East Devon Local Plan 2020-2042

Second Regulation 19 Publication Draft Local Plan

Sustainability Appraisal report

November 2025

East Devon – an outstanding place

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1 Introduction

East Devon Local Plan 2020-2042

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 preparing a revised Local Plan, which covers the period from 1 April 2020 to 31 March 2042. 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; as does practice advice.[4] The guidance makes clear 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.[5]

[1] Review of the East Devon Local Plan 2013-31 is available at: Monitoring - East Devon
[2] Planning and Compulsory Purchase Act 2004, Section 19: Planning and Compulsory Purchase Act 2004 (legislation.gov.uk)
[3] The Environmental Assessment of Plans and Programmes Regulations 2004: The Environmental Assessment of Plans and Programmes Regulations 2004 (legislation.gov.uk)
[4] Planning practice guidance, SA and SEA: Strategic environmental assessment and sustainability appraisal - GOV.UK (www.gov.uk) ; 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 ; PAS Guide to better Sustainability Appraisal
[5] Planning practice guidance, Reference ID: 11-009-30140306: Strategic environmental assessment and sustainability appraisal - GOV.UK (www.gov.uk)

1.4 The following table (figure 1.1) shows how the requirements of the SEA Regulations have been met within this report.

Figure 1.1: Meeting the requirements of the SEA Regulations

SEA Regulations Requirements	**Where covered in this SA report**
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated (Reg. 12). The information to be given is (Schedule 2):	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes	Chapter 2, Appendix Two.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Chapter 3, Appendix Three.
3. The environmental characteristics of areas likely to be significantly affected	Appendix Three.
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Chapter 3 (including paragraph 3.39 relating to areas of particular environmental importance).
5. The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation	Appendix Two.
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects)	Chapter 4, 5, 6; Appendix Five, Six.
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Chapter 4, 5; Appendix Five, Six.

SEA Regulations Requirements	Where covered in this SA report
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapter 2; Appendix Five, Six.
9. a description of measures envisaged concerning monitoring in accordance with regulation 17;	Chapter 7.
10. a non-technical summary of the information provided under the above paragraphs 1 to 9.	A separate non-technical summary has been prepared.
The report shall include the information referred to in Schedule 2 as may reasonably be required taking account of current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process, and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Reg. 12(3))	Addressed throughout the SA report, specifically Reg. 12(3)(a) in Chapter 2, Appendix Three; 3(b) in Chapter 2, 4, 5, Appendices Five and Six; 3(c) in Chapter 1 and 2; 3(d) in Chapter 1, Appendices Five and Six.
Consultation: • authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Reg. 12(5))	Consultation with the consultation bodies on the Draft Scoping Report took place from 18 January to 15 March 2021. Appendix One contains the comments received and Council response.

SEA Regulations Requirements	Where covered in this SA report
• authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Reg. 13)	The Draft Local Plan consultation (November 2022) was accompanied by a Draft SA Report. The Further Draft Local Plan consultation (May 2024) was accompanied by a Further Draft SA Report. Consultation on the Publication Draft Local Plan (Regulation 19) and SA report took place from February 2025. A Second Regulation 19 Publication Draft Local Plan was published for consultation in November 2025, alongside an updated SA report. Appendix One contains the comments received on past consultations and Council response.
• other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Reg. 14).	Not applicable.
Taking the environmental report and the results of the consultations into account in decision-making (Reg. 16)	

SEA Regulations Requirements	Where covered in this SA report
Provision of information on the decision: When the plan or programme is adopted, the public and any countries consulted under Reg. 14 must be informed and the following made available to those so informed: • the plan or programme as adopted • a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report, the opinions expressed and the results of consultations have been taken into account, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and • the measures decided concerning monitoring	To be addressed after the Local Plan is adopted.
Monitoring of the significant environmental effects of the plan's or programme's implementation (Reg. 17)	To be addressed after the Local Plan is adopted.

Background to this report

1.5 This SA report relates to the Second Regulation 19 Publication Draft East Devon Local Plan 2020-2042[6] (November 2025) and should be read in conjunction with that document. This SA report is published for consultation alongside the Second Regulation 19 Publication Draft Local Plan, from November 2025. Comments on the SA can be submitted via our website at Emerging Local Plan 2020-2042 - 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.

1.6 The consultation responses on the Second Regulation 19 Publication Draft Local Plan and this SA report will be reviewed before the Local Plan is submitted for Examination.

[6] Prepared under Regulation 19 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.

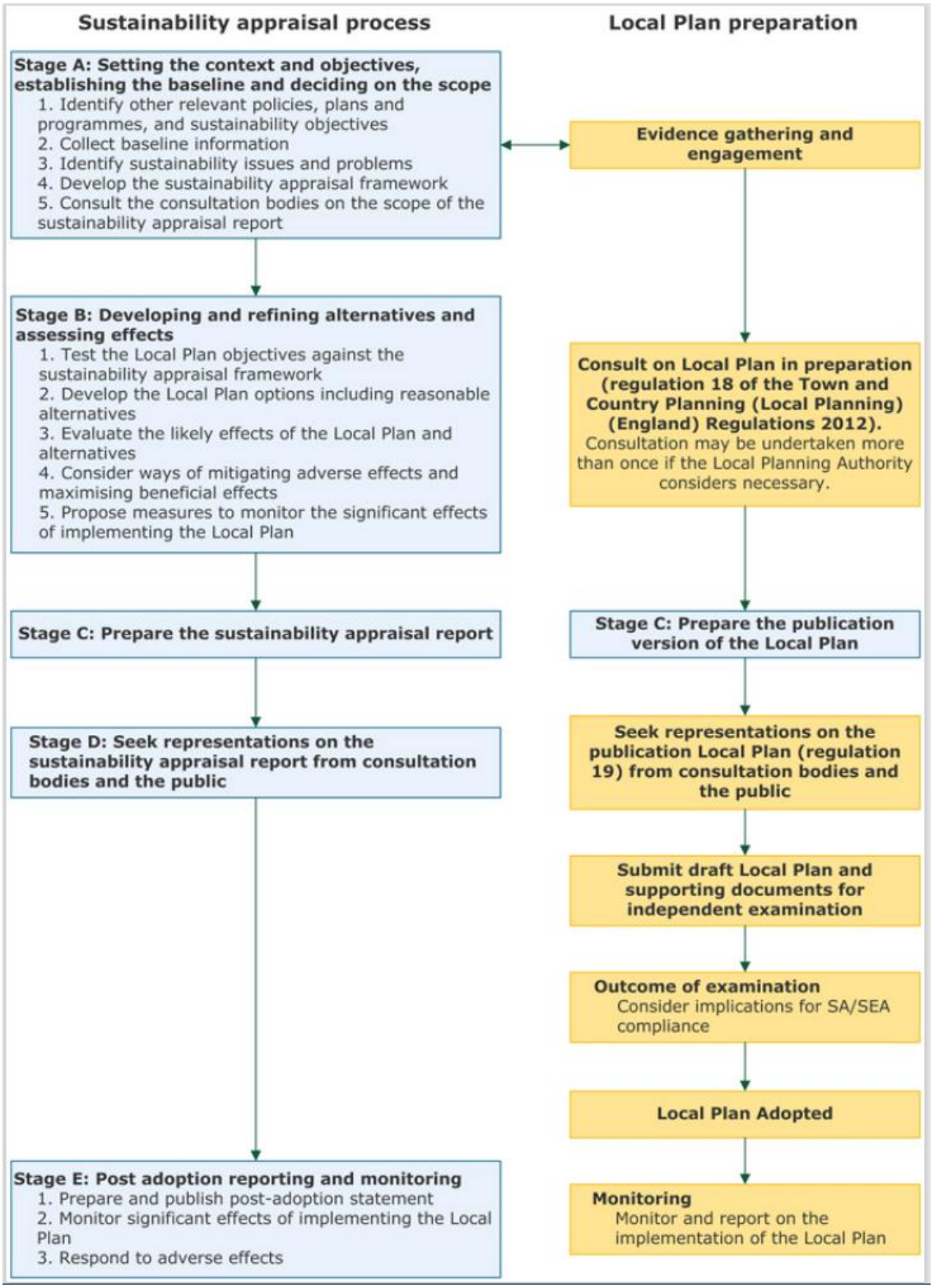
2.2 Figure 2.1 on the following page shows the five stages of the SA process, from A to E, and its relationship with Local Plan preparation. This SA report is seeking representations from consultation bodies and the public, alongside the Publication Draft Local Plan (regulation 19), at Stage D of the SA process. The remainder of this chapter sets out the methodology for undertaking SA.

Stage A: Scoping

2.3 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.

2.4 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

2.5 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	Examples of 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 National Landscapes (also known as Areas of Outstanding Natural Beauty) 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	Examples of 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	Examples of 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).

2.6 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 explains 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

2.7 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.

2.8 The SEA Regulations[7] 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."

2.9 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?[8]

2.10 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

[7] The Environmental Assessment of Plans and Programmes Regulations 2004, Regulation 12(2): The Environmental Assessment of Plans and Programmes Regulations 2004 (legislation.gov.uk)
[8] 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.

2.11 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 guidance[9] 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."*[10]

2.12 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. In addition, plans should avoid the unnecessary duplication of policies in the NPPF.[11]

2.13 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.

2.14 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'.

[9] Implementation of Directive 2001/42 on the assessment of the effects of certain plans and programmes on the environment, European Commission, 2003.
[10] Planning Practice Guidance Reference ID: 11-018-20140306: Strategic environmental assessment and sustainability appraisal - GOV.UK (www.gov.uk)
[11] National Planning Policy Framework (publishing.service.gov.uk) December 2023.

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.
+	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.

2.15 Stage B of the process goes on to consider ways of mitigating likely significant adverse effects and maximising beneficial effects. 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. The appraisal will make clear where the mitigation measures have subsequently been included in the policy wording. In many cases, Local Plan policies relating to specific topics will provide mitigation for site that will lessen adverse effects – these are not repeated for each site appraisal, as the SA report should be read as a whole. 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 services, for example.

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

2.16 In line with the guidance referenced above, any reasonable alternatives should be consistent with the Local Plan vision, objectives and scope. The Local Plan Vision is for East Devon to be a diverse, inclusive and thriving place to live and work and a pleasure to visit and enjoy. The Vision refers to the climate emergency, and growing our towns and villages, with the West End of East Devon being a focal point for growth. It also references securing well-paid jobs, and creating more job opportunities close to where people live. Rural areas will retain their charm, protecting and enhancing the environment, with community facilities and infrastructure delivered alongside new development.

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

i. To encourage healthy lifestyles and living environments for all East Devon residents.

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.

iii. To provide high quality new homes to meet people's needs.

iv. To support business investment and job creation opportunities within East Devon and support a resilient economy.

v. To promote the vitality of our town centres, encourage investment, greater flexibility and a wider range of activities to increase footfall and spend.

vi. To promote high quality beautiful development that is designed and constructed to meet 21st century needs.

vii. To conserve and enhance our outstanding built heritage.

viii. To protect and enhance our outstanding natural environment and support an increase in biodiversity.

ix. To prioritise walking, cycling and public transport and make provision for charging electric vehicles.

x. To secure infrastructure needs at an appropriate time to support new development.

xi. To help support villages and protect and enhance facilities and services they offer.

2.18 These objectives have been tested against the SA framework, shown in see chapter 4.

2.19 The scope of the Local Plan is the development and use of land which the council wish to encourage during a specified period; the allocation of sites for development; and development

management and site allocation policies, which are intended to guide the determination of planning applications.[12]

2.20 The geographic scope of the Local Plan relates to the East Devon district boundary. The Plan covers the period of 2020 to 2042 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 – sites that meet conditions a), b) and c) will be considered as a "reasonable alternative" and therefore subject to appraisal against the SA framework. In exceptional circumstances, sites may be considered as reasonable alternatives even if they fail to meet the sifting criteria – such cases will be clearly justified. 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 sifting criteria to be considered as a 'reasonable alternative'

Sifting criteria	**Reason**
a) Site is assessed as 'suitable, available and achievable' in the Housing and Economic Land Availability Assessment (HELAA)[13]	To ensure only sites of a sufficient size, in an appropriate location, and without significant constraints are considered for potential allocation.
b) Site is located: o within, or adjacent to, settlements in Tiers 1-4 of the settlement hierarchy (excluding Cranbrook[14]); or o adjoining another site that is adjacent to a settlement in Tiers 1-4, and is also well related to that settlement; or o as a freestanding large-scale, sustainable new settlement, or able to be part of a new settlement; or	To reflect the settlement strategy in the emerging Local Plan 2020-2042.

[12] Regulation 5 of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).
[13] There may be circumstances where the HELAA has not considered sites e.g. new sites submitted through Local Plan consultation. In these cases, EDDC Officers will make an initial judgement as to whether the site is suitable, available and achievable, to ensure sites to be considered even if they have not been assessed through the HELAA.
[14] Cranbrook is outside the scope of the East Devon Local Plan 2020-2042 as it is addressed in The Cranbrook Plan (adopted October 2022). Therefore, sites within or adjoining the Cranbrook Plan area will not pass site sifting.

○ adjacent to Exeter or other development in the West End; or ○ adjacent to an existing business park (if site is proposed for employment use)	
c) Site is not already allocated in a 'made' Neighbourhood Plan	It would cause confusion and serve little purpose to allocate sites in the Local Plan which have already been allocated in a 'made' Neighbourhood Plan.
d) Sites in criteria a) or b) that already have planning permission will be noted but not considered for allocation, unless the owner/site promoter submits the site for a different use or the site is no longer deliverable	The Local Plan will not allocate sites that already have planning permission, as they are assumed to be deliverable and will form part of the figure for housing/employment commitments. There may be sites where planning permission has lapsed or likely to lapse that would justify site assessment, but these will be justified on a case-by-case basis. Some sites with permission may no longer be considered deliverable – again, assessment of such sites will need to be justified on a case-by-case basis.

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.

Stage C: Prepare the SA report

2.23 The preparation of the SA report at Stage C is the 'formal' version required under SEA Regulation 12 – this report, dated November 2025, fulfils Stage C.

2.24 Consultation on a SA report took place alongside the 'first' Regulation 19 Publication Draft Local Plan in February 2025. The responses received in relation to the SA report have been considered and addressed as appropriate, as shown in Appendix One – key changes include amendments to the sustainability effects of some sites and clarifying why some sites are 'reasonable alternatives'.

2.25 Amendments have also been made to this SA report to reflect and inform changes to the Local Plan between the first and second Regulation 19 stages. Most changes to the topic-based policies are relatively minor, so do not require changes to the SA. One of the exceptions is Strategic Policy AR02 which was amended to incorporate water quality, as well as efficiency, leading to more positive effects on biodiversity and water quality.

2.26 With regards to site allocations, the second Regulation 19 Local Plan includes additional detail on the East Devon New Community (now known as 'Marlcombe'), including an appraisal of different options for the masterplan. Other key changes that resulted in changes to the SA are the deletion of allocations at Axminster (Axmi_01a), Honiton (Honi_12), and Langaton Lane

(Brcl_26), and to reflect updated evidence such as the Water Cycle Study and archaeology work for some sites. They were relatively minor changes in yield that did not require an update to the SA at sites Ebud_01, Sidm_01, Sidm_06a, Newt_04, and Newt_05. The increase at site GH/ED/39b from 100 dwellings to 195 dwellings is more significant but the site area remains the same and the likely significant effects are also similar.

2.27 Updates have also been made to key elements of the baseline information and relevant plans, policies and programmes between the first and second Regulation 19 SA report.

Stage D: Consultation on the Local Plan and SA report

2.28 Consultation on the 'publication draft' Local Plan at Regulation 19[15] is carried out alongside the 'formal' SA report i.e. this SA report, dated November 2025. For the East Devon Local Plan, there are two rounds of Regulation 19 consultation, in February 2025 and November 2025. This SA report has been updated to reflect the Second Regulation 19 Publication Draft Local Plan, November 2025.

2.29 Following consultation at Stage D, the Local Plan, SA report and supporting documents (including the consultation responses) are 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

2.30 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.

2.31 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

2.32 In general, there is an inherent lack of certainty in carrying out the SA Report given it is a strategic assessment, with matters to be addressed in more detail through the planning application process. This is recognised in the regulations[16] and Government guidance stating

[15] The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).
[16] The Environmental Assessment of Plans and Programmes Regulations 2004, Regulation 12(3)(d): The Environmental Assessment of Plans and Programmes Regulations 2004 (legislation.gov.uk)

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

2.33 A large number of site options are considered in preparing a Local Plan, and there is a general difficultly relating to the approach and ensuring site options are appraised in a consistent manner. To help address this, standards and thresholds have been applied to each SA objective, to be used in determining the nature and significance of site options.

2.34 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.

2.35 Distances to environmental constraints, employment, community services and facilities reflect straight line distances 'as the crow flies', but this is likely to be an underestimate and 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). These 'barriers' have been noted where relevant.

2.36 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.

2.37 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.

2.38 The Government has committed to ending the sale of new cars powered solely by internal combustion engines by 2030, but the rate at which total vehicle emissions will reduce across the Local Plan period is difficult to predict. Therefore, it is assumed that driving a private car will still lead to carbon emissions in most cases.

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 UKs 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 – Stage A3 of the SA process.

3.8 The following paragraphs contain the key sustainability issues along with a summary of the likely future trends in the absence of a new plan and relevant policy coverage. The likely future

trends in the absence of a new Local Plan assume the existing Local Plan policy becoming increasingly dated and of less relevance and therefore an inability to effectively manage future development. The concerns raised could come about as a consequence of more speculative and ad-hoc planning applications that the Council may be less able to resist.

Biodiversity – summary

3.9 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 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.

Biodiversity – likely future trends in the absence of a new Local Plan

3.10 Regardless of there being a new local plan there are still legal considerations that apply to protection of designated wildlife sites. This includes the mandatory 10% biodiversity net gain requirement. However, these most important sites would not benefit from the comprehensive overview that a new local plan can provide, such as an up-to-date strategic approach to habitat mitigation for internationally designated sites. 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. There is less potential for strategic biodiversity enhancement in the absence of a new local plan.

Landscape and seascape – summary

3.11 Over half (57%) of the District is designated as National Landscape meaning that, along with 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.

Landscape and seascape – likely future trends in the absence of a new Local Plan

3.12 National policy to protect the highest tier of landscape designation areas would remain in place and as such, for National Landscapes (formerly known as Areas of Outstanding Natural Beauty) 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, National Landscapes 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 – summary

3.13 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.

Historic Environment – likely future trends in the absence of a new Local Plan

3.14 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.

Design quality – summary

3.15 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.

Design quality – likely future trends in the absence of a new Local Plan

3.16 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 – summary

3.17 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.

Climate change and carbon emissions – likely future trends in the absence of a new Local Plan

3.18 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 and low carbon energy generation and to promote patterns of development that lead to lower carbon dioxide emissions. Without a plan, carbon emissions could be higher.

Climate change adaptation – summary

3.19 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.

Climate change adaptation – likely future trends in the absence of a new Local Plan

3.20 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. The Local Plan can also identify Coastal Change Management Areas which are most likely to change over the long term.

Land resources – summary

3.21 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.

Land resources – likely future trends in the absence of a new Local Plan

3.22 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 – summary

3.23 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. Some waste water treatment works are currently exceeding their capacity (Feniton, Fluxton, Honiton, Woodbury) with others close to capacity. A new plan provides the opportunity to restore and improve water quality outcomes and also to protect water supplies for domestic and other uses, by ensuring any necessary upgrades are undertaken prior to development.

Water quality – likely future trends in the absence of a new Local Plan

3.24 In the absence of a new Local Plan it may not be possible to pro-actively plan for water quality improvements or it may not be possible to accommodate development 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.

Housing – summary

3.25 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, with relatively high average house prices at £335,000, which is 8.5 times the average salary. A local plan provides the means to establish policy designed around providing the right homes in the right places, with appropriate levels of affordable housing.

Housing – likely future trends in the absence of a new Local Plan

3.26 In the absence of a local plan there is far less control over the types of homes that may be built and where. 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 and well-being – summary

3.27 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. 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.

Health and well-being – likely future trends in the absence of a new Local Plan

3.28 The absence of a local 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. It would be less possible to actively plan to minimise possible adverse impacts and if relevant to secure relevant mitigation.

Access to services and facilities – summary

3.29 Generally speaking the towns of East Devon are well served with facilities, but peripheral parts of some East Devon towns can be some distance from key services. Service provision in villages is more sporadic and even more so in many rural areas.

Access to services and facilities – likely future trends in the absence of a new Local Plan

3.30 Robust policy provides positive opportunities to plan for services and facilities alongside new development, especially housing development. The absence of a local 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 – summary

3.31 Having a job for individuals and securing better employment opportunities is likely to be key for a local plan to promote. East Devon has 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.

Jobs and employment – likely future trends in the absence of a new Local Plan

3.32 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 – summary

3.33 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. There is growth in on-line retailing casts a fundamental challenge to future town centre vitality and viability.

Town centres – likely future trends in the absence of a new Local Plan

3.34 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.

Connectivity and transport – summary

3.35 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 areas 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 congestion does occur.

Connectivity and transport – likely future trends in the absence of a new Local Plan

3.36 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

3.37 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]

3.38 There are a number of international 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. International 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. Any development proposals within or affecting these must satisfy the requirements of the EU Directives on the Conservation of Wild Birds (79/409/EEC) and the Conservation of Natural Habitats (92/43/EEC). The NPPF provides the same protection to potential SACs, possible

[17] SEA Regulations, Schedule 2(4).

SPAs; listed or proposed Ramsar sites; and sites identified or required as compensatory measures for adverse effects on such sites.

3.39 Environmental problems that relate to areas of particular environmental importance are:

- River Axe SAC – water quality is 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; recreation pressure.
- East Devon Pebblebed Heaths SAC – Recreation pressures from nearby development; water pollution; air pollution from vehicle emissions.
- East Devon Pebblebeds SPA – Recreation pressures from nearby development; water pollution; loss of supporting habitat/functionally-linked land; air pollution from vehicle emissions.
- Exe Estuary SPA and Ramsar – water quality is classified by the EA as "moderate", with issues preventing waters reaching good status including pollution from towns, cities and transport; recreation pressures from nearby development, including public access/disturbance affecting birds.

3.40 The Council is producing an assessment under the Habitat Regulations to inform the Local Plan that considers these designated sites, threats upon them, and potential mitigation measures, in greater detail.

4 Appraisal Findings of Topic-based Policies

4.1 This chapter presents an overview of the SA findings of the topic-based policies and reasonable alternatives for the Second Regulation 19 Publication Draft East Devon Local Plan 2020-2042. The detailed appraisal tables are in Appendix Five.

4.2 The Local Plan Vision and Objectives set the framework for plan policies that follow. Local Plan policies include the spatial strategy and development sites; followed by a series of topic-based policies addressing issues such as climate change, housing needs, employment, design, transport, 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).

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.

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 21st century needs.	0	0	+ +	+	+	0	0	+	0	0	0	0	0
vii. To conserve and enhance our outstanding historic environment.	0	+	+ +	0	0	0	0	0	0	0	0	0	0

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
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

4.5 Appendix Five contains a series of tables detailing the SA findings of the topic-based policies and reasonable alternatives in the Publication Draft East Devon Local Plan 2020-2042, by chapter order.

4.6 Chapter 3. The Spatial Strategy considers options relating to the spatial strategy, the spatial distribution of development, and the scale of the district-wide housing requirement. It also covers policies relating to the designated neighbourhood area housing requirement, settlement boundaries, and infrastructure delivery. The appraisal notes major positive effects relating to housing, employment, and town centres. Some major negative effects are likely on the landscape and biodiversity, arising from the adverse effects of built development. Negative effects for carbon emissions, land and water resources are also likely for some options.

4.7 Chapter 4. Development at the West End includes the topic-based policies from this chapter (site allocations at the West End are included in chapter 5 and Appendix Six). These policies relate to development within the Enterprise Zone, Exeter Science Park, the Airport, and Clyst Valley Regional Park. Major positive effects are noted for transport and connectivity, given the accessible location of the West End, and also for jobs and employment. Negative effects on the landscape and land resources arise from development in this area. The Clyst Valley Regional Park has a series of major positive effects on the environment and health and well-being, but restrictions on housing development means a negative effect for this objective.

4.8 Chapters 6 and 7. Mitigating and adapting to climate change contains mitigation policies on the climate emergency, net-zero development and promoting renewable and low carbon energy. Adaptation policies cover flood risk, water quality and efficiency, and coastal change. As expected, these policies have major positive effects on carbon emissions and climate change adaptation. Minor positive effects are noted for the environmental objectives, and job opportunities arising from the development of renewable and low carbon energy.

4.9 Chapter 8. Meeting housing needs has a series of policies to provide a mix of decent, affordable homes that are safe, secure and adaptable to changing needs. Other policies relate to self-build and custom build housing, sub-dividing or replacing existing dwellings, annexes and extensions, houses in multiple occupation (HMOs), gypsy and traveller sites, rural exception sites, and housing for rural workers. Major positive effects for homes are identified for all policies, with consequent positive effects on health and well-being. Given the focussed nature of the policies in this chapter, negligible effects are noted for many objectives.

4.10 Chapter 9. Supporting the economy and town centres contains policies on employment development (including resisting their loss), farm diversification, town centres, local shops and services, tourism, and holiday accommodation in designated landscapes. The policies have major positive effects by fostering a strong and entrepreneurial economy, increase access to high quality skills training, improve job opportunities and greater productivity. Several policies also promote access to services and connectivity, with major positive effects. Negligible effects for most other objectives.

4.11 Chapter 10. High quality design has four policies that cover design and local distinctiveness, housing density, advertisements, and green and blue infrastructure. Major positive effects are

likely on the built environment, climate change, health and well-being, connectivity and land and water resources, with no negative effects.

4.12 Chapter 11. Sustainable transport and communications prioritises sustainable travel, protecting key transport routes and sites from other development. It ensures the transport impacts of development are properly assessed and sets parking standards for new development. Policies also cover the safe operation of protected aerodromes, public safety zones and telecommunications. Major positive effects are noted for carbon emissions, health and well-being and connectivity and transport from prioritising sustainable travel. Major positive effects are also likely for digital and telecommunications policies as these are essential to foster a strong and entrepreneurial economy.

4.13 Chapter 12. Our outstanding landscape contains a series of policies to conserve and enhance the landscape, including National Landscapes, Coastal Preservation Areas, and green wedges. Policies also cover contaminated land, pollution control, and agricultural land quality. As expected, major positive effects are likely for the natural environment, which will also have positive effects on adapting to climate change and health and well-being. As policies could restrict housing and employment delivery, negative effects are identified for these objectives.

4.14 Chapter 13. Our outstanding biodiversity and geodiversity protects designated wildlife sites, along with irreplaceable habitats. It sets out the approach to ecological enhancement, including Biodiversity Net Gain, along with the Jurassic Coast World Heritage Site, and geological sites. As for Chapter 12, major positive effects are likely for the natural environment, which will also have positive effects on adapting to climate change and health and well-being. As policies could restrict housing and employment delivery, negative effects are identified for these objectives.

4.15 Chapter 14. Open space and sports and recreation supports access to such facilities, setting standards for new development. This results in major positive effects upon health and well-being, with linked positive effects on the natural environment. Negligible effects are identified for most other policies.

4.16 Chapter 15. Our outstanding historic environment ensures development considers the significance of heritage assets, promoting their conservation and viable use while enhancing local character and distinctiveness. As such, major positive effects are noted for the historic and built environment, with positive effects upon the landscape. Negligible effects are identified for most other policies.

4.17 Chapter 16. Community facilities supports the delivery of new facilities, whilst also guarding against the loss of existing facilities. This will mean major positive effects upon health and well-being and access to services, positive effects upon the built environment, carbon emissions, and jobs, and negligible effects are identified for all other policies.

5 Appraisal Findings of Sites

5.1 Appendix Six contains the SA findings of the housing and employment site allocations and reasonable alternatives that were considered in preparing the Second Regulation 19 Publication Draft East Devon Local Plan 2020-2042. The appendix contains the sites that are reasonable alternatives, an outline of reasons for selecting the alternatives, the appraisal findings for the sites against each sustainability objective, mitigation measures, and reasons for choosing or rejecting sites for allocation.

5.2 Mitigation measures will vary depending on the specific characteristics of each site, but some general mitigation measures include:

- Incorporate existing biodiversity habitats and features, and seek opportunities to expand and create new habitat, to reduce adverse effects on biodiversity.
- Landscape mitigation, such as a including a buffer, tree planting, between the site and surrounding areas to reduce landscape impact.
- High quality design to reduce negative effects and maximise beneficial effects on the built environment, including on any heritage assets.
- If parts of the site are at risk of flooding, use this land for well-designed drainage and open space, rather than built development.
- Noise attenuation for sites that are adversely affected by noise (for example, from nearby main roads, railway).
- Enhance sustainable travel links such as creating bus stops and pedestrian and cycle links within the site and off-site.
- Provide a mix of uses on-site, such as community facilities, employment land, open space and play space, and sustainable travel links – this is more realistic for large-scale sites.

5.3 The West End of East Devon considers housing and employment sites in this area. The largest site is the second new community, where three site options have been considered for allocating 8,000 dwellings and accompanying development. A settlement of this size offers the opportunity for a wide range of employment land, services, and facilities. This is set within a longer-term vision for a total of 10,000 new homes at the new community – the land required for the additional 2,000 dwellings and associated land uses will be allocated in a future local plan. The preferred site option has been subject to masterplanning, and the sustainability effects of the three options related to this are also set out in Appendix Six.

5.4 Other mixed-use sites in the West End have been appraised for 1,000 dwellings (Land at Mosshayne Lane, Brcl_31a) plus accompanying uses, 600 dwellings plus accompanying uses (North of Topsham), and 90 dwellings and employment land (Land north of Exeter Science Park, Brcl_23). A gypsy and traveller site east of the M5 was also appraised. The remaining sites in the West End were appraised for employment uses; comprising a large site north of

Sowton village, sites around Exeter International Airport, at Lodge Trading Estate, Langdon's Business Park, and at Darts Farm.

5.5 The 'first' new community at Cranbrook is also located in the West End but as explained in Chapter 2, site allocations at Cranbrook are outside the scope of the East Devon Local Plan 2020-2042 as it is addressed in The Cranbrook Plan (adopted October 2022). Therefore, sites within or adjoining the Cranbrook Plan area are not being considered for allocation in the Local Plan.

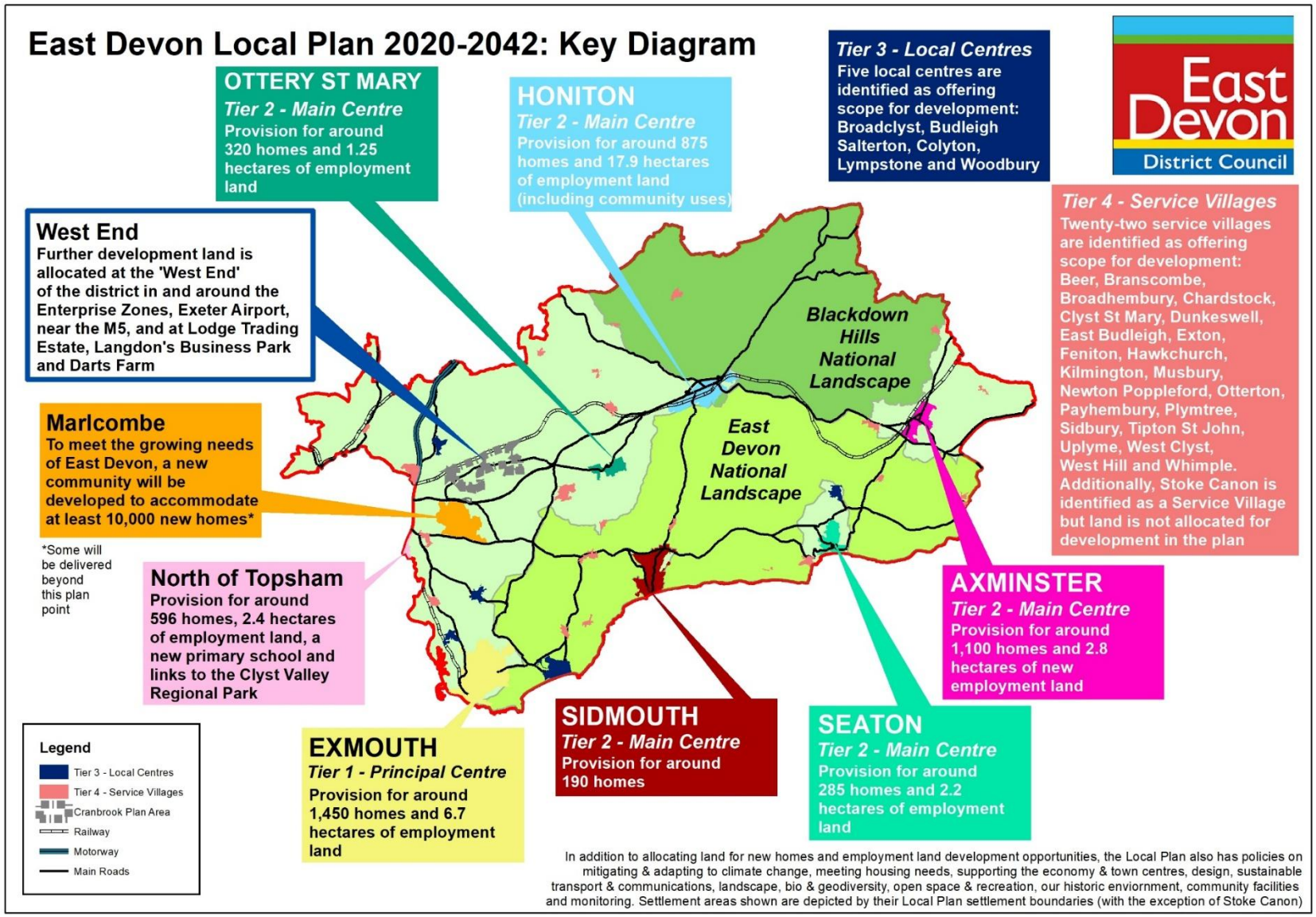
5.6 Over 20 sites were subject to SA at the Tier One – Principal Centre of Exmouth.

5.7 Sites at five settlements are appraised at the Tier Two – Main Centres, namely Axminster, Honiton, Ottery St Mary, Seaton, and Sidmouth.

5.8 The appraisal of sites at the Tier Three – Local Centres also includes five settlements: Broadclyst, Budleigh Salterton, Colyton, Lympstone, Woodbury.

5.9 Over 20 settlements are included in the appraisal of sites at the Tier Four – Service Villages, although no sites were eventually allocated at several of these settlements. This includes Clyst St Mary, which contained allocations in the Draft Local Plan (November 2022), but it was subsequently decided that site allocations at Clyst St Mary would not be within the scope of the Local Plan. This is due to the Bishops Clyst Neighbourhood Plan (which includes Clyst St Mary) having progressed to an advanced stage, subsequently being 'made' in October 2025, which allocates housing sites at a scale that is consistent with the Local Plan spatial strategy. The Local Plan Designated Neighbourhood Area Housing Requirement (Strategic Policy SP03) reflects this by identifying 72 dwellings at Bishops Clyst parish.

5.10 The Local Plan Key Diagram provides an overview of proposed development, shown on the following page.


East Devon Local Plan 2020-2042: Key Diagram
OTTERY ST MARY
Tier 2 - Main Centre
Provision for around 320 homes and 1.25 hectares of employment land
HONITON
Tier 2 - Main Centre
Provision for around 875 homes and 17.9 hectares of employment land (including community uses)
Tier 3 - Local Centres
Five local centres are identified as offering scope for development: Broadclyst, Budleigh Salterton, Colyton, Lympstone and Woodbury
East Devon District Council
Tier 4 - Service Villages
Twenty-two service villages are identified as offering scope for development: Beer, Branscombe, Broadhembury, Chardstock, Clyst St Mary, Dunkeswell, East Budleigh, Exton, Feniton, Hawkchurch, Kilmington, Musbury, Newton Poppleford, Otterton, Payhembury, Plymtree, Sidbury, Tipton St John, Uplyme, West Clyst, West Hill and Whimple. Additionally, Stoke Canon is identified as a Service Village but land is not allocated for development in the plan
West End
Further development land is allocated at the 'West End' of the district in and around the Enterprise Zones, Exeter Airport, near the M5, and at Lodge Trading Estate, Langdon's Business Park and Darts Farm
Marlcombe
To meet the growing needs of East Devon, a new community will be developed to accommodate at least 10,000 new homes*
*Some will be delivered beyond this plan point
North of Topsham
Provision for around 596 homes, 2.4 hectares of employment land, a new primary school and links to the Clyst Valley Regional Park
Blackdown Hills National Landscape
East Devon National Landscape
AXMINSTER
Tier 2 - Main Centre
Provision for around 1,100 homes and 2.8 hectares of new employment land
SIDMOUTH
Tier 2 - Main Centre
Provision for around 190 homes
SEATON
Tier 2 - Main Centre
Provision for around 285 homes and 2.2 hectares of employment land
EXMOUTH
Tier 1 - Principal Centre
Provision for around 1,450 homes and 6.7 hectares of employment land
Legend
Tier 3 - Local Centres
Tier 4 - Service Villages
Cranbrook Plan Area
Railway
Motorway
Main Roads
In addition to allocating land for new homes and employment land development opportunities, the Local Plan also has policies on mitigating & adapting to climate change, meeting housing needs, supporting the economy & town centres, design, sustainable transport & communications, landscape, bio & geodiversity, open space & recreation, our historic enviornment, community facilities and monitoring. Settlement areas shown are depicted by their Local Plan settlement boundaries (with the exception of Stoke Canon)

6 Cumulative effects and Duration of effects

Cumulative effects

6.1 Cumulative effects are all of the effects on components, from the Local Plan but also all other actions including people's behaviour and other underlying trends. Synergistic effects are a subset of cumulative effects, where effects interact to produce a total effect greater than the sum of the individual effects. For simplicity, all cumulative and synergistic effects are referred to as 'cumulative effects'.

Biodiversity

6.2 The significant amount of housing and employment development proposed in the East Devon Local Plan is likely to have negative effects on biodiversity, particularly given that most development will take place on greenfield sites. Negative effects are identified where close to designated biodiversity sites, unconfirmed wildlife sites, and/or where development will sever ecological corridors. There is some uncertainty as appropriate mitigation may avoid adverse effects, or even benefit biodiversity (through biodiversity net gain), with further certainty provided through a planning application. Several Local Plan policies protect and enhance biodiversity, particularly those in Chapter 13 (policies PB01-05). Overall, there will be a cumulative mixed minor positive and minor negative but uncertain effect on biodiversity.

Landscape

6.3 East Devon has a varied and exceptional, rural landscape and seascape. Nearly 60% of the district is designated as National Landscape, with much of the coast designated as World Heritage Site. Therefore, the large-scale of development proposed in the Local Plan will likely lead to negative effects upon the landscape, with major negative effects for sites in particularly sensitive locations such as the National Landscape. Several Local Plan policies conserve and enhance East Devon's outstanding landscape, particularly those in Chapter 12 (policies OL01 – 10). Overall, there will be a cumulative mixed minor positive and minor negative but uncertain effect on landscape.

Historic environment and built environment

6.4 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, with over 3,000 listed buildings, over 100 scheduled monuments, and 32 conservation areas. Again, the large-scale of development proposed in the Local Plan will likely lead to negative effects upon the historic environment and built environment. High quality design can mitigate adverse effects, with some uncertainty subject to planning applications with detailed schemes. Several Local Plan policies advocate high quality design (such as policies DS01 – 04). A cumulative

mixed minor positive and minor negative but uncertain effect on the historic and built environment is likely.

Climate change and carbon emissions

6.5 Carbon emissions have been reducing for East Devon residents over the last 20 years, but not at the rate required to achieve net zero by 2050. The Local Plan spatial strategy (Strategic Policy SP01) directs housing towards the most sustainable locations, where there is best access to jobs, facilities, and services, and to places can be made sustainable (for example, large-scale mixed use site allocations). This should minimise carbon emissions from travel. Nevertheless, the overall scale of development will inevitably increase carbon emissions from construction, building occupation, and road traffic. Several Local Plan policies on climate change mitigation will minimise carbon emissions by requiring new homes to move towards net-zero development (Strategic Policy CC02) and promoting renewable and low carbon energy (Strategic Policy CC03), whilst also prioritising sustainable travel (Strategic Policy TR01), for example. Overall, the Local Plan is likely to have a cumulative mixed minor positive and minor negative effect on climate change and carbon emissions.

Climate change adaptation

6.6 Climate change will mean warmer, wetter winters, and hotter, drier summers, and it is vital that new development is able to adapt to these changes. The Local Plan includes several policies relating to climate change adaptation, covering flood risk, water efficiency, and coastal erosion (policies AR01 – 05), and also ensure new homes are designed to avoid temperate discomfort (Strategic Policy CC02). The majority of site allocations avoid areas of high flood risk or are only affected in a small part where built development can be avoided. However, some sites are more affected, for example with watercourses running through the site, where further work is required to address flooding issues. A cumulative minor positive and minor negative but uncertain effect, depending on whether mitigation measures can fully address negative effects, is likely.

Land resources

6.7 East Devon benefits from high quality land resources, with agriculture being by far the greatest land use in East Devon. The absence of a heavily industrialised past has meant that East Devon does not have the brownfield land legacy of more urban areas, and there are only a few brownfield sites allocated for development in the Local Plan. East Devon's recycling rate has grown significantly over recent years and is now amongst the highest in the country. The vast majority of Local Plan site allocations are greenfield sites, with the spatial strategy focussing new development at the West End, much of which is best and most versatile agricultural land. Local Plan policies minimise the loss or degradation of land resources, including contaminated land (OL07), pollution (OL09), and high quality agricultural land (policy OL10). All of this results in a cumulative minor positive and minor negative effect.

Water resources

6.8 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. Local Plan development is likely to result in capacity being exceeded at the following wastewater treatment works: Colyton, Feniton, Fluxton, Honiton, Seaton South, Woodbury, and potentially Countess Wear. Some Local Plan sites are within groundwater source protection zones, which cover central parts of East Devon, and are important for water supply. Local Plan policies prevent development that would result in water pollution (policies AR02, OL09) and has water efficiency standards so new development uses less water (policy AR01). Nevertheless, new housing and employment development will mean greater water use. This results in a cumulative minor positive and minor negative effect for the Local Plan.

Homes

6.9 Average house prices are relatively high in East Devon at £335,000, which is 8.5 times the average salary. The Local Plan contains a requirement for 20,909 dwellings over the plan period (Strategic Policy SP02), allocating numerous large and small-scale sites to achieve this. The largest allocation is 8,000 dwellings at a new community (3,300 of which will be delivered in the plan period) (Strategic Policy WS01). There are several policies in Chapter 8 to meeting housing needs, including affordable housing (Strategic Policy HN02), older people (Strategic Policy HN03), and gypsy and traveller sites (Policy HN09). Overall, there will likely be a major positive cumulative effect relating to housing.

Health and well-being

6.10 Life expectancy for residents in East Devon is very high with the area ranking in the top 5% of districts in England and Wales, with general health very close to the national average. Levels of deprivation in East Devon are low, although parts of Exmouth and Honiton are in the most deprived 30-40% overall in the country. A range of Local Plan policies support health and well-being, such as policies relating to open space and recreation facilities (Strategic Policy OS01, policies OS02-03), community facilities (policies CF01, 02), and sustainable travel (Strategic Policy TR01). Employment site allocations generally have a positive effect on well-being through the provision of jobs, with housing sites performing better where they have access to open space and recreation facilities, close to areas of higher deprivation, and away from pollution. A minor positive cumulative effect is expected from the Local Plan on health and well-being.

Access to services

6.11 Access to community facilities and services in East Devon varies significantly, with a relatively wide range of facilities in the larger settlements, but poorer access in the more rural areas. The Local Plan spatial strategy (Strategic Policy SP01) directs housing towards the most sustainable locations where there is best access to facilities and services, and to places can be made sustainable (for example, large-scale mixed use site allocations). Other Local Plan policies support the delivery of infrastructure and services (Strategic Policies SP08, 09), and the provision of community facilities (policies CF01, 02). Overall, a minor positive cumulative effect is likely.

Jobs and employment

6.12 East Devon has low unemployment levels, but wages are also comparatively low. Gross Value Added (GVA) per person in East Devon is low but growing, with the area ranking in the bottom 40% of districts nationally. The older age profile of East Devon residents means that it has relatively few working age people, the third lowest proportion of any local authority in Great Britain. There are a number of bigger businesses and more technology-based activities in the West End of East Devon, close to Exeter, and a more traditional business make-up across much of the rest of the District. Around 40% of East Devon residents commute outside the district to work, with Exeter by far the most popular destination.

6.13 The Local Plan supports jobs and employment by allocating several employment sites, mainly at the West End but also at some settlements. Local Plan policies support employment development at settlements (Policy SE01) and in the countryside subject to meeting certain criteria (Policy SE02). It also resists the loss of existing employment sites (Policy SE04) and requires employment and skills statements for larger sites (Policy SE05). The proposed housing development in the Local Plan will also support the economy; whilst policies that protect and enhance the environment will have indirect positive effects by making the area more attractive to businesses and workers. Overall, there will likely be a major positive cumulative effect for jobs and employment.

Town centres

6.14 There are eight town centres and one village centre defined in the Local Plan. These provide facilities to meet most of the needs of the resident populations of those settlements 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. Local Plan policies support town centres by identifying a hierarchy (Strategic Policy SE06), supporting town centre development, setting the sequential approach for town centre uses, and requiring an impact assessment for larger town centre uses proposed outside of town centres (Policy SE07). The proposed housing development in the Local Plan will also support town centres by increasing the resident population; whilst policies that protect and enhance the historic and built environment will have indirect positive effects by making the area more attractive to businesses and those visiting town centres. Underlying trends for more online shopping is likely to continue to challenge the viability of retail in town centres. Overall, this means there will likely be a positive cumulative effect for town centres.

Connectivity and transport

6.15 East Devon has some major road links – the strategic road network comprises the M5 travelling down the west of the district (including Junctions 29 and 30), the A30 running east to west, and the A35 from Honiton to the south east. There are several other ‘A’ roads that connect existing settlements in East Devon and beyond. Traffic congestion is normally only a significant issue in the western parts of East Devon, and the main road links into Exeter suffer from peak time congestion which can affects those living and travelling into the City. 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. Bus services in East Devon are of variable quality – within and between the main towns, including links through to the City of Exeter, service frequency can be good. Many communities are served by five or more buses a day. However, in countryside locations, bus services can be poor. Exeter International Airport, in the West End of East Devon, provides routes to a number of domestic and international locations.

6.16 The Local Plan spatial strategy (Strategic Policy SP01) directs development towards the most sustainable locations, and to places can be made sustainable (for example, large-scale mixed use site allocations), which limits the need to travel. But the overall scale of development will inevitably increase travel and consequent transport infrastructure requirements that new development should deliver (Strategic Policies SP07, 08). Local Plan policies prioritise sustainable travel (Strategic Policy TR01), protecting transport sites and routes to widen transport choice and deliver large scale development (Strategic Policy TR02), whilst ensuring the transport impacts of new development are addressed (Policy TR03). Local Plan policies also support digital connectivity (Policy TR06, 07). This results in a cumulative major positive and minor negative effect for the Local Plan on connectivity and transport.

