are limited opportunities to provide on-site employment opportunities. Given this, a minor negative effect is identified for all sites.														
12. Town centres	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Town centres commentary	It is noted that development will support the vitality and viability of the services in the centre of West Hill, but all sites are more than 1,600m from an existing town centre, so minor negative effect for all.														
13. Connectivity and transport	+	+	+	+	-	+	-	+	+	-	-	+	+	+	
Connectivity and transport commentary	West Hill has an average broadband speed of 57 mbps, so all sites are assumed to have access to superfast broadband. There are no recognised cycle routes within 1,600m of any of the sites in West Hill. West_01, 02, 03, 04 and 06 are all (just) within 1,600m of the A30, which provides good connectivity on the strategic road network. All sites are within 1,600m of an hourly or better bus service, with most (West_01, 02, 03, 04, 06, 08, 09, 11, 15, 16, 17) within 800m – given this, a minor positive effect is noted for these sites.														

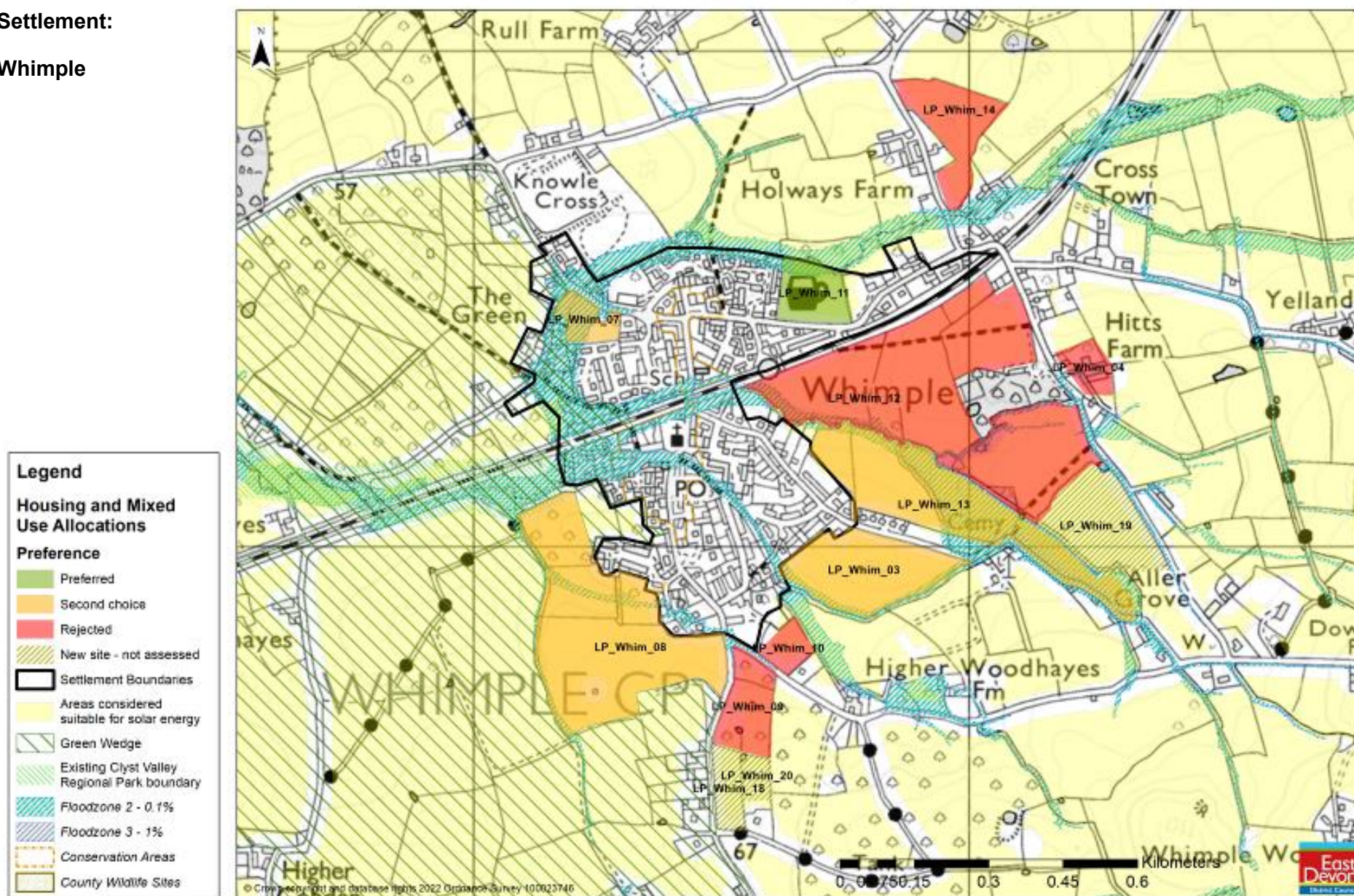
Sites: West Hill															
Site SA Objective	West_01	West_02	West_03	West_04	West_05	West_06	West_07	West_08	West_09	West_10	West_14	West_15	West_16	West_17	
	West_05, 07, 10, and 14 are all beyond 1,600m of an hourly or better bus service, an 'A' road, and a recognised cycle route, so have a minor negative effect.														
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: - Considerable landscaping would be required to address significant adverse effects on the landscape for West_01, 05, 07, 08, 09, 10, 14, 15, 16. A reduction in the site area of West_01 to avoid the on-site woodland would reduce this to a minor negative effect. The sensitivity of the other sites mean that a major negative effect will likely remain despite mitigation measures. - Improve pedestrian links from the sites where possible with the provision of footpaths. - Create a direct pedestrian link through West_04 and 06 to the primary school, village hall and shop to maximise beneficial effects of being within walking distance. This would also benefit West_02 and West_03. - Sustainable drainage systems to minimise flood risk. - Designing new development for low water use and requiring sustainable drainage systems can help turn neutral uncertain effects on water resources into positive uncertain effects.															
Preferred alternative: West_04, West_06. In addition, West_01 is a second choice allocation in the Preferred Options Consultation Draft Local Plan.															
Reasons for alternatives being preferred or rejected: - West_01 – Land at Westhayes/Hayes End Eastfield preferred as second choice site as adjoins existing development, has good access to facilities along a mostly paved and lit route, with suitable highways access and limited heritage impact. However, preferred as second choice due to woodland in western part of site, meaning only eastern part would be acceptable. - West_02 – Field at junction of B3180 and Bendarroch Road rejected due to sensitive landscape with limited context of built form, and route to community facilities lacks pavement and street lighting along most of the route.															