Duration of effects

6.17 For the purposes of the SA, the likely significant effects of the Local Plan may be experienced in the short-term (up to five years), medium-term (5-10 years), or long-term (over 10 years and up to the end of the plan period, and potentially beyond).

6.18 Short-term effects predominantly relate to the initial impacts of commencing development. As most Local Plan sites are currently greenfield, these effects include the removal of vegetation (trees, hedgerows) and soil, and the initial construction of infrastructure (utilities, roads) and the buildings themselves. This will mean likely negative effects on biodiversity, landscape, and health and well-being (through construction noise, lorry movements, dust etc). There will be positive effects on the economy from job opportunities during construction.

6.19 Medium-term positive effects arise from the completion and occupation of homes and employment development for residents and workers. However, there may be negative effects upon the landscape from the visual impact of development (before landscape mitigation has had time to mature), and biodiversity impacts upon habitats and species, both directly from new buildings, and indirectly from the recreational impact of new residents close to biodiversity sites. There may also be negative effects on carbon emissions, health and well-being, and access to services, where non-residential uses and open space is not delivered alongside the occupation of new dwellings, requiring travel, potentially by car.

6.20 Most of the Local Plan effects will be long-term, as the plan directs and manages development that will last many decades. This includes positive effects from the provision of homes and jobs for residents and workers. The Local Plan spatial strategy directs development to

locations which are, or can be made, sustainable where there is access to services and community facilities, with positive effects upon carbon emissions (from minimised travel), health and well-being, access to services and connectivity and transport. The adverse short to medium-term landscape effects of new housing and employment development will lessen as landscaping matures and provides mitigation, although a negative effect may still remain for the most sensitive sites. A long-term minor positive effect on biodiversity is likely due to the legal requirement for biodiversity net gain, meaning development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat. Most Local Plan sites are currently greenfield, some of which is best and most versatile agricultural land, so a negative effect upon land resources is likely. Carbon emissions to power new homes and employment sites, and from the likely proliferation of electric vehicles, will be minimised in the transition to the UK legal requirement for net zero from 2050.

7 Monitoring

7.1 Monitoring of the significant effects of the Local Plan is required to check whether the plan is having unforeseen adverse effects at an early stage, and to undertake appropriate remedial action. The focus should be on monitoring significant effects, rather than all effects. Monitoring indicators are set out below, for each SA objective.

Objective 1. To conserve and enhance the habitat and wildlife of our natural environment.

- Change in areas and populations of biodiversity importance.
- Monitoring of biodiversity net gain.

Objective 2. To conserve and enhance the special qualities and distinctive character of our landscapes, undeveloped coast and seascape.

- Number of dwellings and amount of employment land constructed in the National Landscape, Coastal Preservation Area, Green Wedge, Land of Local Amenity Importance and Local Green Space.

Objective 3. To conserve and enhance our heritage assets and promote high quality design and accessibility in new development.

- Number of planning applications permitted contrary to Historic England advice.
- Number of heritage assets in East Devon on the 'Heritage at Risk' register.
- Proportion of new dwellings that meet the Nationally Described Space Standard.

Objective 4. To minimise greenhouse gas emissions

- Renewable energy capacity installed.
- Number of homes and amount of employment land connected to a district heating system.

Objective 5. To adapt to the possible effects of climate change

- Number of planning permissions granted contrary to the advice of the Environment Agency on flood defence grounds.

Objective 6. To utilise our land resources efficiently and minimise their loss or degradation.

- Percentage of new development taking place on brownfield land.

- Brownfield Land Register listing suitable brownfield sites for development.
- Amount of best and most versatile agricultural land lost to development.

Objective 7. To utilise our water resources efficiently and minimise their loss or degradation.

- Percentage of new dwellings that achieve average water use of 110 litres per person per day or less.
- Percentage of water bodies at good ecological and chemical status.

Objective 8. To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure to meet East Devon's needs.

- Total net and gross dwelling completions by district, parish, settlement, and Built-up Area.
- Percentage of new dwellings that are affordable housing.
- Five Year Housing Land Supply.
- Housing Delivery Test results.
- Demand and supply of self and custom-build housing.
- Delivery of Gypsy and Traveller pitches.

Objective 9. To support healthy, safe and active communities where people have access to attractive and functional recreation spaces.

- Recreation space standards the Local Plan being met.
- Delivery of Clyst Valley Regional Park and Clyst Valley Trail.
- Amount of delivered suitable alternative natural greenspace (SANGS).

Objective 10. To provide accessible and attractive services and community facilities for all ages and interests.

- Availability of and proximity to services and community facilities.
- Playing Pitch Strategy monitoring.

Objective 11. To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity.

- Developed plots and building floorspace.
- Vacant or undeveloped plots suitable for future business development.

- Loss of employment land to other uses.
- Wages and productivity.
- Unemployment and economic inactivity.
- Employee and job numbers.

Objective 12. To safeguard and strengthen the vitality and viability of town centres.

- Amount of completed development in town centres.
- Amount of town centre uses permitted outside of town centres.

Objective 13. 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.

- Levels of bus and rail patronage.
- Delivery of transport sites and routes identified in Local Transport Plan 4, Local Cycling and Walking Infrastructure Plans in East Devon, and Local Plan Strategic Policy TR02.

Appendix One: Consultation responses on previous Sustainability Appraisal reports

Figure A1: Draft Scoping Report consultation (January to March 2021) – summary of main issues raised and Council response

Respondent	Summary of main issues raised	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.
A Bentham	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.
A Bentham	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.
A Bentham	Concern is expressed about the SA referring too much to economic indicators of GDP and GVA and should identify	These comments appear more relevant to making policy and potential local plan content rather than the SA. Fir the SA scoping report changes are not proposed.

Respondent	Summary of main issues raised	Response
	alternative indicators, such as life expectancy, carbon emissions, and education,	
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.
Environment Agency	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.
Environment Agency	Para 3.20 should refer to the Districts rivers.	This is agreed with and changes are appropriate.
Environment Agency	Para 3.22 – threats to biodiversity should include historic legacy impacts to rivers.	This is agreed with and changes are appropriate.
Environment Agency	The climate change section should refer to the natural environment response to climate change.	This is agreed with and changes are appropriate.
Environment Agency	Para 3.46 – the text relating to the Exe Estuary strategy should be updated to note the dropping of managed realignment of the River Clyst.	This is agreed with and changes are appropriate. However the SA should not update any actual plan policy itself, as the submission text could perhaps be inferred to read/mean.
Environment Agency	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.

Respondent	Summary of main issues raised	Response
Environment Agency	In section 5 – SA objectives 4 and 5 – heat, drought and storm extremes should be referenced.	This is agreed with and changes are appropriate.
Environment Agency	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.
Environment Agency	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.
Environment Agency	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.
Forestry Commission England	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.

Respondent	Summary of main issues raised	Response
Historic England	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; • 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.	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.
Historic England	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;	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	Summary of main issues raised	Response
	• 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 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.	
Historic England	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;	Points are agreed with and changes would be appropriate.

Respondent	Summary of main issues raised	Response
	• 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.	
Historic England	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; • 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	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	Summary of main issues raised	Response
	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,
Naome Glanville	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).
Naome Glanville	Page 53: No's 1 (Biodiversity) and 2 (Landscape) – Considered that the value of biodiversity and landscape should be acknowledged	The points raised are not challenged, however on review of the existing scoping report text it is not clear where any changes could be relevant.

Respondent	Summary of main issues raised	Response
	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.	
Naome Glanville	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.
Naome Glanville	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.
Natural England	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.
Natural England	Task A4 - Sustainability objectives: Natural England make a number of comments against the SA objectives, these are: • *Biodiversity* – include a sub-objective which seeks to ensure current connectivity between habitats is not	The points made are agreed with and it will be appropriate to incorporate changes to the SA scoping report to address concerns raised.

Respondent	Summary of main issues raised	Response
	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. • *Landscape* – 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 character of the landscape and undeveloped coast. • *Land resources* – 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. *Health and activity* – 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.	
Natural England	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

Respondent	Summary of main issues raised	Response
Pegasus Group on behalf of Land Value Alliances LLP	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 supply and include the provision of affordable housing.	As this is a comment about application of the SA and not scoping report content changes to the SA would not be appropriate.
Savills for Carter and Crealy Farm	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.

Respondent	Summary of main issues raised	Response
Savills for Carter and Crealy Farm	In respect of Figure 27 – distance of potential development sites to facilities, the distances should apply to both existing facilities and proposed new facilities.	
Savills for Carter and Crealy Farm	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. 1,600m is considered a reasonable maximum walking distance.
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.
Sid Valley Association	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.
Sid Valley Association	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.
Sid Valley Association	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.
Sid Valley Association	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.

Respondent	Summary of main issues raised	Response
Sid Valley Association	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 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)	For SA purposes it is not regarded that a finer grained age breakdown is needed.
Sid Valley Association	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.
Sid Valley Association	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.
Sid Valley Association	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.
Sid Valley Association	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.
Sid Valley Association	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.

Respondent	Summary of main issues raised	Response
Sid Valley Association	Concern is 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.
Sid Valley Association	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.
Sid Valley Association	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 no changes are proposed.
Sid Valley Association	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 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.	Points raised are noted – no changes to the SA scoping report are proposed.
Sidmouth Town Council	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.	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.

Respondent	Summary of main issues raised	Response
	• 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.	
Sidmouth Town Council	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, 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.	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 (EDDC) may choose to pick up on these issues elsewhere they are not directly relevant to SA content.

Respondent	Summary of main issues raised	Response
	• Land Resources – In additional 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.	
Sidmouth Town Council	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.
T Dumper	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	Summary of main issues raised	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.

Local Plan Preferred Options consultation draft Sustainability Appraisal report consultation (November 2022 to January 2023) – summary of main issues raised and Council response

Natural England

No comments on the Appraisal matrices, but we recommend the key environmental baseline daa is updated to take account (page 55) of designated Marine Conservation Zones (MCZs) which in East Devon comprise the Axe Estuary and the Otter Estuary. These should be mapped. The Lyme Bay and Torbay SAC was designated in 2017 and is no longer a candidate SAC but fully protected under legislation.

Council response: Added ref. to MCZs. Amended text to state the Lyme Bay and Torbay SAC is now designated.

Historic England

Only reference to SA is the impact on the Conservation Area of the high quality employment north of Sowton village.

Council response: this has been noted in the assessment. This site is not being allocated in the Local Plan.

Environment Agency

Appendix – Water quality and supply baseline information:

High levels of nutrients are a major reason for East Devon's rivers failing to meet Good Ecological Status. The East Devon Management catchment (which extends beyond the district's boundaries) includes 80 river waterbodies reported on under the WER and 3 WER transitional waterbodies. 79 of the river Waterbodies have a 2019 classification for phosphate. Of these 79 waterbodies the status in respect of phosphate is a follows: • 7 are at High status • 19 are at Good status • 45 are at Moderate status • 8 at Poor status for phosphate. The Exe Transitional waterbody (i.e. the estuary) is at Moderate status for Dissolved Inorganic Nitrogen (DIN), while the other 2 transitional waterbodies are not assessed for this element. Where an element is at less than good status we need to see if action can be taken to improve the status to good. In order to identify appropriate actions, we need to understand the cause of the failure. Once the cause of the problem (activity, source, and sector) has been identified, we assign the failing element a 'reasons for not achieving good' (RNAG) or a 'reason for deterioration' (RFD). In the East Devon management catchment 144 RNAGs that are attributed to nutrient pressure from phosphate, of these 31 are attributed to the wastewater treatment, 99 to agriculture and 14 to other sectors. There are 151 phosphate RNAGs, 99 are attributed to agriculture, 34 to wastewater treatment and 18 to other sectors. The Exe estuary has 5 DIN End 17 RNAGs. Three of these RNAGs are associated with Agriculture, one with wastewater treatment and the other with Private Sewage Treatment. In terms of current water availability for the East Devon our evidence indicates the following: • There is water available for abstraction at all flows around Exeter with the exception of the areas of Countess Weir and Topsham where fully licensed flows are below the

environmental flow indicator at low flows to support the needs of the environment. There is, therefore, restricted water available. • With regards to the water availability for the areas proposed for the New Town, our evidence shows at this current time there is water available for abstraction at all flows in the new proposed areas of the New Town. • There is restricted water available at mid to low flows and no water available at low flows in the Otter Catchment. This covers The Upper, Middle and Lower River Otter, River Tale, River, Wolf (Otter) and River Love. There is no water available from the Otterhead Reservoir at all flows. Any new surface/groundwater abstraction will have a HoF applied in this catchment. this area was designated a priority catchment due to its abstraction pressures and environmental sensitivity. We are working with stakeholder groups and partnerships across the East Devon catchments including the Otter Priority catchment to co-develop a co-ordinated approach to water resource planning for the next 25 years. • There is restricted water available at low flows in the Relief Channel catchment which Beer watercourse sits in. Any new surface/groundwater abstraction will have HoF or HoL applied in this catchment. • Whilst water is available within the River Yarty, Lower and Upper Axe, Cory Brook, Blackwater River and Forton Brook, and is restricted at low flows for Kit Brook, further restrictions will apply in these catchments to protect the flow requirements of the River Axe SAC in line with Common Standard Monitoring Guidance targets.

Council response: this text has been included in the baseline information.

General points

- Impacts on well-being only considered future residents and not the impact of proposed sites on existing population/residents.
- Not adequately considered the impacts of flood risk.
- Need to consider the cumulative effects across the plans.
- Exeter Airport is identified as a significant noise source, so ensure residents of new development are not within the flight path.

Council response: flood risk is captured through the climate change adaptation objective. Cumulative effects will be included in the final SA Report that accompanies the Publication Draft Local Plan. Noise impacts from Exeter Airport will be addressed as appropriate in the appraisal of site options.

Overall distribution options

BDW refers to the SA P110 which assess 4 options for the distribution of the objectively assessed need for housing. Option A is the closest option to that taken forward in the Reg 18 plan. BDW agrees with conclusions about option A. However, even Option A did not consider the sustainability credentials of the distribution of residential development with the Reg 18 plan. There are distribution differences between Option A and the draft plan. So the Plan's distribution has not been assessed. Future SAs should ensure that the sustainability credentials of the proposed distribution is properly assessed.

Council response: Although the SA report notes the effects of Option A will be the same as the distribution contained in the Reg. 18 Local Plan, agree that the SA Report should appraise the preferred alternative more precisely and has been amended accordingly.

Scale of Future Housing development

BDW refers to the SA consideration of two options for the level future housing growth (ie Policy 3 requirement). The first based on 18920 (standard method need rate); the second adding a 20% uplift to need. BDW considers that 20% uplift is an unreasonable alternative, based on the assessment work available. But BDW considers that the SA should have assessed a number of options including uplifts to the requirement of 5%, 10% and 15%. They are deliverable. These are reasonable alternatives that should be considered in future iterations of the SA.

Council response: The 5% and 15% uplifts suggested are not sufficiently distinct to justify being reasonable alternatives. A 10% uplift has been appraised as a reasonable alternative. The 20% uplift is a reasonable alternative as it reflects the outcome of the standard method for calculating local housing need in national planning practice guidance, published on 12 December 2024 (1,188 dwellings per year).

New settlement

- Do not agree with SA report stating new settlement options have a minor impact on transport, loss of 100s acres of land, infrastructure impact, M5 Junctions 29/30.

Council response: the SA notes a range of effects relating to transport, with negative effects due to the current rural location, but general proximity to key transport routes and bus link offering positive effects, particularly with mitigation measures.

- SA report has not considered the reasonable alternative for a dispersed option that spreads houses to existing towns (including Cranbrook) and villages without a needing a new town – this would benefit housing delivery as higher number of developers and would mean greater flexibility.

Council response: Disagree- this has been considered in Strategic Housing Growth Options C ‘No additional housing in the West End of East Devon, more at Principal and Main Centres, less at Local Centres and Service Villages’ and Option D. ‘No additional housing in the West End of East Devon, more at Local Centres and Service Villages.’

- Disagree that no infrastructure is apparently needed for the first 2,500 dwellings (page 232, bullet point one).

Council response: the SA notes that 2,500 dwellings can be accommodated without significant highways interventions but does not state that “no infrastructure” is needed. The accompanying Infrastructure Delivery Plan considers this is more detail.

- Disagree that Option 1 is likely to have a major positive effect on minimising carbon emissions, it has not considered the massive carbon footprint of the new town versus growing existing rural settlements, and the impact of travel before on-site facilities are built.

Council response: SA amended to say effects are mixed with a negative effect arising from emissions associated with the construction of development. Strategic Housing Growth Options consider the effects of alternatives for the spatial distribution of development, including growing existing rural settlements. SA amended to note negative uncertainty in case additional jobs, facilities and sustainable travel links are not provided alongside new housing.

- Overall minor negative effect for Options 1 and 2 is not right as the effects of such a large development could never be described as “minor”.

Council response: Noted, but this is common terminology for SA reports, and is used to identify likely significant effects. Major effects are noted for some objectives such as landscape.

- Comment regarding local lanes and low traffic volumes is not correct as new town will have at least 8,000 cars.

Council response: text added to clarify that low traffic volumes “at present and can retained through master planning the new community”.

- Proximity of NCN Route 2 is 1.5km from the options and not on a desire line.

Council response: the SA notes that 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. No changes necessary.

- Disagree that Options 1 and 3 benefit from proximity to train stations because of lack of parking at Topsham, Exton and Newcourt.

Council response: SA amended to reference the lack of parking at Topsham, Exton and Newcourt may deter users.

- Does not consider health and well-being of existing residents.

Council response: The baseline information contains the health and well-being of existing residents.

- Access to services commentary is unrealistic for 8,000 homes as Exeter, Topsham and Cranbrook are the only service centres of a sustainable scale, all ready access by car.

Council response: The SA notes a wide range of services and facilities are expected to be provided at the community.

- Whilst Options 1 and 3 benefit from proximity to Exeter, neither has access by sustainable travel choices.

Council response: The SA notes sustainable travel choices to Exeter, from cycle links and public transport.

- Mitigation measure of linking to Clyst Valley Regional Park applies to Options 2 and 3 as well as Option 1.

Council response: SA amended to say Clyst Valley Regional Park applies to Options 2 and 3 as well as Option 1.

- Mitigation measures do not mention any improvements to M5 Junctions 29 or 30 which are already at standstill at peak times.

Council response: Agree – SA amended to refer to mitigation measures at M5 junctions 29 and 30.

- Seems like reasons for Option 1 mean it has simply been preferred because it is developer controlled.

Council response: The SA includes a range of reasons for preferred Option 1, including better deliverability.

- Energy from Waste at Hill Barton is mentioned – this is not low carbon in itself.

Council response: Disagree – this facility can offer low carbon district heating.

- Pegasus on behalf of Land Value Alliances support the findings which show that Option 1 is preferred.

Council response: support noted.

- Turley, on behalf of Bloor Homes and Stuart Partners, consider that the SA is sound and has utilised a robust and transparent methodology to demonstrate that Option 1 is the most sustainable reasonable alternative for the delivery of a new community at East Devon. They state that the SA is correct in identifying that Option 1 will result in a number of major positive sustainability impacts in key areas such as: climate change mitigation, the provision of new homes, jobs & employment opportunities and connectivity & transport.

Council response: support noted.

- Not correct to say that the location of the three options has been refined to ensure they do not converge with existing settlements – Option 3 is very close to two settlements, and close to another two.

Council response: Option 3 is close to other settlements but does not converge with them.

- Not true that Option 3 provides a largely traffic-free route to Exeter to the north.

Council response: The SA notes: “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.”

- The proximity to train stations is not a benefit as trains are at capacity.

Council response: Disagree.

- Evidence states a large area of Grade 1 agricultural land covers northern part of Option 1, the remainder being Grade 3 – this applies to Option 3, not Option 1.

Council response: Agree, the SA has been amended.

- There is already unacceptable water pollution in the area, which will be made worse.

Council response: the SA already noted water supply and treatment effects, but text added to the mitigation measures that appropriate water supply and treatment facility.

- Jobs commentary only focuses on jobs during construction, on-site jobs won't be available until construction is complete, so rating should be downgraded to "?".

Council response: disagree – the fact that employment land will be provided means a long-term positive effect.

- Transport commentary has not considered additional development along the Exmouth Road.

Council response: disagree – the SA notes impacts on the A376/Topsham Road junction.

- The 20 minute neighbourhood principle is not applied in terms of food security, despite this being stated in mitigation measures.

Council response: 20 minute neighbourhood principle has been removed as a mitigation measure, although many aspects of this principle are being taken forward for the new community.

- Option 3 is not connected to the Clyst Valley Trail as separated by a dual carriageway.

Council response: disagree – there is potential to access the proposed Clyst Valley Trail through Ebford, avoiding the dual carriageway.

Exmouth

- There is no bus service along Hulham Road, and the distance to the train station mean that residents will have to drive there, so sites in this area should not be scored as positive on connectivity and transport.
- Objective 1 text for Exmo_03 is incorrect as there is no mature vegetation on the site that is not typical of that found in surrounding gardens.
- Objective 2 text for Exmo_03 does not recognise the potential to extend the pavement along Bapton Lane to improve safety for pedestrians. The removal of trees to do this will reduce maintenance/cost of trimming the trees.
- Objective 6 text for Exmo_03 should note that the site is partly brownfield as it contains foundations and parts of walls of old buildings.

Council response: the appraisal notes that the north east sites are beyond 1,600m from the train station, but within 800m of the A376 and the hourly bus route on Dinan Way, so a minor positive effect. Mitigation measures for sites in the north east include an emphasis on maximising and enhancing sustainable travel links e.g. create bus stops near to any given site, pedestrian/cycle links. Exmo_03 is part of the Valley Parks, so does contain mature vegetation. The removal of trees on this site is likely to cause biodiversity harm. The predominant character of Exmo_03 is of a greenfield site.

Ottery St Mary

- SA is incorrect in stating that developing GH/ED/26 and Otry_01a would be too visually intrusive as could amalgamate north/north west fields with proposed development at Otry_01b.
- GH/ED/27 and Otry_10 will have multiple and significant constraints, namely construction noise, mental health impacts, flood risk, loss of privacy, water quality impacts on R. Otter, land instability for Salston Barton properties, significant visual impact, poor road access.
- Reasons for including GH/ED/27 and Otry_10 are not clear as other sites are rejected for the same reasons.

Council response: Disagree - GH/ED/26 is likely to have a significant impact on the local landscape due to the rural character of the site and it's visibility in short and long range views, with a medium-high landscape sensitivity overall. Otry_01b is better related to existing development that adjoins the site, whilst Otry_01a extends into the countryside to the west. The SA notes flood risk at Otry_10 and GH/ED/27 covering small parts of the sites but it 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. Sites in the eastern part of Ottery are within SPZs so have a minor negative effect on water resources – GH/ED/27 and Otry_10 are outside of these zones. Construction noise is a short term negative effect, noted in the SA. The reasons for including GH/ED/27 and Otry_10 are consistent with the approach for other sites.

Lympstone

- Bus services at Lympstone have recently been cut, and residents in most recent developments do not use the train because there is no direct pedestrian route to the train station, so should not be a major positive effect for access to services (objective 10) and connectivity (objective 13).
- The use of “as the crow flies” distances to facilities is mis-leading as there are no inter-connecting paths so true distances are much higher than stated.
- LRM on behalf of Barratt David Wilson consider that the SA’s finding on Page 109 that Option C is preferred as it promotes development at existing settlements where there is a range of jobs, services and facilities’ is robust. It supports the need for new development at existing settlements where there is a range of jobs, services and facilities.

Council response: disagree – the bus route along the A376 has a 15 minute frequency to Exeter in one direction and Exmouth in the other. Existing footpaths link to the train station (e.g. along Burgmanns Hill). The use of “as the crow flies” distances to facilities is noted as a difficulty encountered when preparing the

SA, but the appraisal is supplemented by on the ground issues (e.g. road barriers to pedestrians) where relevant.

Feniton

- The rural nature of Feniton means there is a rich habitat for a wide variety of species – it is not true that all sites are improved grassland as there is regular crop rotation. Therefore, should be a negative effect for Objective 1 except for the playing fields.

Council response: no change – the SA states there are no designated biodiversity sites that are at or close to allocated sites, 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.

- Feniton sits in a natural bowl so proposed sites will spoil its setting. Agree that Feni_05 offers an opportunity for improvements, but all other sites should be negative for Objective 2.

Council response: no change – the SA adequately addresses landscape issues.

- Section on reasons for alternatives being rejected states Feni_08, 09 and 11 are open and exposed, and highly visible from Hembury Fort Scheduled Monument, so should be negative for Objective 2.

Council response: no change – Hembury Fort Scheduled Monument is 3.5km from the edge of Feniton, so development is not likely to significantly affect this asset.

- Objective 4 should be negative for all sites as the mere presence of a railway station does not make Feniton “sustainable” given the infrequent service (Office of Rail and Road statistics show that on average 6 people got on or off each train that stopped at Feniton; PC survey showed 98% of residents didn’t use the train) – mass housing will increase traffic, turn Feniton into a dormitory town, and degrade quality of life.

Council response: no change – a neutral effect is correct for objective 4, as stated.

- The lack of jobs, facilities and public transport in Feniton mean that developing sites will increase car use for these things, so Objective 4 should show a major negative effect.

Council response: no change – a neutral effect is correct for objective 4, as stated. The SA notes that going beyond the basic facilities and wider range of jobs would entail travelling to locations and centres elsewhere.

- Objective 4 comment that all sites are being linked by good quality footpaths is completely inaccurate.

Council response: text added – albeit footpaths are lacking in places as would be expected in a village.

- Objective 5 should be negative for all sites as flood mitigation will help current problems, but concreting over greenfield sites will make flooding worse.

Council response: no change – SuDS will address flooding issues from new sites.

- The combined foul and surface drainage system, sewage pumping station and sewage treatment plan in Feniton cannot cope with further households and added surface water run-off, irrespective of SuDS. Should be a double negative for Objective 5.

Council response: no change – SuDS will address flooding issues from new sites.

- Feni_09 is also Grade 1 agricultural land and should be major negative too.

Council response: no change – Feni_09 is mostly Grade 2.

- Objective 8 should be negative for all sites as a car is required given the limited range of facilities accessible on foot, primary school is over capacity, pop-up Post Office is in old Feniton and only open a few hours a week.

Council response: no change – objective 8 relates to housing.

- Objective 10 should be neutral at best given the limited range of services in Feniton, primary school at capacity, and limited service at the train station.

Council response: the SA notes that for a greater range of services and facilities there is the need to travel elsewhere. No change to score is required.

- Objective 11: Feniton has the lowest jobs to workers ratio, and the limited train service means it is not a major advantage for accessing jobs.

Council response: No change, from neutral effects apart from Otry_20 employment site.

- For Objective 13, it is too simplistic to say that the presence of train station means a positive score for all sites – should be neutral effect as vast majority of journeys from Feniton are by car, along mostly single track country lanes.

Council response: the SA notes that for a greater range of services and facilities there is the need to travel elsewhere. No change to score is required.

- Feniton should only accommodate modest growth to meet local need like any other Tier 4 settlement given the jobs and services available locally.

Council response: the SA notes that many sites are rejected as there are other, more preferable, sites at Feniton and this site in addition would not be consistent with the spatial strategy.

- Need to ensure that the borehole drinking water supply is not polluted by new development.

Council response: all of the assessed sites, in their totality (except 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,

Hawkchurch

Hawkchurch Parish Council state the Sustainability Appraisal misrepresents several aspects:

- It reads for the most part as though there is an available bus service – the bus service should be discounted as it is not sustainable (being one service per week as detailed in the response).
- The accessibility assessment is misleading given the dependency on car travel.

Council response: text amended to make clear only one bus service per week, and car will be needed to access a further range of facilities than found in the village.

- It suggests there will be no impact on the setting of the listed buildings, we disagree - we believe the proposed level of development would impact their setting, including the Grade 1 listed church.

Council response: disagree as there is existing development between the church and the sites.

- It refers to employment space being retained. The storage barns are just that and not an employment area. The community shop is run by volunteers – there is no current employment on the proposed site.

Council response: text amended that storage barns are not currently employment space.

- On page 466 section 8 of the table headed 'Home', the document refers to 'Significant positive where site offers maximum yield >100. All other sites have potential to deliver up to 100 dwellings with a marked positive effect…' This appears to be something left in from another assessment as neither site offers a maximum yield greater than 100.

Council response: text amended.

- The health and wellbeing commentary misrepresents the impact: The scale of development would impact the many walkers in the village, both through the increased traffic and the change in character of the area (35% of household have at least one person who walks daily – the PROW are a significant feature of the Parish). The children's playground is adjacent to the junction of the proposed access road and the main street and close to the site – which includes proposals for light industrial employment space – so actually close to potential noise sources.

Council response: Disagree that the scale of development would harm walkers due the limited scale of development proposed. Text amended: Hawk_01 positive is mixed with a negative effect, due to the provision of employment on-site.

West Hill

- The distance to facilities quoted for West_05 as "just under 1km" is not accurate and should be corrected to say it is well over 1.5km to shops/school/village hall, with distances varying from 1.6km to 2.3km.

Council response: text amended to state "just over 1km".

Local Plan Further Regulation 18 Sustainability Appraisal report Addendum consultation (May 2024 to June 2024) – summary of main issues raised and Council response

The responses regarding the proposed Sustainability Appraisal express a range of views, with some support though there is a general sentiment that the appraisal process has significant weaknesses that undermine the strength and effectiveness of the overall Local Plan. Many respondents feel the Appraisal does not adequately address key sustainability issues, particularly in relation to water quality, sewage infrastructure, and the impact of development on the natural environment and biodiversity.

There are calls for the Sustainability Appraisal to be thoroughly reviewed and updated, with a stronger emphasis on protecting the environment, promoting renewable energy, and ensuring new development is truly sustainable. Several respondents highlight concerns that the Appraisal appears to be used primarily as a box-ticking exercise rather than a meaningful tool to guide policy decisions.

Key points raised, in order of frequency:

- Concerns about the Appraisal's lack of focus on water quality, sewage infrastructure, and flood risk
    - Failure to properly consider the importance of these issues and their impact on sustainability
    - Calls for a more robust, catchment-based approach to water management.

Council response: Disagree – the SA includes objectives that address these issues, with objective 5. Climate change adaptation covering flood risk, and objective 7. Water resources.

- Criticism of the Appraisal's perceived bias towards large-scale, standalone developments
    - Concerns that the Appraisal is designed to confirm existing council policies
    - Preference for smaller, more integrated developments near existing centres

Council response: Disagree – a range of Strategic growth options have been considered in preparing the SA.

- Requests for the Appraisal to place a stronger emphasis on protecting the natural environment, biodiversity, and addressing climate change
    - Desire for more radical, innovative policies that prioritize environmental protection
    - Concerns that the Appraisal does not adequately address these critical issues

Council response: these issues are covered by several SA objectives, specifically 1, 2, 4 and 5.

- Views that the Appraisal is too complex, lengthy, and inaccessible for the public to engage with effectively
    - Suggestions that the key points should be summarized and presented in a more accessible format
    - Concerns that the Appraisal will have little influence on policy decisions

Council response: A non-technical summary has been produced to accompany the ‘final’ SA Report (i.e. this version). The SA report provides reasons why each policy/site has been chosen, and others rejected.

- Scepticism about the objectivity and transparency of the Appraisal process
    - Perceptions that the Appraisal is a subjective, box-ticking exercise
    - Lack of clear, publicly available information and scoring systems

Council response: there is an element of professional judgement in the SA, but the methodology is explained, along with any difficulties encountered.

- Calls for the Appraisal to better reflect local knowledge and lived experiences regarding sustainability issues
    - Concerns that local expertise has been discounted or overlooked
    - Desire for the Appraisal to be more grounded in the realities of specific communities

Council response: the local sustainability issues are explained in the report, along with baseline information providing the local context and knowledge for appraising effects.

- General dissatisfaction with the Appraisal and the broader sustainability approach of the Local Plan
    - Beliefs that the Council is not doing enough to address sustainability
    - Concerns that the plan does not meet the needs of local communities

Council response: Concerns are noted, but the Local Plan strikes a balance between meeting development needs whilst addressing adverse impacts,

Historic England

Note that it should not be assumed that in all circumstances the presence of listed buildings on site means that development would result in an adverse impact – need to understand the significance of the asset and likely impact of development on that significance.

Council response: noted.

Environment Agency

State para 3.11 should state the River Otter as being at poor ecological status and the River Clyst as moderate ecological status. The River Axe should be identified for its unfavourable condition status. Refer to the East Devon Abstraction Licensing Strategy and Water Abstraction Plan 2017 – the increased demand for water supply and associated infrastructure requirements from new development should be considered.
Council response: points added to baseline and relevant plan, policies and programmes sections of the SA report.

NHS Integrated Care Board (ICB)

State the positive rating given to whether a site is within a certain distance to a GP surgery does not consider whether there is physical capacity to accommodate any further patients e.g. Western side of East Devon, Exmouth, Woodbury. State the mitigation measure of providing healthcare facilities along new housing is not always viable – mitigation must also include plans to expand existing facilities.

Council response: Greater clarity will be provided to say that healthcare mitigation can include provide new or expanding existing facilities.

Natural England

Where a site triggers a SSSI Impact Risk Zone (IRZ), then it will be necessary to assess (through the SA/SEA) whether there is a potential impact pathway between the development and the site. The SEA correctly states that all Axminster site fall within the River Axe Nutrient Management Zone. The LPA should be adequately confident that mitigation measures are deliverable and so the proposed development is viable. Suitable mitigation measures should be discussed in the SEA and detailed in the site allocation policies.

Council response: Noted, the impact upon biodiversity will be considered through its SA objective.

Publication Draft Local Plan Sustainability Appraisal report, February 2025 – Consultation responses and Council response

Respondent	Comment	Council response and Action taken
Environment Agency	Overall, the Sustainability Appraisal (SA) provides a thorough assessment of the plan's environmental, social, and economic implications, and we welcome its generally positive findings. However, we urge further consideration of several key issues to strengthen the Plan's alignment with sustainability objectives.	General support noted.
Environment Agency	While the SA acknowledges the challenges of reconciling growth with environmental protection, we agree that many negative impacts can be mitigated through robust policy wording, embedded environmental enhancements, and well-designed green/blue corridors and connected ecological networks. However, where adverse effects are identified—particularly regarding biodiversity, water management, and climate resilience—we recommend explicit policy expansions or additions to ensure mandatory mitigation, compensation, or avoidance measures.	General point relating to mitigation, compensation, or avoidance measures – a response to specific points is set out below.
Environment Agency	The SA rightly highlights risks of habitat loss, species disturbance, and severance due to development, particularly on greenfield sites. To address this, policies must unambiguously enforce the mitigation hierarchy and Biodiversity Net Gain (BNG) requirements, ensuring development: • Protects and incorporates existing habitats, • Actively expands ecological networks through green corridors, sustainable land-use practices, and habitat restoration, • Proceeds only where mitigation strategies demonstrably offset residual harm. We strongly advocate for site-specific biodiversity evaluations to be conditional on approved mitigation plans, with a focus on enhancing degraded areas through green infrastructure.	The SA report identifies mitigation measures to address adverse effects on biodiversity. This comment relates to biodiversity Local Plan policies, rather than the SA report.

Respondent	Comment	Council response and Action taken
Environment Agency	The SA's limited focus on water quality, sewage capacity, and flood risk is concerning and we refer you to sections 1, 4 and 5 of this letter for related comments. A catchment-based approach to water management should be prioritised, with policies that: • Require proof of sewage infrastructure adequacy prior to development approval (i.e. written confirmation from the water undertaker that confirms the adequacy of sewage infrastructure prior to development), • Mandate sustainable drainage systems (SuDS), rainwater harvesting, and greywater recycling, • Address flood risk through resilient design and strategic planning. Given the SA's note of uncertainty around sewage treatment capacity, policies must explicitly tie development phasing to infrastructure delivery to prevent negative impacts on controlled waters resources.	The SA report incorporates comments made by the EA in previous consultations, as set out in this Appendix One. This includes more detailed baseline information, additional plans, policies and programmes. Other comments relate to Local Plan policies rather than the SA report.
Environment Agency	We support the SA's emphasis on low-carbon development, energy efficiency, and sustainable transport. Policies should: • Exceed minimum standards for renewable energy and carbon-neutral construction, • Prioritise walking, cycling, and public transport to reduce reliance on private vehicles, • Integrate climate adaptation measures (e.g., green roofs, flood-resilient design) into all developments.	Support noted.
Environment Agency	While minor negative impacts of growth are noted, the SA rightly underscores the broader positive outcomes—environmental, economic, and social—that well-designed policies can deliver. These co-benefits should be central to decision-making, ensuring net gains for sustainability.	Support noted.
Environment Agency	To enhance the SA's effectiveness, we suggest: • Regular monitoring of policy implementation, with adaptive management to address emerging challenges.	Chapter 7 in the SA report contains the monitoring framework, which will regularly be reported on in the Authorities Monitoring Report.

Respondent	Comment	Council response and Action taken
	• Clearer linkages between SA findings and policy drafting to ensure mitigation is enforceable.	The "Mitigation measures to address likely significant adverse effects…" section of the appraisal matrices identifies where mitigation measures have been included within policies but agree this could be made clearer. **Action: add clearer linkages between SA findings and policy drafting, by more clearly explaining where policies have incorporated the mitigation measures recommended in the SA.**
Environment Agency	In summary, we encourage your authority to refine policies to explicitly address biodiversity, water, and climate risks while capitalising on the SA's positive framework. By doing so, the Local Plan can achieve truly sustainable development for East Devon.	This comment relates to Local Plan policies, rather than the SA report.
Historic England	The Sustainability Appraisal suggests Policy CC03 would result in positive effects on topics such as landscape and the historic environment. This is likely to be incorrect in most cases.	The SA notes positive effects on the landscape and historic environment for Policy CC03 due to inclusion of mitigation measures in the policy wording. But agree that mitigation will make low carbon and renewable energy acceptable, rather than positive. **Action: amend biodiversity, landscape and historic environment effects of policy CC03 to "negative uncertain", rather than positive.**
South West Water	Water Resources – South West Water (SWW) supports the water resources section of the SA as the information regarding SWW's DWMP is accurate and supports the statement: -	Support noted.

Respondent	Comment	Council response and Action taken
	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. In line with the East Devon Abstraction Licensing Strategy and Water Abstraction Plan 2017, the increased demand for water supply and associated infrastructure requirements from new development should be considered. As part of developing the DWMP & WRMP, SWW considered and factored in proposed levels of growth. SWW has now accepted OFWATs determination of the PR24 Business Plan, securing operational funding for the 2025 – 2030 period.	
Boyer Planning re. Land at Addlepool Farm, Clyst St George	1. Biodiversity The Site is supported by a Preliminary Ecological Appraisal (PEA) to identify important ecological features. The PEA found the Site to be dominated by uniform agricultural land of low ecological value, both arable crops and cattle pasture. It is noted that there are designated sites of international importance within a 10km radius of the Site. Mitigation for recreational impacts that may occur to these sites from an increase in residents would be secured as part of the proposals, in the form of financial contributions towards improved access management and provision of substantial alternative recreation locations. The concept masterplan also proposes extensive areas of public open space which will include walking routes and will present an alternative option. The Site will not have an unacceptable impact on biodiversity. It is welcomed the EDDC's HELAA (2022) concluded that the Site would have no unacceptable impact on biodiversity.	This site is within Option 3 and comprises around 38 hectares with a capacity up to 700 dwellings. Option 3 as a whole is rejected due to major negative biodiversity effects; potential for settlement coalescence due to proximity to Clyst St Mary, Ebford, and Clyst St George; uncertainty on land delivery; and adverse highways impact requiring significant mitigation. The SA report explains that smaller scale development of 2-3 new villages, rather than a single larger new settlement, offers less potential to accommodate a mix of uses and consequently poorer access to jobs and services, and greater carbon emissions. An option for a new town *and* a new village is not considered to be a reasonable alternative as it would deliver even more housing in the West End

Respondent	Comment	Council response and Action taken
		and therefore limit the potential to meet housing needs and support the economy in the rest of the district, not consistent with the Local Plan Vision, and deliverability concerns regarding multiple new settlements being under construction at the same time. Therefore, alternatives for sites that could comprise a new village in addition to the new town are not considered reasonable.
Boyer Planning re. Land at Addlepool Farm, Clyst St George	2. Landscape The Site is not located within any statutory or nonstatutory landscape character or quality designations. The northern part of the Site benefits from intervisibility between the Site and Clyst St George. It is acknowledged that the southern part of the Site is on slightly elevated ground and the proposed masterplan demonstrates how the new village can be delivered sensitively in respect of its landscape context. It is welcomed that the HELAA (2022) assessment concluded that the Site would have no impact on NLs.	See above.
Boyer Planning re. Land at Addlepool Farm, Clyst St George	3. Historic and built environment It is acknowledged that Clyst St George Church (Grade II) is located to the north west of the Site and there are locations within the Site which have some visibility of the church tower. The proposed masterplan demonstrates how the new village can be delivered sensitively in the context of these views. Key view corridors have been retained and are proposed as green space to ensure that the intervisibility of the church tower can be preserved. It is agreed that the HELAA (2022) assessment concluded that the Site will not have an unacceptable impact on heritage.	See above.

Respondent	Comment	Council response and Action taken
Boyer Planning re. Land at Addlepool Farm, Clyst St George	4. Climate change and carbon emissions - To minimise greenhouse gas emissions The proposed development will also provide wider benefits associated with services and facilities through the provision of improved bus, cycle and footpath connections, a local centre, a new primary school, green infrastructure, biodiversity enhancements, new open spaces and supporting wider access to the countryside. This will enhance the facilities and services on offer to existing residents within Clyst St George and beyond. We support the HELAA (2022) recognition that "the site is within 1,600 metres of 4 or more different local facilities and within 1,600 metres of a train station or bus route with an hourly or better service".	See above.
Boyer Planning re. Land at Addlepool Farm, Clyst St George	5. Climate change adaption - To adapt to the possible effects of climate change The Vision Document demonstrates that any areas of the Site at risk of flooding (from all sources) would be kept free from development. Any future scheme would be supported by a comprehensive drainage strategy that would demonstrate that the proposed development would be safe for its lifetime. In accordance with DCC aspirations, the proposed development would seek to deliver a betterment to existing greenfield run off rates, therefore delivering a minor positive effect.	See above.
Boyer Planning re. Land at Addlepool Farm, Clyst St George	6. Land resources - To utilise our land resources efficiently and minimise their loss or degradation The majority of the Site comprises of Grade 3 (good to moderate) land classification. The Site is not affected by not affected by minerals, waste, nitrate or phosphate zones.	See above.

Respondent	Comment	Council response and Action taken
Boyer Planning re. Land at Addlepool Farm, Clyst St George	7. Water Resources - To utilise our water resources efficiently and minimise their loss or degradation The Site is not within a groundwater source protection zone or the River Axe SAC phosphates catchment.	See above.
Boyer Planning re. Land at Addlepool Farm, Clyst St George	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 Addlepool Village will be a self-contained new village, whilst connecting the development both visually and physically to the existing surrounding settlements of Ebford and Clyst St George. The proposals will include approximately 700 homes (including both market and affordable homes), making a significant contribution towards EDDC's local housing need in the short to medium term. The Site is owned by a single landowner and under the control of Vistry Group, who as the largest housebuilder in the UK by number of dwellings completed annually, are well positioned to both promote and construct the proposed new homes, seeing the project through from inception to completion.	See above.
Boyer Planning re. Land at Addlepool Farm, Clyst St George	9. Health and well-being - To support healthy, safe and active communities where people have access to attractive and functional recreation spaces Addlepool Farm will be a self-contained new village, providing significant areas of new public open space, which will include allotments, sports pitches and walking routes, centred on health and well-being of future residents. The proposed development will meet and contribute to the objectives of the Clyst Valley Trail and wider network.	See above.

Respondent	Comment	Council response and Action taken
Boyer Planning re. Land at Addlepool Farm, Clyst St George	10. Access to services - To provide accessible and attractive services and community facilities for all ages and interests The Site is in close proximity and with good connectivity to the main district and regional centres of Topsham and Exeter. Clyst St George currently has good public transport connections and is served via several bus services, including 56, 57 Gold, 58C and the 95. These routes provide connections to Topsham, Woodbury, Exeter and the villages in between. The nearby station at Topsham is located approximately 1 mile (1.6km) to the west of Addlepool Village. Great Western Rail service provides connections to Exeter, Plymouth, Taunton and beyond, including London Paddington. The proposed development will also provide wider benefits associated with services and facilities through the provision of improved bus, cycle and footpath connections, a local centre, a new primary school, green infrastructure, biodiversity enhancements, new open spaces and supporting wider access to the countryside. This will enhance the facilities and services on offer to existing residents within Clyst St George and beyond.	See above.
Boyer Planning re. Land at Addlepool Farm, Clyst St George	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 The delivery of the proposed development will create numerous construction jobs and will contribute to the local economy through construction workers' spending. The provision of an onsite community hub will also deliver additional economic benefits through the creation of new employment.	See above.
Boyer Planning re. Land at Addlepool Farm, Clyst St George	12. Town centres - To safeguard and strengthen the vitality and viability of town centres	See above.

Respondent	Comment	Council response and Action taken
	The proposed development is in proximity to Topsham and therefore the future occupiers of the development will contribute to the long-term vitality and viability of East Devon's towns. The proposed development will not compete with the facilities and services on offer in nearby Topsham, however, will provide some on-site retail to meet basic needs.	
Boyer Planning re. Land at Addlepool Farm, Clyst St George	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 The Site is in close proximity and with good connectivity to the main district and regional centres of Topsham and Exeter. Clyst St George currently has good public transport connections and is served via several bus services, including 56, 57 Gold, 58C and the 95. These routes provide connections to Topsham, Woodbury, Exeter and the villages in between. The nearby station at Topsham is located approximately 1 mile (1.6km) to the west of Addlepool Village. Great Western Rail service provides connections to Exeter, Plymouth, Taunton and beyond, including London Paddington. The Site is located in an area with superfast broadband (30mbps plus) as a minimum.	See above.
Boyer Planning re. Land off Northcote Hill (site reference GH/ED/39a and GH/ED/39b)	The Council have assessed Land off Northcote Hill against the Sustainability Appraisal (SA) Objectives (site reference GH/ED/39a and GH/ED/39b) and prepared a site assessment, set out below. On review of the SA, we are able to provide additional evidence to support the assessment of the site. It is considered that this additional evidence will enable an updated site assessment to be considered by the Council, with regard to objectives relating to transport and landscape. The current SA has restricted the site's capacity 200 homes (100 homes	The critique in the consultation response is not directly comparable with the assessment of the site in the SA report, as the response is based upon a relatively detailed proposal supported by a series of technical assessments, whilst the SA report is inherently strategic and considers the sustainability effects of developing the site in

Respondent	Comment	Council response and Action taken
	for site reference GH/ED/39a and 100 homes for site reference GH/ED/39b). Boyer has undertaken a critique of the Council's assessment (set out below) and prepared a revised site suitability assessment. With this revised assessment the site is evidenced to be a suitable site that can accommodate a greater quantum of development, allowing for the draft allocation to be subsequently increased within the Draft LP. The revised assessment has a more positive 'score' for objectives relating to biodiversity, landscape, climate change and carbon emissions, climate change adaption, and health and well-being. The above revised site suitability assessment for land off Northcote Hill, Honiton (land north and south of the railway line), which has been assessed using the site's specific technical notes prepared by relevant technical consultants, demonstrates that the site can deliver 285-300 homes on land south of the railway line, and in excess of 100 homes on land north of the railway line, and continue to positively contribute towards EDDC's Sustainability Objectives	more general terms i.e. with no specific scheme in mind. The SA report includes mitigation measures for GH/ED/39 to address adverse effects. **Action: Update the SA Report to reflect the increase in housing capacity of GH/ED/39b.**
H Beaven	The impacts of the various sites proposed are almost bound to be understated, judging by the impacts of previous developments.	The SA report is a professional judgement, based upon an assessment of likely significant sustainability effects against baseline information and other plan policies.
Black Box Planning Ltd	NPPF Paragraph 33 requires that local plans should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.	Noted.

Respondent	Comment	Council response and Action taken
	Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).	
Black Box Planning Ltd	The Planning Practice Guidance (PPG) further explains that a sustainability appraisal is a systematic process that must be carried out during the preparation of local plans. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.	Noted.
Black Box Planning Ltd	At the time of writing, it is understood that Sustainability Appraisal (SA) (ref CSD-003) – Appendix Six and pages 265 through 280 represents the full extent of the Council SA work in respect of consideration of the Second New Community.	Disagree – the new community is also considered in the SA of the Spatial Strategy and Strategic Housing Growth Options.
Black Box Planning Ltd	Firstly, it is somewhat surprising for such a critical component of the Council's Plan and overall spatial strategy, that the SA work extends to only 15 pages of a 614-page document. This point is especially pertinent in consideration of the reasonable alternatives, the complexity of these and their requisite assessment in order to arrive at an evidenced and methodical conclusion.	Disagree – the new community is also considered in the SA of the Spatial Strategy and Strategic Housing Growth Options.
Black Box Planning Ltd	Secondly, whilst it is understood that the SA is required to assess reasonable alternatives, and that the Options from the October 2022 CBRE report were chosen as the basis for undertaking that assessment, there is little in the way of discussion around alternative options or sub-options for assessment.	Disagree – the SA report contains discussion on various potential options. The SA report explains that smaller scale development of 2-3 new villages, rather than a single larger new settlement, offers less potential to accommodate a mix of uses and consequently poorer access to jobs and services, and greater carbon emissions. An option for a new town *and* a new village is not considered to be a reasonable alternative as it would deliver even more housing in the West End

Respondent	Comment	Council response and Action taken
		and therefore limit the potential to meet housing needs and support the economy in the rest of the district, not consistent with the Local Plan Vision, and due to deliverability concerns regarding multiple new settlements being under construction at the same time.
Black Box Planning Ltd	By way of example, despite Greenhayes submitting a representation in January 2023 definitively confirming the extent of their land control and the basis on which a strategic promotion could be brought forward and contribute towards the Council spatial strategy and objective to deliver a Second New Community, the reasonable alternative assessed by the SA in February remains as per the broad Option 2 set out in the October 2022 CBRE report.	The SA report explains that smaller scale development of 2-3 new villages, rather than a single larger new settlement, offers less potential to accommodate a mix of uses and consequently poorer access to jobs and services, and greater carbon emissions. Therefore, the three new community options that were appraised are all around 500 hectares to accommodate 8,000 dwellings plus employment land, and a range of services and facilities.
Black Box Planning Ltd	Option 2 is not consistent with the Greenhayes promotion land control as set out in the January 2023 Regulation 18 representation, instead it is based upon more outdated 2017 and 2021 Call for site submissions. Indeed, the very western extent of the Greenhayes promotion straddles into Option 3. The SA itself acknowledges on page 266 that land not being submitted to a Call for sites exercise would not necessarily prevent it from being considered.	The three new community options that were appraised are all around 500 hectares in size, with the western extent of the Greenhayes promotion being in Option 3 rather than Option 2.
Black Box Planning Ltd	The SA sets out on page 265 that: • The Local Plan 2020-2042 will allocate land for 8,000 homes and accompanying employment, services and facilities etc, but there is a longer term vision for 10,000 homes at the new community; • Long lead-in times and build-out rates for a new settlement mean that 3,300 dwellings are proposed in the plan period up to the year 2032;	Noted.

Respondent	Comment	Council response and Action taken
	• The remaining 4,700 dwellings would be delivered after 2042 on the remainder of the allocated land; • The land required for the additional 2,000 dwellings and associated land uses will be allocated in a future Local Plan.	
Black Box Planning Ltd	The SA recognises that the location of the three options recognise existing land uses that are not likely to relocate, such as Greendale Business Park and Crealy Theme Park and Resort. Nevertheless, Option 2 appears to wash over both land uses. The Greenhayes promotion demonstrates how the co-location of residential uses with these employment hubs and ensuring strong links between them, could contribute significantly to meeting wider sustainability objectives, including reducing the necessity to commute by private vehicle and to encourage active travel as part of the daily commute.	Noted.
Black Box Planning Ltd	The assessment in SA Objective 4 and 13 and also the conclusion that Option 2 is isolated from existing cycle infrastructure, fails to recognise that the Clyst Valley & New Communities Local Cycling and Walking Infrastructure Plan (LCWIP) January 2025 (ref TRI-018) identifies the A3052 Sidmouth Road as a critical active travel route that all new settlement options will further increase demand upon. It is stated that 'a high-quality protected route, separated from the carriageway by a buffer should be delivered between Clyst St Mary and Greendale. To include crossing points (e.g. signalised crossings) for the Clyst Valley Trail, Cat & Fiddle, Crealy, and Greendale. This would required engagement and negotiation with landowners'.	The SA of the three new community options contains mitigation measures to address adverse effects and maximise beneficial effects, which include the provision of "high quality, safe and direct cycle routes" and Options 1 and 3 should link with the proposed Clyst Valley Trail. Cycle route improvements from new settlement options identified in the Clyst Valley & New Communities LCWIP are referenced in Appendix Two. Nevertheless, it would be useful to specifically refer to the other LCWIP mitigation measures relevant to Option 2. **Action: add reference to Clyst Valley & New Communities LCWIP routes at 'A3052 Sidmouth Road' and 'Woodbury Quiet Lanes' as mitigation measures for Options 1, 2 and 3.**

Respondent	Comment	Council response and Action taken
Black Box Planning Ltd	Option 2 is the only option which would offer land control on both sides of the A3052 corridor to enable delivery of the critical active travel route as set out by the LCWIP. It would also be the only option which would enable the delivery of the requisite connections into Crealy and Greendale.	Noted, but the active travel route could be delivered along the north of A3052 as part of Option 1, with crossings if appropriate into Crealy and Greendale.
Black Box Planning Ltd	The assessment in SA Objective 4 recognises the potential in Option 1 for a low carbon district heating network by connecting to the proposed Energy from Waste (EfW) plant at Hill Barton. However, it fails to consider that Option 2 would also benefit from this facility, given its location adjacent to Hill Barton Business Park and the Local Development Order boundary for the District Heating Network.	Agree that the commentary should be clarified to reflect that each of the Options is either within or near the proposed Hill Barton EfW plant, but this does not change the conclusion that Option 1 is preferred on this matter. **Action: amend Objective 4 commentary to state that "Due to the EfW plant location at Hill Barton, Options 1 and 2 benefit from direct connection to a low carbon district heating network, but Option 1 is preferred in this matter as it transits the proposed route of a district heating connector so offering a cheaper and easier solution."**
Black Box Planning Ltd	It also fails to recognise that Option 2 would also enable opportunities to build upon the existing energy infrastructure at Greendale Business Park in the form of the anaerobic digestor facility. The plant currently processes farm crops and livestock manure into biogas and bio fertiliser. The biogas is used to produce electricity for the Business Park, whilst the bio fertiliser is used in local agricultural practice in place of fossil fuel derived fertilisers.	Noted, but no detail as to whether the cited anaerobic digestor facility is of a significant scale to warrant consideration – the Greendale anaerobic digestor facility is not included in evidence "East Devon New Community Net Zero and Climate Risk Review of Option Sites, October 2022".
Black Box Planning Ltd	The assessment in the conclusion that Option 2 is in multiple ownership with significant land assembly required is unfair in consideration of the same challenges that would equally apply to Options 1 and 3. The	There is little difference between Options 1 and 2 in terms of deliverability, as all landowners have been identified for both Options, with similar

Respondent	Comment	Council response and Action taken
	Greenhayes promotion predominantly to the south of the A3052 is a single entity with two landowners involved. In consideration of the HELAA mapping, the landownership to the north of the A3052 appears more granular meaning that the same land assembly challenges will equally apply to Option 1.	proportions (around 50%) being controlled by the three largest landowners. Option 3 has more fragmented land ownership and the greatest amount of unknown land ownership, so would require significant land assembly. **Action: Objective 8, remove uncertainty from Option 2 score; amend commentary, 2nd and 3rd sentences to state that "There is little difference between Options 1 and 2 in terms of deliverability, as all landowners have been identified for both Options, with similar proportions (around 50%) being controlled by the three largest landowners. Option 3 has more fragmented land ownership and the greatest amount of unknown land ownership, so would require significant land assembly. Therefore, an uncertain effect has been added to Option 3."** **Action: Option 2, reasons for alternatives being preferred or rejected, delete "in multiple ownership with significant land assembly required to enable this Option to come forward".**
Black Box Planning Ltd	In respect of SA Objective 8, it is unclear why Option 2 does not score better than Option 3 in consideration that the SA acknowledges that "a relatively large proportion of the land in Option 3 has not been submitted by the landowners". An inconsistent approach is unlawful on the basis that it would be irrational.	See above.

Respondent	Comment	Council response and Action taken
Black Box Planning Ltd	The assessments in SA Objectives 10 and 12 fail to acknowledge the established hub of facilities and services at the Greendale Farm Shop site, including a café / restaurant, farm shop, nursery, medical facility and various tourism and visitor attractions.	Agree it would be useful to reference Greendale Farm Shop as being within Option 2, and adjacent Option 1, in Objective 10. But do not consider this will change the overall score for these Options given the lack of other existing services in the vicinity. Objective 12 relates to town centres, so no change is required for this objective. **Action: add reference to Greendale Farm Shop and related facilities as being within Option 2, and adjacent Option 1, in Objective 10.**
Black Box Planning Ltd	The assessment in SA Objective 11 that Options 1 and 3 benefit from employment opportunities arising from proximity to Exeter, yet Option 2 is limited only to employment opportunities arising from Greendale and Hill Barton Business Park is nonsensical. Option 2 equally benefits from such a location and sits on a direct public transport route and proposed active travel corridor into the city.	Agree that some clarity in the text would be helpful, but do not consider that the sustainability score would change as a result. **Action: in Objective 11, clarify that Option 2 offers fewer employment opportunities in its vicinity than Options 1 and 3. Replace text stating Option 2 employment centres are "limited to Greendale and Hill Barton Business Parks" with "Option 2 offers fewer employment opportunities within its vicinity – aside from Greendale and Hill Barton Business Parks, all other employment centres are located at least 3km from this Option." Also add that Options 1 and 3 benefit from being served by more than one main road, making them more attractive for future business occupants. Amend "close proximity" to "within 3km" for employment**

Respondent	Comment	Council response and Action taken
		opportunities listed for Option 1. (Ref. East Devon New Community Sustainable Access Review of Option Sites, November 2023).
Black Box Planning Ltd	It is recognised that Option 1 provides ease of access to several employment hubs around the A30 corridor, but the Greenhayes promotion would achieve the same objectives through proximity to Crealy and Greendale Business Park. The business park is home to approximately 150 companies, providing approximately 2,000 no. jobs in the local Exeter and East Devon economy. The park comprises over 1.8 million square feet of existing industrial and commercial space hosting a variety of business tenants.	Option 1 is also in close proximity to Crealy and Greendale Business Park.
Black Box Planning Ltd	It is recognised that, in preparing the Sustainability Appraisal, a number of the core sustainability objectives will need to be assessed by applying evaluative judgement. This can account for differences in opinion in assessing the document. However, if such judgements are applied having regard to inaccurate information or on an obviously inconsistent basis, the Sustainable Appraisal will not be legally compliant. That is the case currently.	As noted above, several relatively minor amendments are being made to the SA report.
Black Box Planning Ltd	It is recommended that in reviewing and incorporating the full evidence base to support the Local Plan as part of a full Regulation 19 Consultation, and meeting full objectively assessed needs, that a further iteration of the SA is prepared to amend the inconsistencies.	As noted above, several relatively minor amendments are being made to the SA report. These will be reflected in the SA report that will accompany the second Regulation 19 consultation and then submitted for Examination.
M Smith	The Sustainability Appraisal includes a lengthy section on the sites that emerged from the Call for Sites. A member of the Parish Council's Local Plan Working Group made detailed comments on the original appraisal of the Feniton sites which have never been acknowledged or reported to the Strategic Planning Committee. No changes have been made to the Sustainability Appraisal and no explanation given as to why the	The SA report considers numerous sites at Feniton. It is not possible to respond further without seeing the "detailed comments" referred to in the comment.

Respondent	Comment	Council response and Action taken
	suggested amendments were rejected. The Parish Council remains concerned that this element of the Sustainability Appraisal is flawed and understates the sustainability impacts of development proposals in Feniton.	
E Glanfield	The Site Selection Methodology document which appears in the reg 19 Draft Local Plan evidence library is not the version which was used for the reg 18 stage; an amended version has been submitted to the evidence library - this methodology document was amended AFTER the SPC approved the Draft Local Plan on 11.12.24. Methodology was altered retrospectively to remove conflict within the Local Plan. Exmo_20 failed the HELAA assessment; it was deemed "available but not suitable or achievable", therefore according to the methodology in use at the time Exmo_20 was unable to be selected, and was accordingly omitted from Stage 3 Site Assessments. AFTER the Draft Local Plan had been approved (with Exmo_20 having reappeared and been selected), wording of the site selection methodology was altered to enable sites which had failed site sifting at stage 2 to be carried forward to stage 3 "in exceptional circumstances", and to state that "such cases will be clearly justified". Note there is no agreed definition of what constitutes 'exceptional circumstances', nor is any 'clear justification' given. Furthermore, despite Exmo_20 having failed the HELAA assesment, sustainability Appraisal Report (Feb 2025) states that it was "assessed as suitable, available and achievable". Neither the decision-making process nor the evidence base have been sufficiently transparent, robust or well documented for the process to be considered sound, nor does amending the evidence base retrospectively to fit the plan enable the process to be considered legally compliant. On these bases allocation of Exmo_20 cannot be considered justified or sound.	In exceptional circumstances, the Site Selection methodology allows sites to be considered for allocation if they are not suitable or achievable in the HELAA but agree this is not explained in the SA report itself. The remaining comments are not related to the SA Report. **Action: SA report, preceding Figure 2.4, add the following text "In exceptional circumstances, sites may be 'reasonable alternatives' despite not meeting the criteria below – such cases will be clearly justified."** **Appendix Six, Exmouth section, explain why Exmo_20 is considered a reasonable alternative despite being unachievable in the HELAA, because it is considered that issues relating to site access, minerals, and proximity to the Pebblebed Heaths can be addressed; and the spatial strategy for significant development at Exmouth.**

Respondent	Comment	Council response and Action taken
	The Site Selection methodology used for the Regulation 18 stage states that “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”.(Site Selection methodology May 22, Subtext point 6). Exmo_ 20 was ruled out as being unsuitable in the HELAA, yet despite being within 400m of the Pebblebed Heaths appeared again at stage 4 and was allocated. AFTER the Draft Local Plan had been approved, the Site Selection methodology was amended and the above clause removed. The version of Site Selection Methodology presented in the evidence library of the Draft Local Plan is not the version used for reg 18 but a version amended to remove conflict within the plan. Neither the decision-making process nor the evidence base have been sufficiently transparent, robust or well documented for the process to be considered sound, nor does amending the evidence base retrospectively to fit the plan enable the process to be considered legally compliant. On these bases allocation of Exmo_20 cannot be considered justified or sound.	
S Pemberthy	Paragraph 3.9 of the Sustainability appraisal fails to even list the significant ongoing pollution issues as a result of overcapacity sewage systems in Exmouth - given there is a major class action being pursued by residents and local businesses against South West Water due to the ongoing damage to business, tourism and the environment this failure to even mention it is shocking. It MUST be included as a separate bullet such that plans put forward are only approved if the sewage issues are addressed.	Water quality is covered in paragraphs 3.23-24. Appendix Four notes there is uncertainty on the capacity of local sewage treatment works to accommodate additional demand from new housing. Policy OL09 states development should be refused if it would result in pollution that cannot be adequately mitigated.
N Humphrey J Hamill	The map on page 326 for site Exmo_20 is incorrect. Since being made aware of this site on 4th September 2024 my neighbours and I have	The map on page 326 is taken from the Exmouth Site Selection report but agree Exmo_20 should

Respondent	Comment	Council response and Action taken
	repeatedly made EDDC aware that our homes, the Grade II* listed church and its lands, and the caravan park etc… ARE NOT TO BE INCLUDED AS PART OF THIS DEVELOPMENT, AND SHOULD NOT BE COVERED BY THE SHADED AREA ON THIS MAP. This has been raised with the Chair of the Strategic Planning Committee and planning officers (see email trail evidence attached showing contact with Councillor Todd Olive for an example). I was under the impression that all of this has been sorted and the map shown in Blue within the Reg 19 evidence should be the one used here (I have attached this for evidence) The map on page 326 needs to be replaced with the correct map. Please amend as a matter of urgency.	be amended to reflect the site area shown on the Local Plan policies map. **Action: Add note to SA report stating that, although Exmo_20 is larger in the HELAA, the site boundary has been amended to reflect more recent information on the land being promoted for development. Amend Exmo_20 on the map to reflect the site area shown on the Local Plan policies map. Amend Objective 3 commentary "Exmo_20 has a small number of heritage assets ~~within the~~ <u>that could be adversely affected by developing</u> the site…".**
N Humphrey B Thomas J Ojaim E Glanfield K Cross T Shillitoe	Figure 2.2 (p.11) states: 1. Biodiversity: To conserve and enhance the habitat and wildlife of our natural environment. • Natural habitats and biodiversity; flora and fauna • Ensure current and potential future habitat connectivity is not compromised. The allocation of Exmo_20, a supporting habitat for foraging Nightjars, directly contradicts this objective. Moreover, Exmo_20 is located within SNA 368, which is designated as a site under the Devon Local Nature Recovery Network (LNRS) in accordance with the Environment Act 2021. Allocating this site would, therefore, undermine the strategic goal of conserving and enhancing habitats and wildlife within our natural environment. This allocation is unjustified. Alternative sites, identified as preferred within the Agenda for the 3rd September Strategic Planning Committee meeting, should be selected instead of Exmo_20.	The Devon Local Nature Recovery Strategy is still under preparation, so Exmo_20 is not designated in this strategy. Exmo_20 is covered by the 'Lowland Heath' Strategic Nature Area – SNAs are not designated areas, rather they contain higher than average concentrations of existing wildlife habitats. The SA already notes a major negative effect for Objective 1. Biodiversity, and includes mitigation measures to reduce this effect. **Action: amend Objective 1 commentary "Exmo_20 ~~has extensive areas of~~ <u>is partly covered by woodland, ~~most of which is~~ shown as</u> an Unconfirmed Wildlife Site."** **In Objective 1 commentary, add reference to the site being covered by the 'Lowland Heath'**

Respondent	Comment	Council response and Action taken
		Strategic Nature Area and draft Nature Recovery Network.
N Humphrey B Thomas K Cross T Shillitoe	On pages 11-12, the document states: 4. Climate Change and Carbon Emissions: Development that minimizes the need to travel by providing access to public transport and cycling. The allocation of Exmo_20 fails to meet this criterion, as it is located in an unsustainable area with the primary access point leading onto the B3179, a rural country road. The site's allocation fails to align with the objective of reducing travel needs and emissions. This allocation is unjustified. Alternative sites, identified as preferred within the Agenda for the 3rd September Strategic Planning Committee meeting, should be selected instead of Exmo_20.	The SA notes a range of facilities within reasonable proximity to Exmo_20, whilst also noting in mitigation measures that its large size means that mix of uses should be incorporated into the site to reduce the need to travel.
N Humphrey B Thomas J Ojaim J Hamill K Cross T Shillitoe	On page 18, Figure 2.4: Site Criteria for Consideration as a "Reasonable Alternative" confirms that Exmo_20 cannot be deemed a reasonable alternative, as it failed the HELAA assessment stage and was classified as "not suitable or achievable" (HELAA Appendix E(v)1). Its allocation is unjustified. Alternative sites, identified as preferred within the Agenda for the 3rd September 2024 Strategic Planning Committee meeting, should be selected instead of Exmo_20.	In exceptional circumstances, the Site Selection methodology allows sites to be considered for allocation if they are not suitable or achievable in the HELAA but agree this is not explained in the SA report itself. **Action: SA report, preceding Figure 2.4, add the following text "In exceptional circumstances, sites may be 'reasonable alternatives' despite not meeting the criteria below – such cases will be clearly justified."** **Appendix Six, Exmouth section, explain why Exmo_20 is considered a reasonable alternative despite being unachievable in the HELAA, because it is considered that issues relating to site access, minerals, and proximity to the Pebblebed Heaths can be**

Respondent	Comment	Council response and Action taken
		addressed; and the spatial strategy for significant development at Exmouth.
N Humphrey B Thomas E Glanfield K Cross T Shillitoe	I strongly disagree with the conclusions drawn in the Exmouth Sites Biodiversity objective (p.331/332). Both Exmo_04 and Exmo_20 are given double negative (--) scores, yet the commentary and conclusions between the two sites are inconsistent and unjustified. Exmo_04's allocation partially falls outside the 400m zone, whereas Exmo_20's allocation runs directly adjacent to the protected site. This inconsistency is unacceptable and undermines the integrity of the assessment.	Exmo_04 and 20 have potential for negative effects on an internationally designation with mitigation likely to be difficult so a major negative effect is identified, consistent with the framework in SA Report Appendix Four. Mitigation measures are recommended to reduce this adverse effect, including the removal of the most sensitive area of Exmo_04 within the 400m buffer zone, resulting in the allocation Exmo_04a.
E Glanfield	The Local Plan (Paragraph 12.31) states that "The Council will consult statutory pollution control authorities at an early stage for proposals that may raise pollution concerns. This ensures that developments are assessed for their potential impacts on health, the natural environment and amenity." Councillors allocated Exmo_20, a site adjoining a SAC/SPA/SSSI without consulting either statutory pollution control authorities or Natural England to consider pollution concerns. Exmo_20 was allocated and the Draft Local Plan agreed before the initial Habitats Regulations Assessment was published on 30.01.25. The HRA concluded that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to…air quality (East Devon Pebblebed Heaths SAC/SPA)". There is currently no suitable mitigation for this. As a result of failing to follow due process EDDC have allocated Exmo 20 against the principles of the mitigation hierarchy; to prioritise avoidance over mitigation. The allocation of Exmo_20 was not in accordance with the NPPF (chapter 3, paragraph 16c) which states "The right information is crucial to	The comment is not related to the SA Report. Appendix Four sets out the SA of the Exmouth sites, including Exmo_20.

Respondent	Comment	Council response and Action taken
	good decision-making, particularly where formal assessments are required (such as Habitats Regulations Assessments…)". Councillors were simply not in possession of the right information when they voted on allocation of Exmo_20. They did not have the results of the Habitats Regulations Assessments. By the time they did, they had no opportunity to revisit their decision. A member of the Strategic Planning Committee directly expressed her discomfort at the committee not having seen the Habitat Regulation Assessments(and other evidence). (SPC meeting 04.02.25, 1:15). She suggested that by not having access to these documents before the Local Plan going to regulation 19 consultation and without the information having gone through committee and been discussed, it raised the question of whether the Draft Local Plan could be considered Sound and Legally robust. The Habitats Regulations Assessments and other missing evidence was referred to by The Assistant Director – Planning Strategy and Development Management, as "bits and bobs", and it was considered satisfactory go to regulation 19 consultation without them. THIS RENDERS THE ALLOCATION OF EXMO _20 IN DIRECT CONFLICT WITH NPPF AND THEREFORE UNSOUND. In addition to this, also not in accordance with NPPF, (Chapter 3, paragraph 16c), members of the SPC did not have the right information in terms of site boundaries. The map shown to the SPC when they voted on sites was massively inaccurate and the boundary of Exmo_20 depicted approximately 1/3 more land than was available, including a substantial listed heritage site (St Johns in the Wilderness church and churchyard), a large area of SAC/SASI impact risk zone, and a considerable number of privately owned properties.	

Respondent	Comment	Council response and Action taken
	Numerous attempts were made by members of the community to get the map amended to inform councillors of the actual land available but to no avail, until it appeared corrected in the reg. 19 Draft Local Plan.	
N Humphrey B Thomas K Cross T Shillitoe	In the Exmouth Sites Historic Built Environment commentary (p.334), the assumption that the site's large size enables adverse impacts to be minimized is flawed. First, the site has significantly decreased in size since ownership was verified after the allocation on 3rd September 2024. Second, the top 400m of the site cannot accommodate housing. Third, the remaining area is only sufficient to accommodate 700 houses, making the assumption that mitigation can be effectively integrated completely unfounded. This justification lacks credibility and should not stand.	Disagree, the large site size of Exmo_20 means there is scope to conserve and enhance the historic environment through overall layout and appropriate buffers. **Action: add historic environment mitigation measures for Exmo_20 to conserve and enhance the setting of nearby heritage assets, specifically St John in the Wilderness church.**
N Humphrey B Thomas J Ojaim K Cross T Shillitoe	It is astonishing that the Exmouth Sites Climate Change Adaptation commentary (p.336) fails to mention the flood risk present at the lowest end of Exmo_20. Even more concerning is the complete omission of the fact that this extensive greenfield area entirely drains into Withycombe Brook—an area with a known and significant flood risk in Exmouth. Incredibly, this critical issue has not been assessed in the Strategic Flood Risk Assessment for the draft Local Plan. The EDDC Level 1 Strategic Flood Risk Assessment – Final Report (February 2024, p.69) explicitly states: "This table does not provide information on all Main Rivers in East Devon. Other Main Rivers within East Devon are: Grindle Brook, Wotton Brook, Withycombe Brook, Budleigh Brook, Back Brook, Snod Brook, The Gissage and Woodhayne Range." Given the known flood risks, the Brook's route through East Devon's largest settlement, and the considerable size of the proposed Exmo_20 allocation upstream, it is simply incomprehensible that this issue has been overlooked.	Exmo_20 does not extend into an area of flood risk – Withycombe Brook is beyond the site boundary to the south, so the findings are consistent with the framework in SA Report Appendix Four. Local Plan Strategic Policy AR01 ensures flood risk will not be exacerbated elsewhere. The cited table in the SFRA describes the watercourses in East Devon, rather than assessing flooding issues. SFRA report, Appendix B, shows Withycombe Brook to the west of Exmo_20 flowing out into the River Exe.

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N Humphrey B Thomas J Ojaim B Reed D Parry K Cross T Shillitoe	Turning to the Exmouth Sites Access to Services commentary (p.338), it is baffling that a distance of 1,600 metres is used as a standard when the correct figure should be 800 metres—1,600m represents a round-trip distance, not the standard walkable distance. The Government's National Design Guide and "Sustran, Walkable Neighbourhoods" both define 800m as the standard walkable distance. Furthermore, the commentary fails to acknowledge that distances should be measured from site centres, not the nearest point—a critical consideration for Exmo_20, given that the entire site spans over 800m in length. Using the 1,600m figure in this context is entirely unjustified and misleading.	1,600m is considered a reasonable upper limit for walking, as explained in the Site Selection methodology. There is no requirement for distances to be measured from site centres – the large size of Exmo_20 means that a mix of uses should be provided on site.
N Humphrey B Thomas J Ojaim B Reed K Cross	In the Exmouth Sites Connectivity and Transport commentary (p.340), the assertion that Exmo_20 is within 800m of the A376 is simply untrue. This claim is misleading and unjustified. Again, distances should be measured from the site center, not the nearest point. For a site as extensive as Exmo_20, this oversight is unacceptable. Moreover, the failure to recognize that the main access point is now onto the B3179 country road is yet another serious omission that should have been a material consideration.	The text stating Exmo_20 is within 800m of the A376 is an error. But this does not change the minor positive effect for this objective overall. The role of the SA is to appraise the sites against a framework, not to consider what the main access point could be, which is for the Local Plan itself and a future planning application. **Action: remove "within 800m of the A376" from Objective 13 commentary, 4th sentence.**
N Humphrey B Thomas J Ojaim T Shillitoe	Given these glaring inconsistencies, inaccuracies, and unjustified conclusions, it is deeply concerning that Exmo_20 continues to be considered for allocation. Alternative sites, identified as preferred within the Agenda for the 3rd September Strategic Planning Committee meeting, should be selected instead. I strongly disagree with the conclusions presented in the Exmouth Sites commentary on page 340, which states: "Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects:	Objection noted, the SA report explains the reasons for selecting and rejecting sites. The mitigation measures make clear that built development should be concentrated in the southern parts of Exmo_20, avoiding the 400m exclusion zone.

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	• Mitigate impact upon Exe Estuary and Pebblebed Heaths SPAs – to be considered in the Habitats Regulations Assessment, though for areas of Exmo_04 and 20 within 400 metres of the Pebblebed Heaths, mitigation would not be seen as possible. Exmo_04 can be amended to exclude the most sensitive area, resulting in Exmo_04a." It is entirely inconsistent and unjustified that only Exmo_04 is amended to exclude the most sensitive area while Exmo_20 remains allocated despite being within the same 400-metre exclusion zone. This selective approach lacks any reasonable justification and undermines the integrity of the site allocation process. The site allocation and settlement boundary must be repositioned 400 metres from the Pebblebed Heaths.	
N Humphrey T Shilitoe	On page 343, the reasoning for rejecting sites states: • Exmo_04b – Land at Marley Drive is rejected due to a major adverse biodiversity effect arising from its location within the 400-metre Pebblebed Heaths exclusion zone. This decision is entirely inconsistent with the allocation of Exmo_20, which is similarly located within the exclusion zone. It is illogical and indefensible to apply different standards to these two sites. The site allocation and settlement boundary must be repositioned 400 metres from the Pebblebed Heaths to ensure a fair and consistent approach.	The mitigation measures make clear that built development should be concentrated in the southern part of Exmo_20, avoiding the 400m exclusion zone.
N Humphrey	The selective and inconsistent treatment of sites, the disregard for established criteria, and the flawed assessment of alternatives render the current site allocation process at EDDC unsound and unjustified.	Objection noted, the SA report explains the reasons for selecting and rejecting sites.
B Cairns M Cairns	Exmouth is identified in the local plan as the only Tier 1 settlement designated for significant growth and development. Among the development sites allocated under SD01, Exmo_20 is the largest, with a proposal for approximately 700 homes, followed by Exmo_17, which plans for 410 homes. Consequently, Exmo_20 represents 48% of the	In exceptional circumstances, the Site Selection methodology allows sites to be considered for allocation if they are not suitable or achievable in the HELAA but agree this is not explained in the SA report itself.

Respondent	Comment	Council response and Action taken
	total housing allocation in SD01 for Exmouth, comprising 700 homes compared to 755 homes across all other designated sites. Given the substantial share of new housing attributed to Exmo_20 and Exmouth's key role in the broader local plan, the allocation of this site represents a major procedural failure. This is particularly concerning as Exmo_20 was previously deemed unsuitable during the HELAA site sifting process. Normally, a failure at an early selection stage would prevent further consideration in later assessments. Since Exmo_20 was ruled unsuitable at HELAA stage 2, it was not subject to further review: At HELAA stage 2, Exmo_20 was categorized as "not suitable or achievable." Due to this designation, it was excluded from Regulation 18 consultations. However, on 3/9/24, its status changed from "ongoing assessment" to "allocated." Despite this shift, there was no opportunity for public consultation or review by the Strategic Planning Committee, leaving the evaluation of Exmo_20 incomplete. It is highly concerning that the largest proposed development within the only Tier 1 settlement has not undergone full scrutiny. This omission undermines the credibility of the plan. Given the scale of the project, its critical role in Exmouth's development, and Exmouth's overall importance in the region, it is essential that the full planning process is properly followed and its conclusions upheld.	**Action: SA report, preceding Figure 2.4, add the following text "In exceptional circumstances, sites may be 'reasonable alternatives' despite not meeting the criteria below – such cases will be clearly justified."** **Action: Appendix Six, Exmouth section, state that Exmo_20 is a reasonable alternative despite being unachievable in the HELAA, because it is considered that access, minerals, and proximity to the Pebblebed Heaths issues can be addressed; and the spatial strategy for significant development at Exmouth.** Exmo_20 was subject to public consultation in the Draft Local Plan consultation, November 2022 – January 2023.
J Hamill N Humphrey B Thomas	In addition p 329 states "The reasonable alternatives listed above have all been assessed (it doesn't say by whom) as "suitable", "available" and "achievable" in the HELAA. Of the Exmouth sites listed Exmo_03, Exmo_08, Exmo_20, Exmo_47 and Lymp_10 are all on the HELAA Appendix E (v) 1 - Available housing sites - NOT Suitable or Achievable. Clearly on this basis none of these sites should have been Allocated. The HELAA was prepared in November 2022 and the sustainabbility	In exceptional circumstances, the Site Selection methodology allows sites to be considered for allocation if they are not suitable or achievable in the HELAA but agree this is not explained in the SA report itself.

Respondent	Comment	Council response and Action taken
	Appraisal report in February 2025, clearly those producing the 2025 document hadn't even bothered to check the 2022 before making this claim. The evidence of this is in the EDDC Evidence Library for the current Consultation.	**Action: Appendix Six, Exmouth section, Exmo_03 is a reasonable alternative despite being unsuitable in the HELAA, because the yield could meet the five-dwelling threshold.** **Exmo_08 is a reasonable alternative despite being unachievable in the HELAA because it is considered there is potential to access the site.** **Exmo_20 is a reasonable alternative despite being unachievable in the HELAA because it is considered that access, minerals, and proximity to the Pebblebed Heaths issues can be addressed; and the spatial strategy for significant development at Exmouth.** **Exmo_47 is a reasonable alternative despite being not suitable in the HELAA as the Registered Historic Park and Garden designation on this site was removed after publication of the HELAA.** **Lymp_10 is a reasonable alternative despite being unachievable in the HELAA due to TPO coverage limiting necessary improvements to Hulham Road. It is considered the loss of TPO trees is outweighed by the benefits of allocating the site, given the spatial strategy for significant development at Exmouth.**

Respondent	Comment	Council response and Action taken
N Humphrey	On page 346 it states that 'The reasonable alternatives listed above have all been assessed as suitable, available and achievable in the HELAA'. The list it refers to is of the sites for Axminster. It should be noted that Axmi_10 is on the HELAA Appendix E(v)1 - Available housing sites - Not suitable or achievable. WHICH DOCUMENT IS CORRECT?? I was under the impression that as the HELAA was produced in November 2022 that the February 2025 Sustainability Appraisal Report would have checked this sort of detail before making such a claim.	The yield in the HELAA is four dwellings which is below the five dwelling threshold in the HELAA, meaning it is categorised as not suitable. However, as the Axminster Site Selection report explains, the standard density has been increased to reflect its urban location near to the town centre, meaning a yield of 10 dwellings. Agree this is not explained in the SA report itself. **Action: Appendix Six, Axminster section, explain that Axmi_10 is a reasonable alternative despite being not suitable in the HELAA, because of an increase in its density to reflect its urban location near to the town centre that takes it above the five dwellings threshold.**
J Hamill N Humphrey	Furthermore p 357 states "The reasonable alternatives listed above have all been assessed as "suitable, available and achievable" in the HELAA. The list it refers to is of the sites for Honiton, it should be noted that site GH/ED/39 is on the HELAA Appendix E (v)1 - Available housing sites - NOT Suitable or Achievable. As above the HELAA report was produced in November 2022 and the Sustainabilty Appraisal Report in February 2025 - see EDDC Evidence Library for the 2025 Regulation 19 Consultation.	In exceptional circumstances, the Site Selection methodology allows sites to be considered for allocation if they are not suitable or achievable in the HELAA but agree this is not explained in the SA report itself. **Action: Appendix Six, Honiton section, explain that GH/ED/39 is considered a reasonable alternative despite being not achievable in the HELAA, because of known developer interest and it is considered there is potential to overcome highways constraints.**
J Hamill N Humphrey	The same as above applies on p394 Sidm_29, comments above about HELAA, the SAR and the Evidence Library apply.	Sidm_29 was not suitable or achievable for housing in the HELAA, but it was achievable for

Respondent	Comment	Council response and Action taken
		employment. The SA report states that Sidm_29 was considered for employment. **Action: Appendix Six, Sidmouth section, explain that Sidm_29 was not suitable or achievable for housing in the HELAA, but it was achievable for employment.**
J Hamill N Humphrey	The same as above applies on p 406, Brcl_29, comments above about HELAA, the SAR and the Evidence Library apply.	In exceptional circumstances, the Site Selection methodology allows sites to be considered for allocation if they are not suitable or achievable in the HELAA but agree this is not explained in the SA report itself. **Action: Appendix Six, Broadclyst section, explain that EDDC Officers consider there is potential to access Brcl_29, contrary to published HELAA.**
J Hamill N Humphrey	Similarly pp 450,502,587 & 594 referring to sites in Beer, Feniton, Westclyst & West Hill, comments above about HELAA, the SAR and the Evidence Library all apply.	In exceptional circumstances, the Site Selection methodology allows sites to be considered for allocation if they are not suitable or achievable in the HELAA but agree this is not explained in the SA report itself. **Action: Appendix Six, Beer section, explain that Beer_01 is a reasonable alternative despite being unachievable in the HELAA because of limited alternatives in Beer, where the spatial strategy supports development.**

Respondent	Comment	Council response and Action taken
		Action: Appendix Six, Feniton section, explain that Feni_15 is a reasonable alternative despite being unachievable in the HELAA, as it is considered that minerals constraints on this site can be addressed. **Action: Appendix Six, Westclyst section, explain that Polt_07 is a reasonable alternative despite being unachievable in the HELAA, as an identical site (Polt_03) previously included in the HELAA states the site is achievable.** **Action: Appendix Six, West Hill section, explain that West_14 is a reasonable alternative despite being unachievable in the HELAA, as Devon County Council removed their minerals objection after publication of the HELAA.**
J Hamill N Humphrey K Cross	In addition the February 2025 SAR is in conflict with the November 2022 SAR in relation to Allocated Sites Exmo_20 & Exmo_46. See pp251 - 268 and specifically p253 of the November 2022 Report in particuliar Exmo_20 was deemed available BUT NOT "Achievable or Suitable" in the November 2022 HELAA and therefore ineligible for Consultation at Reg 18. The only site associated with Exmo_20 but only deemed suitable as a second choice was Exmo_46 and therefore thsi was the only site that could possible be considered at Reg 18 stage. For totally inexplicable reasons Exmo_46 was completely ignored. The validity of Exmo_46 can be seen by referring to Evidence documents for the Reg 18 Consultation ie the relevant HELAA, SAR and the "Exmouth Sites - additional sites" document. Completely incorrectly two new sites were created by EDDC	The SA Report (page 330) states that Exmo_46 is not a reasonable alternative as it overlaps with Exmo_20. Exmo_20b was subject to consultation as a “second choice” site in the Draft Local Plan (November 2022) and is almost the same site as Exmo_46. Exmo_20a was consulted on as a “rejected” site in the Draft Local Plan consultation. The SA Report (page 342) explains that Exmo_20 is preferred as it is consistent with the spatial strategy, generally well-screened which minimises landscape impact so long as development is

Respondent	Comment	Council response and Action taken
	Exmo_20a & 20b and appeared on maps produced to the Strategic Planning Committee in 1/11 2022, it has not been possible to find out from EDDC who created Exmo_20a & 20b, under which authority or why. From the minutes of this meeting (available on EDDC website) no discussion was held on these newly created entities, although the Reg 18 Consulation started just 6 days later. Therfore it is patently obvious that there is no legitimate reason for Exmo_20, Exmo_20a or Exmo_20b to be included in the Reg 18 and therefore no legitimacy for their inclusion in the SPC meeting of 3/9/2024 when they were incorrectly Allocated. By following this evidence and logic Exmo_20 is incapable of being included in the Reg 19 Consultation.	predominantly in the central and southerly parts of the site. Exmo_20 offers significant development at the only Principal Centre in East Devon.
J Hamill N Humphrey	Additionally it is stated in pp11/12 that "4. Climate change and carbon emmisions . (Encourage) Development that minimises the need to travel by providing access to public transport and cycleways. Exmo_20 is in direct and specific opposition to this policy as the main access to the site for 700 + houses is away from Exmouth via the B3179, more than 7 km from Exmouth centre. The town centre of Budleigh Salterton is 3km fro the site access point, this site is in effect an alloactaion to a tier 3 settlement.	Local Plan policy SD01 makes clear that vehicle access for modest levels of development will be allowed for southern parts from the road 'Southern Wood', with primary access from the B3179. High quality sustainable travel links are required into Exmouth. Note the distance to the town centre, but disagree the site is in effect an allocation at Budleigh Salterton.
J Hamill N Humphrey	Lastly p13 point 13 - Connectivity and Transport the policy requires a reduced reliance on car use and an increased take up of cycling and walking together with having no impact on local raod networks thus reducing congestion. Exmo_20 is a direct rejection of these policies, the main access will be onto the B3179 (see above) Walking and cycling are not feasible due to the steepness of the site and the fact B3179 is already overcrowded and dangerous.	The SA Report notes mitigation measures for Exmo_20 in the form of sustainable travel links and a mix of uses on site.
J Ojaim B Thomas	On page 11/12 it states "4. Climate change and carbon emissions. Development that minimises the need to travel by providing access to	The SA Report notes mitigation measures for Exmo_20 in the form of sustainable travel links

Respondent	Comment	Council response and Action taken
	public transport, cycle." Allocation of Exmo_20 would not minimise the need to travel, as it is in an unsustainable location around 4km from amenities and therefore it is not in any way going to minimise need for travel by car. Other sites, shown as preferred within the Agenda for the 3rd September Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20.	and a mix of uses on site. Whilst the town is around 3km away, there are facilities closer to the site, on Salterton Road for example.
J Ojaim B Thomas K Cross E Glanfield T Shillitoe	The Sustainability Appraisal Framework must explicitly reference the Mitigation Hierarchy, which prioritizes avoidance over mitigation. This structured approach to managing environmental impacts is firmly established in several key pieces of legislation, including: 1. The Environmental Impact Assessment (EIA) Regulations (2017) 2. The Environment Act 2021 3. The National Planning Policy Framework (NPPF) 4. The Conservation of Habitats and Species Regulations 2017 (Habitats Regulations) 5. Defra's Biodiversity Metric and Biodiversity Net Gain Guidance Failure to integrate the Mitigation Hierarchy into the site selection methodology or process is inconsistent with national policy and, therefore, fundamentally unsound. Alternative sites, identified as preferred within the Agenda for the 3rd September 2024 Strategic Planning Committee meeting, should be allocated instead of Exmo_20.	The SA Report is consistent with the Environmental Assessment of Plans and Programmes Regulations 2004 in identifying the measures to prevent, reduce and as fully as possible offset any significant adverse effects on the environment. The SA Report (page 342) explains why Exmo_20 is preferred.
J Ojaim D Parry	Distances should be taken from central points of sites. Exmo_20 is a vast site stretching over a long distance top to bottom. It is crucial that the central point is used for distance measurements rather the nearest points. Distance measurement is used innacurately and in a misleading way several times with reference to Exmo_20 in the Local Plan, making it unjustified and unsound. The site access point is at the most northern point of Exmo_20; having used distances from the most southern parts - on a site approx 800m long, makes a material difference to the proposal and makes the allocation of Exmo_20 unjustified and unsound.	There is no requirement for distances to be measured from site centres – the large size of Exmo_20 means that a mix of uses should be provided on site.

Respondent	Comment	Council response and Action taken
C Goodyear	Sd23 Otto 01 The allocation of housing, (10 proposed dwellings), would have a detrimental affect on the character of Otterton village and it's landscape. This site houses various wildlife species, notably bats and newts. It provides a natural habitat for birds and to build on it would effectively remove an important wildlife corridor. There are other less sensitive sites within the village boundary which should be considered.	The SA Report notes negative effects on the landscape and biodiversity for Otto_01, and includes mitigation measures to address these. The SA Report explains why Otto_01 is preferred over the alternatives at Otterton.
C Goodyear	Site allocation SD23 Otto 01. This land has been known to suffer erosion in the past. The burden of housing would seem inappropriate und u sustainable. Drainage and flooding onto nearby, lower positioned properties is a huge concern. There are other sites around Otterton which would be more economic to develop and more sustainable for the future.	There are no significant flooding or drainage issues at Otto_01, but any issues can be adequately addressed through the planning application process in accordance with specific Local Plan and national policy.
P Bridge	Paragraph 12 states that the Axe Valley is an SAC. This is a high level European water quality designation. The section from the confluence with the Blackwater to Colyton Bridge is also an SSSI under the UK legislation which requires further consideration above just nutrient levels. Paragraphs 12-14 include specific references to water quality and levels in the River Axe and indicate that building may not be possible due to these factors, but do not also consider the SSSI status of the lower section of the river where it flows through Axminster. The potential for flooding in the Axe vally is also mentioned in paragraphs 35 and 37. The development of green field sites around Axminster will inevitably lead to less surface water retention and greater run-off into the River Axe. These factors do not appear to have been considered in the site selections at Axminster where sloping sites directly adjoining current high flood risk areas have been chosen. Paragraph 45 considers negative effects on biodiversity and this is of particular concern at trhe Axminster greenfield sites where development of open grassland and associated hedgerow loss can only be predicted	The SA Report, Appendix Six, identifies the likely significant effects, mitigation measures, and reasons for choosing and rejecting sites at Axminster. This includes commentary on biodiversity, flood risk and water quality issues.

Respondent	Comment	Council response and Action taken
	to have a negative effect on biodiversity and will not result in the legally required 10%BNG given in paragraph 47. There appears to be no consideration of the range and extent of habitat required by protected species and preservation of bat roosts at Beer or the otters in the Axe rely on their surrounding habitats to be maintained. Sites selected at Axminster include some known to form part of the Beer Quarry bat range (admitted in the evidence document, but other protected and priority species in the area including otters, Golden dormice and Oak polypores have not been mentioned. Paragraph 55 implies that negative effects on water quality, flooding and buidiversity were considered in site selection but the site descriptions for Axminster sites do not appear to have have attached any weight to these and some of the rejected sites have less negative constraints. There would appear to be a lack of justification for the current site selections and the constraints given in paragraphs 12,13,14,35, 37 and 45 would prevent development at most of the Axminster sites if they were aplied to them.	
S Meller	The SA is clearly not sustainable. Before building up new areas we should first of all make sure all council flats/houses are used .Buildings/flats which stand empty need to be compulsory purchased and sold/rented out . The purchase of 2nd hoes needs to be limited to a minimum. If new developments need to be build , apartment blocks with affordable 1-2 bedroom flats to buy or rent should be prioritised over developments of individual houses. Developments should not be granted outside settlement boundaries or on areas of National Landscape	The SA Report has considered the likely significant effects of the Local Plan on a range of issues, including land resources and the landscape.
H Roulson	Please can we consider rain water collection for new builds to be used in toilet flushing. Also instead of tarmac or concrete drives, please use water permeable surfaces to reduce run off and flash flooding.	The SA Report has considered the likely significant effects of the Local Plan on a range of issues, including water resources and flood risk. The Local Plan includes policy AR02 relating to water quality and efficiency.