Sites: West Hill														
Site	West_01	West_02	West_03	West_04	West_05	West_06	West_07	West_08	West_09	West_10	West_14	West_15	West_16	West_17
SA Objective														
	- West_03 – Rear of Hasta-La-Vista, Windmill Lane rejected as difficult highways access off a narrow lane with limited visibility, route to community facilities lacks pavement and street lighting along most of the route, and sensitive landscape with limited context of built form. - West_04 – Land adjoining Wind Mill Lane preferred as no change to heritage assets, suitable highways access, and existing dwellings along north eastern boundary and to south provide some context of built form. - West_05 – Land off Oak Road rejected as poor pedestrian access to facilities; and site is currently a sensitive, rural landscape, including TPO covering entire site boundary. - West_06 – Land north and east of Eastfield preferred as relatively good pedestrian access to facilities, along with suitable highways access. No change to heritage assets. Adjacent to existing development, so less sensitive landscape. - West_07 – Land at Lower Broad Oak Road rejected as 1km route to facilities is narrow, lacks pavements and street lighting, and has steep topography which would not be attractive to pedestrians. Tranquil, rural landscape means relatively high landscape sensitivity. Adverse ecological impact. - West_08 – Land adjacent to Badgers Bend, Lower Broad Oak Road rejected as poor pedestrian access to facilities, sensitive landscape including entire site covered by TPO, adverse ecological impact, and surface water flood risk. - West_09 – Land adjoining The Gap, Lower Broad Oak Road rejected as poor pedestrian access to facilities, sensitive landscape including entire site covered by TPO, adverse ecological impact, and surface water flood risk. - West_10 – Land east of The Pygthle, Lower Broad Oak Road rejected as poor pedestrian access to facilities, and a sensitive landscape that slopes steeply in parts. - West_14 – Pikes Farm rejected as poor pedestrian access to facilities; and site is currently a sensitive, rural landscape. - West_15 – Flower Cottage, Elsdon Lane rejected as sensitive landscape including on-site woodland, adverse ecological impact, steep slope in part, surface water flood risk on edge of site - West_16 – Elsdon House, Elsdon Lane rejected as sensitive landscape, adverse ecological impact. - West_17 – WI building and adjoining land rejected as surface water flood risk covers most of site, and there are sequentially preferable sites in West Hill.													

East Devon Local Plan 2020-2040 - Whimble

Settlement:

Whimble



n.b. Items in the Legend that appear in regular type are for consultation; items in italics are for information only

Reasonable alternatives

- Whim_03 Land south of Grove Road
- Whim_04 Hits Farmhouse, Lilypond Lane
- Whim_07 Land fronting Broadclyst Road
- Whim_08 Land West of Church Road and Bramley Gardens
- Whim_09 Land at Church Road and Woodhayes Lane
- Whim_10 Land adjoining Woodhayes Country House
- Whim_11 Land at Station Road
- Whim_13 Land North of Grove Road
- Whim_14 Land at Perriton Barton
- Whim_18 Land between Orchard Lea and Church Road
- Whim_19 Hitts Farm, Lilypond Lane
- Whim_20 Orchard Lea

Outline of reasons for selecting the alternatives

The reasonable alternatives listed above have all been assessed as suitable, available and achievable in the HELAA, which provides evidence that they have potential to be delivered (subject to further consideration through the planning process).