Respondent	Comment	Council response and Action taken
M Elms	This seems to be a thorough appraisal of the area.	Support noted.
M Thurgood	PARAGRAPH 34, Non-Technical Summary: There appears nothing in the draft plan to support this assertion and its delivery. To advance Ottery St Mary as an example, there are currently no sustainable travel options that mitigate against the use of private cars: and there is nothing in the draft local plan to address the matter. Ottery St Mary has no fast link to the principal employment sites of Exeter, the airport and its related employment sites. There is no rail station and bus services are infrequent and very slow: but there is no draft policy or other proposal in the draft plan to address the point such as regular limited stop bus services to key employment locations and other major East Devon towns. (Similar issues no doubt arise at other larger settlements). On a smaller scale, there are no proposals in the draft local plan to eliminate shorter journeys by motor vehicles to and from the existing larger settlements. Again, to take Ottery St Mary as an example, there are no safe pedestrian and cycle links between the town centre and the smaller outlying settlements (Alfington, West Hill, Tipton St John, Wiggaton, etc) served by the Town's facilities (and, in the case of Ottery St Mary, a failure to address an essential safe link between the Town and the major employment and retail hub at the garden centre). The current narrow country lanes are considered by the overwhelming majority of people as unsafe for walking and cycling: but the draft local plan fails to address the matter. A policy of providing segregated pedestrian and cycle routes to address such matters is essential, not least on grounds of safety, 'Zero Emissions' and the promotion of thriving service centres in the smaller towns. (Such provision will also address the travel needs of an aging population as more mechanised disability vehicles come into use). To identify edge of development housing sites but fail to identify	Disagree, Ottery St Mary does have sustainable travel options, including a regular bus service (approximately every half hour) to Exeter in one direction and Honiton in the other. The SA Report, Appendix Six, identifies the likely significant effects, mitigation measures, and reasons for choosing and rejecting sites at Ottery St Mary. Mitigation measures include walking/cycling links, reflected in Local Plan policies.

Respondent	Comment	Council response and Action taken
	how sustainable travel will be secured is unacceptable and must be addressed if a case is to be made out for such developments.	
M Thurgood	PARAGRAPH 48, Non-Technical Summary: Your proposed development maps do not show pedestrian and cycle links off-site: while such provision is clearly essential, a failure to indicate where such might be located simply fails to address the impossibility of its provision, as is clearly demonstrated by your proposals for Ottery St Mary and the Town's recent past experience. (No doubt the same can be said for other existing larger Towns). The matter must be positively and practically addressed in the Local Plan: it is not sufficient merely to raise the point but not address its resolution.	The SA Report, Appendix Six, identifies the likely significant effects, mitigation measures, and reasons for choosing and rejecting sites at Ottery St Mary. Mitigation measures include walking/cycling links, reflected in Local Plan policies and to be delivered through development, as appropriate.
M Thurgood	Provide a mix of uses on-site statement is incorrect and highlights a major deficiency in the draft plan, that is, the provision of increased community facilities at the smaller towns where significant development is proposed. To advance Ottery St Mary as an example, the Town has experienced some 25% growth in dwellings in recent years (against a planned expansion of around 8%) but no additional community facilities have been provided. A further significant increase is proposed in the draft local plan but no increase in community facilities (other than schooling) has been identified and no land has been allocated for such use. (No doubt the same can be said for other larger towns). Simply to identify and provide for housing needs is unacceptable without also identifying how increased community facilities (for example, public transport, health and recreation, etc) can and will be provided.	The SA Report appraises access to community facilities and includes mitigation measures to ensure good access to community facilities, reflected in Local Plan policies.
M Thurgood	PARAGRAPH 50, Non-Technical Summary: The text at [A] makes an assertion that is not supported by the fact. To give but one example, Ottery St Mary has limited jobs and most people commute to Exeter by unsustainable means, services (such as health	Ottery St Mary has a range of jobs commensurate with its position as a Main Centre in the Local Plan Spatial Strategy. The SA Report identifies the likely significant effects of the reasonable alternatives for the Spatial Strategy, and includes

Respondent	Comment	Council response and Action taken
	and etc) are stretched to beyond capacity and facilities (such as parking spaces, recreational land and the like) are limited. Crucially, the draft plan proposal does not make out the case for the 'preferred option' that it selects, that is development at existing settlements with the remainder provided in the West End and Exeter. Indeed, by stating that focusing development where there is good connectivity in close proximity to a much wider range of jobs, services, and facilities in the West End and Exeter, the draft Local Plan overwhelmingly makes the case for the option of focusing development almost wholly in the West End and Exeter and not the existing settlements. The text at [B] simply supports and reinforces the point that development close to Exeter and in the West End is the overwhelmingly logical choice: and that development at existing larger settlements is second best and fails to address the crucial issues that now face us, not least the climate emergency, Zero carbon, and the like.	the reasons for choosing and rejecting each reasonable alternative.

Appendix Two: Relevant Plans, Policies and Programmes

International

European Union (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 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 – these are reflected in legislation and policies prepared at a national and local level, as outlined below. Following the UKs 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.

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, December 2023) is particularly important, setting out the Government's planning policies for England and how these should be applied.[18] 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, on a wide range of topics.

[18] An updated NPPF was published in December 2024, but the East Devon Local Plan will follow the transitional arrangements and be examined against the December 2023 version.

The Climate Change Act 2008 was the first legislation in the world to provide a comprehensive framework to tackle global warming. This Act was amended in 2019 to commit the UK to net zero emissions by 2050. The Carbon Budget Delivery Plan (2023) explains how the legally binding climate goals will be met. The UK Climate Change Risk Assessment 2022 outlines the Governments' position on key climate change risks and opportunities, comprising 61 in total. The eight risk areas for action in the next two years includes risks from increased exposure to heat in homes and other buildings, climate-related failure of the power system, and risks to soil health.

The Environment Act 2021 provides long-term protection and recovery for the UKs natural environment, part of the delivery of the Government's 25-year Environment Plan (YEP). 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. The Environment Improvement Plan 2023 for England is the first revision of the 25 YEP, setting out how the Government will work with landowners, communities and businesses to deliver each of the goals for improving the environment. Section 41 of the Natural Environment and Rural Communities Act 2006 and the UK Biodiversity Action Plan identify priority habitats and species. Section 245 of the Levelling Up and Regeneration Act 2023 amended the duty for relevant authorities (which includes East Devon District Council) from "have regard to" to "seek to further" the purpose of conserving and enhancing AONBs (now known as National Landscapes).

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) and SA/SEA advice note 8. 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.

The Government's 'Plan for Change' (December 2024) contains missions relating to growing the economy, an NHS fit for the future, safer streets, opportunity for all, and making Britain a clean energy superpower.

Several national guidance documents provide further detail on achieving high quality design, 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 2024-28 sets out four key priorities, relating to the right homes in the right places, with appropriate infrastructure, a sustainable environment moving towards carbon neutrality, a vibrant and resilient economy, and a well-managed, financially secure council. 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. In line with the East Devon Abstraction Licensing Strategy and Water Abstraction Plan 2017, the increased demand for water supply and associated infrastructure requirements from new development should be considered. 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 National Landscape Partnership Plan 2025 – 2030 contains strategic goals relating to nature, climate, people, and place. Similarly, the Blackdown Hills National Landscape Management Plan 2025 – 2030 includes five guiding principles relating to valuing the distinctive character of the Blackdown Hills, recognising its historic environment and cultural heritage, ensuring any development is of the highest quality, ensuring a healthy rural economy, and sustainable land management. 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 (2024) identifies 26 heritage assets as being 'at risk' in East Devon – at Bicton Registered Park and Garden the absence of a masterplan to guide and inform development remains a major cause for concern. Grade II* listed Church of St Michael is adjacent to emerging Local Plan allocation Honi_07, where development should consider securing the future of the church such as community asset and through use of developer contributions. 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.

Transport infrastructure in particular has been subject to several local plans, policies and programmes. The Devon and Torbay Local Transport Plan 4[19] includes a vision that *"Transport will facilitate sustainable growth and support reaching net zero carbon by 2050 at the latest. Well-integrated, accessible and inclusive transport will improve travel choice and benefit the health and wellbeing of everyone."* This is supported by six objectives: Decarbonisation; Reliable and resilient; Easier travel; Unlock development; Greater places for people; The place to be naturally active. 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. The Devon Countywide Local Cycling and Walking Infrastructure Plan (LCWIP) contains 10 routes, three of which are entirely within East Devon: Otter Trail, Sidbury to Sidford, Beer to Axminster and Uplyme. The only route in the Countywide LCWIP that is a short-term priority is Sidbury to Sidford. The Clyst Valley and New Communities Local Cycling and Walking Infrastructure Plan (LCWIP) includes four groups of cycle route improvements: Clyst Valley Trail, Killerton and Broadclyst, Cranbrook, Local Plan new settlement

[19] Devon and Torbay Local Transport Plan 4, 2025-2040 - Roads and transport

options. In addition, an important walking route was identified from Westclyst to Broadclyst, which would benefit from some focussed improvements.

Strategic improvements to the railway network in East Devon are proposed through railway passing loops at Axminster, Honiton, and Whimple 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 emerging East Devon Local Plan:

- Housing – the West Dorset, Weymouth & Portland Local Plan (adopted 2015) favours proposals that support the long-term growth of Lyme Regis and Uplyme if necessary, given the two settlements are adjacent to each other. The emerging Dorset Council Local Plan Options Consultation (August 2025) identifies Lyme Regis (adjacent to East Devon's border) as a main centre for service provision where growth will be focussed.
- Housing – Torbay Council has submitted a Local Plan 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.
- 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 National Landscape 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 National Landscapes 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 the effects of the local plan strategy and policy choices are compared to 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.[20] 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. Sustainable development is, by its nature, a holistic concept and therefore the various themes, by implication, interact and cross boundaries.

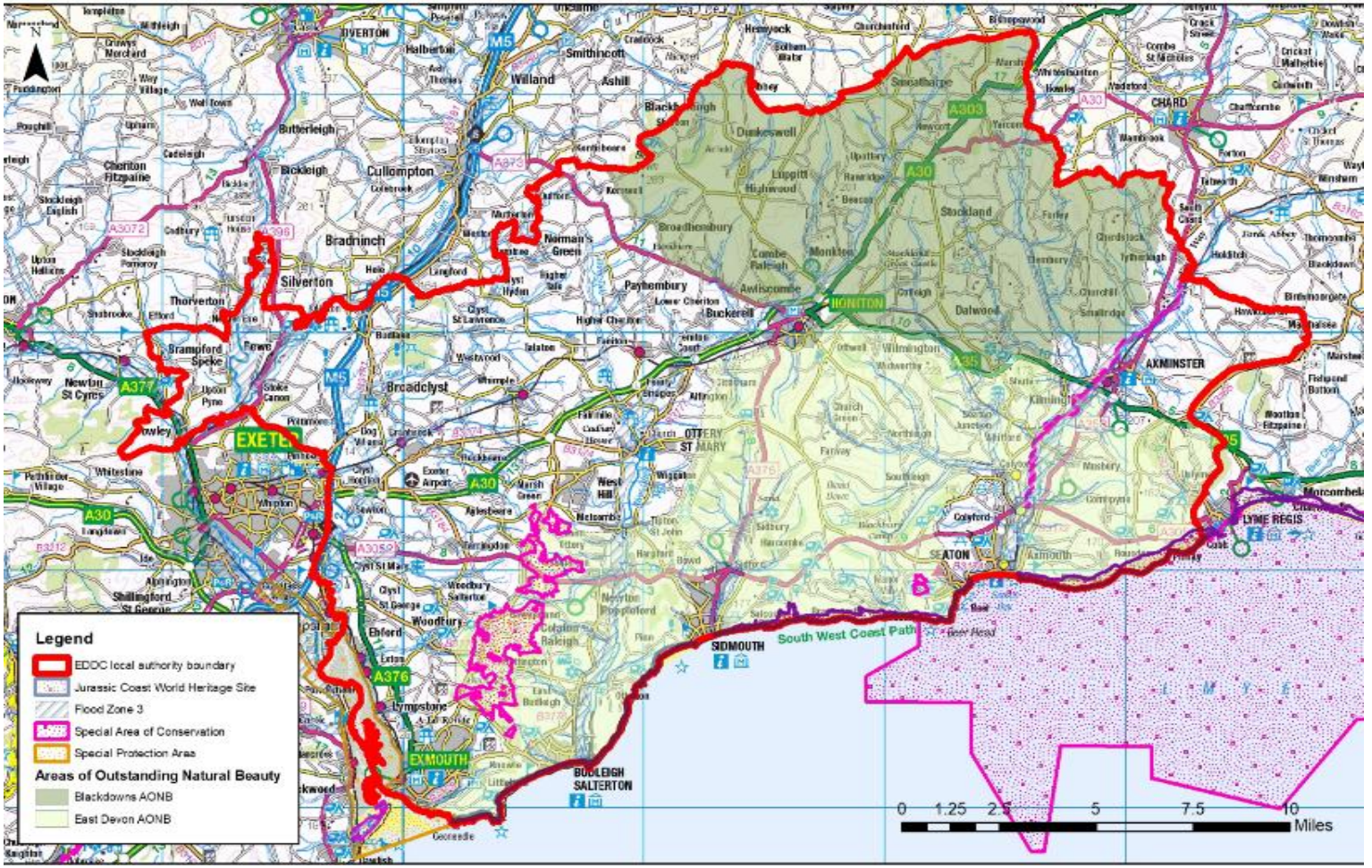
It should be noted that there are some quite marked variations in the environmental, social and economic make-up across differing parts of East Devon and this work picks up on not just an overarching East Devon wide picture but where information and data is available it seeks to drill down to smaller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

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)

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

Key environmental designations in East Devon



Biodiversity

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.

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 five SACs in East Devon, and two SPAs – namely:

- Beer Quarry and Caves SAC (rare bats);
- East Devon Pebblebed Heaths SAC (lowland heathland);
- River Axe SAC (supporting floating vegetation and rare fish); and
- Sidmouth to West Bay SAC (sea cliffs).
- Lyme Bay and Torbay SAC (reefs and sea caves).
- Exe Estuary SPA (also a Ramsar site and designated for waterbirds); and
- East Devon Heaths SPA (Dartford warbler and nightjar) – identical boundary to the East Devon Pebblebed Heaths SAC.

There are a number of other international 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 nationally designated for wildlife and/or geological interest, some of which overlap with the European sites listed above. Site conditions are regularly monitored, and are currently varied in East Devon; for example, Otter Estuary SSSI is 96% favourable; River Axe SSSI is 64% favourable, but 36% unfavourable – declining; East Devon Pebblebed Heaths SSSI is 28% favourable, 57% unfavourable – recovering, 15% unfavourable – no change or declining; and Exe Estuary SSSI is 71% favourable, but 26% unfavourable – declining, the remaining 3% is unfavourable – recovering.

There are two National Nature Reserves (NNRs) in East Devon, at the Axmouth to Lyme Regis Undercliffs; and the Pebblebed Heaths. NNRs protect important habitats, species and geology, whilst also providing 'outdoor laboratories' for research.

Marine Conservation Zones (MCZs) are a type of marine protected area that can be designated in territorial and offshore waters, protecting a range of nationally important, rare or threatened habitats and species. There are two MCZs in East Devon: the Axe Estuary and Otter Estuary.

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,[21] 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, some of which are known as 'undesignated wildlife sites'.

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, 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.

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

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

where not intensively managed) and hedgerows, trees and woodland,[22] 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.

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 Map[23] 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.

Landscape and seascape

East Devon has exceptional landscape qualities and the planning system gives great weight to conserving landscape and scenic beauty, specifically including National Landscapes (previously known as Areas of Outstanding Natural Beauty). The East Devon National Landscape falls entirely in East Devon as does most of the Blackdown Hills National Landscape, they collectively cover around 57% of the District. A very small part of the Dorset National Landscape also enters East Devon.

[22] 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.
[23] See: Rebuilding Devon's Nature Map – DBRC and Strategic Nature Areas within East Devon: OverallmapEastDevon.jpg (1753×1241) (dbrc.org.uk)

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.[24] 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.

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 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 the sea 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

[24] Dark sky map: England’s Light Pollution and Dark Skies (cpre.org.uk) ; Tranquillity map: tranquillity_map_england_regional_boundaries_1.pdf (cpre.org.uk) . Both prepared by Campaign to Protect Rural England.

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 National Landscapes; 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

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 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 list[25] and those shown on the Devon Historic Environment Record.[26] East Devon District Council has an adopted heritage strategy[27] 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.[28]

Designated Heritage assets in East Devon[29]

	East Devon
Listed Buildings	3,088 (54 Grade I, 185 Grade II*, 2,849 Grade II)
Scheduled Monuments	112

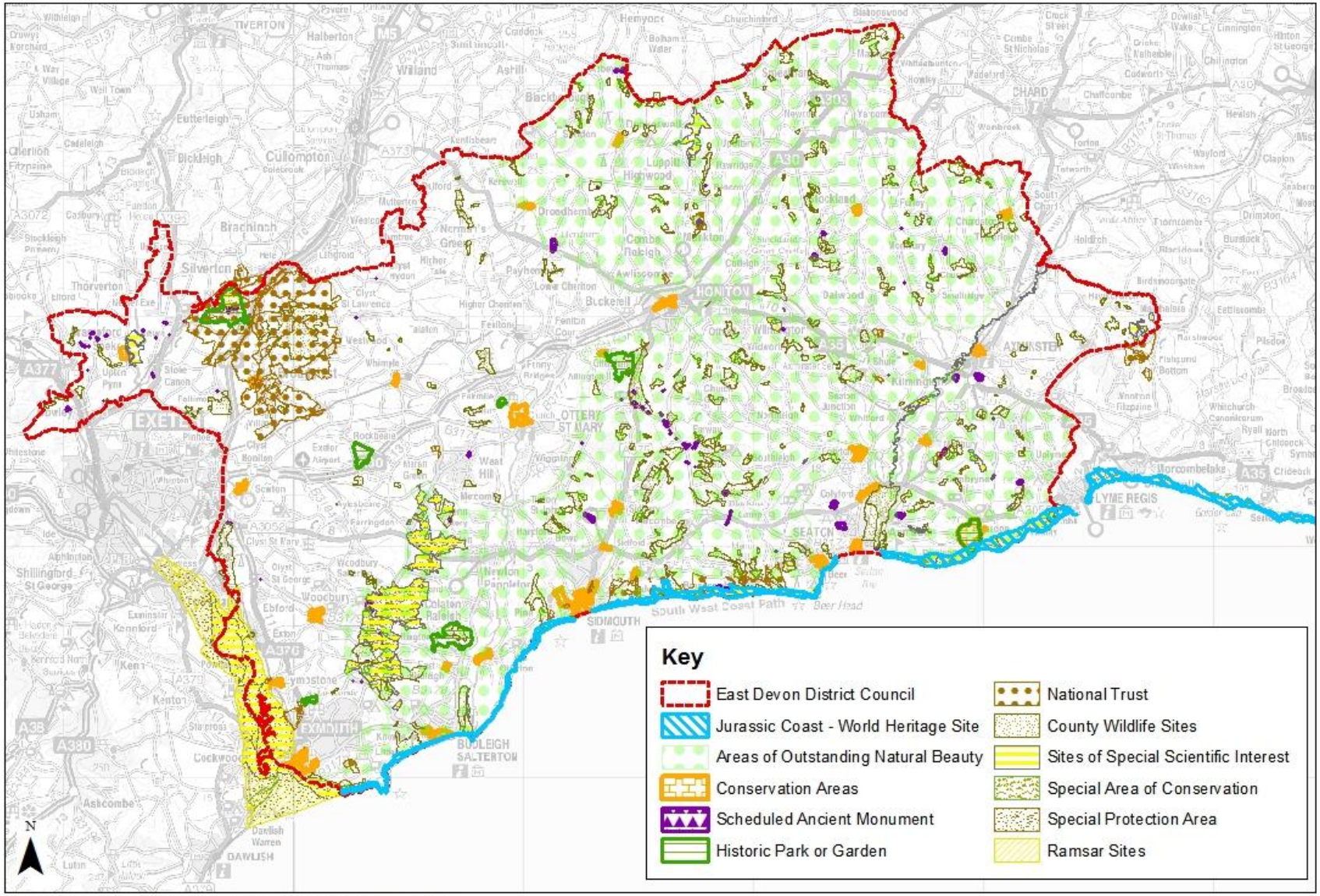
[25] East Devon local list of heritage assets east-devon-list-of-local-heritage-assets-december-2020.pdf (eastdevon.gov.uk) ; Devon Historic Environment Record Historic Environment Record (HER) - Devon County Council
[26] Historic Environment Record (HER) - Devon County Council
[27] See: https://eastdevon.gov.uk/media/3413423/final-heritage-strategy-2019-2031.pdf
[28] Available at: Conservation areas - East Devon
[29] 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)

Registered Park/Gardens	8 (1 Grade I, 1 Grade II*, 6 Grade II)
Conservation Areas	32
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 26 entries located in East Devon in the latest register (2023) – the only asset where inappropriate development is identified as being an issue, and thus relevant to Local Plan production, is at Bicton Registered Park and Garden.

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.

East Devon Heritage and Landscape designations



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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.

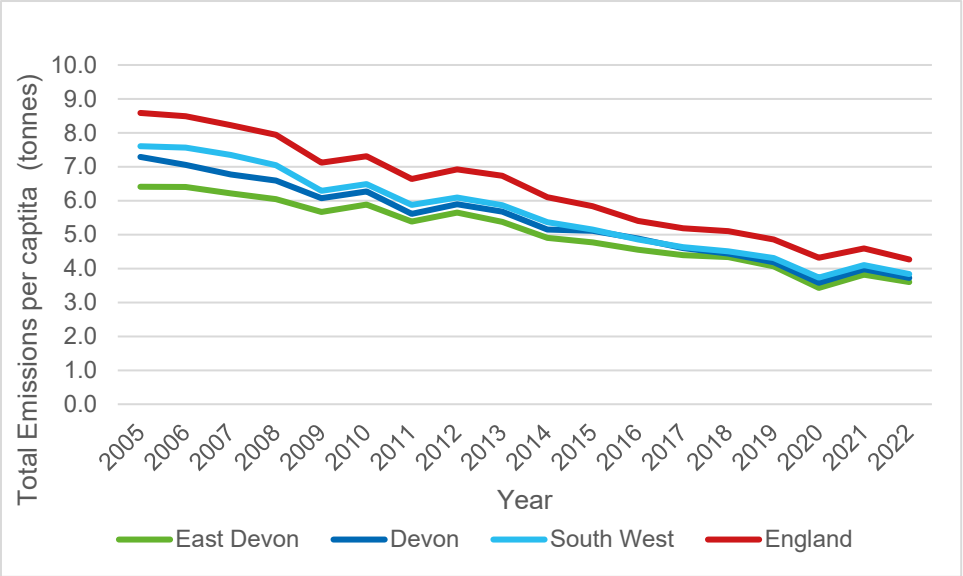
Climate change

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 (CO_2) 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 CO_2 emissions for East Devon, Devon, the South West region and England from 2005 to 2022.

Carbon dioxide emissions 2005-2022 - tonnes per capita[30]

[30] UK local authority and regional greenhouse gas emissions national statistics, 2005 to 2022: UK local authority and regional greenhouse gas emissions national statistics, 2005 to 2022 - GOV.UK (www.gov.uk)

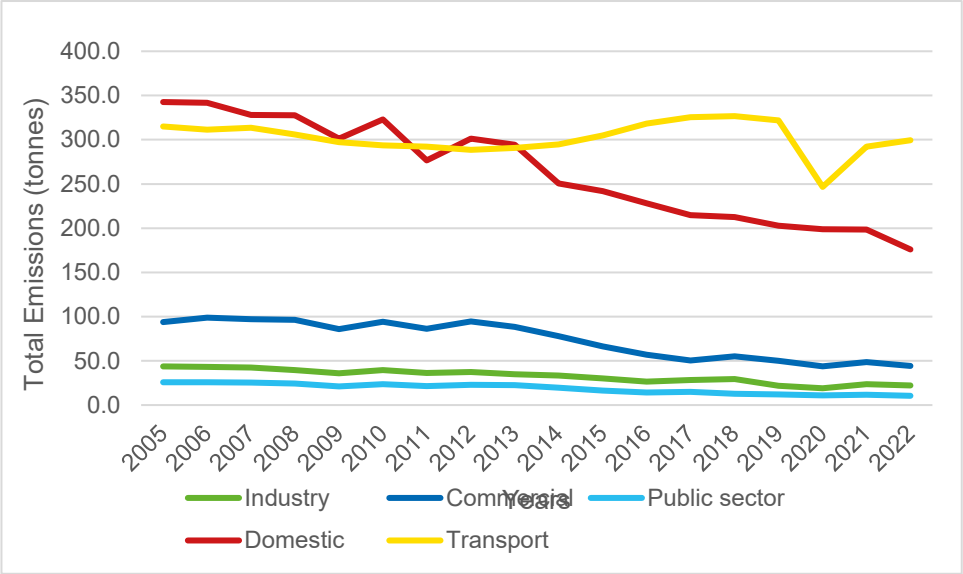


The graph shows a clear pattern of declining carbon dioxide emissions per person over the period from 2005 to 2022. It also shows emissions per person being lower in East Devon compared to Devon, South West, and England, although the gap has narrowed over recent years. In 2005 there were 6.4 tonnes per person emitted in East Devon compared to an England figure of 8.6, the South West at 7.6, and Devon at 7.3. By 2022 the differences between East Devon, Devon, regional and national level were much closer, with comparative figures ranging from 3.6 tonnes per person to 4.3 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 2022, broken down into five sectors. Emissions from all sectors have reduced, but to varying degrees. Commercial emissions have fallen by over half, whilst transport, the biggest emitter, has only seen a slight decline (after recovering from the Covid pandemic dip) and indeed is similar to total emissions back in 2008.

East Devon carbon dioxide emissions 2005-2022 by sector[31]

[31] UK local authority and regional greenhouse gas emissions national statistics, 2005 to 2022: UK local authority and regional greenhouse gas emissions national statistics, 2005 to 2022 - GOV.UK (www.gov.uk)



Climate change adaptation

Despite efforts to reduce levels of CO_2 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 defences[32].

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 Whimple, west of Feniton, and east of Axminster.[33]

[32] See the Flood map for planning at: Flood map for planning - GOV.UK (flood-map-for-planning.service.gov.uk)
[33] Further information on the CDAs can be seen at: Planning and development - Flood Risk Management (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.

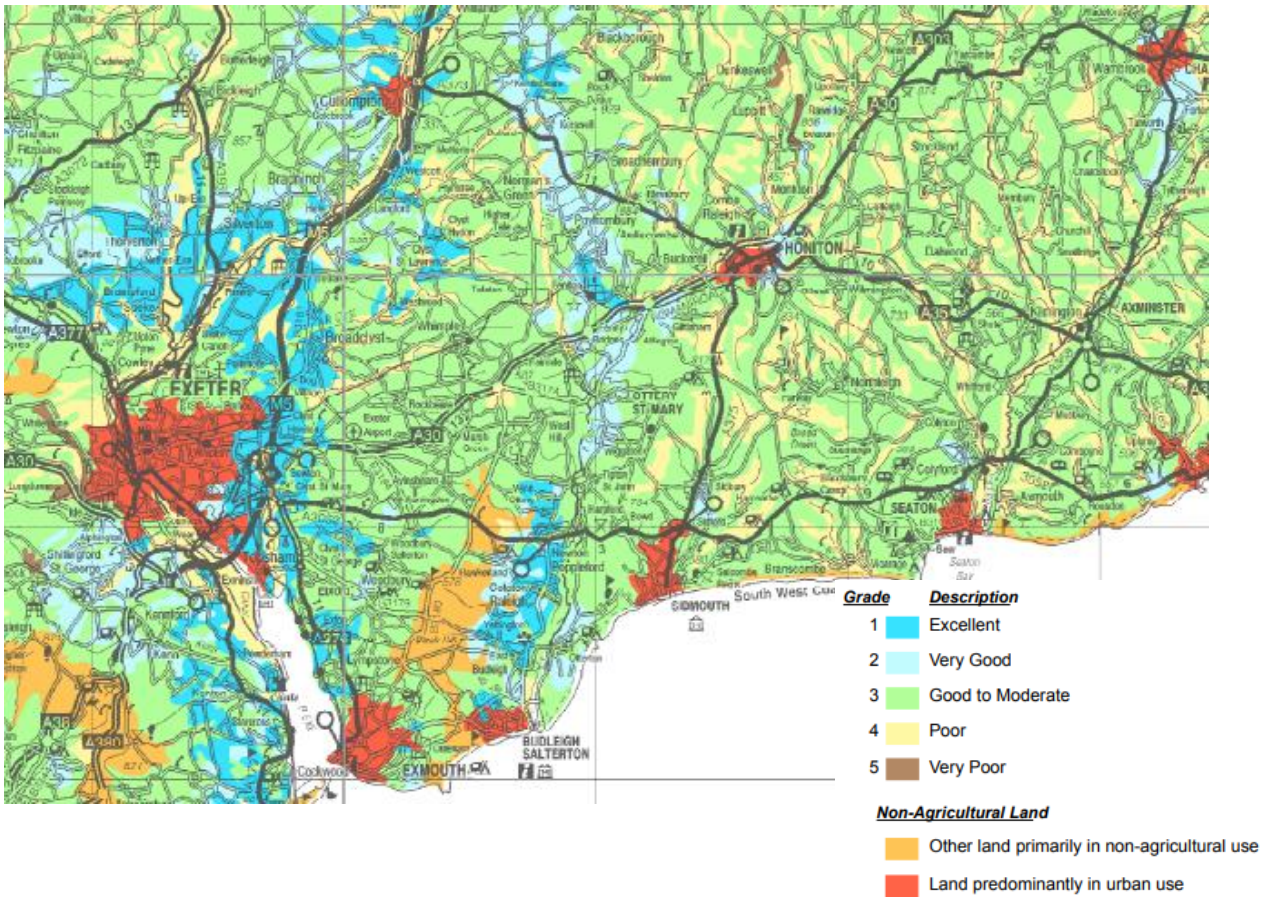
In addition, and sometimes related, to flooding concerns is the process of coastal erosion. Large parts of the coastline of East Devon is subject to erosion and work being undertaken by the University of Plymouth is mapping out projected vulnerability to loss to the sea of the coast of the District.

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 map[34]

[34] Map extract obtained from Agricultural Land Classification Map South West Region - ALC006 (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 2021 East Devon Brownfield Land Register has 28 sites totalling 25.39ha of land.[35]

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.[36]

Waste

Household waste generated per head in East Devon is among the lowest in Devon, second only to Exeter.[37] 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 (%)[38]

Area	2004/05	2011/12	2014/15	2019/20	2020/21	2021/22	2022/23
East Devon	16.4	48.5	46.3	60.5	60	61.0	59.5
Exeter	20.7	36.2	33.8	26.1	27.8	25.5	24.5
Mid Devon	17.8	49.2	48.2	53.1	53.7	53.7	55.4
Teignbridge	26.9	57.3	53.7	56.3	55.9	55.6	53.8
Devon	32.7	55.3	55.4	56.6	55.3	55.1	54.0

Water quality

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

[35] East Devon District Council's Brownfield Land Register (2021): Brownfield land - East Devon
[36] MSAs can be seen in the Devon Minerals Plan Policies Map: Minerals and waste policy - Planning (devon.gov.uk)
[37] Waste Performance Statistics 2022 23.pdf (devon.gov.uk)
[38] Sources: Devon Waste Plan 2014; Devon Waste & Resource Management Strategy Review & DEFRA (2015) Local Authority Collected Waste Statistics – Local Authority Data; Waste Performance Statistics 2022 23.pdf (devon.gov.uk)

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. High levels of nutrients are a major reason for East Devon's rivers failing to meet Good Ecological Status. The East Devon Management catchment (which extends beyond the district's boundaries) includes 80 river waterbodies reported on under the Water Environment Regulations (WER) and 3 WER transitional waterbodies. 79 of the river Waterbodies have a 2019 classification for phosphate. Of these 79 waterbodies the status in respect of phosphate is a follows: • 7 are at High status • 19 are at Good status • 45 are at Moderate status • 8 at Poor status for phosphate. The Exe Transitional waterbody (i.e. the estuary) is at Moderate status for Dissolved Inorganic Nitrogen (DIN), while the other 2 transitional waterbodies are not assessed for this element. The River Otter is of poor ecological status and the River Clyst as moderate ecological status. The River Axe is unfavourable condition status, and 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.

The South West Water (SWW) initiative '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 parts of East Devon come from Otter Valley groundwater sources.[39] 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.

In terms of water availability for the East Devon, the Environment Agency indicates the following: • There is water available for abstraction at all flows around Exeter with the exception of the areas of Countess Weir and Topsham where fully licensed flows are below the environmental flow indicator at low flows to support the needs of the environment. There is, therefore, restricted water available. • With regards to the water availability for the areas proposed for the New Town, our evidence shows at this current time there is water available for abstraction at all flows in the new proposed areas of the New Town. • There is restricted water available at mid to low flows and no water available at low

[39] Microsoft Word - SWW draft WRMP24 chapter 2 water supply system in detail v2.0 (southwestwater.co.uk)

flows in the Otter Catchment. This covers The Upper, Middle and Lower River Otter, River Tale, River, Wolf (Otter) and River Love. There is no water available from the Otterhead Reservoir at all flows. Any new surface/groundwater abstraction will have a Hands off Flow (HoF) applied in this catchment. this area was designated a priority catchment due to its abstraction pressures and environmental sensitivity. We are working with stakeholder groups and partnerships across the East Devon catchments including the Otter Priority catchment to co-develop a co-ordinated approach to water resource planning for the next 25 years. • There is restricted water available at low flows in the Relief Channel catchment which Beer watercourse sits in. Any new surface/groundwater abstraction will have HoF or Hands off Level (HoL) applied in this catchment. • Whilst water is available within the River Yarty, Lower and Upper Axe, Cory Brook, Blackwater River and Forton Brook, and is restricted at low flows for Kit Brook, further restrictions will apply in these catchments to protect the flow requirements of the River Axe SAC in line with Common Standard Monitoring Guidance targets.

Social baseline data

Population

East Devon has a population of 158,239 people, the highest of the eight districts in Devon.[40] The 10 years from 2011 to 2021 saw significant growth, with East Devon's population growing by around 18,200 people in that time.[41] This was followed by a modest increase of 4.1% between mid-2021 and mid-2024, which was broadly in line with the average population increase of districts across the country.[42] Nevertheless, East Devon remains sparsely populated with 185.2 people per square kilometre – the England average is 433.5.[43] 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.[44]

Exmouth has by far the largest population in East Devon at nearly 36,000, over two and a half 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 7,900 to 6,700 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. Newton Poppleford is largest of the other settlements, leading a cluster of 10 settlements with around 1,500-2,000 people. Beer, Whimple, Clyst St Mary, and Kilmington all have

[40] Mid-2024 population estimates, ONS, published July 2025: Population estimates for England and Wales - Office for National Statistics
[41] Mid-2022 population estimates, ONS, published March 2022: Population estimates for the UK, England, Wales, Scotland, and Northern Ireland - Office for National Statistics (ons.gov.uk)
[42] Mid-2024 Local Authorities Population Profiles, ONS, published July 2025.
[43] Mid-2022 population estimates, ONS, published March 2022.
[44] 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)

around 1,000 people, and below this, the population of a series of smaller settlements ranges from around 240 to 800 people.[45]

Residents of East Devon are among the oldest in the country with a median age of 50.9, compared to the UK figure of 40.2. The proportion of those aged 65 plus in East Devon is 30.2%, the sixth highest of any local authority in the UK (as of 2024) and far higher than the national average of 18.9%[46] – 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%), East Budleigh and Chardstock. However in Cranbrook just 3.6% of people are over 65, and 27.8% are aged 0 to 15 (compared to the district average of 16.2%), indicating this new town is popular for families with children.[47] Cranbrook also has one of the highest proportions of working age people aged 16-64 (68.5%) – other settlements with a proportion over 60% are Exton (highest at 85.6%), Clyst Honiton, West Clyst, Brampford Speke and Broadclyst. 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, nearly three times more than 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.[48]

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.

Future population

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) leads to an increased in the housing requirement. Though other factors such as economic growth policies and job creation projections have been important in East Devon in terms of determining housing provision.

[45] Population estimates – small area based by single year of age – England and Wales, 2022, Nomis: https://www.nomisweb.co.uk/
[46] Mid-2024 Local Authorities Population Profiles, ONS, published July 2025.
[47] Population estimates – small area based by single year of age – England and Wales, 2022, Nomis: https://www.nomisweb.co.uk/
[48] Population estimates – small area based by single year of age – England and Wales, 2019, Nomis: https://www.nomisweb.co.uk/

The Local Housing Needs Assessment[49], drawing on Office for National Statistics records, notes there is a projected population increase in East Devon of 17,281 people over the 20 year period from 2020, with the population of 146,782, going up to a 2040 population of 164,063. This amounts to a projected annual average increase in population of 864 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 16 to 20 years old.

The Local Housing Needs Assessment advises of a 20 year need of 12,885 dwellings to meet projected population growth. This averages out at 644 new dwellings a year. The latest (May 2025) Government standard method local housing need equates is 1,156 new dwellings per year in East Devon. This level of house building clearly exceeds the 644 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 218 homes a year, would effectively imply an increase in net in-migration above the Office for National Statistics estimates.

Ethnicity and religion

Predominantly East Devon residents are from a white British background. The 2021 census shows that just 2.6% of the district's population is from an ethnic background, this is a slight increase on the 2011 census at which 1.59% of the population were from an ethnic background. This is very low by national standards with the England average standing at 19% but is in common with the other districts in Devon.

Christianity is the largest religion practiced in East Devon at 50.1% of residents being adherents (75,621). The largest non-Christian religion practiced in East Devon is Buddhism with 499 adherents. 63,176 people (41.9% of the population) said that they followed no religion at the 2021 Census.[50]

Housing and its affordability

There are a total of 75,116 dwellings in East Devon, of which 7,273 are considered to be affordable.[51] This proportion of affordable dwellings (9.7%) is lower than both the county (11%) and national (16.7%) average.

Census 2021 showed that around 74% of households in the District either owned their home outright or were in the process of buying it. The proportion of households owning or buying their home has fallen slightly in recent years. The proportion of household in social rented housing returned to 2001

[49] See: East Devon, Exeter, Mid Devon and Teignbridge Local Housing Needs Assessment 2022
[50] East Devon Local Authority 2021 Census Profile for areas in England and Wales - Nomis (nomisweb.co.uk)
[51] Number of dwellings by tenure and district, England, 2024, 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.

levels with 10% in 2001, 9% in 2011, back to 10% in 2021. In contrast the proportion of households in the private rented sector (or rent free) has seen a marked increase, from 11% in 1991, to 12% in 2001, 15% in 2011, up to 16% in 2021. 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.

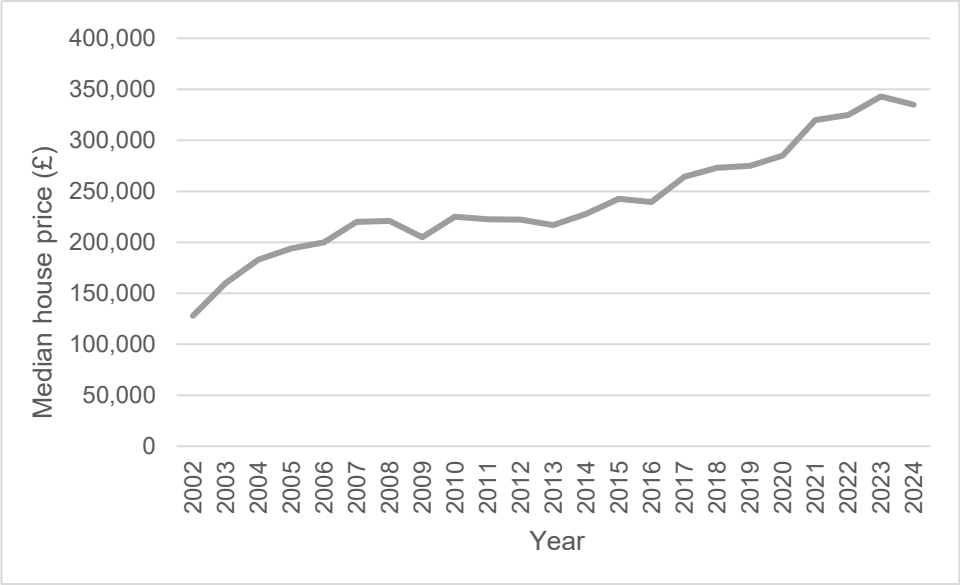
Whilst it is still a minority part of the overall market there has been a clear and growing trend of increasing numbers and an increasing proportion of households living in private rented sector housing. As the cost of buying a house has increased, and specifically so has the ratio of income levels to 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 the Local Housing Needs report states 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 prices

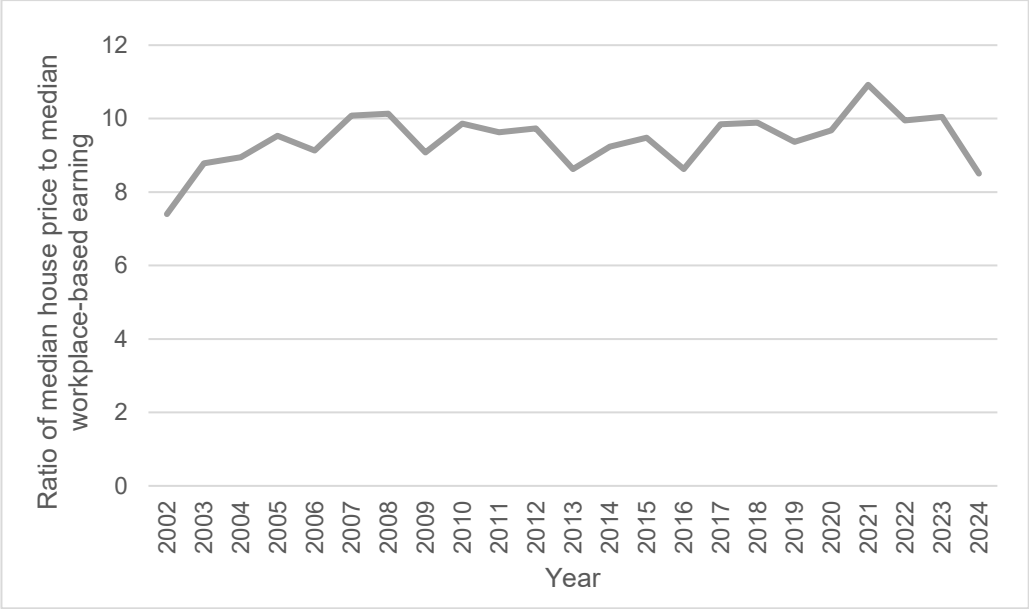
Drawing on data from 2024[52] the median house price in East Devon was £335,000, which was 8.5 times median residence-based earnings. This makes East Devon a less affordable place to buy a house than both England (7.58) and south west region (8.31). The following graphs show average house prices in East Devon since 2002, along with the affordability ratio that compares house prices to earnings. These indicate that house prices nearly doubled between 2002 and 2024, with a stable period between 2007-2016 before a steep and sustained rise from 2017-2023. House prices have dropped between 2023 and 2024 however, a trend that has been seen in many districts across the country. The affordability ratio has remained steady since a sharp rise at the start of the 2000's, with house prices fluctuating around 10 times earnings since 2005, with a slight fall between 2023 and 2024 mirroring the lower house prices. 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.

Median house price in East Devon 2002-2024

[52] House Price (existing dwellings) to residence-based earnings ratio House price (existing dwellings) to residence-based earnings ratio - Office for National Statistics (ons.gov.uk)



Affordability ratio in East Devon 2002-2024[53]



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

[53] See: House price (existing dwellings) to residence-based earnings ratio - Office for National Statistics (ons.gov.uk)

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.

The housing requirement in the East Devon Local Plan is 20,909 dwellings over the plan period 2020-42. From 2013 to 2023 there were 9,374 new homes built, an average of 937 per year.

Health

At 81.8 for males and 85.2 years old for females, the life expectancy for residents in East Devon is very high with the area ranking in the top 5% of districts in England and Wales, and is top of all the Devon districts.[54] The ward with the highest average life expectancy is Newton Poppleford at 89.3 years and the lowest is Exmouth Littleham at 79.7 Years old.[55]

The 2021 Census showed the proportion of the working age in East Devon who are economically inactive due to suffering from long-term sickness is 3.0% of the working age population, slightly below the Devon average of 3.6% and national average of 4.1%.[56]

At the 2021 census, residents were asked what their general health had been like in the past 12 months. In East Devon 81.5% of residents said that they were in good or very good health. This is below the national average of 82.2% and fourth highest out of the eight local authorities in Devon. The figure in the 2021 was a rise from the 2011 census when 79.8% of residents said they were in good or very good health, with 15.06% in fair health and 5.11% whose health was bad or very bad.[57]

Health of the resident population - self reporting 2021[58]

Location	General Health: Good/very good (pop.)	General Health: fair (pop.)	General Health: Bad/very bad (pop.)
East Devon	**81.5**	**13.7**	**4.8**
Exeter	93.8	11.6	4.6
Mid Devon	82.0	15.3	6.0
North Devon	80.4	13.9	5.7

[54] Office for National Statistics: Life Expectancy for Local Areas 2022: Life expectancy for local areas in England, Northern Ireland and Wales - Office for National Statistics (ons.gov.uk)
[55] Office for National Statistics: Life expectancy at birth 2011 Ward Level Life expectancy by census ward (ons.gov.uk) *(average between LE of both male and female taken)*
[56] Nomis ONS: Census 2021 – East Devon Local Authority 2021 Census Profile for areas in England and Wales - Nomis (nomisweb.co.uk)
[57] Nomis ONS: Census 2011 - General Health (East Devon) Data Viewer - Nomis - Official Census and Labour Market Statistics (nomisweb.co.uk)
[58] Nomis ONS: Census 2021 2021 Census Profile for areas in England and Wales - Nomis (nomisweb.co.uk)

South Hams	82.3	12.7	5.0
Teignbridge	80.5	14.1	5.5
Torridge	78.6	15.3	6.0
West Devon	80.2	14.4	5.4
National Average	82.2	12.7	5.2

The East Devon Public Health Implementation Plan 2024/25 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 overarching priorities within the Public Health Strategy 2024-27 are:

- Healthy People – focusing on health-related outcomes
- Healthy Lives – focusing on health-related behaviours and personal circumstances
- Healthy Places – focusing on the wider social, economic and environmental drivers of health

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.[59] 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, 2019[60]

Rank	LSOA Name	Ward	National Rank (1 is most deprived, 32,844 least deprived)
1	East Devon 020C	Exmouth Littleham	6,745

[59] English Indices of Deprivation 2019: https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019
[60] English Indices of Deprivation 2019 explorer: Indices of Deprivation 2015 and 2019 (communities.gov.uk)

2	East Devon 018C	Exmouth Withycombe Raleigh	10,143
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

Well-being

Well-being 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 (NO_2) arising from road traffic around the busier and more congested areas. East Devon District Council had fifty four passive monitoring sites monitored NO_2 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

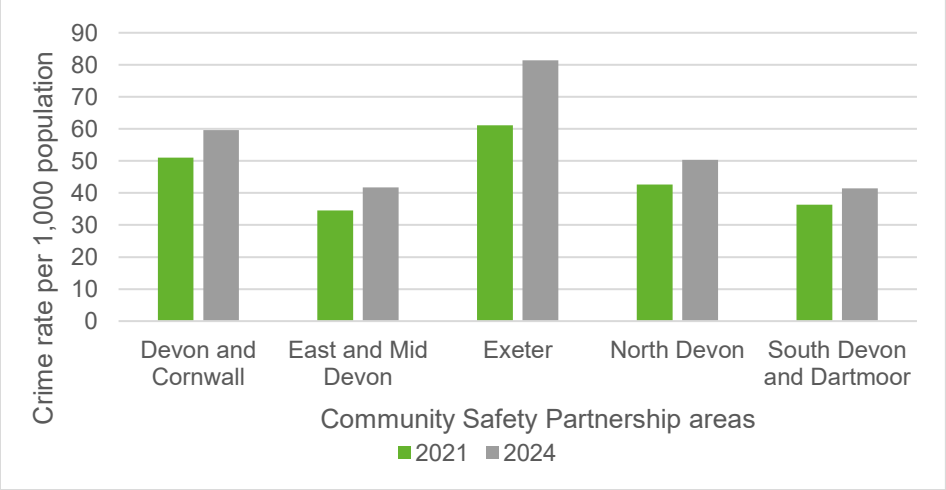
Noise pollution can also have a detrimental impact on levels of wellbeing. Urban areas tend to be noisier than rural areas though it is vehicle and traffic noise that typically generates the greatest levels of noise pollution and dwellings and other noise sensitive land uses near to main roads can see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

Crime

The combined East and Mid Devon Community Safety Partnership area has one of the lowest crime rates in Britain with 41.7 offences per 1,000 residents in the year ending March 2024. By comparison the Devon figure 59.6 and the national figure was 37.63 offences per 1,000 residents.[61]

Recorded crime per 1,000 population 2021-2024[39]



The levels of recorded crime in East and Mid Devon have risen slightly from 2021-2024, following a similar pattern to the rest of the Devon. East Devon still has relatively low rates of crime for thefts, vehicle crimes and violent crimes however, making East Devon one of the safest districts to live in, in one of the safest Police Force Areas 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 2024[62]

[61] Office for National Statistics: Recorded Crime data by Community Safety Partnership area 2024 Recorded crime data by Community Safety Partnership area - Office for National Statistics (ons.gov.uk)
[62] Office for National Statistics: Recorded Crime data by Community Safety Partnership area 2024

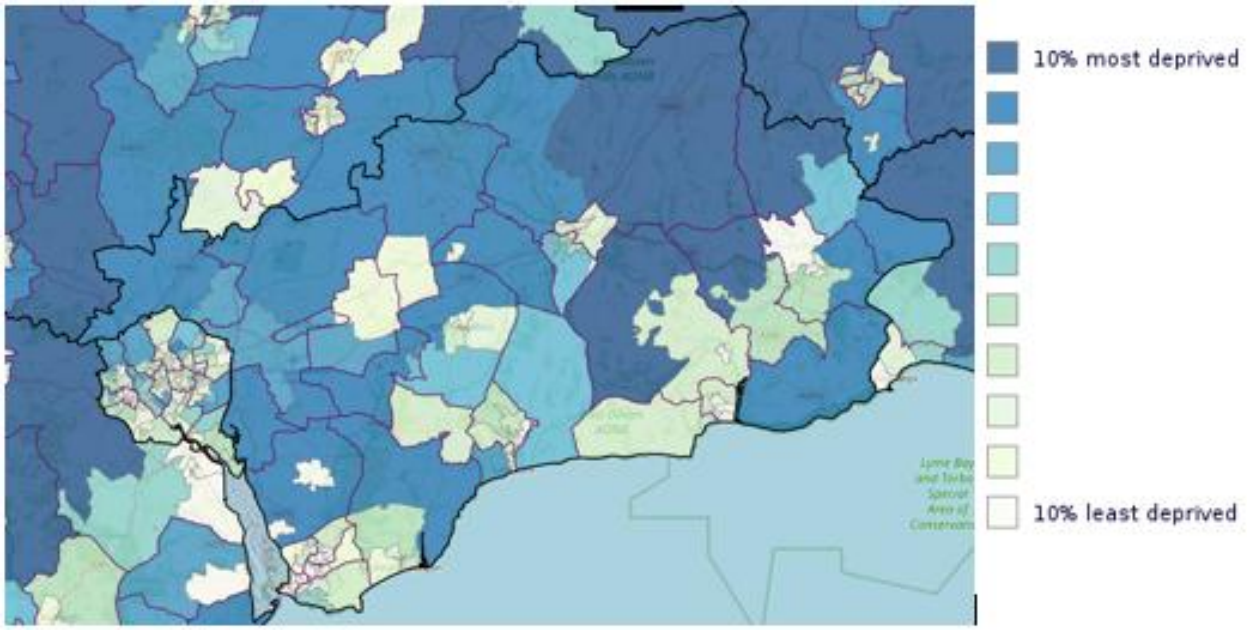
Community Safety Partnership Area	Theft offences (per 1000 pop.)	Vehicle crimes (per 1000 vehicles)	Violent crimes (per 1000 pop.)
East and Mid Devon	**8.9**	**1.5**	**19.2**
Exeter	21.9	2.8	33.5
North Devon (North Devon & Torridge)	11.7	1.7	22.7
South Devon and Dartmoor (South Hams, Teignbridge & West Devon)	10.0	1.7	22.7
Devon and Cornwall Total	14.0	2.1	26.4

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)[63]

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



Evidence[64] 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.

Budleigh Salterton, Colyton, Broadclyst, and Lympstone 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

[64] 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)

settlements have at least seven local facilities and 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 at least superfast broadband speeds, with some settlements including Cranbrook, Exmouth, Ottery St Mary and Axminster having access to Ultrafast. Whilst the majority of smaller settlements have superfast broadband (and even ultrafast in the case of Upottery, Smallridge, and Westclyst, Clyst St Mary, Whimple and Poltimore), several still have only standard broadband speeds making it more difficult to access internet services.[65]

Economic baseline data

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 similar to the South West and national average. There are a higher proportion of people aged 16-64 with at least a low level qualification (91.9%) in East Devon, than the regional (91.3%) and national average (89.0%). However, the proportion of East Devon residents with higher level qualification of RFQ4 or above (41.6%) is lower than both the regional (43.8%) and national (Great Britain) average (47.3%).[66]

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 (£682) is higher than the South West average (£664), but almost on par with the figure for Great Britain as a whole (£683). The gap between East Devon and Great Britain for weekly earnings by place of work is higher (£672 compared to £683), indicating that the jobs available in East Devon are relatively low paid.[67]

[65] Broadband speeds from the centre of the settlement, from Ofcom broadband coverage checker, accessed on 07/10/24: https://checker.ofcom.org.uk/
[66] ONS annual population survey, 2023, accessed on Nomis: Labour Market Profile - Nomis - Official Labour Market Statistics (nomisweb.co.uk)
[67] Earnings by place of residence and Earnings by place of work, ONS annual survey of hours and earnings, 2023, accessed on Nomis: Labour Market Profile - Nomis - Official Labour Market Statistics (nomisweb.co.uk)

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

Despite the lower than average wages in East Devon, it has a low claimant count of 2.1% of those people aged 16-64, compared to 2.9% across the South West, and 4.3% for Great Britain as a whole.[68]

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%.[69]

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%.[70] 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 level[71] – these jobs are often lower paid and part time. Construction is also an important sector; but manufacturing, information and communications, and finance and insurance are all less concentrated in East Devon.[72]

[68] ONS Claimant count by sex and age, August 2024, accessed on Nomis: Labour Market Profile - Nomis - Official Labour Market Statistics (nomisweb.co.uk)
[69] Office for National Statistics: GVA by NUTS 3 2014
[70] Office for National Statistics: The Business Register and Employment Survey (BRES) 2017
[71] Employee jobs (2022), Nomis: Labour Market Profile - Nomis - Official Labour Market Statistics (nomisweb.co.uk)
[72] Greater Exeter Economic Development Needs Assessment, March 2017: Evidence - Greater Exeter Strategic Plan (gesp.org.uk)

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%.[73]

Between 2011 and 2024, the total number of enterprises in East Devon grew from 5,660 to 6,825.[74] 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 2024 there were 6,825 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 Exeter[75]. There has been a slight increase in the number of VAT registered businesses in East Devon since 2018, and trend can be seen across most of Devon.

Numbers of VAT registered businesses 2024[76]

	2018	2024
East Devon	6,390	6,825
Exeter	4,105	4,385
Mid Devon	4,520	4,480
North Devon	4,920	5,080
South Hams	5,115	5,245
Teignbridge	5,755	5,865
Torridge	3,615	3,680

[73] Office for National Statistics: Inter Departmental Business Register (IDBR) 2017
[74] UK Business counts (2024), Enterprises, Inter Departmental Business Register, ONS – accessed on Nomis: Labour Market Profile - Nomis - Official Labour Market Statistics (nomisweb.co.uk)
[75] Office for National Statistics: UK business: activity, size and location 2024 UK business; activity, size and location - Office for National Statistics (ons.gov.uk)
[76] Office for National Statistics: UK business: activity, size and location 2024

West Devon	3,160	3,165

East Devon has a high number of micro and small businesses. The proportion of all businesses in East Devon that are classed as micro, with 9 or less employees is 87.1% as of 2024. 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.[77] The self-employment rate in East Devon is also high by national standards. In 2023, the self-employment rate was 11.5%, compared with 7.3% in Exeter and 9.5% nationally.[78] 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%.[79]

Labour market

In terms of labour supply, East Devon has 83,000 residents of working age (16 – 64) which is the third lowest proportion of working age people (54.6%) of any local authority in the Great Britain.[80] Of these working age people, a relatively high number (81%, equating to 67,200 people) are economically active (those who are either in employment or unemployed). Unemployment is low at 2.1% in East Devon, compared to 2.5% across the south west, and a national figure of 3.9%.[81]

As of 2022, there are around 65,000 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 0.78. This ratio has remained the same since 2011, but is below the average level in the South West (0.89) and Great Britain as a whole (0.87) with both having seen growth between 2011 and 2022.[82]

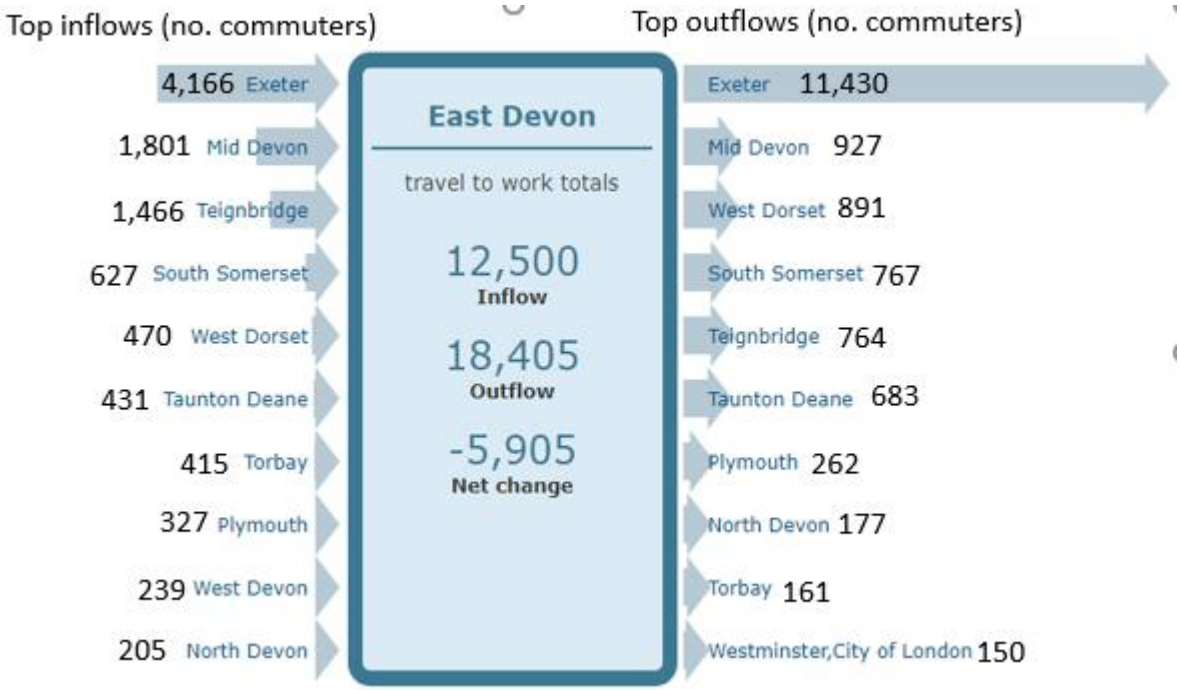
The population aged 65+ has seen a big rise of those who are economically active – in 2005 just 7% of the 65+ population were economically active, which has increased to 12.6% in 2024.[83]

The proportion of people claiming out-of-work benefits in East Devon is lower at 2.1% than the South West (2.9%) and Great Britain (4.3%) average. Similarly, unemployment rates are slightly lower in East Devon (2.1%) than the South West (2.5%) and Great Britain (3.9%) average.[84] 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.

[77] Office for National Statistics: UK business: activity, size and location 2024
[78] Office for National Statistics: (TS066) Economic activity Status (2023), data extracted on Nomis 07/10/24 TS066 - Economic activity status - Nomis - Official Census and Labour Market Statistics (nomisweb.co.uk)
[79] Office for National Statistics: UK business: activity, size and location 2018
[80] Mid-2021 population estimates, ONS, accessed on Nomis Labour Market Profile - Nomis - Official Census and Labour Market Statistics (nomisweb.co.uk)
[81] Office for National Statistics: Labour Market Profile Employment and unemployment (Apr 23-Mar 24), accessed on Nomis Labour Market Profile - Nomis - Official Labour Market Statistics (nomisweb.co.uk)
[82] Jobs density, Nomis, 2022.
[83] Office for National Statistics: Annual Population Survey, accessed on Nomis 2024
[84] ONS claimant count, Aug 24; Employment and unemployment (Apr 23-Mar 24), accessed on Nomis

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.[85] 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.

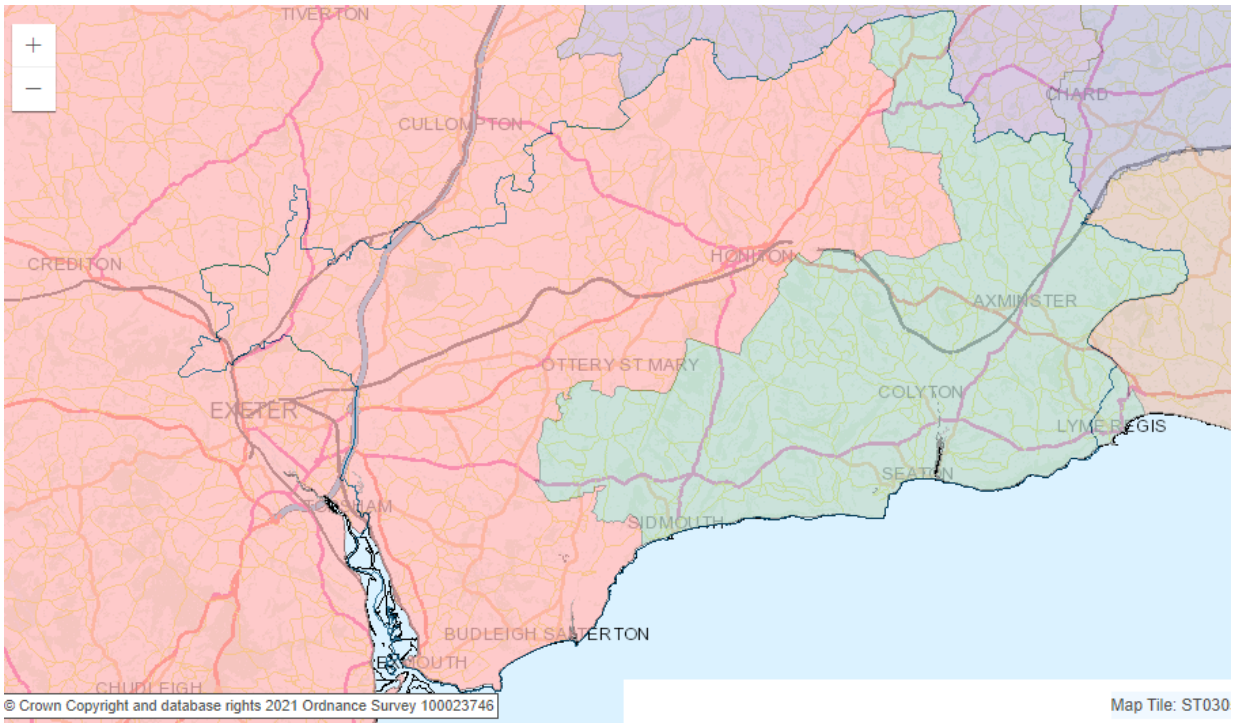
Top inflow and Top outflow of commuters in East Devon[86]



The influence of Exeter in employing East Devon residents is reflected in data on Travel to Work Areas (TTWAs).[87] 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, the Exeter TTWA extends far into East Devon, with the Sidmouth TTWA covering the south eastern part of the district.

[85] Table 1, Local Housing Needs Assessment for the Greater Exeter area, May 2020: https://www.gesp.org.uk/evidence/
[86] 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
[87] 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".

Travel to Work Areas in East Devon (Census 2011)



According to the 2021 Census data, the majority of employed East Devon residents work mainly from home (29.6%), and large increase since 2011 (10%)[88]. Of those that travel to work, most travel between 10-20km (14.8%) followed by 5 to less than 10km (10.2%), with a significant amount (11.4%) travelling less than 2km.[89] The majority of journeys to work are made in a car/van, with 52.2% driving to work and a further 3.2% as a passenger. 8.8% of people walk to work, 1.7% get the bus, and 0.8% travel by train (a decrease from 2% in in 2011).[90] As the 2021 Census data was collected during a period of lockdown during the Covid pandemic, this data may be misleading and not representative of regular working and commuting patterns in East Devon. The Covid-19 pandemic required many more people to work at home– it remains to be seen whether this trend continues in the long term.

Town centres

East Devon currently has eight town centres and one village centre, as defined in the East Devon Local Plan 2013-31 and the East Devon Villages Plan: Axminster, Budleigh Salterton, Colyton, Cranbrook, Honiton, Ottery St Mary, Seaton, Sidmouth, and Beer (village centre).

[88] Census 2011, Distance travelled to work, East Devon: Data Viewer - Nomis - Official Labour Market Statistics (nomisweb.co.uk); Census 2011, Method of travel to work, East Devon: Data Viewer - Nomis - Official Labour Market Statistics (nomisweb.co.uk)
[89] Census 2021, TS058 – Distance travelled to work, East Devon, data extracted on Nomis 09/10/24: TS058 - Distance travelled to work - Nomis - Official Census and Labour Market Statistics (nomisweb.co.uk)
[90] Census 2021, TS061 – Method used to travel to work, East Devon, data extracted on Nomis 09/10/24:: TS061 - Method used to travel to work - Nomis - Official Census and Labour Market Statistics (nomisweb.co.uk)

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, actual 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 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 good 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

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 mains 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 A3052[91].

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

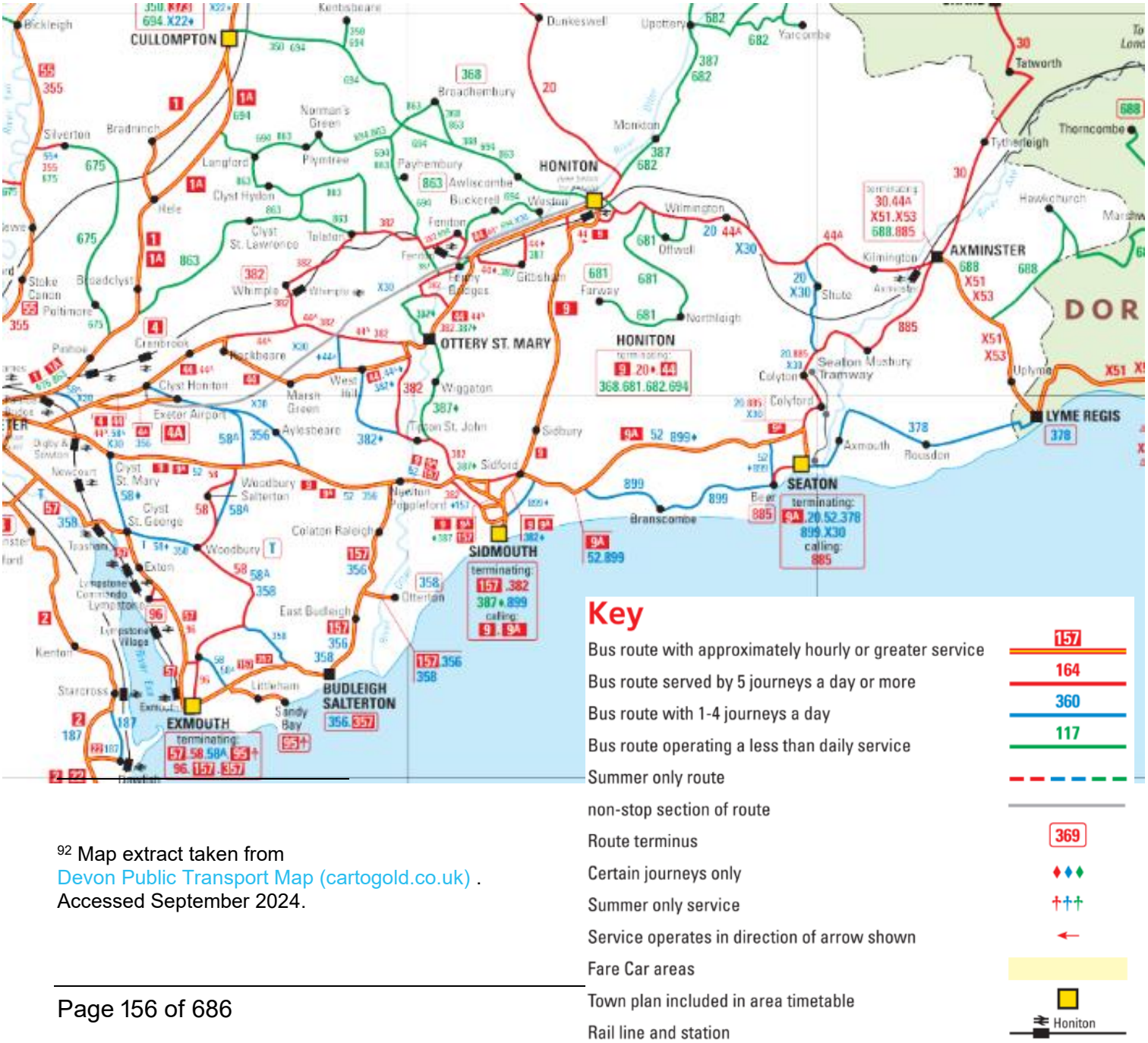
[91] Exeter Transport Strategy – Transport Empirical Data Report, Devon County Council, Jan 2019: https://www.gesp.org.uk/evidence/

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.

Bus routes and Train lines in East Devon[92]



[92] Map extract taken from Devon Public Transport Map (cartogold.co.uk) . Accessed September 2024.

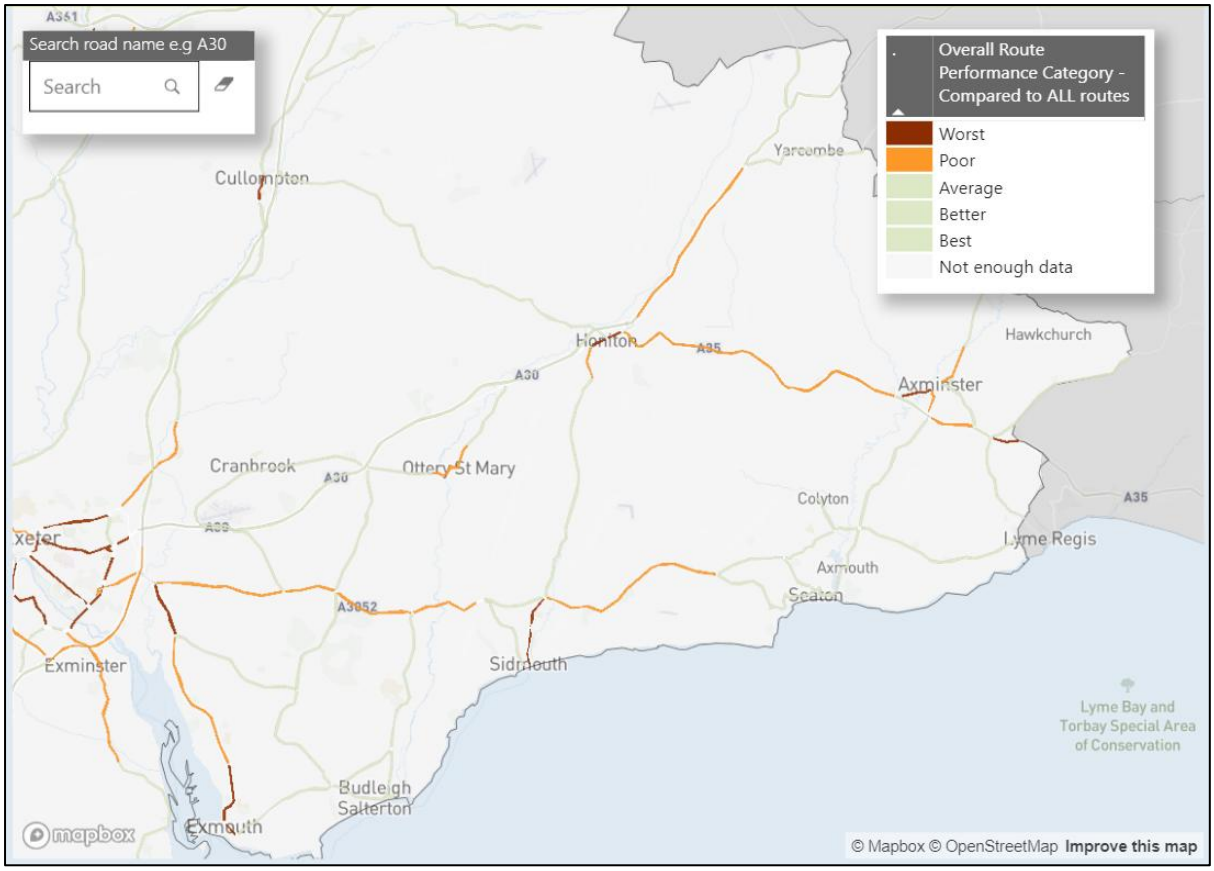
There are some high quality active travel (walking and cycling) corridors in East Devon, most notably the Exe Estuary Trail. The countryside of East Devon is accessible by a number of footpaths and the South West Coast Path runs along the entire length of the Districts coastline. Paths in towns are generally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

A variety of projects are already in the pipeline to improve transport connections and support development across East Devon.[93] These include a passing loop on the Exeter-London Waterloo train line near Cranbrook/Whimple to improve reliability and increase train frequency; a cycle path linking Cranbrook to Exeter; and the now completed 'park and change' site at Exeter Science Park

Road traffic collisions fell by a third across the Greater Exeter area over 10 years from 2006 to 2015, [94] with the number of casualties recorded in 2022 being 23% lower than the pre-covid average.[95] Roads in East Devon are generally safe, however, based on data from 2018-2022 the A376 (North at Clyst St George and South from Exmouth M&S to Courtlands Road) and the A375 (between Sidford to Sidmouth seafront) are some of the worst performing roads in the district for number of collisions when compared to other routes in Devon and Cornwall.[96]

[93] East Devon Infrastructure Delivery Plan review, Nov 2017: https://eastdevon.gov.uk/media/2270747/idp-review-2017_report.pdf ; Transport Infrastructure Plan, Devon County Council, March 2020: https://www.devon.gov.uk/roadsandtransport/traffic-information/transport-planning/
[94] Exeter Transport Strategy, Transport Empirical Data report, January 2019 Evidence - Greater Exeter Strategic Plan (gesp.org.uk)
[95] Devon County Council, Collision and Casualty Data: Latest Casualty overview (2022) Collision and Casualty Data - Roads and transport (devon.gov.uk)
[96] Collision and Casualty Data: High Harm Routes (2022) Collision and Casualty Data - Roads and transport (devon.gov.uk)

Collision and Casualty data: High Harm Routes[97]



[97] Collision and Casualty Data: High Harm Routes - interactive map (2022)

Appendix Four: Sites Sustainability Appraisal 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. The terms "lower-level surveys and assessments" refer to more detailed assessment that is required to support a planning application. Note that references in the appraisal tables to Section 41 (s.41) habitats of principle importance excludes hedgerow, as this is common to most/all sites.

Sustainability objective	Significance criteria	
1. Biodiversity To conserve and enhance the habitat and wildlife of our natural environment *Evidence sources include: HELAA site assessments for proximity to wildlife sites; draft Nature Recovery Network; Unconfirmed Wildlife Sites; Priority Habitats and Species in the Devon BAP; aerial imagery.*	**+ +**	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 in the draft Nature Recovery Network; and there are potential opportunities to enhance biodiversity.
	0	Development at the site is not likely to have positive or negative effects on biodiversity.
	?	Uncertain until more detailed lower level surveys and assessments have been carried out.
	-	Development at the site is likely to have negative effects on locally designated biodiversity sites, and/or unconfirmed wildlife sites, and/or sever ecological corridors identified in the draft Nature Recovery Network. Mitigation is likely possible for adverse effects on national and international sites.
	- -	Development at the site is likely to have negative effects on an internationally or nationally designated biodiversity site, with mitigation likely to be difficult.
2. Landscape	**+ +**	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.

Sustainability objective	Significance criteria	
To conserve and enhance the special qualities and distinctive character of our landscapes, undeveloped coast and seascape *Evidence sources include: HELAA site assessments for proximity to National Landscape (AONB) and comments on landscape impact; East Devon and Blackdown Hills Landscape Character Assessment (2019); aerial imagery.*	+	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	Development at the site will likely have a neutral effect on the landscape.
	?	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 a National Landscape, 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 a National Landscape or Coastal Preservation Area. 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 *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*	+ +	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.

Sustainability objective	Significance criteria	
4. Climate change and carbon emissions To minimise greenhouse gas emissions *Evidence sources include: HELAA site assessments for proximity to sustainable travel links; An accessibility assessment undertaken for the Site Selection work identified a total of 12 services, facilities and employment sites[98]; local studies on renewable and low carbon energy*	**+ +**	Site offers opportunities to significantly minimise greenhouse gas emissions by minimising the need to travel, having access to sustainable travel links, and/or 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.
	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. Neutral effect overall.
	?	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 *Evidence sources include: HELAA site assessments for proximity to flood zones, surface*	**+ +**	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.

[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).

Sustainability objective	Significance criteria	
water flooding, critical drainage areas; aerial imagery.	**?**	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 To utilise our land resources efficiently and minimise their loss or degradation *Evidence sources include: HELAA site assessments for agricultural land classification, mineral safeguarding areas and contaminated land; aerial imagery.*	**+ +**	The site is entirely brownfield and will not result in the loss of any greenfield or agricultural land, and/or development 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	Development at the site is not likely to have positive or negative effects on land resources.
	?	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 To utilise our water resources efficiently and minimise their loss or degradation	**+ +**	Development at the site will lead to significant positive effects on water resources by using water efficiently and not affecting water quality.
	+	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.

Sustainability objective	Significance criteria	
Evidence sources include: HELAA site assessments for proximity to flood zones; proximity to River Exe; River Axe Nutrient Management Plan.	-	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 To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure to meet East Devon's needs. *Evidence sources include: HELAA; emerging Local Plan*	+ +	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.
	+	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 *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*	+ +	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	Development at the site is unlikely to have any significant effects on health and well-being.
	?	Uncertain until more detailed lower level surveys and assessments have been carried out.

Sustainability objective	Significance criteria	
space/allotment and children's play area	-	Site is beyond 1,600m of open space/allotment and a children's play area; or developing the site would result in a net loss of existing open space/leisure facilities. Site is adjacent to an 'A' road, motorway, railway line, or other noise sources.
	- -	Site is beyond 1,600m of open space/allotment and a children's play area; and 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, or other significant noise sources.
10. Access to services To provide accessible and attractive services and community facilities for all ages and interests. *Evidence sources include: HELAA site assessments for proximity to facilities;*	+ +	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 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	Development at the site is unlikely to have any significant effects on access to services.
	?	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; Or 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	+ +	The site is within 800m of an employment site; and 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; and/or has realistic potential to accommodate employment on site (e.g. larger site that has good access, acceptable landscape impact, and acceptable impact on amenity).

Sustainability objective	Significance criteria	
improved job opportunities and greater productivity. *Evidence sources include: sites in Employment Land Review and Local Plan; aerial imagery*	**0**	Development at the site is unlikely to have any significant effects on jobs and employment.
	?	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 To safeguard and strengthen the vitality and viability of town centres. *Evidence sources: defined town centres in the Local Plan, Villages Plan, and 'made' neighbourhood plans*.	**+ +**	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).
	0	Development at the site is unlikely to have any significant effects on town centres.
	?	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. *Evidence sources include: HELAA site assessments for proximity to train station and bus service; Google Maps cycling trails, dedicated lanes, bike*	**+ +**	Site is located within 1,600m 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; or • an 'A' road; or • a recognised cycle route Site is located in an area with standard broadband (10-30 mbps) as a minimum.
	0	Development at the site is unlikely to have any significant effects on connectivity and transport.

Sustainability objective	Significance criteria	
friendly roads; House of Commons Library: Constituency data and speeds	**?**	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; and • an 'A' road; and • 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 Site is located in an area with standard broadband (10-30 mbps) or less.

Appendix Five: Appraisal matrices of Topic-based Policies

Local Plan Chapter 3. The Spatial Strategy

Policy number/title: Strategic Policy SP01: Spatial Strategy

Reasonable alternatives

- Option A. Promote significant development at one Principal Centre and six Main Centres[99]; local development at five Local Centres; and limited development at 23 Service Villages; do not focus strategic development on the West End 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 West End of the district, including a new town and other major development adjacent to existing development.
- 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 West End of the district, including 2-3 new villages and other major development.

Outline of reasons for selecting the alternatives

[99] Note: Cranbrook is identified as a Main Centre in The Role and Function of Settlements study, but the Cranbrook Plan (adopted 2022) means that additional development at Cranbrook is outside the scope of the Local Plan.

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 West End 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 West End of the district. Option C incorporates a new town in the West End of sufficient size to provide a wide range of jobs, services and facilities. Option D is a different approach for 2-3 smaller new 'villages' in the West End, rather than a single new, larger town, assumed to total the same size as the single new town in Option C. 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 *and* a new village in the West End is not considered to be a reasonable alternative as it would deliver even more housing in the West End and therefore limit the potential to meet housing needs (market and affordable) in the rest of the district; less support for the economy and town centres that arise from new housing in the rest of the district (outside the West End); is not consistent with the Local Plan Vision; and concerns that it would not be deliverable within the Local Plan period to have multiple new settlements under construction at the same time within close proximity of each other (noting that Cranbrook is still under construction).

A policy requiring mixed-use developments incorporating housing, employment and community facilities at specified site size thresholds was considered in preparing the Local Plan, but is considered not to be a reasonable alternative because of a lack of evidence on setting thresholds for requiring mixed-use development; lack of evidence on the subsequent ratios for mixed-use development; and difficulties for developers in delivering a policy, including who is going to buy and build-out employment plots on a housing development.

Note: Options A – D consider the spatial distribution of development – the district-wide scale of development would the same across all options.

Policy title: Strategic Policy SP01: 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. These negative effects are mixed with a long-term minor positive effect due to the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat. By avoiding strategic development in the West End 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, Kilmington, 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.

Policy title: Strategic Policy SP01: Spatial Strategy					
Option / SA Objective	Option A	Option B	Option C	Option D	Commentary
					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 National Landscape and/or undeveloped coast; two Local Centres (Budleigh Salterton, Colyton) within or in close proximity to National Landscape; and many Service Villages in the National Landscape (East Budleigh, Otterton, Newton Poppleford, Tipton St John, Sidbury, Branscombe, Beer, Musbury, Kilmington, Uplyme, Hawkchurch, Chardstock). This means a significant negative uncertain long-term effect arising from development under 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 incorporation of strategic development in the West End 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 West End has relatively few designated heritage assets (notable assets include Sowton Conservation Area with its cluster

Policy title: Strategic Policy SP01: Spatial Strategy					
Option / SA Objective	Option A	Option B	Option C	Option D	Commentary
					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. 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 West End 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 West End 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

Policy title: Strategic Policy SP01: Spatial Strategy					
Option / SA Objective	Option A	Option B	Option C	Option D	Commentary
					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 West End 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.
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 West End, 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 water supply issues from the

Policy title: Strategic Policy SP01: Spatial Strategy					
Option / SA Objective	Option A	Option B	Option C	Option D	Commentary
					Wimbleball reservoir upstream of the River Exe; 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.
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 West End (Options C and D) could mean market and 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 2-3 smaller new settlements, rather than one single larger one. 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

Policy title: Strategic Policy SP01: Spatial Strategy					
Option / SA Objective	Option A	Option B	Option C	Option D	Commentary
					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 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 West End 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

Policy title: Strategic Policy SP01: Spatial Strategy					
Option / SA Objective	Option A	Option B	Option C	Option D	Commentary
					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 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 West End, in addition to existing settlements, offers the added benefit of close proximity to employment and training opportunities in the West End 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 West End in what is a currently countryside area. Overall, a major positive uncertain effect for Option C, reducing to a

Policy title: Strategic Policy SP01: Spatial Strategy					
Option / SA Objective	Option A	Option B	Option C	Option D	Commentary
					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 West End (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 West End is not prescribed. The same effect is likely for Option D.
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 (Lympstone, Exton, Kilmington, Clyst St Mary, Newton Poppleford, Sidbury, Musbury); an hourly bus service, and/or train station (Lympstone, 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 West End 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 West End, although the area suffers from congestion at peak times. Option C offers greater potential to incorporate

Policy title: Strategic Policy SP01: Spatial Strategy					
Option / SA Objective	Option A	Option B	Option C	Option D	Commentary
					sustainable travel links given the larger size of a single new settlement 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:

- West End 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.
- 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.

Policy title: Strategic Policy SP01: Spatial Strategy					
Option / SA Objective	Option A	Option B	Option C	Option D	Commentary
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 West End of the district, including a new town and other major development. This results in Strategic Policy SP01: Spatial Strategy. **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 West End 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 West End 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 West End and Exeter. 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 less potential to accommodate a mix of uses and consequently poorer accessibility to jobs and services and greater carbon emissions.					

Policy number/title: Strategic Housing Growth Options

Reasonable alternatives

- Option A. Continue with pattern of housing distribution in East Devon Local Plan 2013-31:

    - 60% in West End (12,500 dwellings)
    - 30% at the Principal Centre and Main Centres (6,200 dwellings)
    - 10% at Local Centres, Service Villages and Countryside (2,100 dwellings)
- Option B. Higher concentration of housing in the West End of East Devon, less in rest of district:
    - 75% in West End (15,600 dwellings)
    - 15% at the Principal Centre and Main Centres (3,100 dwellings)
    - 10% at Local Centres, Service Villages and Countryside (2,100 dwellings)
- Option C. No additional housing in the West End of East Devon, more at Principal and Main Centres, less at Local Centres and Service Villages:
    - 35% in West End (7,300 dwellings)
    - 58% at the Principal Centre and Main Centres (12,100 dwellings)
    - 7% at Local Centres, Service Villages and Countryside (1,500 dwellings)
- Option D. No additional housing in the West End of East Devon, more at Local Centres and Service Villages:
    - 35% in West End (7,300 dwellings)
    - 15% at the Principal Centre and Main Centres (3,100 dwellings)
    - 50% at Local Centres, Service Villages and Countryside (10,400 dwellings)
- Option E. Most development in West End, high proportion at Principal and Main Centres, low proportion at Local Centres and Service Villages:
    - 55% in West End (11,600 dwellings)
    - 32% at the Principal Centre and Main Centres (6,800 dwellings)
    - 13% Local Centres, Service Villages and Countryside (2,700 dwellings)

Outline of reasons for selecting the alternatives

The scale of growth for all alternatives is the district-wide Local Plan housing requirement of 950 dwellings per year (total of 20,900 dwellings over the plan period 2020-2042). The number of dwellings shown under each reasonable alternative is rounded to the nearest 100 dwellings, so some of the totals do not add up to 20,900. Just over half of the housing requirement is already planned for, with dwelling completions (from 2020-25), existing commitments, and Cranbrook DPD allocations totalling around 11,700 dwellings. “No additional housing” in Options C and D means no more housing in the West End beyond existing completions, commitments, and Cranbrook Plan allocations.

The distribution of development in Option A reflects that of the current 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 in proposing a higher concentration of development in the West End. The spatial strategy includes one, large-scale new settlement, rather than several smaller new settlements, to benefit from economies of scale and make it a more sustainable development. Option B would require the development of more than one new settlement in the West End to deliver the required scale of growth. Option C entails more housing at the largest settlements (Principal Centres and Main Centres) where there is access to existing jobs, facilities and services in East Devon. Option D offers the opportunity to help meet housing needs in the smaller settlements and rural areas of East Devon. Option E is similar to Option A but provides for slightly less housing in the West End, and more at existing settlements in the rest of the district.

Policy title: Strategic Housing Growth Options						
Option / **SA Objective**	**Option A**	**Option B**	**Option C**	**Option D**	**Option E**	**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. These negative effects are mixed with a long-term minor positive effect due to the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat. Options A, B and E 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 effect 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 Kilmington.

Policy title: Strategic Housing Growth Options						
Option / SA Objective	Option A	Option B	Option C	Option D	Option E	Commentary
						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 is uncertainty on the significance of the effects. Option A, E, 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 West End 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.
3. Historic and built environment	- ?	- ?	- ?	- ?	- ?	The precise location of new housing in relation to heritage assets is not set out, 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 West End 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 , B and E. 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

Policy title: Strategic Housing Growth Options						
Option / SA Objective	Option A	Option B	Option C	Option D	Option E	Commentary
						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. OptionS A, B and E 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 West End in particular where there would be large-scale housing development in a currently countryside area. This negative uncertainty is more pronounced for Option B as this will require more than one new settlement, with lower economies of scale meaning fewer job and facilities being provided on-site with less potential to minimise travel and use of sustainable travel modes. 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 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.

Policy title: Strategic Housing Growth Options						
Option / SA Objective	Option A	Option B	Option C	Option D	Option E	Commentary
						Areas of high flood risk associated with the River Clyst flood plain and its tributaries covers large parts of the West End, resulting in a likely minor negative effect for Options A, B and E. 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 Whimple 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 West End, which would be at threat from a high proportion of new housing in this area. Options A, B and E 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 and E, rising to a major negative for Option B where the proportion of West End housing is higher and more than one new settlement will be required. Some areas around the Principal and Main Centres are also best and most versatile agricultural land, but more housing at existing settlements 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 affect Mineral Safeguarding Areas at Beer, Feniton, West Hill and Whimple; 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.
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 West End (Options A, B and E) could adversely affect water quality due to potential for pollution from housing into the Exe Estuary SPA, along with water supply

Policy title: Strategic Housing Growth Options						
Option / SA Objective	Option A	Option B	Option C	Option D	Option E	Commentary
						issues from Wimbleball reservoir upstream of the River Exe, 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 major negative effect for Option C. Less development at the West End, 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 Kilmington, 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 the 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, B and E will require the delivery of a new settlement (more than one new settlement for Option B) in the West End of East Devon. Whilst larger sites may increase the level of affordable housing overall, this could mean market and affordable 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. 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 more than one new settlement 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 more new settlements in Options A, B and E), faster build-out rates are likely. Affordable housing need in rural areas would likely be met in Option D, but this

Policy title: Strategic Housing Growth Options						
Option / SA Objective	Option A	Option B	Option C	Option D	Option E	Commentary
						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, B and E 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.
10. Access to services	+ / - ?	+ / - - ?	+ ?	- -	+ / - ?	Options A, B and E 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, B and E, with uncertainty in case additional services and/or sustainable travel links are not provided alongside new housing at the West End in particular where there would be large-scale housing development in a currently countryside area. This negative uncertainty is more pronounced for Option B. The large proportion of housing at Principal

Policy title: Strategic Housing Growth Options						
Option / SA Objective	Option A	Option B	Option C	Option D	Option E	Commentary
						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 to 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, B and E provide good access to employment and training opportunities in the West End of the district (e.g. Skypark, distribution centres, Exeter Airport) and in Exeter. There would also be access to 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 also an uncertain negative effect for Options A, B and E in case additional employment and/or sustainable travel links is not provided alongside new housing at the West End 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

Policy title: Strategic Housing Growth Options						
Option / SA Objective	Option A	Option B	Option C	Option D	Option E	Commentary
						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 West End of East Devon, with less elsewhere, will provide fewer residents to support vitality and viability of existing town centres in East Devon. Therefore, a negative effect is likely for Options A and E, 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.
13. Connectivity and transport	+	+	+	-	+	The West End 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 West End, 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

Policy title: Strategic Housing Growth Options						
Option / SA Objective	Option A	Option B	Option C	Option D	Option E	Commentary
						stations at Lympstone, Feniton, Whimple, Exton). This means positive effects for Options A, B and E due to more housing in the West End, 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, Kilmington, 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:

- West End 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.
- 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.

Policy title: Strategic Housing Growth Options						
Option / SA Objective	Option A	Option B	Option C	Option D	Option E	Commentary
• 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 likely reduce the major negative effects to minor negative.						
Preferred alternative: Option E. Most development in West End, high proportion at Principal and Main Centres, low proportion at Local Centres and Service Villages **Reasons for alternatives being preferred or rejected:** • **Option A is rejected** as, although it offers a good balance of accessing jobs, services and facilities at the West End 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 E performs marginally better as more detailed site selection work shows this is more sustainable. • **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. • **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. • **Option E is preferred** as it offers the best balance of accessing jobs, services and facilities at the West End 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.						

Policy number/title: Strategic Policy SP02: Levels of future housing development

Reasonable alternatives:

- Option A. 950 dwellings per year, a total of 20,909 dwellings[100] over the Local Plan period.
- Option B. 1,045 dwellings per year, a total of 22,990 dwellings over the Local Plan period.
- Option C. 1,188 dwellings per year, a total of 26,136 dwellings over the Local Plan period.