Sites: Whimble																				
Site SA Objective	Whim_03	Whim_04	Whim_07	Whim_08	Whim_09	Whim_10	Whim_11	Whim_13	Whim_14	Whim_18	Whim_19	Whim_20								
1. Biodiversity	--	--	--	--	--	--	--	--	--	--	--	--								
Biodiversity commentary	All sites are in the Pebblebed Heaths mitigation zone. Whim_09 is an unconfirmed wildlife site and a core nature area. All other sites are either adjacent to or in close proximity to either an unconfirmed wildlife site and/or core nature areas.																			
2. Landscape	-	-	-	-	-	-	-	-	-	-	-	-								
Landscape commentary	None of the sites are in an AONB, but all contribute to the attractive landscape setting of Whimble.																			
3. Hist. built env	-	--	--	-	--	--	-	-	-	0	-	0								
Hist. built env. commentary	There is a listed building partly within Whim_04. Whim_07 has several listed buildings around the site, including a Grade I* and a Grade II listed building surrounded on three sides by the site. Whim_09 and 10 are very close to a Grade II listed summerhouse and have the potential to affect the setting of a Grade II* listed building. Whim_03, 08, 11, 14 and 19 have the potential to have a negative impact on the setting of designated heritage assets.																			
4. Climate change carbon emissions	-	-	-	-	-	-	-	-	-	-	-	-								

Sites: Whimble																				
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Climate change carbon emissions commentary	An accessibility assessment undertaken for the Site Selection work identified a total of 12 services, facilities and employment sites ¹⁰⁶ . All sites are within 1600 metres of the eight out of twelve facilities available, but pavements are not continuous and may deter pedestrian access. The bus route to the village has a frequency of five or fewer buses so use of private transport is likely to be high.																			
5. Climate change adaptation	--	--	--	0	+	+	--	--	--	+	--	+								
Climate change adaptation commentary	Whim_04, 07, 11, 12, 13 and 18 are wholly in a critical drainage area and partly in flood zones 2 and 3. Whim_03 is partly in a critical drainage area and partly in flood zones 2 and 3. Small parts of Whim_08 are in flood zones 2 and 3 and a small part of Whim_09 together with the land adjacent to Whim_10 are in flood zone 2.																			
6. Land resources	?	?	?	?	?	?	?	?	?	?	?	?								

¹⁰⁶ Namely: train station, hourly or better bus route, primary school, secondary school, convenience store/shop, Post Office, Community hall, Pub, Open space/allotment, children's play area, GP, employment site (identified in the Employment Land Review).

Sites: Whimble																				
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Land resources commentary	All the sites are Grade 3 agricultural land where it is not broken into a and b so an uncertain effect.																			
7. Water resources	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?								
Water resources commentary	Development at the sites is unlikely to have any significant effects on water quality and quantity as none are located within a groundwater source protection zone. There is uncertainty on the capacity of local sewage treatment works to accommodate additional demand from new housing. This means an uncertain neutral effect for all sites.																			
8. Homes	+	+	+	++	+	+	+	+	+	+	+	+								
Homes commentary	Whim_08 has the potential for more than 100 homes so a significant positive effect. The other sites have a capacity for up to 100 so a positive effect. An appropriate mix of tenures and sizes including affordable housing is assumed for all sites.																			
9. Health and well-being	+	+	+	+	+	+	+	+	+	+	+	+								
Health and well-being commentary	No sites are within 800 metres of an area of higher deprivation. All sites are within 1600 metres of open space and a children's play area. No sites are adjacent to a railway line or A road.																			

Sites: Whimble																				
Site SA Objective	Whim_03	Whim_04	Whim_07	Whim_08	Whim_09	Whim_10	Whim_11	Whim_13	Whim_14	Whim_18	Whim_19	Whim_20								
10. Access to services	+	+	+	+	+	+	+	+	+	+	+	+								
Access to services commentary	All sites are within 800 metres of the facilities in the village centre, which include a primary school, train station, GP surgery, shop and pub. However, there are issues relating to the quality of pedestrian access due to intermittent pavements so a minor positive impact.																			
11. Jobs and employment	-	-	-	+	-	-	-	-	-	-	-	-								
Jobs/employment commentary	There are no employment sites within 1600 metres of any site. There may be potential for employment uses on Whim_08.																			
12. Town centres	-	-	-	-	-	-	-	-	-	-	-	-								
Town centres commentary	No sites are within 1600 metres of a town centre.																			
13. Connectivity and transport	+	+	+	+	+	+	+	+	+	+	+	+								