Outline of reasons for selecting the alternatives

Option A is 80% of the local housing need figure, which applies as the Local Plan has reached regulation 19 (pre-submission stage) on or before 12 March 2025.[101] Option B adds 10% to the local housing need figure as it is potentially deliverable (the highest housing delivery in recent years is 1,065 dwellings in 2019/20) and would further boost housing supply, consistent with Government policy. Option C reflects the outcome of the standard method for calculating local housing need in national planning practice guidance, published on 12 December 2024. In May 2025, the outcome of the standard method in East Devon changed to 1,156 dwellings per year – this is not considered a reasonable alternative as the Local Plan is not changing significantly between the two Regulation 19 stages, to comply with government guidance on Local Plan transitional arrangements[102]. Changing the housing requirement is considered a significant change, so not within the scope of the Second Regulation 19 Publication Draft Local Plan.

As explained, the spatial strategy includes one, large-scale new settlement, rather than several smaller new settlements, to benefit from economies of scale and make it a more sustainable development. Options B and C would require the development of more than one new settlement in the West End to deliver the required scale of growth in the Local Plan period.

[100] The precise figure for 80% of the standard method for local housing need is 950.4 dwellings per year, leading to 20,909 dwellings over the 22 year plan period.
[101] Paragraph 234a, NPPF, December 2024 National Planning Policy Framework (publishing.service.gov.uk)
[102] Plan-making - GOV.UK Paragraph: 86 Reference ID:61-086-20250616.

A significantly higher housing requirement figure than presented by Option C is not a reasonable alternative for the following reasons: it is not deliverable across the plan period in terms of the overall number; there would be likely significant negative environmental effects that would be difficult to mitigate; and it would undermine the vision, strategic objectives and spatial strategy in the Local Plan by requiring significant levels of development at less sustainable locations such as villages.

Providing for less than the local housing need figure is not a reasonable alternative as it would not be consistent with national policy and more detailed work on site assessment shows there is a reasonable prospect of delivering the local housing need figure in East Devon, by applying the presumption in favour of sustainable development for plan-making in national policy (NPPF paragraph 11).

Policy title: **Strategic Policy SP02: Levels of future housing development**				
Option / **SA Objective**	**Option A**	**Option B**	**Option C**	**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. These negative effects are mixed with a long-term minor positive effect due to the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat. Minor negative effects are likely from Option A, rising to major negative in Options B and C due to likely effects upon the internationally designated Exe Estuary SPA and Pebblebed Heaths 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. The greater biodiversity impact from Options B and C is partly due to the development of more than one new settlement.
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

Policy title: **Strategic Policy SP02: Levels of future housing development**				
Option / **SA Objective**	**Option A**	**Option B**	**Option C**	**Commentary**
				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 Options B and C due to likely impact from higher land take upon the East Devon and Blackdown Hills AONBs and the undeveloped coast. The greater landscape impact from Options B and C is partly due to the development of more than one new settlement.
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 Options B and C due to greater land take required. The greater impact from Options B and C is partly due to the development of more than one new settlement.
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. A major negative effect due to the higher housing figure under Options B and C. This negative effect is also more pronounced for Options B and C as it will require more than one new settlement, with lower economies of scale meaning fewer jobs, services and facilities being provided on-site, with less potential to minimise travel and use of sustainable travel modes.

Policy title: **Strategic Policy SP02: Levels of future housing development**				
Option / **SA Objective**	**Option A**	**Option B**	**Option C**	**Commentary**
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, flood risk affects most settlements and parts of the West End of East Devon, leading to a likely negative uncertain effect for Option A from an increase in impermeable land. Although Options B and C 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 not broken down into 3a and 3b in most of the district, and as housing location is not identified. This results in a minor negative uncertain effect for Option A, rising to major negative for Options B and C 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 water supply issues from the Wimbleball reservoir upstream of the River Exe, and potential to worsen the already significant phosphate levels in the River Axe SAC. Option A is likely to have a minor negative effect, rising to major negative for Options B and C from the higher level of housing.
8. Homes	**+ +**	**+ +**	**+ +**	Option A is 80% below the local housing need figure published in the Governments’ standard method, but is allowed by the NPPF transitional arrangements, and would still see a significant amount of new housing being

Policy title: **Strategic Policy SP02: Levels of future housing development**				
Option / **SA Objective**	**Option A**	**Option B**	**Option C**	**Commentary**
				built in East Devon. The increased level of housing under Options B and C will 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 all options.
10. Access to services	**?**	**- ?**	**- ?**	Some uncertainty for all options, as the location of housing in relation to services and facilities is not specified. This uncertainty is combined with a negative effect for Options B and C as these will require more than one new settlement, with lower economies of scale meaning fewer services and facilities being provided on-site.
11. Jobs and employment	**+ +**	**+ +**	**+ +**	The levels of housing supply in all options 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.
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 all options.
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 Option A, rising to major negative for Options B and C as a

Policy title: **Strategic Policy SP02: Levels of future housing development**				
Option / **SA Objective**	**Option A**	**Option B**	**Option C**	**Commentary**
				result of higher levels of housing as these will require more than one new settlement, with lower economies of scale meaning fewer jobs, services and facilities being provided on-site and consequently increased travel.
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 20,909 dwellings.				

Policy title: **Strategic Policy SP02: Levels of future housing development**				
Option / **SA Objective**	**Option A**	**Option B**	**Option C**	**Commentary**
Reasons for alternatives being preferred or rejected: • **Option A is preferred** as it will deliver significant amounts of new housing in East Devon at a level that is consistent with the NPPF, will support economic growth, with a less adverse environmental impact than Options B and C. • **Option B is rejected** due to the significant adverse environmental impact of delivering a higher level of housing development. • **Option C is rejected** due to the significant adverse environmental impact of delivering a higher level of housing development.				

Policy number/title: Strategic Policy SP03: Housing Requirement by Designated Neighbourhood Area

Reasonable alternatives

- Option A. All housing supply forecast for the period 1 April 2020 to 31 March 2042 excluding an allowance for future windfalls
- Option B. All housing supply forecast for the period 1 April 2020 to 31 March 2042 including an allowance for future windfalls

Outline of reasons for selecting the alternatives

Strategic policies should set out a housing requirement for designated neighbourhood areas (DNAs) which reflects the overall strategy for the pattern and scale of development and any relevant allocations (NPPF paragraph 67). The two reasonable alternatives for Designated Neighbourhood Area (DNA) housing requirements are consistent with national policy and accompanying guidance; are simple and transparent; enable neighbourhood plans to include housing provision; support the Local Plan vision and spatial strategy; and are justified by evidence and enable effective monitoring. Option A does not include an allowance for windfalls at the DNAs, whilst Option B includes an estimated allowance for windfalls at DNAs. Although it may appear that

housing delivery in Option B would be higher, the overall scale of housing across the district would be the same for each option, as windfall development is taken into account more generally at a district-wide level in Strategic Policy SP02.

Other alternatives under consideration in preparing the Local Plan are: to only include some of the total housing supply categories (for example, excluding one or more of completions, commitments, Local Plan and other adopted/made Development Plan allocations); or to take a top-down approach based upon population and/or percentage of total housing, theoretically apportioned across the district, without specific reference to future housing supply. These alternatives are not 'reasonable' as they would create a great deal of uncertainty and are more technically difficult to justify; and/or would not be consistent with the emerging Local Plan spatial strategy or national policy.

Policy title: Strategic Policy SP03: Housing Requirement by Designated Neighbourhood Area			
Option / **SA Objective**	**Option A**	**Option B**	**Commentary**
1. Biodiversity	**+ / -**	**+ / - ?**	Both options will deliver significant amounts of new housing at most DNAs apart from the most rural areas, leading to negative effects arising from species disturbance, habitat loss, and severance. Therefore, minor negative effects are likely from both options due to likely effects upon the internationally designated Exe Estuary SPA and Pebblebed Heaths SPA/SAC and the River Axe SAC, in particular at Exmouth, Sidmouth, Axminster, Seaton, Woodbury, and Lympstone which are all located in close proximity to internationally and locally designated biodiversity sites and would see 400 plus homes. 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. There is uncertainty for Option B as the location of future windfalls is not known. These negative effects are mixed with a long-term minor positive effect due to the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.

Policy title: Strategic Policy SP03: Housing Requirement by Designated Neighbourhood Area			
Option / SA Objective	Option A	Option B	Commentary
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. Therefore, a minor negative effect for both options. There is uncertainty for Option B as the location of future windfalls is not known.
3. Historic and built environment	-	- ?	The 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 both options. There is uncertainty for Option B as the location of future windfalls is not known.
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 West End in particular where there would be large-scale housing development in a currently countryside area.
5. Climate change adaptation	-	- ?	The potential to adapt to heat, drought and extreme storms is likely to be the same for all options. Areas of flood risk affects most settlements and parts of the West End of East Devon, 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

Policy title: Strategic Policy SP03: Housing Requirement by Designated Neighbourhood Area			
Option / SA Objective	Option A	Option B	Commentary
			meaning particular drainage problems here. There is uncertainty for Option B as the location of future windfalls is not known.
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 not broken down into 3a and 3b in most cases. This results in a minor negative uncertain effect for both options.
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 phosphate levels in the River Axe SAC.
8. Homes	+ +	+ +	A significant number of new homes will be delivered under both options, so a major positive for Options A and B.
9. Health and well-being	+ / -	+ / -	Both options could benefit deprivation levels, particularly at Exmouth, Honiton and Axminster which contain the top 8 most deprived areas in the district. Short-term negative effects associated with noise and disturbance from the construction of development will arise for both options. So, a mixed positive and negative effect.
10. Access to services	+	+ / -	Options A and B will both mean a significant amount of new housing being located close to Exeter, offering access to numerous services in the city, and the larger settlements with a greater range of jobs, shops and services such as Exmouth, Axminster, Honiton, Sidmouth and Seaton. Although a good range of local facilities are largely present at the smaller settlements in the settlement hierarchy (Local Centres and Service Villages), the picture is variable (for example Dunkeswell and Exton lack a primary school). Additional housing in the smaller settlements can help sustain local

Policy title: Strategic Policy SP03: Housing Requirement by Designated Neighbourhood Area			
Option / **SA Objective**	**Option A**	**Option B**	**Commentary**
			facilities. The positive effect for Option B is mixed with negative as applying windfalls adds to the expected stated scale of housing across all 42 DNAs, but some of these have poor connectivity, being beyond areas identified as suitable for growth by the spatial strategy (e.g. All Saints, Cotleigh, Luppitt).
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.
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, so a minor positive effect is likely for Options A and B.
13. Connectivity and transport	**+**	**+ / -**	The vast majority of new homes would be located in accessible locations, with good connectivity. The Principal and Main Centres also have generally good connections, including an hourly or better bus service, train station (in 4 out of 7 cases), adjacent to 'A' roads (except Ottery St Mary); but connectivity at Local Centres and Service Villages is generally less good (with the exception of train stations at Lympstone, Feniton, Whimple, Exton). The positive effect for Option B is mixed with negative as applying windfalls adds to the expected stated scale of housing across all 42 DNAs, but some of these have poor connectivity, being beyond areas identified as suitable for growth by the spatial strategy (e.g. All Saints, Cotleigh, Luppitt).
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.			

Policy title: Strategic Policy SP03: Housing Requirement by Designated Neighbourhood Area			
Option / SA Objective	Option A	Option B	Commentary
• 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 in town centres. • Enhance the road network alongside new housing where necessary to reduce congestion.			
Preferred alternative: Option A. All housing supply forecast for the period 1 April 2020 to 31 March 2042 excluding an allowance for future windfalls. This is reflected in Strategic Policy SP03: Housing Requirement by Designated Neighbourhood Area. **Reasons for alternatives being preferred or rejected:** • **Option A. All housing supply forecast for the period 1 April 2020 to 31 March 2042 excluding an allowance for future windfalls is preferred** as it provides more certainty by being simpler and easier to understand. It avoids difficult technical issues associated with justifying and apportioning a basic windfall projection rate to the DNAs and removes the potential for assertions of 'spurious accuracy', particularly in smaller DNAs where windfall numbers are low. It is more consistent with the spatial strategy as it avoids applying windfall development to less sustainable areas that are not suitable for growth in the spatial strategy (e.g. All Saints, Cotleigh, Luppitt). • **Option B. All housing supply forecast for the period 1 April 2020 to 31 March 2042 including an allowance for future windfalls is rejected** as there is uncertainty on the number, location, mix and timing of such sites. It is technically difficult to accurately forecast windfall sites at such a small geographic level and may lead to overlaps with other sources of housing supply as future neighbourhood plan allocations may be located on windfall sites. It could also encourage more development beyond areas identified as suitable for growth in the spatial strategy (e.g. All Saints, Cotleigh, Luppitt).			

Policy number/title: Strategic Employment Growth Options

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

Each of the reasonable 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 alternatives reflect the Local Plan objective to support business investment and job creation opportunities within East Devon and support a resilient economy.

Policy title: Strategic Employment Growth Options						
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

Policy title: Strategic Employment Growth Options						
Option / SA Objective	Option A	Option B	Option C	Option D	Option E	Commentary
						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. The negative effects are mixed with a long-term minor positive effect due to the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.
2. Landscape	-	-	- - ?	- - ?	+	Whilst the development of employment sites will lead to negative effects against this objective, Options A and B would avoid National Landscapes which means just a single negative. The presence of National Landscapes 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 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.

Policy title: Strategic Employment Growth Options						
Option / **SA Objective**	**Option A**	**Option B**	**Option C**	**Option D**	**Option E**	**Commentary**
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 major 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, 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

Policy title: Strategic Employment Growth Options						
Option / **SA Objective**	**Option A**	**Option B**	**Option C**	**Option D**	**Option E**	**Commentary**
						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.
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.

Policy title: Strategic Employment Growth Options						
Option / **SA Objective**	**Option A**	**Option B**	**Option C**	**Option D**	**Option E**	**Commentary**
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. Major positive effect for Options A-C due to access to labour market and/or conglomeration effects of co-locating employment. Some uncertainty on the delivery of Options C and D as landowners have not promoted much land at these locations
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 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

Policy title: Strategic Employment Growth Options						
Option / SA Objective	Option A	Option B	Option C	Option D	Option E	Commentary
						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.
- 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 included within Strategic Policy SP04.

Policy number/title: Strategic Policy SP04: Employment Provision and Distribution Strategy

Reasonable alternatives:

- Strategic Policy SP04: Employment Provision and Distribution Strategy

Outline of reasons for selecting the alternatives

Strategic Policy SP04 reflects evidence on employment provision and is consistent with the NPPF. Strategic employment growth options have been considered elsewhere (above), and there are no other reasonable alternatives to this policy.

Policy title: Strategic Policy SP04: Employment Provision and Distribution Strategy		
Policy / **SA Objective**	**SP04: Employ-ment**	**Commentary**
1. Biodiversity	**+ / - ?**	The provision of significant amounts of employment development will likely lead to negative effects arising from species disturbance, habitat loss, and severance, particularly for development that could affect European sites. These negative effects are mixed with a long-term minor positive effect due to the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat. The policy includes reference to employment delivery at Cranbrook, the new town and the West End more generally, which are within the 10km recreation zones of the Exe Estuary and Pebblebed Heaths, but as it relates to employment rather than housing, this will likely reduce the overall recreational impact from development. The effects will largely depend on the precise location of development, meaning there is some uncertainty for this strategic policy.
2. Landscape	**- ?**	The lack of brownfield land in East Devon means a significant amount of employment development will take place on greenfield sites, with potential for adverse landscape impact as a consequence. The policy refers to development at

Policy title: Strategic Policy SP04: Employment Provision and Distribution Strategy		
Policy / SA Objective	**SP04: Employ-ment**	**Commentary**
		Cranbrook, the new town and the West End more generally, which are outside of the National Landscape. As the precise location of housing is not set out, there is uncertainty on the significance of the effects.
3. Historic and built environment	**?**	There are relatively few designated heritage assets near to the big employment sites in the West End, the main exception being Sowton Conservation Area and listed buildings. Uncertain effect until precise locations for development are set out.
4. Climate change and carbon emissions	**+**	Good sustainable travel links in the West End, being in close proximity to high frequency bus route, cycle/foot paths, and Cranbrook train station. There is also a large workforce in existing and planned new residential development in the West End, as well as nearby in Exeter itself. This means a positive effect from employment use at the West End, as it should minimise carbon emissions from travel.
5. Climate change adaptation	**- ?**	Uncertainty until precise locations for new employment development 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, so negative effects likely.
6. Land resources	**-**	The lack of previously developed land in East Devon means a general negative effect. Much of the West End contains best and most versatile agricultural land.
7. Water resources	**- ?**	General uncertainty until sewage treatment works capacity is known to cope with additional employment land. The West End includes the River Clyst and/or its tributaries, which runs into the Exe Estuary SPA/Ramsar, so uncertain negative effect.
8. Homes	0	Negligible effects as the policy relates to employment, rather than housing.

Policy title: Strategic Policy SP04: Employment Provision and Distribution Strategy		
Policy / **SA Objective**	**SP04: Employ-ment**	**Commentary**
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 with some uncertainty until precise development locations are known.
10. Access to services	**+ ?**	Broadband speeds are generally good but some uncertainty as connections will depend on precise location.
11. Jobs and employment	**+ +**	Major positive effect through the provision of high quality, high value jobs.
12. Town centres	**+**	Supporting offices in the town centres of tier 1 and tier 2 settlements will have a positive effect on the vitality and viability of town centres.
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 positive effect due to specific reference to employment development at Cranbrook, the new town and the West End more generally. This is mixed with a negative effect due to congestion in the vicinity of M5 J29 and the main roads into Exeter.
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: • Habitat mitigation measures. • Nutrient neutrality from new development. • Robust landscaping requirements.		

Policy title: Strategic Policy SP04: Employment Provision and Distribution Strategy		
Policy / SA Objective	SP04: Employ-ment	Commentary
• 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: Strategic Policy SP04: Employment Provision and Distribution Strategy. **Reasons for alternatives being preferred or rejected:** • **Strategic Policy SP04: Employment Provision and Distribution Strategy is preferred** as it will have major positive effects on jobs and employment in the district, support town centres, at locations with good sustainable travel links and less environmental impact.		

Policy number/title: Strategic Policy SP05: 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 to not identify boundaries but instead include a general, criteria-based policy, is presented as a reasonable alternative.

Policy title: Strategic Policy SP05: 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. The negative effects are mixed with a long-term minor positive effect due to the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.
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: Strategic Policy SP05: 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: Strategic Policy SP05: 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: Strategic Policy SP05: Development inside Settlement Boundaries			
Option / SA Objective	Option A	Option B	Commentary
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. Strategic Policy SP05: 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: Strategic Policy SP06: 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: Strategic Policy SP06: 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. The negative effects are mixed with a long-term minor positive effect due to the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.
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.

Policy title: Strategic Policy SP06: Development beyond Settlement Boundaries			
Option / **SA Objective**	**Option A**	**Option B**	**Commentary**
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 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: Strategic Policy SP06: 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: Strategic Policy SP06: Development beyond Settlement Boundaries			
Option / SA Objective	Option A	Option B	Commentary
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 SP06: 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. • Option B is rejected as due to likely negative albeit uncertain environmental effects from development beyond settlement boundaries, in countryside locations.			

Policy number/title: Strategic Policy SP07: Delivery of Infrastructure and Strategic Policy SP08: Phased delivery of Infrastructure and Services

Reasonable alternatives:

- Option A. Strategic Policies SP07 and SP08 on the delivery of infrastructure
- Option B. More detailed policy setting out specific infrastructure requirements

Outline of reasons for selecting the alternatives

Option A to include Strategic Policies SP07 and SP08 relating to infrastructure delivery is consistent the numerous references in the NPPF to infrastructure delivery, including that strategic policies should make sufficient provision for infrastructure (NPPF, paragraph 20b). Option B provides more detail on specific infrastructure requirements, again reflecting the numerous references in the NPPF to infrastructure delivery. An option for more flexibility on infrastructure delivery is not considered a reasonable alternative as it would likely mean infrastructure being delivered too late, or not at all, and not consistent with the NPPF or Local Plan objectives.

Policy title: Strategic Policy SP07: Delivery of Infrastructure and SP08: Phased delivery of Infrastructure and services			
Option / SA Objective	**Option A**	**Option B**	**Commentary**
1. Biodiversity	**+ / - ?**	**+ / - ?**	Delivery of grey infrastructure will likely result in some minor localised biodiversity disruption, so some negative impact is expected. However, green infrastructure delivered utilising this policy will likely result in positive impacts. Both options are therefore expected to have a mixed impact on biodiversity.

Policy title: Strategic Policy SP07: Delivery of Infrastructure and SP08: Phased delivery of Infrastructure and services			
Option / SA Objective	Option A	Option B	Commentary
2. Landscape	+ / - ?	+ / - ?	A minor negative impact on the landscape is expected due to the inevitable changes that will occur from the delivery of infrastructure. Some infrastructure, especially green infrastructure, may actually improve the landscape and so positive impacts may result from this.
3. Historic and built environment	+ / - ?	+ / - ?	Infrastructure projects may result in some negative impact on the historic environment but may also offer the opportunity to improve the existing situation. Mixed impacts are therefore expected for both options.
4. Climate change and carbon emissions	+ ? / - ?	+ / - ?	The development of almost all grey infrastructure projects will likely have a negative impact on climate change and carbon emissions, due to the emissions associated with the materials and construction processes. However, uncertain positive long-term effects from infrastructure that could lower transport carbon emissions (e.g. modal shift from road to rail). Green infrastructure projects, including the planting of trees may have a positive impact. Mixed impacts are therefore expected for both options.
5. Climate change adaptation	+ / - ?	+ / - ?	Mixed impacts are expected on this objective, as the impacts will largely be dependent on the location and type of infrastructure project being brought forward. Should the infrastructure be flood-related then the application of this policy will have positive impacts across both options.
6. Land resources	- ?	- ?	It is likely that new infrastructure will be delivered on greenfield land and so an uncertain negative impact is expected for this objective. This is the same for both options.
7. Water resources	+	+	The requirement for infrastructure provision alongside new development could include water resources infrastructure, so a positive effect for both options.

Policy title: Strategic Policy SP07: Delivery of Infrastructure and SP08: Phased delivery of Infrastructure and services			
Option / SA Objective	**Option A**	**Option B**	**Commentary**
8. Homes	**-**	**-**	Although the policy will result in better access to infrastructure for homes, stricter standards for delivery of this infrastructure may impact on the viability of schemes. This could slow down the delivery of homes and is the same for both options.
9. Health and well-being	**+ +**	**+ +**	The timely delivery of infrastructure alongside new homes will result in major positive impacts for health and wellbeing, as it will ensure that open green spaces, cycle routes and other infrastructure will be provided at sufficient levels and in a timely manner. This is the same for both options.
10. Access to services	**+ +**	**+ +**	The timely delivery of infrastructure alongside new homes will result in major positive impacts access of services, as it will ensure that community facilities such as such as schools will be provided at sufficient levels and in a timely manner. This is the same for both options.
11. Jobs and employment	**+ / - ?**	**+ / - ?**	Should the policy be successful, higher levels of infrastructure delivery could result in additional job creation from the construction and running and maintenance of such infrastructure for both options. However, should the policy delay development fewer jobs will be created as a result.
12. Town centres	**0**	**0**	The policy is not likely to directly affect this objective.
13. Connectivity and transport	**+ +**	**+ +**	Should the policy be successful, it should result in improved cycling, walking and other sustainable transport links to support next development. A significant positive impact on this objective is therefore anticipated for both options.
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: • None identified.			

Policy title: Strategic Policy SP07: Delivery of Infrastructure and SP08: Phased delivery of Infrastructure and services			
Option / SA Objective	Option A	Option B	Commentary
Preferred alternative: Option A. Include Strategic Policies SP07 and SP08 on the delivery of infrastructure. **Reasons for alternatives being preferred or rejected:** • Option A is preferred as it ensures new development is supported by appropriate infrastructure, delivered in a timely manner. • Option B is rejected as it is too prescriptive and likely to become quickly out-of-date.			

Local Plan Chapter 4. Development at the West End

Policy number/title:

- Strategic Policy WS02: Development within the Enterprise Zone
- Strategic Policy WS03: Exeter Science Park
- Strategic Policy WS05: Exeter International Airport and its future operation and development

Reasonable alternatives:

- WS03A. Do not expand Exeter Science Park
- WS05A. 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 West End. Reasonable alternatives were not identified for the Enterprise Zone (WS02), as that area has already been designated to actively encourage employment and business growth.

Local Plan Chapter 4. Development at the West End				
Policy / SA Objective	**WS02. Enterprise zone**	**WS03. Science Pk**	**WS05. Exeter Airport**	
1. Biodiversity	**+ / -**	**+ / -**	**+ / -**	
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). These negative effects are mixed with a long-term minor positive effect due to the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.			
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 / - ?**	

Local Plan Chapter 4. Development at the West End				
Policy / SA Objective	WS02. Enterprise zone	WS03. Science Pk	WS05. Exeter Airport	
Hist. built env. commentary	WS02 refers to the vision for development, and WS03 make clear that development should be of the highest build quality, so will have a positive effect on promoting high quality design. WS05 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 WS02 requires new buildings to connect to the district heating network. Policy WS03 includes an emphasis on high environmental quality. WS05 supports the transition to net zero carbon operations through enhanced public transport and renewable energy generation. For these reasons, minor positive effects are noted, with a mixed major negative effect for WS05 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	**-**	**-**	**-**	

Local Plan Chapter 4. Development at the West End				
Policy / SA Objective	WS02. Enterprise zone	WS03. Science Pk	WS05. Exeter Airport	
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 all policies.			
8. Homes	**0**	**0**	**0**	
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. The areas are located close to existing walking and cycling links, also resulting in positive effects. The noise associated with supporting the growth of the airport is likely to have a negative effect on health and well-being.			
10. Access to services	**0**	**0**	**0**	

Local Plan Chapter 4. Development at the West End				
Policy / SA Objective	WS02. Enterprise zone	WS03. Science Pk	WS05. Exeter Airport	
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.			
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, meaning 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.				

Local Plan Chapter 4. Development at the West End			
Policy / SA Objective	WS02. Enterprise zone	WS03. Science Pk	WS05. Exeter Airport
• 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: Strategic Policies WS02, WS03, WS09. **Reasons for alternatives being preferred or rejected:** • Strategic Policies WS02, WS03, WS09 are preferred as they will have major economic positive effects, in areas with good connectivity. • WS03A. Do not expand Exeter Science Park is rejected as, whilst it may have fewer adverse environmental effects, it would also not have the major positive economic effects. • WS05A. Do not allocate land for development at Exeter Airport is rejected whilst there may be fewer adverse environmental impacts, this alternative 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.			

Policy number/title: Strategic Policy WS09: Clyst Valley Regional Park

Reasonable alternatives

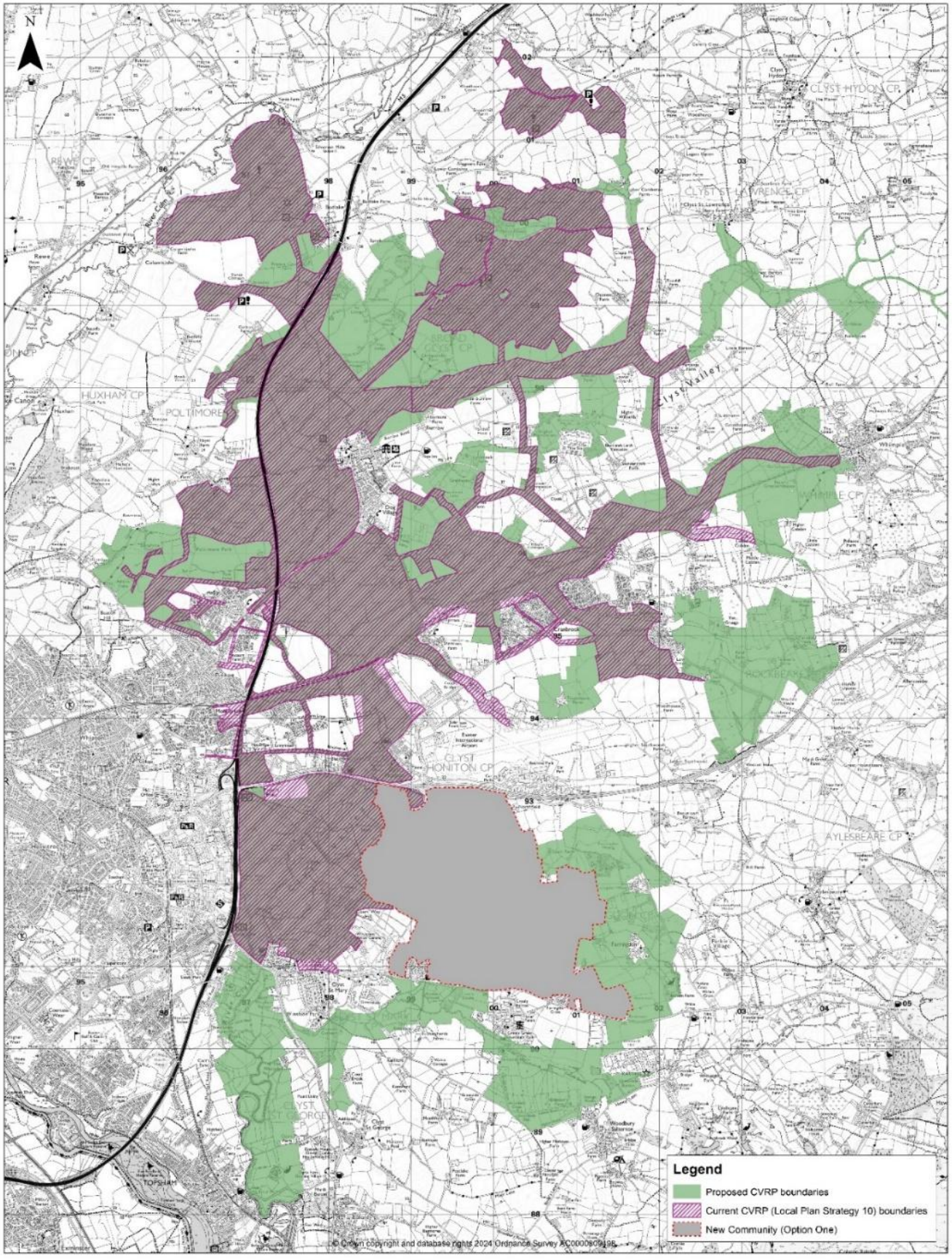
- Option A. Retain the existing Clyst Valley Regional Park boundary from the adopted East Devon Local Plan 2013-31
- Option B. Expand the existing Clyst Valley Regional Park boundary

Outline of reasons for selecting the alternatives

The adopted East Devon Local Plan 2013-31 contains a Clyst Valley Regional Park (CVRP) boundary and a policy which attaches particular emphasis to establishing high quality landscapes and settings for development, people and wildlife within the boundary. The existing CVRP covers a large area of land on the West End of East Devon. The key principles considered for the inclusion of land in the CVRP are: *"The park boundary will be defined by work that draws on assessment of suitability of land for inclusion in the park of land areas that fall in: Flood zone 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."*

The CVRP has been reviewed to reflect new and updated information, including the CVRP Masterplan, the CVRP Landscape Character Assessment, the Local Nature Recovery network, implemented development, and development proposed in the adopted Cranbrook Plan and the emerging Local Plan. This has resulted in Option B, an expansion of the existing CVRP.

The following map shows the current CVRP as purple hatching (Option A), and the expansion of the CVRP boundaries in green (Option B).


N
Legend
Proposed CVRP boundaries
Current CVRP (Local Plan Strategy 10) boundaries
New Community (Option One)
© Crown copyright and database rights 2024 Ordnance Survey AC0000809196
Clyst Valley Regional Park
0 0.275 0.55 1.1 1.65 2.2 Miles

Policy title: Strategic Policy WS09: Clyst Valley Regional Park			
Option / **SA Objective**	**Option A**	**Option B**	**Commentary**
1. Biodiversity	**+ +**	**+ +**	A key purpose of the CVRP is to conserve and enhance habitat and wildlife, so a major positive effect is likely from both options. The larger area of Option B will provide greater biodiversity benefits.
2. Landscape	**+ +**	**+ +**	The CVRP will deliver a range of green infrastructure, landscape enhancement and recreational benefits, which means a major positive effect for both options. Again, the larger area of Option B will lead to even more benefits.
3. Historic and built environment	**+ +**	**+ +**	The restriction of development within the CVRP boundary will conserve and enhance heritage assets across the area, with the potential for interpretation initiatives as part of park provision offering greater enhancement. These benefits will be increased through the larger area of Option B.
4. Climate change and carbon emissions	**+ / -**	**+ / -**	The promotion of high quality walking and cycling routes within the CVRP, including the Clyst Valley Trail, will minimise greenhouse gas emissions from travel. However, there may be limited scope for renewable and low carbon energy generation within the CVRP so, overall, a mixed positive and negative effect for both options.
5. Climate change adaptation	**+**	**+**	The restriction of built development and policy for green infrastructure enhancement in the CVRP will help climate change adaptation by managing flood risk and making the area more resilient to heat, drought and extreme storms.
6. Land resources	**+**	**+**	The CVRP will minimise the loss or degradation of land resources, so a minor positive effect for both options.
7. Water resources	**+**	**+**	The conservation and enhancement of the CVRP will have positive effects upon water quality at the River Clyst and its tributaries.
8. Homes	**-**	**-**	The restriction of housing development within the CVRP results in a negative effect against this objective.

Policy title: Strategic Policy WS09: Clyst Valley Regional Park			
Option / **SA Objective**	**Option A**	**Option B**	**Commentary**
9. Health and well-being	**+ +**	**+ +**	The increased recreational opportunities across the CVRP will support health, safe and active communities, with even greater benefits from the larger area of Option B.
10. Access to services	**0**	**0**	Not relevant to the CVRP.
11. Jobs and employment	**0**	**0**	No significant effects likely to arise on this objective from the CVRP.
12. Town centres	**0**	**0**	Not relevant to the CVRP.
13. Connectivity and transport	**+**	**+**	The proposed increase in active travel routes in the CVRP will improve transport connectivity, potentially reducing traffic congestion.
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: • None identified, given the positive effects identified for both options.			
Preferred alternative: Option B. Expand the existing Clyst Valley Regional Park boundary. This results in Strategic Policy WS09: Clyst Valley Regional Park. **Reasons for alternatives being preferred or rejected:** • Option A. Retain the existing Clyst Valley Regional Park boundary from the adopted East Devon Local Plan 2013-31 is rejected because, despite many positive effects, the alternative (Option B) is likely to have even greater sustainability benefits.			

Policy title: Strategic Policy WS09: Clyst Valley Regional Park			
Option / SA Objective	Option A	Option B	Commentary
• Option B. Expand the existing Clyst Valley Regional Park boundary is preferred because of the range of positive effects across the range of social and environmental objectives.			

Local Plan Chapter 6. Mitigating climate change and Chapter 7. Adapting to climate change

Policy number/title:

- Strategic Policy CC01: Climate Emergency;
- Strategic Policy CC02: Net-zero Carbon Development;
- Strategic Policy CC03: Promoting renewables and zero carbon energy;
- Strategic Policy CC04: Energy storage;
- Strategic Policy CC05: Heat networks;
- Strategic Policy CC06: Embodied carbon;
- Strategic Policy AR01: Flooding;
- Strategic Policy AR02: Water quality and efficiency
- Policy AR03: Coastal Change Management Areas (CCMAs);
- Policy AR04: Relocation of uses affected by coastal change;
- Policy AR05: Development affecting coastal erosion.

Reasonable alternatives to these policies:

- CC01A. Carbon neutral by 2050 – this reflects the requirement in the Climate Change Act 2008;

- CC02A. Do not require new development to be net-zero – this would mean relying on national policy and the Future Homes and Future Buildings Standard;
- CC04A. Identify suitable areas for energy storage;
- CC05A. Do not require major development to connect to existing heat network, or for large-scale development to create a new heat network;
- CC06A. 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 developing renewable and low carbon energy (Strategic Policy CC03) was ruled out as a reasonable alternative as it would not reflect national policy. Similarly, there are no reasonable alternatives for flood risk (Strategic Policy AR01) and coastal change policies (Strategic Policies AR03, AR04, AR05), as they are consistent with national policy and an option of not having a policy was not considered as being reasonable.

Local Plan Chapters 6 and 7. Mitigating and adapting to climate change												
Policy / **SA Objective**	**CC01. Climate emergency**	**CC02. Net-zero development**	**CC03. Renewables**	**CC04.Energy storage**	**CC05. Heat networks**	**CC06. Embodied carbon**	**AR01. Flooding**	**AR02. Water quality/use**	**AR03. CCMAs**	**AR04. Relocate uses**	**AR05. Coastal erosion**	
1. Biodiversity	**0**	**0**	**+**	**+**	**0**	**0**	**+**	**+ +**	**0**	**+**	**+**	
Biodiversity commentary	Positive effect noted for policy CC03 due to inclusion of reference to avoiding impacts on protected species and ecological sites. Minor positive effect also for CC04 as energy storage schemes will only be permitted where there are no adverse impacts on the											

Local Plan Chapters 6 and 7. Mitigating and adapting to climate change												
Policy / SA Objective	CC01. Climate emergency	CC02. Net-zero development	CC03. Renewables	CC04.Energy storage	CC05. Heat networks	CC06. Embodied carbon	AR01. Flooding	AR02. Water quality/use	AR03. CCMAs	AR04. Relocate uses	AR05. Coastal erosion	
	environment. AR01 states flooding measures should respect biodiversity, resulting in a minor positive effect. Less water use will reduce the need to abstract water from the natural environment which, alongside water quality measures, means a major positive effect for AR02. Sustainable coastal change management proposals will only be permitted where there is no unacceptable environmental impact, leading to a minor positive for AR04 and AR05. Negligible effects on biodiversity for all other policies.											
2. Landscape	**0**	**0**	**- ?**	**+**	**0**	**0**	**0**	**0**	**0**	**+**	**+**	
Landscape commentary	Positive effect noted for policy AR04 due to inclusion of reference to avoiding impacts on landscape. Negative uncertain effect for CC03 as, despite reference to avoiding adverse landscape impacts, residual negative effects are likely with some uncertainty depending on scale and location of energy generating schemes. Minor positive effect also for CC04 as energy storage schemes will only be permitted where there are no adverse impacts on the environment. AR01 promotes natural flood management, with secondary positive effects on the landscape. 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 AR05. Negligible effects on landscape for all other policies.											
3. Hist. built env	**+**	**+**	**- ?**	**+**	**0 ?**	**0**	**0**	**0**	**0**	**+**	**+**	
Hist. built env. commentary	Long-term positive effect likely for policies CC01, CC02 as net-zero development will promote high quality design through highly energy efficient buildings. Positive effect noted for policy AR04 due to inclusion of reference to avoiding impacts on historic environment and residential amenity. Negative uncertain effect for CC03 as, despite reference to avoiding adverse landscape impacts, residual negative effects are likely with some uncertainty depending on scale and location of energy generating schemes. Minor positive effect for CC04 as energy storage schemes will only be permitted where there are no adverse impacts on the environment.											

Local Plan Chapters 6 and 7. Mitigating and adapting to climate change												
Policy / SA Objective	CC01. Climate emergency	CC02. Net-zero development	CC03. Renewables	CC04.Energy storage	CC05. Heat networks	CC06. Embodied carbon	AR01. Flooding	AR02. Water quality/use	AR03. CCMAs	AR04. Relocate uses	AR05. Coastal erosion	
	Negligible effect for CC05 as, apart from a central plant building, heat networks are located underground where environmental impact is generally limited, with some uncertainty as there may be archaeological remains. 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 AR05. Negligible effect for remaining policies.											
4. Climate change carbon emissions	+ +	+ +	+ + ?	+ +	+ +	+	0	0	0	0	0	
Climate change carbon emissions commentary	Major positive effect is likely for several policies due to net-zero development, maximising renewable and low carbon energy, and retaining existing buildings where possible in recognition of embodied carbon. CC02 is likely to have a major positive effect by storing renewable energy. CC03 has a mixed uncertain effect as it allows fossil fuel-based energy generation in limited circumstances that may not occur. Negligible effect for other policies as they do not relate to greenhouse gas emissions.											
5. Climate change adaptation	0	+ +	0	+	0	0	+ +	+ +	+ +	+ +	+ +	
Climate change adaptation commentary	Policy CC02 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 CC04, as energy storage can supply energy in the event of extreme storms disrupting power supplies. Major positive effect for AR01 as it avoids development in areas that flood, taking account of climate change, ensuring that development adapts to the effects of climate change. With hotter, drier summers more likely because of climate change, AR02 has a major positive through less water use. AR03 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. AR04 allows the relocation of development in areas affected by coastal erosion, in part due to climate change from sea level rises and more extreme											

Local Plan Chapters 6 and 7. Mitigating and adapting to climate change												
Policy / SA Objective	CC01. Climate emergency	CC02. Net-zero development	CC03. Renewables	CC04.Energy storage	CC05. Heat networks	CC06. Embodied carbon	AR01. Flooding	AR02. Water quality/use	AR03. CCMAs	AR04. Relocate uses	AR05. Coastal erosion	
	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 AR05. Negligible effects for other policies as they relate to climate change mitigation rather than adaptation.											
6. Land resources	**0**	**0**	**- ?**	**- ?**	**0**	**+**	**0**	**0**	**0**	**0**	**0**	
Land resources commentary	Potential for negative effect for CC03 if there is a loss of best and most versatile agricultural land from renewable energy schemes – this is uncertainty until precise locations are known. Energy storage could also be located on best and most versatile agricultural land, but CC04 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 CC06 as the re-use of existing buildings will safeguard mineral resources. Negligible effects on this objective for all other policies.											
7. Water resources	**0**	**0**	**0**	**0**	**0**	**0**	**+ +**	**+ +**	**0**	**0**	**0**	
Water resources commentary	Major positive effect for AR01, as effective management of surface water run-off will reduce the degradation of water resources, and the conservation and enhancement of water quality by using sustainable drainage systems. AR02 includes measures to improve water quality, alongside using water more efficiently through the Optional Technical Housing Standard of 110 litres per person per day, so a major positive effect. Negligible effects on this objective for other policies in this chapter.											
8. Homes	**+ / -**	**+ / -**	**0**	**0**	**0**	**0**	**0**	**+ / -**	**0**	**0**	**0**	

Local Plan Chapters 6 and 7. Mitigating and adapting to climate change												
Policy / SA Objective	CC01. Climate emergency	CC02. Net-zero development	CC03. Renewables	CC04.Energy storage	CC05. Heat networks	CC06. Embodied carbon	AR01. Flooding	AR02. Water quality/use	AR03. CCMAs	AR04. Relocate uses	AR05. Coastal erosion	
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 for consumers, so a mixed positive and negative effect for policies CC01, CC02. Similar findings for water efficiency requirements in AR02, which could increase the cost of housing, albeit provide a good quality home. Although AR03 prevents residential development in CCMAs, the area covered is relatively limited and geographically isolated, so will have a negligible effect on housing supply. Negligible effects on this objective for other policies.											
9. Health and well-being	**0**	**0**	**+**	**0**	**0**	**0**	**+**	**+**	**+**	**+**	**+**	
Health and well-being commentary	Positive effect noted for policy CC03 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 policies AR01, AR03, AR04, AR05. Improved water quality will positively affect health and well-being, for AR02. Negligible effects on this objective for other policies.											
10. Access to services	**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.											

Local Plan Chapters 6 and 7. Mitigating and adapting to climate change												
Policy / SA Objective	CC01. Climate emergency	CC02. Net-zero development	CC03. Renewables	CC04.Energy storage	CC05. Heat networks	CC06. Embodied carbon	AR01. Flooding	AR02. Water quality/use	AR03. CCMAs	AR04. Relocate uses	AR05. Coastal erosion	
11. Jobs and employment	+	+	+	+	+	0	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 CC01, CC02, CC03, CC04. Although AR03 limits employment development in CCMAs, the area covered is relatively limited and geographically isolated, so will have a negligible effect on employment land supply. Negligible effect for other policies.											
12. Town centres	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	
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. • Retain agricultural use where possible for renewable energy schemes (included in Strategic Policy CC03).												

Local Plan Chapters 6 and 7. Mitigating and adapting to climate change												
Policy / SA Objective	CC01. Climate emergency	CC02. Net-zero development	CC03. Renewables	CC04.Energy storage	CC05. Heat networks	CC06. Embodied carbon	AR01. Flooding	AR02. Water quality/use	AR03. CCMAs	AR04. Relocate uses	AR05. Coastal erosion	
• AR01 has been re-written to take account of the most up-to-date evidence and SA objectives. • AR01 is a new policy based on emerging evidence and the SA objectives. • Additional text added relating to water quality to AR02. • Minimal changes have been made to AR03, AR04 and AR05 as the evidence for these policies and their importance to the SA objectives is unchanged.												
Preferred alternative: Policies CC01, CC02, CC03, CC04, CC05, CC06, AR01, AR02, AR03, AR04, AR05. **Reasons for alternatives being preferred or rejected:** • The preferred policies 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. • CC01A. 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 on climate change objectives, which is consistent with the Council Plan and "climate emergency" declaration. • CC02A. 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). • CC04A. Identify suitable areas for energy storage – this would provide greater certainty on their delivery but is **rejected** as 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. • CC05A. 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. • CC06A. 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

Policy number/title:

- Strategic Policy HN01: Housing to address needs
- Strategic Policy HN02: Affordable Housing
- Policy HN03: Housing to meet the needs of older people
- Policy HN04: Accessible and Adaptable Housing
- Policy HN05: Self-build and Custom build housing
- Policy HN06: Residential Sub-division of existing dwellings and buildings and replacement of existing dwellings
- Policy HN07: Householder Annexes, extensions, alterations and outbuildings.
- Policy HN08: Hostels and Houses in Multiple Occupation (HMOs)
- Policy HN09: Provision for Gypsy and Travellers, and Travelling Showpeople Sites
- Strategic Policy HN10: Rural Exception Sites
- Policy HN11: Housing for rural workers

Reasonable alternatives to these policies:

- HN02A. Provide higher levels of affordable housing
- HN02B. Provide lower levels of affordable housing
- HN02C. A tenure mix with less social rented housing, more intermediate and other forms of affordable housing
- HN03A. Require a higher proportion of older persons housing on larger sites
- HN03B. Restrict older persons housing in locations that are less accessible by public transport and with fewer services and facilities.
- HN43A. Include a policy on the mix of market housing
- HN05A. Lower self-build site threshold
- HN05B. Higher percentage of self-build plots
- HN06A. Do not restrict dwelling size increase
- HN06B. Do not support conversions/sub-divisions outside of settlement boundaries
- HN07A. Do not have a policy on householder annexes, extensions, alterations and out-buildings

- HN08A. Do not have a policy on hostels and houses in multiple occupation (HMOs)
- HN10A. Higher percentage of affordable housing on Rural Exception Sites
- HN10B. Lower percentage of affordable housing on Rural Exception Sites
- HN11A. Rural business succession
- HN11B. 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. 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 local evidence (East Devon Local Housing Need Assessment, 2025), so reasonable alternatives have not been identified on these issues (Policy HN02). Site allocations for older persons housing is not a reasonable alternative as there is a lack of evidence that this approach is deliverable (Policy HN03). Similarly, given demographic projections and the long term need for older persons housing, an alternative to not have a policy is not considered reasonable (Policy HN03). Standards for accessible and adaptable housing reflect the Building Regulations and local evidence of significant need, so no reasonable alternatives have been identified (Policy HN04). As national policy supports self-build and custom build housing, alternatives that do not support its delivery are not reasonable (Policy HN05). An increase in the size of householder annexes, extensions, alternations and outbuildings is not likely to mean significant effects beyond those identified for policy HN07. Government policy includes provision for affordable traveller sites (exception sites), but local evidence (Gypsy and Traveller Accommodation Assessment) does not specifically identify a need for affordable pitches – in any case, the identified need (including affordable) for pitches will be met in full through allocations at Cranbrook and the new community. Therefore, an alternative to release land for affordable traveller pitches (exception sites) is not reasonable (Policy HN09).

Local Plan Chapter 8. Meeting housing needs												
Policy / SA Objective	HN01. Address needs	HN02. Aff. housing	HN03. Older people	HN04.Adaptable housing	HN05. Self-build	HN06. Sub-division etc	HN07. Annexes etc	HN08. HMOs	HN09. Gypsy/ Traveller	HN10. Exception	HN11. Rural workers	
1. Biodiversity	**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**	**-**	**-**	**-**	
Landscape commentary	Negligible effects on this objective for most policies in Chapter 8. Policies HN09, 10 and 11 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**	
Hist. built env. commentary	Policies HN03, 04 and 05 ensure high quality, accessible, and adaptable housing. Policies HN06 and HN08 avoid adverse impact on the character/amenity of the area, meaning a minor positive effect. Similarly, policy HN07 requires proposals to be subordinate to the main dwelling and relate well to local character, again meaning a minor positive effect on the built environment.											
4. Climate change carbon emissions	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**-**	**-**	**-**	
Climate change carbon emissions commentary	Policies HN09, 10 and 11 are likely to lead to more development in rural locations where there are fewer sustainable travel opportunities, leading to carbon emissions. Negligible effects for the remaining policies in Chapter 8.											

Local Plan Chapter 8. Meeting housing needs												
Policy / SA Objective	HN01. Address needs	HN02. Aff. housing	HN03. Older people	HN04.Adaptable housing	HN05. Self-build	HN06. Sub-division etc	HN07. Annexes etc	HN08. HMOs	HN09. Gypsy/ Traveller	HN10. Exception	HN11. Rural workers	
5. Climate change adaptation	**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**	
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**	
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												
Policy / SA Objective	HN01. Address needs	HN02. Aff. housing	HN03. Older people	HN04.Adaptable housing	HN05. Self-build	HN06. Sub-division etc	HN07. Annexes etc	HN08. HMOs	HN09. Gypsy/ Traveller	HN10. Exception	HN11. 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	+	-	-	
Access to services commentary	Policy HN03 states that older person's accommodation should be highly accessible, within 400m of facilities, well-served by public transport, so a major positive effect. Gypsy and traveller sites should be located within a reasonable distance of a range of services, meaning a likely positive effect. Exception sites are likely to be in rural locations, so a minor negative effect is likely for policy HN10. Rural workers dwellings are also located in rural locations, so HN11 is also likely to a minor negative effect. 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	+	
Jobs/employment commentary	Minor positive effect for housing for rural workers policy (HN11), 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	

Local Plan Chapter 8. Meeting housing needs												
Policy / SA Objective	HN01. Address needs	HN02. Aff. housing	HN03. Older people	HN04.Adaptable housing	HN05. Self-build	HN06. Sub-division etc	HN07. Annexes etc	HN08. HMOs	HN09. Gypsy/ Traveller	HN10. Exception	HN11. Rural workers	
Town centres commentary	Negligible effects on this objective for all policies in Chapter 8, apart from policies HN03 and HN08 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**	
Connectivity and transport commentary	Policies HN03 and HN08 refer to having good connectivity so a minor positive effect is likely. HN09 includes provision for acceptable vehicular access. 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, exception sites, and rural workers dwellings are limited in scale and conserve and enhance landscape character (included in policies HN09, 10, 11). • Ensure there are sustainable travel opportunities for rural development to minimise carbon emissions (included in policies HN09, 10) – this is not possible for rural workers dwellings (HN11), given the nature of this type of development is related to rural businesses. • Require gypsy and traveller and rural exception sites to have access to services and facilities (included in policies HN09, 10) – this is not possible for rural workers dwellings (HN11), given the nature of this type of development is related to rural businesses. These mitigation measures will reduce adverse impacts to negligible or minor positive.											
Preferred alternative: Policies HN01 – HN11. **Reasons for alternatives being preferred or rejected:**												

Local Plan Chapter 8. Meeting housing needs												
Policy / SA Objective	HN01. Address needs	HN02. Aff. housing	HN03. Older people	HN04.Adaptable housing	HN05. Self-build	HN06. Sub-division etc	HN07. Annexes etc	HN08. HMOs	HN09. Gypsy/ Traveller	HN10. Exception	HN11. Rural workers	
• The preferred policies (HN01 – HN11) are likely to have major positive effects on meeting housing needs, with minor positive effects on supporting healthy and safe communities and social deprivation. • **HN02A. Provide higher levels of affordable housing is rejected** as although this would better meet needs for affordable housing, but the additional cost of doing so is likely to adversely affect viability, and therefore inhibit the delivery of housing as well as the provision of supporting infrastructure. • **HN02B. Provide lower levels of affordable housing is rejected** as whilst this could make the delivery of facilities and services more viable, this would limit the potential to meet affordable housing need. • **HN02C. A tenure mix with less social rented housing, more intermediate and other forms of affordable housing is rejected** because it would less positive effects on meeting housing need in East Devon, given the high demand for social rented housing. • **HN03A. Require a higher proportion of older persons housing on larger sites is rejected** as 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. • **HN03B. Restrict older persons housing in locations that are less accessible by public transport and with fewer services and facilities is rejected** as 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. • **HN43A. Including a policy on market housing mix is rejected** as it is too prescriptive and better outcomes will be achieved on a case-by-case basis through considering planning applications; and Strategic Policy HN01 already requires an appropriate mix of housing types. • **HN05A. Lower self-build threshold is rejected** as it 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. • **HN05B. Higher percentage of self-build plots is rejected** as it 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. • **HN06A. Do not restrict dwelling size increase is rejected** as it would reduce the number of smaller homes, so there is less potential to meet local need for smaller homes.												

Local Plan Chapter 8. Meeting housing needs												
Policy / SA Objective	HN01. Address needs	HN02. Aff. housing	HN03. Older people	HN04.Adaptable housing	HN05. Self-build	HN06. Sub-division etc	HN07. Annexes etc	HN08. HMOs	HN09. Gypsy/ Traveller	HN10. Exception	HN11. Rural workers	

- **HN06B. Do not support conversions/sub-divisions outside of settlement boundaries is rejected** as it would constrain the amount of housing in the countryside. It could also 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.
- **HN07A. Do not have a policy on householder annexes, extensions, alterations and out-buildings is rejected** – 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.
- **HN08A. Do not have a policy on hostels and houses in multiple occupation (HMOs) is rejected** – 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.
- **HN10A. Higher percentage of affordable housing on Rural Exception Sites is rejected** – 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.
- **HN10B. Lower percentage of affordable housing on Rural Exception Sites is rejected** as it would deliver fewer affordable homes, so would perform less well on the housing objective.
- **HN11A. Rural business succession is rejected** – 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.
- **HN11B. Low impact residential development is rejected** – 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 location means that environmental harm remains likely, and it would increase carbon emissions from travel to facilities and services.

Local Plan Chapter 9. Supporting the economy and town centres

Policy number/title:

- Policy SE01: Employment development within existing settlement boundaries
- Policy SE02: Employment development in the countryside
- Policy SE03: Farm diversification
- Strategic Policy SE04: Resisting the loss of Employment sites
- Policy SE05: Employment and skills statements
- Strategic Policy SE06: Town centre hierarchy, sequential approach and impact assessment
- Policy SE07: Town centre development
- Policy SE08: Local shops and services
- Policy SE09: Rural shops
- Policy SE10: Sustainable tourism
- Policy SE11: Holiday accommodation parks in designated landscapes

Reasonable alternatives:

- SE01A. Allow other job generating uses on existing employment sites (other than use E(g), B2 or B8)
- SE03A. Restrict farm diversification to more limited uses and smaller scale development
- SE04A. Taking a less restrictive approach by allowing a greater mix of uses on employment sites
- SE05A. Do not include a policy requiring employment and skills statements
- SE08A. Do not include a policy that resists the loss of local shops and services
- SE09A. Do not include a policy that addresses rural shops
- SE10A. Do not include a policy to address sustainable tourism
- SE11A. 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 SE06 and SE07.

Local Plan Chapter 9. Supporting the economy and town centres												
Policy / SA Objective	**SE01. Set. Boundaries**	**SE02. Countryside**	**SE03. Farm diversify**	**SE04. Loss empl. Sites**	**SE05.Emp Statement**	**SE06. Town centre hierarchy**	**SE07. Town centre**	**SE08. Local shops and services**	**SE09. Rural shops**	**SE10. Sust. tourism**	**SE11. Hol. Accomm.**	
1. Biodiversity	**0**	**0**	**+**	**0**	**0**	**0**	**0**	**0**	**+**	**+**	**+**	
Biodiversity commentary	Policies SE03 and SE10 seek opportunities to improve biodiversity, so will likely have a minor positive effect. Also a minor positive effect for policy SE09 as proposals must not harm the natural environment. Policy SE11 refers to achieving biodiversity net gain, so a minor positive effect is likely. Negligible effects for other policies.											
2. Landscape	**0**	**-**	**+**	**0**	**0**	**0**	**0**	**0**	**+**	**+**	**+ +**	
Landscape commentary	Likely minor negative landscape effect from extending employment development and new agricultural buildings in the countryside (policy SE02). Policies SE03 and SE10 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 SE09 as proposals must not harm the rural character of the natural environment. Policy SE11 does not allow holiday accommodation in the most sensitive landscapes, and required extensive landscaping, resulting in a major positive effect. Negligible effects for other policies.											

Local Plan Chapter 9. Supporting the economy and town centres												
Policy / SA Objective	SE01. Set. Boundaries	SE02. Countryside	SE03. Farm diversify	SE04. Loss empl. Sites	SE05.Emp Statement	SE06. Town centre hierarchy	SE07. Town centre	SE08. Local shops and services	SE09. Rural shops	SE10. Sust. tourism	SE11. Hol. Accomm.	
3. Hist. built env	+	0	+	0	0	- ?	- ?	0	+	+	+	
Hist. built env. commentary	Minor positive effect for policy SE01 as employment uses should be compatible with neighbouring uses and not have adverse amenity impacts. Policies SE03 and SE10 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 SE06 and SE07, due to encouraging development in these locations, with uncertainty depending upon specific proposals. Also, a minor positive effect for policy SE09 as proposals must not harm the historic environment and should be sympathetic to the surroundings. Policy SE11 refers to avoiding adverse impacts upon local character or amenity, so a minor positive effect is noted. Negligible effects for remaining policies.											
4. Climate change carbon emissions	+	-	-	0	0	+	+	+	-	-	+	
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 SE01. Minor negative effect from carbon emissions from additional travel to employment development in the countryside in policy SE02, farm diversification schemes (policy SE03), rural shops (policy SE09) and tourism (policy SE10). Minor positive effect from encouraging development in town centres in policies SE06 and SE07, 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 SE08. Policy SE11 supports sustainable construction and on-site renewable energy production, meaning a minor positive effect. Negligible effects for policies SE04, SE05.											

Local Plan Chapter 9. Supporting the economy and town centres												
Policy / SA Objective	SE01. Set. Boundaries	SE02. Countryside	SE03. Farm diversify	SE04. Loss empl. Sites	SE05.Emp Statement	SE06. Town centre hierarchy	SE07. Town centre	SE08. Local shops and services	SE09. Rural shops	SE10. Sust. tourism	SE11. Hol. Accomm.	
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 SE11 which makes clear that proposals will not use the best and most versatile agricultural land.											
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.											

Local Plan Chapter 9. Supporting the economy and town centres												
Policy / SA Objective	SE01. Set. Boundaries	SE02. Countryside	SE03. Farm diversify	SE04. Loss empl. Sites	SE05.Emp Statement	SE06. Town centre hierarchy	SE07. Town centre	SE08. Local shops and services	SE09. Rural shops	SE10. Sust. tourism	SE11. Hol. Accomm.	
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 10. Encouraging main town centre uses will provide accessible services, meaning a major positive effect for policies SE06 and SE07. 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 positive effect for policy SE08. Similarly, shops outside villages will provide access to services, but the rural location limits this to a likely minor positive effect for policy SE09.											
11. Jobs and employment	+ +	+ +	+ +	+ +	+ +	+ +	+ +	+ +	+ +	+ +	+	
Jobs/employment commentary	Most policies in chapter 10 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 SE11 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	

Local Plan Chapter 9. Supporting the economy and town centres												
Policy / SA Objective	SE01. Set. Boundaries	SE02. Countryside	SE03. Farm diversify	SE04. Loss empl. Sites	SE05.Emp Statement	SE06. Town centre hierarchy	SE07. Town centre	SE08. Local shops and services	SE09. Rural shops	SE10. Sust. tourism	SE11. Hol. Accomm.	
Town centres commentary	Employment uses within settlement boundaries (policy SE01) are likely to have a positive effect on town centres given the potential for additional trade. Major positive for policies SE06 and SE07 which actively promote town centres. Minor positive effect for policy SE08 and SE09 as they ensure the provision of new shops and services without impacting on the vitality and viability of any nearby centre. Negligible effects for other policies.											
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 SE01. 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 SE02. Farm diversification schemes are likely to be in rural locations with poorer transport connections, so a minor negative effect for policy SE03. Settlement centres generally have the best connections, so a major positive effect is likely from encouraging developing in these locations in policies SE06 and SE07. 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 SE08. The rural location of retail development in policy SE09 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 SE10. Safe highway access is required in policy SE11, meaning a minor positive effect. Negligible effects for other policies.											
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: • Ensure there are sustainable travel opportunities for rural employment development (included in Policy SE02, SE10).												

Local Plan Chapter 9. Supporting the economy and town centres												
Policy / SA Objective	SE01. Set. Boundaries	SE02. Countryside	SE03. Farm diversify	SE04. Loss empl. Sites	SE05.Emp Statement	SE06. Town centre hierarchy	SE07. Town centre	SE08. Local shops and services	SE09. Rural shops	SE10. Sust. tourism	SE11. Hol. Accomm.	
• Address adverse landscape effects, including through landscaping, for employment proposals in rural locations (included in Policy SE02, SE03, SE09, SE10, SE11). These measures are likely to reduce negative effects to neutral.												
Preferred alternative: Policies SE01 – SE11. **Reasons for alternatives being preferred or rejected:** • The preferred policies SE01 – SE11 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. • **SE01A. Allow other job generating uses on existing employment sites (other than use E(g), B2 or B8) is rejected** – 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. • **SE03A. Restrict farm diversification to more limited uses and smaller scale development is rejected** – 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, adversely effecting the local economy and rural prosperity. • **SE04A. Taking a less restrictive approach by allowing employment sites to be available for other uses is rejected** – this would result in a positive effect on housing as it would increase the level of housing supply, but will have negative effects associated with the loss of employment sites. • **SE05A. Do not include a policy requiring employment and skills statements is rejected** as it would provide less opportunity to access high quality skills training, limiting the positive effects on objective 11.												

Local Plan Chapter 9. Supporting the economy and town centres												
Policy / SA Objective	SE01. Set. Boundaries	SE02. Countryside	SE03. Farm diversify	SE04. Loss empl. Sites	SE05.Emp Statement	SE06. Town centre hierarchy	SE07. Town centre	SE08. Local shops and services	SE09. Rural shops	SE10. Sust. tourism	SE11. Hol. Accomm.	

- **SE08A. Do not include a policy that resists the loss of local shops and services is rejected** – 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.
- **SE09A. Do not include a policy that addresses rural shops is rejected** – 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.
- **SE10A. Do not include a policy to address sustainable tourism is 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.
- **SE11A. Include a less restrictive criteria-based policy which permits extensions to existing holiday parks and establishment of new parks is rejected** – 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), it will have major negative landscape effects (objective 2).

Local Plan Chapter 10. High quality design

Policy number/title:

- Strategic Policy DS01: Design and Local distinctiveness
- Policy DS02: Housing Density and efficient use of land
- Policy DS03: Display of Advertisements
- Policy DS04: Green and Blue Infrastructure

Reasonable alternatives:

- DS01A. Do not include a design policy
- DS03A. 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. High quality design					
Policy / **SA Objective**	**DS01. Design**	**DS02. Housing density**	**DS03. Adverts**	**DS04. Green, Blue Infr.**	
1. Biodiversity	**+ +**	**0**	**+**	**+ +**	
Biodiversity commentary	Major positive effects are likely from policy DS01 due to biodiversity enhancement, habitat creation, and retention of trees and hedgerows. A range of biodiversity benefits are also likely from DS04. DS03 refers to considering biodiversity value, so a minor positive. Negligible effect for other policies.				
2. Landscape	**+ +**	**+ +**	**+**	**+ +**	
Landscape commentary	Policy DS01 states that important landscape characteristics and prominent topographical features should not be adversely affected, along with 'greening' measures, leading to a major positive effect. Housing density should conserve or enhance the character of the area, especially in a National Landscape, so a major positive effect for DS02. Advertisements should be sympathetic to the character				

Local Plan Chapter 10. High quality design					
Policy / SA Objective	DS01. Design	DS02. Housing density	DS03. Adverts	DS04. Green, Blue Infr.	
	of the area, appropriately positioned and scaled in relation to their context, leading to a minor positive effect for DS03. A wide range of landscape benefits are likely from DS04.				
3. Hist. built env	+ +	+ +	+ +	+ +	
Hist. built env. commentary	A major positive effect is likely from policy DS01 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 DS02 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 DS03. The wide range of green and blue infrastructure enhancements means major positive effects are also likely from DS04.				
4. Climate change carbon emissions	+ +	+ ?	0	+ +	
Climate change carbon emissions commentary	Specific mention is made in policy DS01 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 DS01. Making efficient use of land should minimise carbon emissions from travel, but this positive effect for policy DS02 has uncertainty until density standards are prescribed. Supporting connected cycling/walking infrastructure through green and blue infrastructure leads to a major positive effect for DS04. Negligible effect for DS03.				

Local Plan Chapter 10. High quality design					
Policy / SA Objective	DS01. Design	DS02. Housing density	DS03. Adverts	DS04. Green, Blue Infr.	
5. Climate change adaptation	+ +	0	0	+ +	
Climate change adaptation commentary	High quality design should ensure new development is adapted to climate change, meaning a major positive effect for policy DS01. Delivering high quality multi-functional green and blue infrastructure will have a major positive effect for DS04. Negligible effect for other policies.				
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 DS01. The efficient use of land in policy DS02 has a major positive effect on this objective. References to restoring soil health and delivering high quality multi-functional green and blue infrastructure will have a major positive effect for DS04. Negligible effect for policy DS03.				
7. Water resources	0	0	0	+ +	
Water resources commentary	References to delivering high quality multi-functional green and blue infrastructure and achievement of excellent ecological status of rivers and watercourses means a major positive effect for DS04. Negligible effect for other policies.				
8. Homes	+	+	0	0	

Local Plan Chapter 10. High quality design					
Policy / SA Objective	DS01. Design	DS02. Housing density	DS03. Adverts	DS04. Green, Blue Infr.	
Homes commentary	The provision of good quality homes means a positive effect for policy DS01. The conservation and enhancement of the area through housing density means a positive effect for policy DS02. Negligible effect for remaining policies.				
9. Health and well-being	+ +	+	+	+ +	
Health and well-being commentary	Policy DS01 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. These measures mean a major positive effect for policy DS01. Ensuring the display of adverts considers public safety has a minor positive effect for DS03. The delivery of high quality multi-functional Green and Blue infrastructure provides a range of health and well-being major positive benefits. Negligible effect for policy DS02.				
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 DS01. The efficient use of land should ensure housing density is highest where there is good access to services and facilities for DS02. The delivery of connected cycling/walking infrastructure means positive effects for DS04 as these can provide access to services.				

Local Plan Chapter 10. High quality design					
Policy / SA Objective	DS01. Design	DS02. Housing density	DS03. Adverts	DS04. Green, Blue Infr.	
	Negligible effect for policy DS03.				
11. Jobs and employment	**0**	**0**	**0**	**0**	
Jobs/employment commentary	Negligible effect for all policies.				
12. Town centres	**0**	**0**	**0**	**0**	
Town centres commentary	Negligible effect for all policies.				
13. Connectivity and transport	**+ +**	**+**	**0**	**+ +**	
Connectivity and transport commentary	The requirement in policy DS01 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. The delivery of connected cycling/walking infrastructure through high quality multi-functional Green and Blue infrastructure has major benefits for connectivity. Negligible effect for policy DS03.				
Mitigation measures to address likely significant adverse effects and maximise beneficial effects, and likely post-mitigation effects:					

Local Plan Chapter 10. High quality design					
Policy / SA Objective	DS01. Design	DS02. Housing density	DS03. Adverts	DS04. Green, Blue Infr.	
• Include higher density housing at locations with good access to services and facilities (including public transport) (included in Policy DS02).					

Preferred alternative: Policies DS01 – DS04.

Reasons for alternatives being preferred or rejected:

- **Policies DS01 – DS04 are preferred** as they are likely to have major positive effects arising from biodiversity, landscape high quality design, carbon emissions and health and well-being. A range of minor positive effects are noted in relation to land resources, housing, access to services and connectivity.
- **DS01A. Do not include a design policy is rejected** – 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.
- **DS04A. Do not have a policy relating to the display of advertisements 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. Sustainable transport and communications

Policy number/title:

- Strategic Policy TR01: Prioritising walking, wheeling, cycling, and public transport
- Strategic Policy TR02: Protecting transport sites and routes
- Policy TR03: Travel Plans, Transport Statements, Transport Assessments
- Policy TR04: Parking standards and electric vehicle charging points
- Policy TR05: Aerodrome safeguarded areas and public safety zones
- Policy TR06: Digital connectivity

- Policy TR07: Wireless connectivity and telecoms infrastructure

Reasonable alternatives:

- TR01A. Specify walking distances to local facilities from new housing
- TR01B. Set mode share targets for different travel modes from new development
- TR02A. Do not protect transport sites and routes
- TR03A. Do not include a policy on Travel Plans, Transport Statements, Transport Assessments
- TR04A. Do not set parking standards
- TR06A. 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 TR05 and TR07 are detailed policies on specific matters, to which there are no reasonable alternatives.

Local Plan Chapter 11. Sustainable transport and communications								
Policy / **SA Objective**	**TR01. Walking, cycling, etc**	**TR02. Protect routes/sites**	**TR03. Travel Plans etc.**	**TR04. Parking standards**	**TR05. Aerodrome**	**TR06. Digital**	**TR07. Telecoms**	
1. Biodiversity	**0**	**0**	**0**	**0**	**+**	**0**	**+**	
Biodiversity commentary	Negligible effect for most policies in chapter 11. A minor positive effect for policy TR05 as it restricts development in the vicinity of aerodromes where it will cause a bird strike hazard. Policy TR07 is likely to have a minor positive effect as telecoms infrastructure must avoid adverse impacts on biodiversity.							

Local Plan Chapter 11. Sustainable transport and communications								
Policy / SA Objective	TR01. Walking, cycling, etc	TR02. Protect routes/sites	TR03. Travel Plans etc.	TR04. Parking standards	TR05. Aerodrome	TR06. Digital	TR07. Telecoms	
2. Landscape	0	0	0	0	0	0	- ?	
Landscape commentary	Negligible effect for most policies in chapter 11. Telecoms infrastructure is likely to have a negative effect on landscape, but policy TR07 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	- ?	
Hist. built env. commentary	Policy TR01 facilitates high quality accessibility in new development and is therefore likely to have a major positive effect. Telecoms infrastructure is likely to have a negative effect on the historic and built environment, but policy TR07 notes proposals must avoid adverse impacts on heritage and the environment, so a negative uncertain effect depending on location. Negligible effect on this objective for other policies.							
4. Climate change carbon emissions	+ +	+ +	+	+ / -	0	+	+	
Climate change carbon emissions commentary	Prioritising walking and cycling, alongside access to high quality public transport, means a major positive effect for TR01 as it will minimise carbon emissions associated with travel. Most transport sites and routes in policy TR02 relate to strategic cycle networks or public transport, so a major positive effect is likely from minimising carbon emissions. Policy TR03 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 will likely increase emissions from travel, so a mixed positive / negative effect for policy TR04. Digital connectivity and							

Local Plan Chapter 11. Sustainable transport and communications								
Policy / SA Objective	TR01. Walking, cycling, etc	TR02. Protect routes/sites	TR03. Travel Plans etc.	TR04. Parking standards	TR05. Aerodrome	TR06. Digital	TR07. Telecoms	
	telecoms infrastructure can facilitate working from home which minimises carbon emissions, and therefore a minor positive effect for policies TR06 and TR07.							
5. Climate change adaptation	**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**	
Land resources commentary	Negligible effect for all policies in chapter 11.							
7. Water resources	**0**	**0**	**0**	**0**	**0**	**0**	**0**	
Water resources commentary	Negligible effect for all policies in chapter 11.							
8. Homes	**0**	**0**	**0**	**0**	**0**	**0**	**0**	

Local Plan Chapter 11. Sustainable transport and communications								
Policy / SA Objective	TR01. Walking, cycling, etc	TR02. Protect routes/sites	TR03. Travel Plans etc.	TR04. Parking standards	TR05. Aerodrome	TR06. Digital	TR07. Telecoms	
Homes commentary	Negligible effect for all policies in chapter 11.							
9. Health and well-being	+ +	+ +	+	+	+	0	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 TR01 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 TR02. Securing active travel arrangements is likely to mean positive effects for policy TR03. The provision of cycle parking in new housing development results in a minor positive effect for policy TR04. Development will not be permitted where it cause safety concerns for aerodromes, and therefore a likely minor positive effect is noted for TR05.							
10. Access to services	+	+	+	+	0	0	0	
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 TR01. Policy TR02 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 TR03. Providing car and cycle parking in new housing development is likely to have a minor positive effect on accessing services and facilities for policy TR04.							

Local Plan Chapter 11. Sustainable transport and communications								
Policy / SA Objective	TR01. Walking, cycling, etc	TR02. Protect routes/sites	TR03. Travel Plans etc.	TR04. Parking standards	TR05. Aerodrome	TR06. Digital	TR07. Telecoms	
11. Jobs and employment	0	0	0	0	+	+ +	+ +	
Jobs/employment commentary	The restriction of development near to aerodromes is likely to have positive economic effects on the operation of Exeter International Airport and Dunkeswell Airfield. Digital connectivity and telecoms infrastructure is essential to foster a strong and entrepreneurial economy, so a major positive effect is identified for policies TR06 and TR07. Negligible effect for remaining policies.							
12. Town centres	0	0	0	0	0	0	0	
Town centres commentary	Negligible effect for all policies in chapter 11.							
13. Connectivity and transport	+ +	+ +	+	+	+	+ +	+ +	
Connectivity and transport commentary	A major positive effect is likely for policy TR01 from prioritising walking and cycling, alongside access to high quality public transport. Similarly, the protection of strategic cycle network and public transport schemes in TR02 will have major positive effect on connectivity. Policy TR03 supports transport connectivity by requiring measures to secure new sustainable travel arrangements, meaning a minor positive effect. Providing car and cycle parking, along with electric vehicle charging, in new development is likely to have a minor positive effect on connectivity and transport for policy TR04. 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 for							

Local Plan Chapter 11. Sustainable transport and communications								
Policy / SA Objective	TR01. Walking, cycling, etc	TR02. Protect routes/sites	TR03. Travel Plans etc.	TR04. Parking standards	TR05. Aerodrome	TR06. Digital	TR07. Telecoms	
	TR05. Digital connectivity requirements and telecoms infrastructure in policies TR06, 07 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 (included in Policy TR04).

Preferred alternative: Policies TR01 – TR07.

Reasons for alternatives being preferred or rejected:

- **The preferred policies TR01 – TR07 are preferred** due to 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 are a few negative uncertain effects, which can be mitigated to reduce their impact.
- **TR01A. Specify walking distances to local facilities from new housing is rejected** – 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.
- **TR01B. Set mode share targets for different travel modes from new development is rejected** – 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.
- **TR02A. Do not protect transport sites and routes 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).
- **TR03A. Do not include a policy on Travel Plans, Transport Statements, Transport Assessments 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).

Local Plan Chapter 11. Sustainable transport and communications								
Policy / SA Objective	TR01. Walking, cycling, etc	TR02. Protect routes/sites	TR03. Travel Plans etc.	TR04. Parking standards	TR05. Aerodrome	TR06. Digital	TR07. Telecoms	
• **TR04A. Do not set parking standards 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). • **TR06A. Do not include a policy on digital connectivity is rejected** – 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.								

Local Plan Chapter 12. Our outstanding landscape

Policy number/title:

- Strategic Policy OL01 – Landscape features
- Strategic Policy OL02 – National Landscapes (Areas of Outstanding Natural Beauty)
- Strategic Policy OL03 – Coastal Preservation Areas
- Policy OL04 – Areas of Strategic visual importance
- Policy OL05 – Green wedges *(note that the appraisal of Green Wedges follows below the Chapter 13 appraisal)*
- Policy OL06 – Land of local amenity importance or Local Green Space
- Policy OL07 – Contaminated land
- Policy OL08 – Potentially hazardous developments notifiable installations
- Policy OL09 – Control of pollution
- Policy OL10 – Development on high quality agricultural land

Reasonable alternatives:

- OL01A. Do not include a policy to protect landscape features
- OL02A. Do not include a policy to protect National Landscapes (AONBs)
- OL06A. 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.

Coastal Preservation Areas (CPAs) reflect a direct visual relationship with the sea, so alternative boundaries are not considered to be reasonable. For example, alternatives for the CPAs to be either strategically larger or smaller would not reflect the requirement for a direct visual relationship with the sea. The methodology for creating CPAs contains further detail on this. Not identifying CPAs is not a reasonable alternative given NPPF requirements and the exceptional quality of East Devon's coastline, the vast majority of which is designated as Jurassic Coast World Heritage Site and National Landscape.

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, so fall outside the scope of the Local Plan – Policy OL06 states the policy will apply to Local Green Spaces designated through Neighbourhood Plans. Policies OL08-10 are detailed policies on specific matters, to which there are no reasonable alternatives.

Local Plan Chapter 12. Our outstanding landscape										
Policy / SA Objective	**OL01. Landscape**	**OL02. NL (AONBs)**	**OL03. CPAs**	**OL04. Strat. Visual**	**OL06. Amenity, LGS**	**OL07. Contam. Land**	**OL08. Hazardous**	**OL09. Pollution**	**OL10. Agri. land**	
1. Biodiversity	**+ +**	**+ +**	**+ +**	**+**	**+**	**0**	**0**	**+**	**+ ?**	

Local Plan Chapter 12. Our outstanding landscape										
Policy / SA Objective	OL01. Landscape	OL02. NL (AONBs)	OL03. CPAs	OL04. Strat. Visual	OL06. Amenity, LGS	OL07. Contam. Land	OL08. Hazardous	OL09. Pollution	OL10. Agri. land	
Biodiversity commentary	Although titled “landscape features”, several aspects of policy OL01 will benefit biodiversity, such as protection of trees and woodland, traditional field boundaries, and areas of importance for nature conservation. National Landscapes are important locations for biodiversity, so restricting development means a minor positive effect for policy OL02. The presence of biodiversity interest in or adjoining Coastal Preservation Areas, such as the Lyme Bay and Torbay SAC, Exe Estuary SPA/Ramsar, Beer Quarry and Caves SAC, means a major positive effect through the restriction of development in these areas (OL03). Similarly, at land of local amenity importance (LLAI) policy OL06 will have a positive effect through the restriction of development in these areas. Policy OL04 protects views relating to biodiversity features and, as such, is likely to have a positive effect. Policy OL09 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 OL10, with some uncertainty depending on how the land is used; for example, intensive arable farming will have less biodiversity benefits in its current use. Negligible effect for other policies.									
2. Landscape	**+ +**	**+ +**	**+ +**	**+ +**	**+ +**	**0**	**0**	**+**	**+**	
Landscape commentary	The intention of policy OL01 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 National Landscapes means that policy OL02 has a major positive effect. Policy OL03 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 OL04. Restricting development in land of local amenity importance and Local Green Spaces (LGS) means that policy OL06 will also have a major positive effect. Policy OL09 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 OL10. Negligible effect for other policies.									

Local Plan Chapter 12. Our outstanding landscape										
Policy / SA Objective	OL01. Landscape	OL02. NL (AONBs)	OL03. CPAs	OL04. Strat. Visual	OL06. Amenity, LGS	OL07. Contam. Land	OL08. Hazardous	OL09. Pollution	OL10. Agri. land	
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 OL01. Restricting development in National Landscapes will benefit heritage assets and ensure high quality design in new development, so a positive effect for policy OL02. Restricting development in CPAs will benefit the Jurassic Coast World Heritage Site, leading to a major positive effect (OL03). Policy OL04 protects views relating to heritage assets and, as such, is likely to have a positive effect. Restricting development in land of local amenity importance and Local Green Spaces and means that policy OL06 will have a positive effect on the historic and built environment. Negligible effect for policies OL08-10.									
4. Climate change carbon emissions	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	+	

Local Plan Chapter 12. Our outstanding landscape										
Policy / SA Objective	OL01. Landscape	OL02. NL (AONBs)	OL03. CPAs	OL04. Strat. Visual	OL06. Amenity, LGS	OL07. Contam. Land	OL08. Hazardous	OL09. Pollution	OL10. Agri. land	
Climate change adaptation commentary	The protection and enhancement of traditional field boundaries, trees and woodlands will help adapt to increased flood risk, heat, drought and extreme storms from climate change, meaning a major positive effect for policy OL04. Major positive effect for policy OL03 from restricting development in CPAs, some areas of which will suffer from coastal erosion and sea level rises, as a result of climate change. Protecting high quality agricultural land is likely to mean the land is better able to cope with more periods of drought, so a positive effect for policy OL10. Negligible effect for other policies.									
6. Land resources	+ +	+ +	+	0	+	+ +	0	+ +	+ +	
Land resources commentary	Protection of landscape features from harmful means a major positive effect for policy OL01. Land resources will be protected in National Landscapes, so a major positive effect for policy OL02. Restricting development in CPAs, LLAI, LGS and Exmouth Valley Parks will benefit land resources in these areas (policies OL03, 06). A major positive effect is likely from policy OL07 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 of land resources, resulting in a major positive effect for policy OL09. A major positive from policy OL10 due to its detailed protection of best and most versatile agricultural land. Negligible effect for other policies.									
7. Water resources	+	0	0	0	0	+ +	0	+ +	0	
Water resources commentary	Policy OL01 will protect and enhance important natural and manmade features, including watercourses and water bodies, so positive effect on water quality. Assessing and remediating contaminated land is likely to benefit water quality, so a major positive effect for policy OL07. Similarly, policy OL09 prevents pollution of surface or underground waters, again leading to a major positive effect.									

Local Plan Chapter 12. Our outstanding landscape										
Policy / SA Objective	OL01. Landscape	OL02. NL (AONBs)	OL03. CPAs	OL04. Strat. Visual	OL06. Amenity, LGS	OL07. Contam. Land	OL08. Hazardous	OL09. Pollution	OL10. Agri. land	
	Negligible effect for other policies.									
8. Homes	-	-	-	-	-	-	-	-	-	
Homes commentary	All policies in chapter 12 could restrict housing delivery, so likely to have a negative 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 policies OL01 and OL02. Policy OL03 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 positive effect for policy OL04. Policy OL06 supports open space, play and recreation in LLAI, 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 OL07, 09). Restricting development within notified consultation zones will have major positive health and safety effects for policy OL08. Negligible effect for policy OL10.									
10. Access to services	0	0	0	0	0	0	0	0	0	

Local Plan Chapter 12. Our outstanding landscape										
Policy / SA Objective	OL01. Landscape	OL02. NL (AONBs)	OL03. CPAs	OL04. Strat. Visual	OL06. Amenity, LGS	OL07. Contam. Land	OL08. Hazardous	OL09. Pollution	OL10. Agri. land	
Access to services commentary	Negligible effect for all policies in chapter 12.									
11. Jobs and employment	-	-	-	-	-	-	-	-	-	
Jobs/employment commentary	All policies in chapter 12 could restrict employment land delivery, so likely to have a negative effect.									
12. Town centres	0	0	0	0	0	0	0	0	0	
Town centres commentary	Negligible effect for all policies in chapter 12.									
13. Connectivity and transport	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.										

Local Plan Chapter 12. Our outstanding landscape									
Policy / SA Objective	OL01. Landscape	OL02. NL (AONBs)	OL03. CPAs	OL04. Strat. Visual	OL06. Amenity, LGS	OL07. Contam. Land	OL08. Hazardous	OL09. Pollution	OL10. Agri. land

Preferred alternative: Policies OL01-10 (excluding policy OL05 – Green Wedges).

Reasons for alternatives being preferred or rejected:

- **Policies OL01-10 (excluding policy OL05 – Green Wedges) are preferred** due to numerous and wide ranging benefits relating to biodiversity, landscape, the historic and built environment, climate change adaptation, land/water resources and health. It should be noted that policy protecting high quality agricultural land excludes development site allocations, some of which are located on best and most versatile agricultural land (as detailed in the site specific appraisals).
- **OL01A. Do not include a policy to protect landscape features is rejected** as this alternative would result in some uncertainty on the positive effects for objective 2.
- **OL02A. Do not include a policy to protect National Landscapes is rejected** – although these are afforded protection in legislation and by the NPPF, given that 57% of East Devon is designated as National Landscapes, this alternative could reduce the positive effects and cause uncertainty.
- **OL06A. Do not include a policy on land of local amenity importance or Local Green Space is rejected** – 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.

Policy number/title: Policy OL05: Green Wedges

Reasonable alternatives

- Option A. Retain Green Wedges from the adopted East Devon Local Plan 2013-31, with minor adjustments
- Option B. Smaller Green Wedges, compared to the adopted East Devon Local Plan 2013-31

- Option C. Do not include Green Wedges

Outline of reasons for selecting the alternatives

Green Wedges are contained in the adopted East Devon Local Plan 2013-31 and have proven a successful policy tool in preventing the coalescence of settlements and protecting the identity of settlements. The alternatives are presented separately to the other policies in Chapter 12 given the strategic nature of the Green Wedge policy approach, with potential for significantly different appraisal findings.

Option A retains the Green Wedges from the adopted East Devon Local Plan 2013-31, with minor adjustments to exclude implemented development, and to include emerging Local Plan development allocations. This option also includes 'equivalent' green wedge policy areas adopted in neighbourhood plans after the Local Plan was adopted, with additional areas including Ottery St Mary to West Hill, Beer to Seaton, and Sidmouth to Sidbury. The approach in Option B for smaller Green Wedges minimises the area of land required to prevent settlement coalescence by only including limited areas of land between settlements, rather than the entire 'gap' between settlements. National policy is silent on settlement coalescence, so Option C is also considered a reasonable alternative with no national requirement for a local policy on avoiding settlement coalescence.

Policy title: Green Wedges				
Option / **SA Objective**	**Option A**	**Option B**	**Option C**	**Commentary**
1. Biodiversity	**+ +**	**+**	**-**	The likely presence of biodiversity interest in areas covered by Green Wedges means a major positive due to the relatively large areas covered by Option A, and minor positive for the smaller areas in Option B. A minor negative is likely for Option C as there is less protection against development which could adversely affect biodiversity.
2. Landscape	**+ +**	**+**	**-**	Preventing settlement coalescence and recognising the character of settlements is likely to have major positive effect on the landscape for Option A, with a minor positive for the smaller area under Option B. A minor negative

Policy title: Green Wedges				
Option / **SA Objective**	**Option A**	**Option B**	**Option C**	**Commentary**
				effect is predicted for Option C due to lower levels of protection from development which could adversely affect the landscape.
3. Historic and built environment	**+ +**	**+**	**-**	A major positive effect on the historic and built environment for Option A by preventing settlement coalescence and recognising the character of settlements, with a minor positive for the smaller area under Option B. A minor negative effect is predicted for Option C due to lower levels of protection from development which could adversely affect the historic and built environment.
4. Climate change and carbon emissions	**0**	**0**	**0**	Negligible effect for all options.
5. Climate change adaptation	**0**	**0**	**0**	Negligible effect for all options.
6. Land resources	**+ +**	**+**	**-**	Restricting built development across relatively large areas results in a major positive effect for Option A.
7. Water resources	**0**	**0**	**0**	Negligible effect for all options.
8. Homes	**- -**	**-**	**+**	Options A and B will restrict housing delivery on the edge of those settlements with a Green Wedge, so a negative effect is likely, major for Option A given the relatively large area covered. Option C places less restrictions on edge of settlement housing delivery, leading to a minor positive effect.

Policy title: Green Wedges				
Option / **SA Objective**	**Option A**	**Option B**	**Option C**	**Commentary**
9. Health and well-being	**+**	**+**	**0**	Green Wedges can potentially include open space, play and recreation, so a positive effect for Option A and B. Neutral for Option C as existing health and well-being opportunities should remain.
10. Access to services	**0**	**0**	**0**	Negligible effect for all options.
11. Jobs and employment	**- -**	**-**	**+**	Options A and B will restrict employment land delivery on the edge of those settlements with a Green Wedge, so a negative effect is likely, major for Option A given the relatively large area covered. Option C places less restrictions on edge of settlement housing delivery, leading to a minor positive effect.
12. Town centres	**0**	**0**	**0**	Negligible effect for all options.
13. Connectivity and transport	**0**	**0**	**0**	Negligible effect for all options.
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: • None identified.				
Preferred alternative: Option A. Retain Green Wedges from the adopted East Devon Local Plan 2013-31, with minor adjustments. **Reasons for alternatives being preferred or rejected:** • **Option A. 'Retain Green Wedges from the adopted East Devon Local Plan 2013-31, with minor adjustments' is preferred** as it is likely to have major positive effects on biodiversity, landscape, historic and built environment, and land resources, with a minor positive effect on health and well-being, by protecting relatively large areas of land from development. Policy OL05 restricts development in Green Wedges.				

Policy title: Green Wedges				
Option / SA Objective	Option A	Option B	Option C	Commentary
• **Option B. 'Smaller Green Wedges, compared to the adopted East Devon Local Plan 2013-31' is rejected** as the environmental benefits are less than Option A, whilst also impeding housing and employment development albeit to a lesser degree than Option A. • **Option C. 'Do not include a policy on Green Wedges' is rejected** due to negative effects on biodiversity, landscape, historic and built environment, and land resources.				

Local Plan Chapter 13. Our outstanding biodiversity and geodiversity

Policy number/title:

- Strategic Policy PB01 – Protection of internationally and Nationally important wildlife sites
- Policy PB02 – Protection of Regionally and Locally important wildlife sites
- Policy PB03 – Protection of irreplaceable habitats and important features
- Strategic Policy PB04 – Habitats Regulations Assessment
- Strategic Policy PB05 – Biodiversity Net Gain
- Strategic Policy PB06 – Local Nature Recovery Strategy and Nature Recovery Network
- Policy PB07 – Ecological enhancement and biodiversity in the built environment
- Policy PB08 – Tree, Hedges and Woodland on Development sites
- Policy PB09 – Monitoring requirements for new planting schemes
- Policy PB10 – Protection and enhancement of the Jurassic Coast World Heritage site
- Policy PB11 – Protection of designated geological sites
- Policy PB12 – Regionally Important Geological and Geomorphological Sites

Reasonable alternatives:

- PB01A. Do not include a policy on the matters covered by policies in chapter 13.
- PB05A. Require 10% Biodiversity Net Gain
- PB05B. 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. Our outstanding biodiversity and geodiversity													
Policy / **SA Objective**	**PB01. Int. wildlife sites**	**PB02. Reg. wildlife sites**	**PB03. Habitats**	**PB04. HRA**	**PB05. Bio. Net Gain**	**PB06. LNRS, NRN**	**PB07. Max. biodiversity**	**PB08. Trees etc.**	**PB09. Monitoring**	**PB10. Jurassic Coast**	**PB11. Geologic sites**	**PB12. Reg. Geo. Sites**	
1. Biodiversity	+ +	+ +	+ +	+ +	+ +	+ +	+ +	+ +	+ +	+ +	+ +	+ +	
Biodiversity commentary	The intention of policies PB01-09 is to conserve and enhance habitat and wildlife – therefore these policies will have major positive effects on this objective. Policies PB10-12 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	+ +	+ +	+ +	+ +	+ +	+ +	+	+ +	+	+ +	+	+	
Landscape commentary	Major positive effect is likely for policies PB01, 02, 04, and 05, as the protection of wildlife sites and species, and Biodiversity Net Gain, will have indirect benefits for landscape character. Features protected by policy PB03 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 major positive effect for policy PB06. Minor positive effect for policy PB07 as the measures are specific, small-scale design features to maximise biodiversity value, as are the monitoring requirements of PB09. The												

Local Plan Chapter 13. Our outstanding biodiversity and geodiversity													
Policy / SA Objective	PB01. Int. wildlife sites	PB02. Reg. wildlife sites	PB03. Habitats	PB04. HRA	PB05. Bio. Net Gain	PB06. LNRS, NRN	PB07. Max. biodiversity	PB08. Trees etc.	PB09. Monitoring	PB10. Jurassic Coast	PB11. Geologic sites	PB12. Reg. Geo. Sites	
	protection of existing trees and provision of additional trees in policy PB08 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 PB10). Minor positive effects are likely from protecting nationally and regionally (policies PB11, 12) designated geological sites, as they often contribute to the special qualities and character of the landscape.												
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 PB03 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 PB05. Contribution to the Local Nature Recovery Strategy is also likely to help achieve high quality design, so a minor positive effect for policy PB06. The protection of existing trees and provision of additional trees in policy PB08 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 PB10. Negligible effect is likely for other policies.												
4. Climate change carbon emissions	**+**	**+**	**+**	**+**	**+**	**+**	**+**	**+**	**+**	**0**	**0**	**0**	
Climate change carbon emissions commentary	Minor positive effect for most policies through the conservation and enhancement of biodiversity features, which store carbon. Negligible effect for PB10-12 as these policies relate to geological issues.												