Sites: Whimble																				
Site SA Objective	Whim_03	Whim_04	Whim_07	Whim_08	Whim_09	Whim_10	Whim_11	Whim_13	Whim_14	Whim_18	Whim_19	Whim_20								
Connectivity and transport commentary	Whimble has broadband speeds over 30 mbps. All sites are within 1600 metres of a train station so a minor positive impact.																			
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: • Mitigate impact upon Pebblebed Heaths SPAs – to be considered in the Habitats Regulations Assessment. • Further work needed to assess impact of any development on unconfirmed wildlife site at Whim_09 and whether this could be mitigated. • Further work required to assess any impact of development on nearby sites of biodiversity interest and devise mitigation measures. • A minor negative landscape effect for all sites means that appropriate landscaping should be incorporated, although as sites are currently greenfield, a negative effect would remain. • The development of all sites except Whim_18 and 20 and would need to be designed appropriately to take account of the impact on nearby heritage assets. The potential impacts on designated heritage assets of development on Whim_04 and 07 are particularly significant and may be difficult to mitigate. • All sites in the Whimble critical drainage area should meet the minimum drainage standards and contribute to a scheme to reduce risk of flooding¹⁰⁷.																				

¹⁰⁷ See Whimble Critical Drainage Area at

[https://devoncc.sharepoint.com/sites/PublicDocs/Planning/FloodRisk/Forms/AllItems.aspx?id=%2Fsites%2FPublicDocs%2FPlanning%2FFloodRisk%2FCritical Drainage Areas%2FWhimble Critical Drainage Area%2Epdf&parent=%2Fsites%2FPublicDocs%2FPlanning%2FFloodRisk%2FCritical Drainage Areas&p=true&ga=1](https://devoncc.sharepoint.com/sites/PublicDocs/Planning/FloodRisk/Forms/AllItems.aspx?id=%2Fsites%2FPublicDocs%2FPlanning%2FFloodRisk%2FCritical%2FDrainageAreas%2FWhimble%20Critical%20Drainage%20Area%2Epdf&parent=%2Fsites%2FPublicDocs%2FPlanning%2FFloodRisk%2FCritical%2FDrainageAreas&p=true&ga=1)

Sites: Whimble																				
Site	Whim_03	Whim_04	Whim_07	Whim_08	Whim_09	Whim_10	Whim_11	Whim_13	Whim_14	Whim_18	Whim_19	Whim_20								
SA Objective																				
Preferred alternative: Whim_11 Reasons for alternatives being preferred or rejected: - Whim_03 Land south of Grove Road – rejected as strategic level of growth not compatible with strategy and difficulties of providing satisfactory highway access. Drainage, flooding, heritage, landscape and ecology issues would also need to be addressed. - Whim_04 Hits Farmhouse, Lilypond Lane – rejected due to poor access making pedestrian and cycling routes to facilities in village centre difficult. - Whim_07 Land fronting Broadclyst Road – rejected due to flooding potential impacts on designated heritage assets. - Whim_08 Land West of Church Road and Bramley Gardens - rejected as strategic level of growth not compatible with strategy and landscape impacts on setting of village, including difficulties of providing satisfactory highway access without detrimental landscape impacts. - Whim_09 Land at Church Road and Woodhayes Lane – rejected due to detrimental impact on setting of designated heritage assets, landscape setting of village and poor pedestrian cycling links to village centre. - Whim_10 Land adjoining Woodhayes Country House – rejected due to detrimental impact on setting of designated heritage assets, landscape setting of village and poor pedestrian cycling links to village centre. - Whim_11 Land at Station Road – preferred as compatible with strategy and best option for accommodating growth, although further work is required to consider how design can limit the impact on or improve setting of a listed building, flooding, drainage, ecology and improving pedestrian links to the village centre.																				

Sites: Whimble																				
Site	Whim_03	Whim_04	Whim_07	Whim_08	Whim_09	Whim_10	Whim_11	Whim_13	Whim_14	Whim_18	Whim_19	Whim_20								
SA Objective																				
- Whim_13 Land North of Grove Road - rejected as strategic level of growth not compatible with strategy and landscape impacts on setting of village. - Whim_14 Land at Perriton Barton – rejected due to poor relationship and pedestrian links with village, landscape impact and potential impact on ecology and the setting of designated heritage assets. - Whim_18 Land between Orchard Lea and Church Road - rejected due to poor relationship and pedestrian links with village and landscape impact. - Whim_19 Hits Farm, Lilypond Lane rejected as it is remote from the village with poor pedestrian links. - Whim_20 Orchard Lea – rejected due to poor relationship and pedestrian links with village and landscape impact.																				