Local Plan Chapter 13. Our outstanding biodiversity and geodiversity													
Policy / SA Objective	PB01. Int. wildlife sites	PB02. Reg. wildlife sites	PB03. Habitats	PB04. HRA	PB05. Bio. Net Gain	PB06. LNRS, NRN	PB07. Max. biodiversity	PB08. Trees etc.	PB09. Monitoring	PB10. Jurassic Coast	PB11. Geologic sites	PB12. Reg. Geo. Sites	
5. Climate change adaptation	+	+	+	+	+	+	+	+	0	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 most policies. These will also have 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 PB06. Ecological enhancement measures in policy PB07 can help species adapt to climate change. The protection of existing trees and provision of additional trees in policy PB08 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 other policies.												
6. Land resources	+ +	+ +	+ +	+ +	+ +	+ +	+	+	+	+	+	+	
Land resources commentary	The protection of wildlife sites and irreplaceable habitats will minimise the loss or degradation of land resources, so policies PB01-03, and 06 are likely to have a major positive effect. BNG is likely to minimise the degradation of land resources, so a major positive effect for policy PB04. Minor positive effect for policy PB07 as the measures are specific, small-scale design features to maximise biodiversity value. The protection of existing trees will minimise the loss of land resources, so a minor positive effect for policy PB08, whilst the monitoring requirements will also have a positive effect (PB09). Policies PB10-12 protect geological sites and, as such, are likely to have a positive effect on land resources.												
7. Water resources	+	+	+	+ +	+	+	0	+	0	0	0	0	

Local Plan Chapter 13. Our outstanding biodiversity and geodiversity													
Policy / SA Objective	PB01. Int. wildlife sites	PB02. Reg. wildlife sites	PB03. Habitats	PB04. HRA	PB05. Bio. Net Gain	PB06. LNRS, NRN	PB07. Max. biodiversity	PB08. Trees etc.	PB09. Monitoring	PB10. Jurassic Coast	PB11. Geologic sites	PB12. Reg. Geo. Sites	
Water resources commentary	The protection of wildlife sites and species will minimise the loss or degradation of water resources, so policies PB01, 02 are likely to have a positive effect. Policy PB03 includes protection of irreplaceable, so will have a positive effect on water quality. Policy PB04 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 PB05, 06. The protection of existing trees and provision of additional trees can improve water quality by filtering water, so a minor positive effect for policy PB08. Negligible effect for policy PB07 as the measures are specific, small-scale design features to maximise biodiversity value. Negligible effect also likely for remaining policies.												
8. Homes	**- ?**	**- ?**	**- ?**	**- ?**	**- ?**	**- ?**	**- ?**	**- ?**	**- ?**	**- ?**	**- ?**	**- ?**	
Homes commentary	It is possible that all policies in chapter 13 could restrict housing delivery, due to the costs associated with the standards, and restrictions placed upon certain (sensitive) locations, so a negative uncertain effect.												
9. Health and well-being	**+**	**+**	**0**	**+ +**	**+**	**+**	**0**	**+**	**0**	**0**	**0**	**0**	
Health and well-being commentary	Wildlife sites often provide recreation space, so policies PB01, 02 will support healthy communities through their protection. Mitigation measures in policy PB04 include provision of attractive and functional recreation spaces, resulting in a major positive effect. Policy PB05 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 PB06. Air												

Local Plan Chapter 13. Our outstanding biodiversity and geodiversity													
Policy / SA Objective	PB01. Int. wildlife sites	PB02. Reg. wildlife sites	PB03. Habitats	PB04. HRA	PB05. Bio. Net Gain	PB06. LNRS, NRN	PB07. Max. biodiversity	PB08. Trees etc.	PB09. Monitoring	PB10. Jurassic Coast	PB11. Geologic sites	PB12. Reg. Geo. Sites	
	quality is likely to improve through the protection of existing trees and provision of additional trees, which filter pollutants from the air, benefitting health for PB08. Negligible effect for other policies.												
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	**- ?**	**- ?**	**- ?**	**- ?**	**- ?**	**- ?**	**- ?**	**- ?**	**0**	**- ?**	**- ?**	**- ?**	
Jobs/employment commentary	It is possible that all policies in chapter 14 could restrict employment land delivery, depending upon the location of proposals, so a negative uncertain effect. Whilst there may be benefits from potentially more jobs in biodiversity sectors and green tourism, this is not considered significant enough to outweigh the negative effect. Negligible effect for the monitoring policy (PB09).												
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.												

Local Plan Chapter 13. Our outstanding biodiversity and geodiversity													
Policy / SA Objective	PB01. Int. wildlife sites	PB02. Reg. wildlife sites	PB03. Habitats	PB04. HRA	PB05. Bio. Net Gain	PB06. LNRS, NRN	PB07. Max. biodiversity	PB08. Trees etc.	PB09. Monitoring	PB10. Jurassic Coast	PB11. Geologic sites	PB12. Reg. Geo. Sites	
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 PB01-12.

Reasons for alternatives being preferred or rejected:

- **Policies PB01-12 are preferred** due to numerous and wide ranging benefits relating to biodiversity, landscape, the historic and built environment, land/water resources and health.
- **PB01A. Do not include a policy on the matters covered by policies in chapter 13 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. Detailed policies relating to Ecological Impact Assessment and consideration of protected and notable species have been rejected as there is no need to repeat best practice guidance, and these requirements would be better included in the planning application validation checklist.
- **PB05A. Require 10% Biodiversity Net Gain is rejected** – 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.

Local Plan Chapter 13. Our outstanding biodiversity and geodiversity												
Policy / SA Objective	PB01. Int. wildlife sites	PB02. Reg. wildlife sites	PB03. Habitats	PB04. HRA	PB05. Bio. Net Gain	PB06. LNRS, NRN	PB07. Max. biodiversity	PB08. Trees etc.	PB09. Monitoring	PB10. Jurassic Coast	PB11. Geologic sites	PB12. Reg. Geo. Sites
• **PB05B. Require higher than 20% Biodiversity Net Gain is rejected** as it would reduce 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

Policy number/title:

- Strategic Policy OS01 – Access to open space and recreation facilities
- Policy OS02 – Land and buildings for sport, recreation and open scape areas in association with development
- Policy OS03 – Location of facilities for sport and recreation, open spaces and allotments
- Policy OS04 – New allotments and avoiding the loss of existing ones
- Policy OS05 – Leisure and recreation developments in the countryside

Reasonable alternatives:

- OS01A. Do not have a policy that promotes access to open space and recreation facilities
- OS02A. Lower level of provision of land and buildings for sport, recreation and open space in new development
- OS03A. Do not set out location criteria and offer more flexibility on the location of facilities
- OS04A. Less restrictive approach to the loss of allotments to other uses
- OS05A. 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. A policy on the retention of land and buildings for sport and recreation use is not considered reasonable as it would duplicate the NPPF.

Local Plan Chapter 14. Open space and sports and recreation						
Policy / SA Objective	**OS01. Access**	**OS02. Sports buildings**	**OS03. Location**	**OS04. Allotments**	**OS05. Country**	
1. Biodiversity	**+**	**+**	**+**	**+**	**- ?**	
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 OS01. Similarly, policy OS02 requires several types of open space that can also benefit biodiversity; namely allotments, amenity open space, parks and recreation grounds, and natural and semi-natural greenspace. Policy OS03 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. Allotments can have biodiversity value and enable habitat connectivity, resulting in a positive effect for policy OS04. The countryside location for outdoor recreation facilities (policy OS05) 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 OS01, 02, 03. The provision of new allotments, and protection of existing ones, will benefit landscape character (policy OS04). The countryside location for outdoor recreation facilities (policy OS05) has the potential for					

Local Plan Chapter 14. Open space and sports and recreation						
Policy / SA Objective	OS01. Access	OS02. Sports buildings	OS03. Location	OS04. Allotments	OS05. Country	
	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 OS01, 02, 03. The provision of new allotments, and protection of existing ones, can also promote high quality design (policy OS04). Negligible effect for policy OS05 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 OS01 is likely to have a positive effect. Policy OS02 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 OS03 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. 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 OS05 is likely to have negative effects on carbon emissions from travel.					

Local Plan Chapter 14. Open space and sports and recreation						
Policy / SA Objective	OS01. Access	OS02. Sports buildings	OS03. Location	OS04. Allotments	OS05. Country	
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 most policies are likely to have a positive effect on adapting to the effects of climate change. Negligible effect for policy OS05 as it relates to outdoor recreation facilities in the countryside, rather than alongside new housing development.					
6. Land resources	0	0	0	0	0	
Land resources commentary	Negligible effect for all policies in chapter 14.					
7. Water resources	0	0	0	0	0	
Water resources commentary	Negligible effect for all policies in chapter 14.					
8. Homes	0	0	0	0	0	
Homes commentary	Negligible effect for all policies in chapter 14.					

Local Plan Chapter 14. Open space and sports and recreation						
Policy / SA Objective	OS01. Access	OS02. Sports buildings	OS03. Location	OS04. Allotments	OS05. Country	
9. Health and well-being	+ +	+ +	+ +	+ +	+	
Health and well-being commentary	Policies OS01, 02, 03 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 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 OS04. Minor positive for policy OS05 as, although it provides recreation facilities, the countryside location limits their accessibility.					
10. Access to services	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	
Jobs/employment commentary	Negligible effect for all policies in chapter 14.					
12. Town centres	0	0	0	0	0	

Local Plan Chapter 14. Open space and sports and recreation						
Policy / SA Objective	OS01. Access	OS02. Sports buildings	OS03. Location	OS04. Allotments	OS05. Country	
Town centres commentary	Negligible effect for all policies in chapter 14.					
13. Connectivity and transport	**0**	**0**	**0**	**0**	**0**	
Connectivity and transport commentary	Negligible effect for all policies in chapter 14.					
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: • None identified.						
Preferred alternative: Policies OS01-05. **Reasons for alternatives being preferred or rejected:** • **Policies OS01-05 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. • **OS01A. Do not have a policy that promotes access to open space and recreation facilities is rejected** due to less significant positive effects relating to the built environment (objective 3) and health and well-being (9). • **OS02A. Lower level of provision of land and buildings for sport, recreation and open space in new development is rejected** – 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.						

Local Plan Chapter 14. Open space and sports and recreation						
Policy / SA Objective	OS01. Access	OS02. Sports buildings	OS03. Location	OS04. Allotments	OS05. Country	
• **OS03A. Do not set out location criteria and offer more flexibility on the location of facilities is rejected** – 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). • **OS04A. Less restrictive approach to the loss of allotments to other uses is rejected** – 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. • **OS05A. Less restrictive approach to leisure and recreation development in the countryside is rejected** – 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.						

Local Plan Chapter 15. Our outstanding historic environment

Policy number/title:

- Strategic Policy HE01 – Historic environment
- Policy HE02 – Listed buildings
- Policy HE03 – Conservation Areas
- Policy HE04 – Archaeology and Scheduled Monuments
- Policy HE05 – Historic Landscapes, Parks and Gardens

Reasonable alternatives:

- HE01A. 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	**HE01. Hist. Env.**	**HE02. Listed buildings**	**HE03. Con. Areas**	**HE04. Archaeolog**	**HE05. 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 HE01-04. The focus of policy HE06 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.					

Local Plan Chapter 15. Our outstanding historic environment						
Policy / SA Objective	HE01. Hist. Env.	HE02. Listed buildings	HE03. Con. Areas	HE04. Archaeolog	HE05. Hist. landscapes	
4. Climate change carbon emissions	**-**	**0**	**0**	**0**	**0**	
Climate change carbon emissions commentary	Policy HE01 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.					
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.					

Local Plan Chapter 15. Our outstanding historic environment						
Policy / SA Objective	HE01. Hist. Env.	HE02. Listed buildings	HE03. Con. Areas	HE04. Archaeolog	HE05. Hist. landscapes	
8. Homes	+ / - ?	- ?	- ?	- ?	- ?	
Homes commentary	It is possible that all policies in chapter 16 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 mixed positive effect for policy HE01.					
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	+ / - ?	+ / - ?	+ / - ?	+ / - ?	+ / - ?	

Local Plan Chapter 15. Our outstanding historic environment						
Policy / SA Objective	**HE01. Hist. Env.**	**HE02. Listed buildings**	**HE03. Con. Areas**	**HE04. Archaeolog**	**HE05. Hist. landscapes**	
Jobs/employment commentary	All policies in chapter 16 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 HE01. The conservation and enhancement of the historic environment can provide an attractive location for businesses (for example, tourists appreciating and being attracted to the conservation areas in many settlements), so a mixed positive effect for other policies too.					
12. Town centres	**0**	**0**	**0**	**0**	**0**	
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 HE01-05.						

Local Plan Chapter 15. Our outstanding historic environment						
Policy / SA Objective	HE01. Hist. Env.	HE02. Listed buildings	HE03. Con. Areas	HE04. Archaeolog	HE05. Hist. landscapes	
Reasons for alternatives being preferred or rejected: • **Policies HE01-05 are preferred** due to major positive effects on conserving and enhancing heritage assets (objective 3), along with positive effects on the landscape (objective 2). • **HE01A. Do not include policies on the conservation and enhancement of the historic environment is rejected** – 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. Community facilities

Policy number/title

- Policy CF01 – New or extended community facilities
- Policy CF02 – Loss of community facilities

Reasonable alternatives

- CF01A. Less restrictive approach to the provision of community facilities in terms of location and meeting a local need
- CF02A. 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. Community facilities			
Policy / SA Objective	**CF01. New facilities**	**CF02. Loss of facilities**	
1. Biodiversity	**0**	**0**	
Biodiversity commentary	Negligible effect for both policies.		
2. Landscape	**0**	**0**	
Landscape commentary	Negligible effect for both policies.		
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 both policies.		
4. Climate change carbon emissions	**+**	**+**	

Local Plan Chapter 16. Community facilities			
Policy / SA Objective	CF01. New facilities	CF02. Loss of facilities	
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 CF01. Preventing the loss of community facilities should have similar effects.		
5. Climate change adaptation	**0**	**0**	
Climate change adaptation commentary	Negligible effect for both policies.		
6. Land resources	**0**	**0**	
Land resources commentary	Negligible effect for both policies.		
7. Water resources	**0**	**0**	
Water resources commentary	Negligible effect for both policies.		
8. Homes	**0**	**0**	

Local Plan Chapter 16. Community facilities			
Policy / SA Objective	CF01. New facilities	CF02. Loss of facilities	
Homes commentary	Negligible effect for both policies.		
9. Health and well-being	+ +	+ +	
Health and well-being commentary	The provision and protection of community facilities will support healthy and active communities, and therefore a major positive effect for both policies.		
10. Access to services	+ +	+ +	
Access to services commentary	A major positive effect is likely for both as they enable the provision of accessible and attractive new community facilities, and protection of existing facilities.		
11. Jobs and employment	+	+	
Jobs/employment commentary	A minor positive effect is noted for both policies due to the provision of jobs associated with community facilities.		
12. Town centres	0	0	

Local Plan Chapter 16. Community facilities			
Policy / SA Objective	CF01. New facilities	CF02. Loss of facilities	
Town centres commentary	Negligible effect for both policies.		
13. Connectivity and transport	**0**	**0**	
Connectivity and transport commentary	Negligible effect for both policies.		
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: • None identified.			
Preferred alternative: Policies CF01 and CF02. **Reasons for alternatives being preferred or rejected:** • **Policies CF01 and CF02 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. • **CF01A. Less restrictive approach to the provision of community facilities in terms of location and meeting a local need is rejected** – 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. • **CF02A. Less restrictive approach to the loss of community facilities is rejected** – 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.			

Appendix Six: Appraisal matrices of Housing and Employment sites

West End of East Devon

Settlement: Second New Community east of Exeter

Reasonable alternatives

- Option 1
- Option 2
- Option 3

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 nearly 60% of the district is covered by National Landscape. 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 (National Landscapes, international/national biodiversity designations), are in close proximity to the wide range of jobs, facilities and services in Exeter and at the West End 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 3,300 dwellings are proposed in the Local Plan period up to the year 2042, with the remaining 4,700 dwellings to be delivered after 2042. Whilst the Local Plan 2020-2042 will allocate land for 8,000 homes and accompanying employment, services and facilities etc, this is set within a longer term vision for a total of 10,000 new homes at the new community – the land required for the additional 2,000 dwellings and associated land uses will be allocated in a future Local Plan.

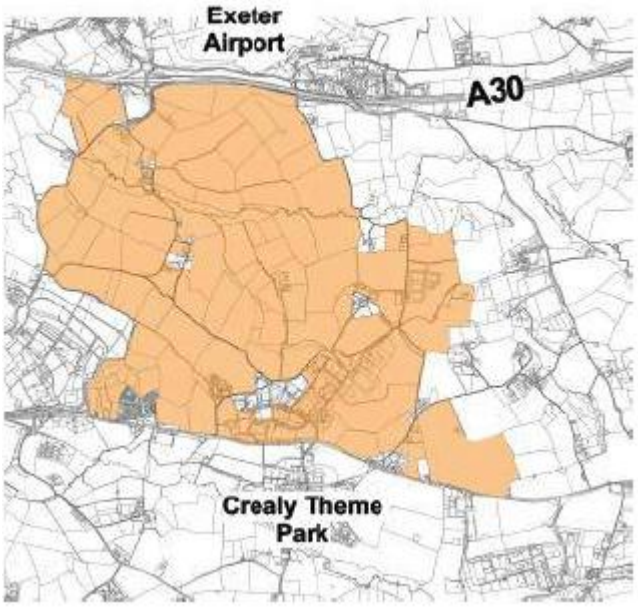
The vast majority of the area covered by the reasonable alternatives is formed of sites that have been assessed as suitable, available and achievable in the HELAA. This provides evidence that they can be delivered. Land in the western part of Option 1, and several parcels of land around Option 3, has not yet been submitted through a HELAA 'call for sites'. 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 around 500 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.

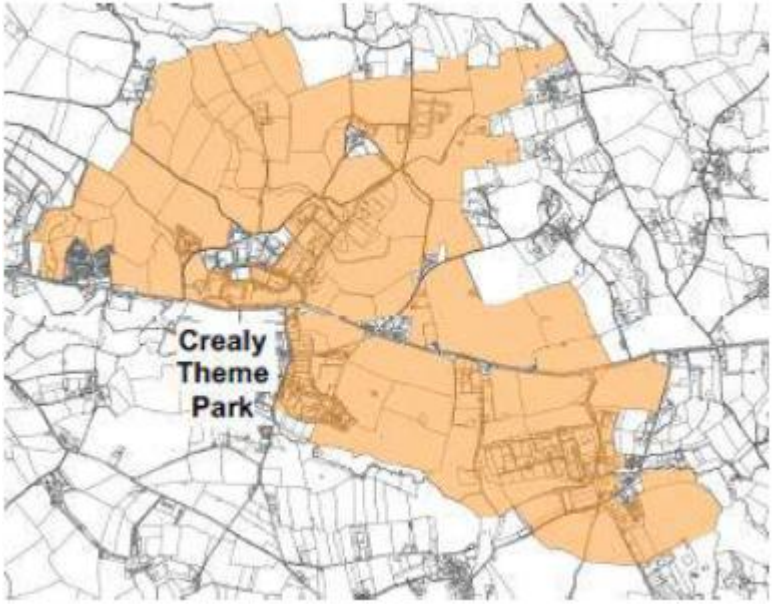
As set out in the SA of the Spatial Strategy (Strategic Policy SP01), the smaller scale of development in 2-3 new villages (rather than a single new, larger new settlement) offers less potential to create a sustainable, mixed-use community due to the lower scale of proposed housing proposed, meaning less potential to accommodate a mix of uses and consequently poorer access to jobs and services and greater carbon emissions. Therefore, alternatives for sites that could comprise a new 'village' are not considered reasonable.

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

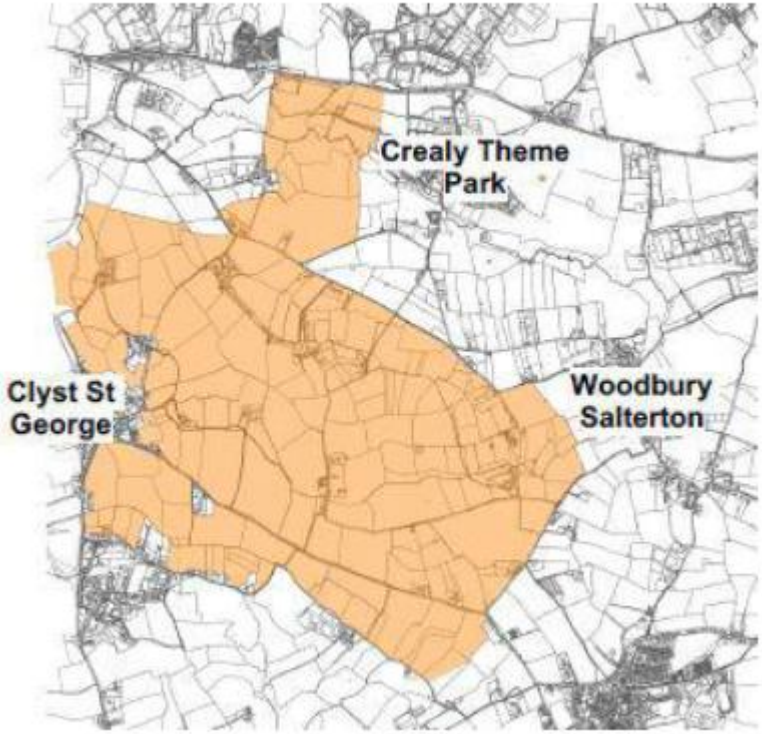
Option 1



Option 2



Option 3



Sites: New community				
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. There are risks relating to recreation and air quality on European sites for all Options due to the proximity of the Pebblebed Heaths and Exe Estuary. 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 three 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 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. These negative effects are mixed with a long-term minor positive			

Sites: New community				
Site / **SA Objective**	**Option 1**	**Option 2**	**Option 3**	
	effect due to the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.			
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 National Landscape. 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 National Landscape, 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, whilst Options 1 and 2 are a mixture of medium-low and high-medium landscape sensitivity. Therefore, a minor negative effect for all Options.			
3. Historic and built environment	**- ?**	**- ?**	**- ?**	

Sites: New community				
Site / **SA Objective**	**Option 1**	**Option 2**	**Option 3**	
Hist. built env. commentary	Option 1 contains one Grade II listed property to the south east, with other Grade II and II* listed buildings excluded beyond the site boundary, albeit in close proximity. 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 scheduled monument off Woodbury Road in the southern part of the site, with all other Grade II and II* listed buildings excluded from the land identified for a new settlement. The Historic Environment Record has archaeological records scattered across all three Options. Given this, all Options are likely to have minor negative effect due to potential impact upon the setting of designated heritage assets. There is uncertainty relating to the archaeological impact until more detailed work is undertaken through the planning application process.			
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 at present, meaning they can be suitable for cyclists and can be retained through master planning the new community. 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.			

Sites: New community				
Site / SA Objective	Option 1	Option 2	Option 3	
	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 edge of Option 3. Option 1 benefits from existing bus priority at M5 J29. 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. Due to the EfW plant location at Hill Barton, Options 1 and 2 benefit from a potential on-site connection to a low carbon district heating network, but Option 1 is preferred in this matter as it transits the proposed route of a district heating connector so offering a cheaper and easier solution. 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			

Sites: New community				
Site / **SA Objective**	**Option 1**	**Option 2**	**Option 3**	
	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. These effects are mixed with a negative effect arising from emissions associated with the construction of development. Also, some negative uncertainty in case additional jobs, facilities and sustainable travel links are not provided alongside new housing at the appropriate time.			
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			

Sites: New community				
Site / **SA Objective**	**Option 1**	**Option 2**	**Option 3**	
	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. 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 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 3b 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 3, 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.			

Sites: New community				
Site / **SA Objective**	**Option 1**	**Option 2**	**Option 3**	
	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	**- ?**	**- ?**	**- ?**	
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. South West Water forecast there will be adequate water supply. 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 where there is forecast to be marginal capacity exceedances, although this may not take into account planned investment. 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 at Countess Wear. 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 than Option 1 due to the presence of a source protection zone but remains minor negative.			

Sites: New community				
Site / **SA Objective**	**Option 1**	**Option 2**	**Option 3**	
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. There is little difference between Options 1 and 2 in terms of deliverability, as all landowners have been identified for both Options, with similar proportions (around 50%) being controlled by the three largest landowners. Land in the western part of Option 1 was not submitted for development through a HELAA 'call for sites' Local Plan consultation, so has some uncertainty. Option 3 has more fragmented land ownership and the greatest amount of unknown land ownership, so would require significant land assembly. Therefore, an uncertain effect has been added to 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.			

Sites: New community				
Site / **SA Objective**	**Option 1**	**Option 2**	**Option 3**	
	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 – the only services/facilities within any of the site Options is Greendale Farm Shop at Option 2 (and adjacent to Option 1). 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. 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, and also benefit from being served by more than one main road, making them more attractive for future business occupants. Option 2 offers fewer employment opportunities within its vicinity – aside from Greendale and Hill Barton Business Parks, all other employment centres are located at least 3km from this Option. Option 3 is also in close proximity to other employment			

Sites: New community				
Site / SA Objective	Option 1	Option 2	Option 3	
	opportunities at Winslade Park, Darts Farm, and Topsham. However, Option 1 has the largest number of employment opportunities within 3km, in addition to Exeter, including 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.			
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.			

Sites: New community				
Site / SA Objective	Option 1	Option 2	Option 3	
	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. Option 1 benefits from existing bus priority at M5 J29. 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 lack of car parking at Topsham, Exton and Newcourt may deter those wishing to drive a car and then use the train. 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 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 undertaken for 2,500 dwellings at each Option indicates that Option 1 will have generally small increases in delay on the local and strategic road network, most notably at M5 Junction 29 and Clyst St Mary Roundabout. Option 2 also has generally small increases in delay on surrounding roads, but significant impacts at Clyst St Mary Roundabout, with other significant increases in delay to the east of Exeter road network. Option 3 also has minor changes in delay on the local and strategic road network, but significant impacts at Clyst St Mary Roundabout. Overall, Option 1 has the least significant highways impact, and development of 2,500 homes up to the year 2040 could be accommodated without significant highways interventions and is preferred in terms of highways impact, followed by Option 3, with Option 2 being least preferred.			

Sites: New community				
Site / **SA Objective**	**Option 1**	**Option 2**	**Option 3**	
	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 all Options.
- Sensitively designed green and blue infrastructure.
- Landscape buffer between the new settlement and existing settlements to respect the character of existing settlements.
- Conserve and enhance the setting of designated heritage assets.
- Potential requirement for capacity upgrades to Countess Wear Wastewater Treatment Works or on-site Wastewater Treatments Works – Strategic Policy AR02 requires infrastructure improvements to overcome water quality issues.
- Require a network of convenient, direct, permeable, safe and easy to navigate pedestrian routes.
- Options 1 and 2 should contribute towards, and link with, a new pedestrian/cycle bridge over the M5, included in the Clyst Valley and New Communities LCWIP.
- All Options should contribute towards, and link with, relevant routes proposed in the LCWIP such as the ‘Clyst Valley Trail’, ‘A3052 Sidmouth Road’, ‘Woodbury Quiet Lanes’.
- In general, 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.

Sites: New community				
Site / **SA Objective**	**Option 1**	**Option 2**	**Option 3**	
• Provide recreation space, play and leisure facilities alongside new housing. • Deliver a wide range of employment, 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. • At Option 1, include a north-south link road between the A30 and A3052, prioritised for sustainable travel but also offering increased resilience for car travel in the area if necessary. • Option 1, being adjacent to main 'A' roads to the north and south, offers the opportunity for park and ride/change sites in these areas. • Related to the above, all Options should incorporate mobility hubs to facilitate sustainable travel. • Off-site highways mitigation measures required for all Options, on the local and strategic (M5) road network. More significant mitigation required for Options 2 and 3. The Local Plan policy (WS01) for the New Community at site Option 1 incorporates these mitigation measures, improving post-mitigation effects.				
Preferred alternative: Option 1. **Reasons for alternatives being preferred or rejected:** • **Option 1 is preferred** as there is greater certainty that the proposed new community 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. • **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; and impact on the highway network requiring significant mitigation at Clyst St Mary roundabout and the A376/Topsham Road junction.				

Sites: New community				
Site / SA Objective	Option 1	Option 2	Option 3	
• **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 due to fragmented land ownership and the greatest amount of unknown land ownership, so would require significant land assembly; adverse highways impact requiring significant mitigation including at Clyst St Mary roundabout.				

Settlement: Second New Community east of Exeter – Masterplan

Reasonable alternatives

- Scenario One
- Scenario Two
- Site allocation Masterplan

Outline of reasons for selecting the alternatives

For the reasons set out in the appraisal of New Community site options above, Option 1 is the preferred location for a New Community of 8,000 homes and associated employment, retail, education, public open space, and gypsy and traveller pitches. Therefore, masterplanning of the New Community is only being considered for Option 1. The Local Plan contains a Vision for a New Community that is self-sufficient, healthy and dynamic with distinctive character. This Vision informs four overarching masterplan concepts:

- A Connected Green-Blue Infrastructure – provide a network of connected, accessible and high-quality open spaces; connect to Clyst Valley Regional Park.
- Movements and Active Travel Networks – establish a comprehensive and integrated network of high-quality and attractive active travel routes; create multi-functional, multi-modal streets; connections to strategic active travel and public transport routes creating links to Clyst Vallet Regional Park, Cranbrook and local employment.
- Well served Communities – create three walkable neighbourhoods, each with a primary school, centre and open space at its heart, with accessible and attractive links to destinations elsewhere; town and neighbourhood centres are of an appropriate scale to meet day-to-day needs and located where they are accessible to housing.
- Variety of built forms – create three distinct neighbourhoods, sensitively integrated into the existing natural topography; provide homes at a range of densities, with higher densities located in and around centres and primary transport routes; reflect existing local characteristics of historic East Devon towns and villages, incorporating tight urban forms.

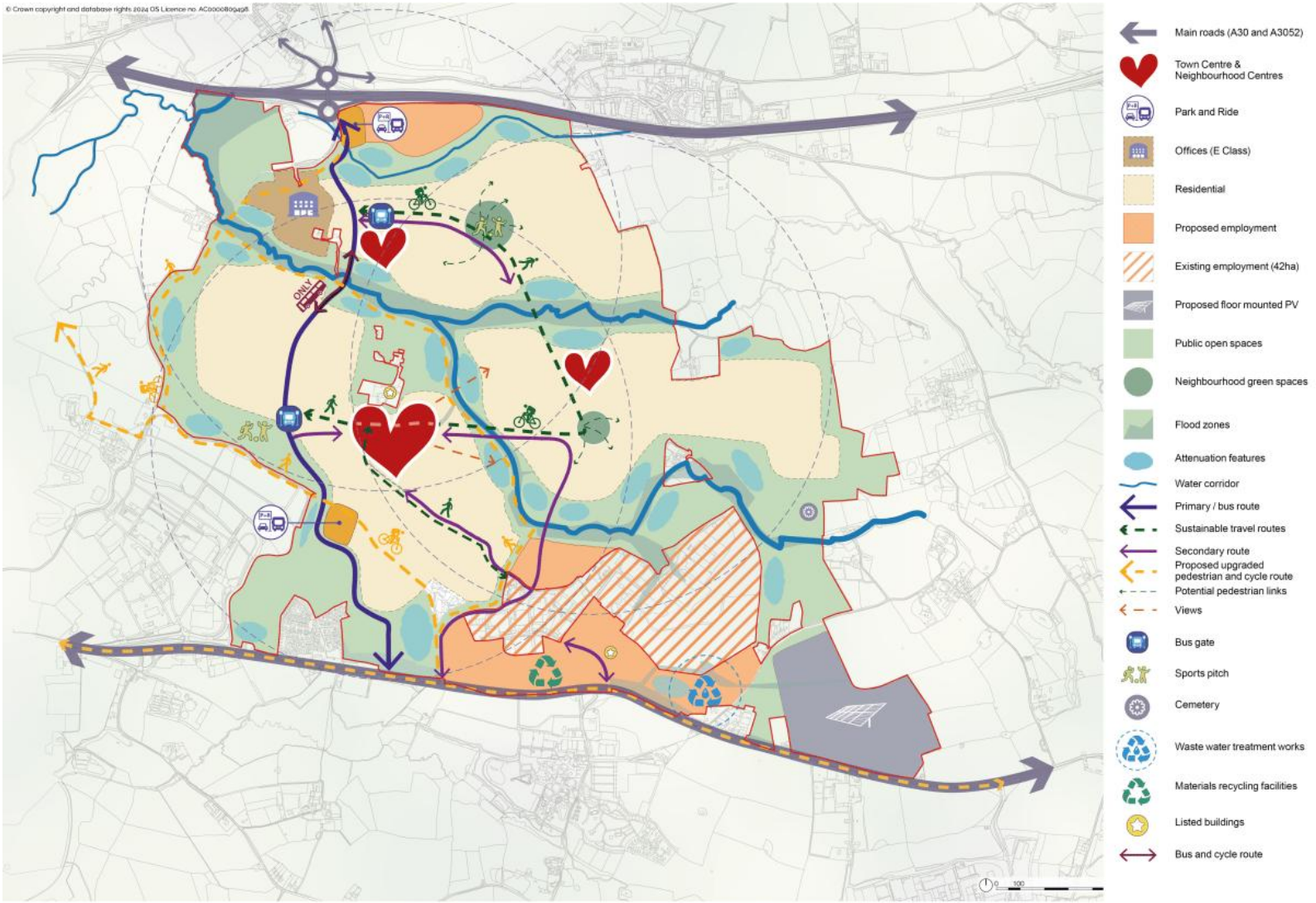
Further detail is set out in overarching principles for the masterplan, which include three neighbourhoods with a centre and school in each; retention of river corridor and creation of landscape ‘heart’; mixed-use town centre in a visible and accessible location; new employment uses at the A30 and A3052 adjacent to Hill Barton; two Park and Ride facilities on the A30 and A3052; provide a landscape buffer to adjacent communities.

Masterplan options are also set within the existing opportunities and challenges on the site, including flood zones, heritage assets, opportunities to connect into existing and proposed movement networks, noise impact from the A30, the location and setting of existing settlements, and new park and ride sites that will benefit from direct access to the A30 and A3052. The total area of the ‘Site allocation Masterplan’ alternative is slightly smaller than Scenarios One and Two as it excludes areas already utilised for employment uses at Hill Barton Business Park following further discussions which indicated there was limited opportunity for redevelopment or intensification.

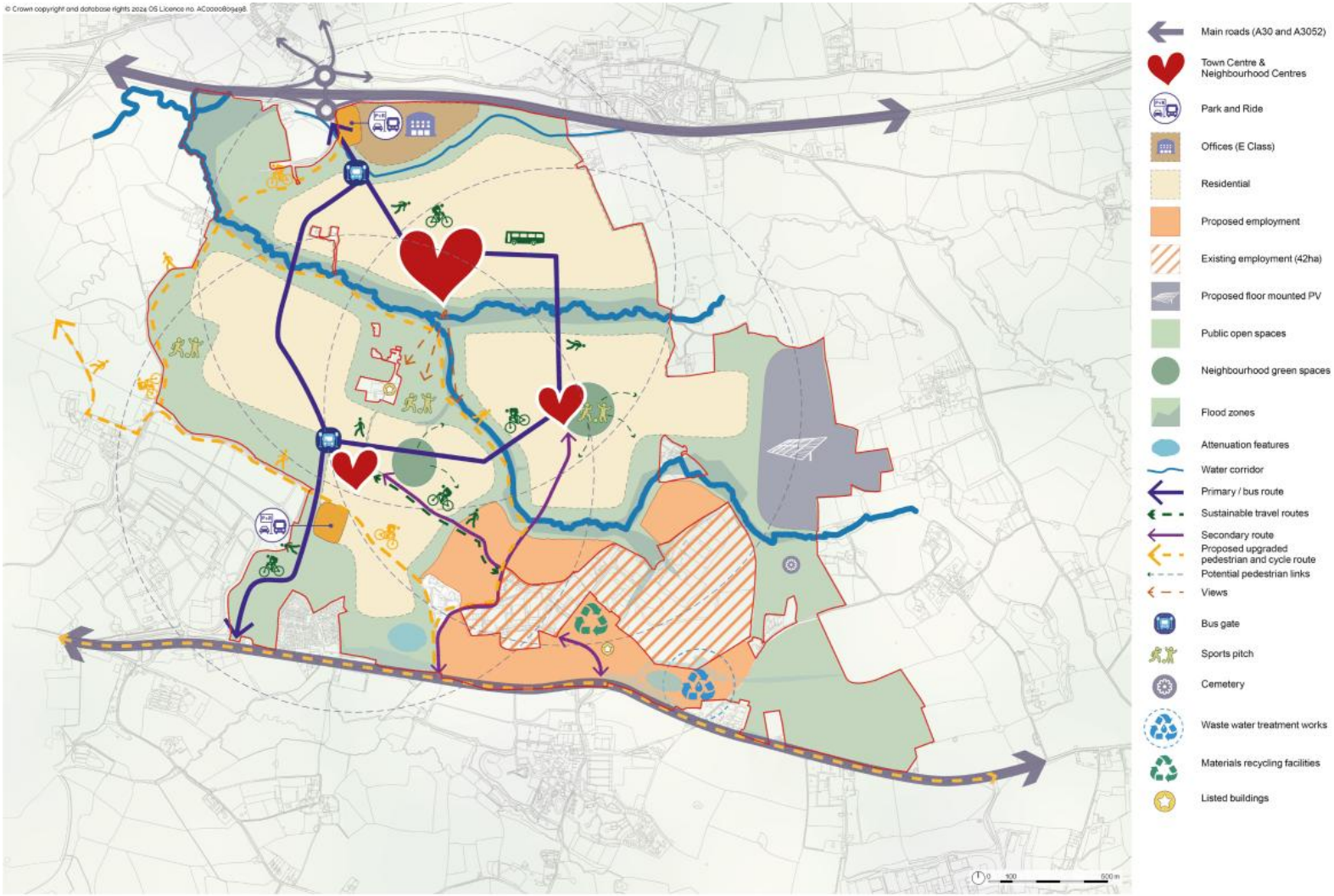
There are numerous possible alternatives for masterplans within the parameters of Vision, concepts, principles, opportunities and challenges above, but the three reasonable alternatives have all been informed by detailed assessment and subsequent refinement, and subject to public consultation in preparing the Local Plan. The key differences between the three reasonable alternatives are set out below, followed by the masterplans themselves.

Scenario One	Scenario Two	Site allocation Masterplan
Slightly wider river corridor.	Slightly narrower river corridors with larger open space located in south eastern corner.	River corridor refined, but generally similar to Scenario One.
Employment uses are split between the north and south.	Industrial areas clustered in the south, with less in the north.	Employment uses are split between the north and south.
Connection between the north (A30) and south (A3052) only for buses and bikes.	Multifunctional streets (for car, bike, buses and pedestrians) connecting all neighbourhoods and ability to drive from north (A30) to south (A3052). Access onto A3052 would need to go through Ancient Woodland.	Primary access road links to north (A30) and south (A3052) and the three neighbourhoods.
Slightly more area identified for homes, allowing lower density and less open space.	Less area for homes leading to slight increase in density.	Development frontage to A3052.
Town centre adjacent to large open space and listed buildings.	Town centre located in the north on river corridor.	Town centre located with visibility/prominence on key route.
A single Waste water treatment works located in south east of Hill Barton Business Park.	A single Waste water treatment works located in the south east of Hill Barton Business Park.	10 smaller, package waste water treatment plants located across the site.
Two areas shown for sports pitches, in northern neighbourhood and western edge of site.	Three areas shown for sport pitches, located across the centre of the site.	Consolidation of sports pitches into a single location in the south east, near the A3052.
Park and Ride located in north adjacent to A30, and south approximately 500m from A3052.	Park and Ride located in north adjacent to A30, and south approximately 500m from A3052.	Park and Ride located in north adjacent to A30, and south adjacent to A3052.

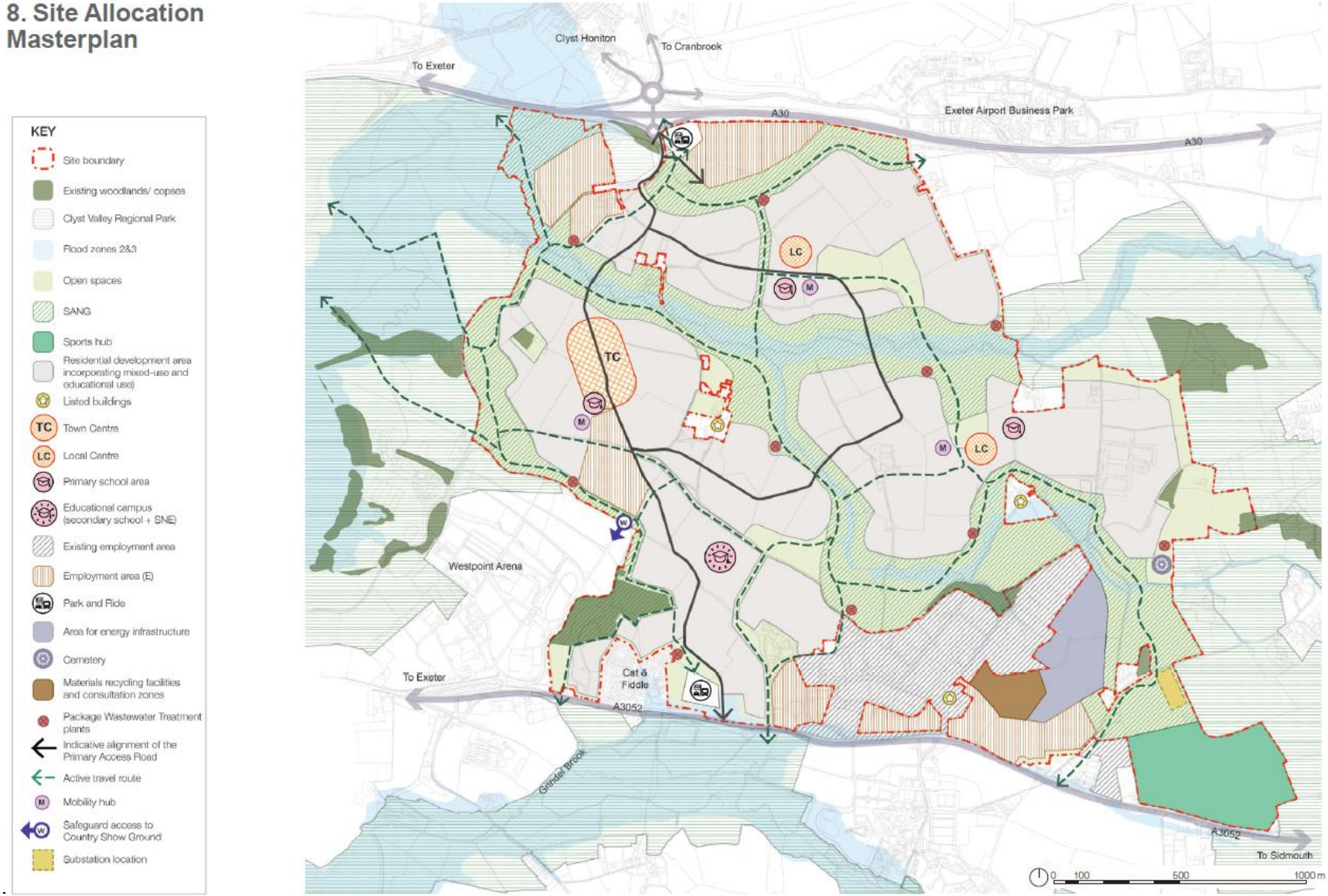
Scenario One



Scenario Two



Site allocation Masterplan



Sites: New Community Masterplan				
Option / SA Objective	Scenario 1	Scenario 2	Site allocation Masterplan	
1. Biodiversity	+	+ / -	+	
Biodiversity commentary	The New Community is within the 10km recreational buffer zone for the Exe Estuary SPA/Ramsar and Pebblebed Heaths SPA/SAC within which new dwellings must provide mitigation for visitor pressure – all masterplan options incorporate this requirement. Scenario 1 provides 189 hectares of public open space, which includes biodiversity net gain and SANGS to mitigate the adverse impact upon the Exe Estuary and Pebblebed Heaths. Scenario 2 provides a slightly higher figure of 214 hectares of public open space; whilst the Site allocation Masterplan includes 192 hectares of public open space. Scenario 1 and the Site allocation Masterplan have a wider river corridor, whilst Scenario 2 has narrower river corridors but larger open space located in south eastern corner, leading to similar (positive) effects overall. The site contains three Unconfirmed Wildlife Sites, and important habitats such as woodlands, veteran/ancient trees, hedgerows, rivers/streams, and ponds/lakes. In general, the masterplan options avoid developing on sensitive habitats and provide buffers to ecological areas which, alongside the open space provision (incorporating green and blue infrastructure), means a positive effect. However, Scenario 2 includes access onto the A3052 through Ancient Woodland and Cat Copse Unconfirmed Wildlife Site, leading to a minor negative effect on biodiversity. There is a long-term minor positive effect for all options due to the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat. The Site allocation Masterplan includes a principle for at least 20% biodiversity net gain.			
2. Landscape	-	-	-	
Landscape commentary	The site has a mixture of medium-low and high-medium landscape sensitivity. Special landscape sensitivities at the site are the quality and integrity of the historic rural landscape, including the character of rural lanes, large trees and hedges, the character of			

Sites: New Community Masterplan				
Option / SA Objective	Scenario 1	Scenario 2	Site allocation Masterplan	
	existing historic settlements on the peripheries, plus the associated Holbrook river corridors flowing east-west through the option. Land with the lowest landscape sensitivity is found in the southern part of the site where all options identify employment uses. All options provide a network of connected, accessible and high-quality open spaces with connections to the Clyst Valley Regional Park, and over 40% of the site set aside for blue and green infrastructure. The Site allocation Masterplan applies a landscape-led masterplan approach with an integrated blue and green infrastructure network. The options sensitively integrate development into the existing natural topography with a concept of reflecting existing local characteristics of historic East Devon towns and villages, incorporating tight urban forms. Scenario 1 and the Site allocation Masterplan have a wider river corridor, whilst Scenario 2 has slightly narrower river corridors but larger open space located in south eastern corner, leading to similar effects overall. The Scenario 2 includes access onto the A3052 that travels through Ancient Woodland with consequent negative effects on landscape character. Overall, a minor negative effect on the landscape is likely for all options due to the impact of built development upon areas of medium-low and high-medium landscape sensitivity.			
3. Historic and built environment	**+ ?**	**+ ?**	**+ ?**	
Hist. built env. commentary	The site contains one Grade II listed property to the south east, with other Grade II and II* listed buildings excluded beyond the site boundary, albeit in close proximity. All masterplan options seek to protect and enhance the listed buildings within open spaces.			

Sites: New Community Masterplan				
Option / **SA Objective**	**Scenario 1**	**Scenario 2**	**Site allocation Masterplan**	
	In terms of design, each option includes three distinct, well-connected, neighbourhoods, providing homes at a range of densities, with higher densities located in and around centres and primary transport routes; and an intention to reflect existing local characteristics of historic East Devon towns and villages, incorporating tight urban forms. Scenario 2 has a lower land take for homes and consequently an increase in density that may not be consistent with local character, although this does mean a larger area of open space. The Historic Environment Record shows various archaeological records scattered across the site – none are designated as a scheduled monument, but there is uncertainty relating to the archaeological impact until more detailed work is undertaken through the planning application process. Given this, all Options are likely to have minor positive effect due to careful consideration of the historic and built environment in design concepts and principles, with uncertainty relating to the potential impact of development upon the setting of listed buildings and archaeology.			
4. Climate change and carbon emissions	**+ + / -**	**+ + / -**	**+ + / -**	
Climate change carbon emissions commentary	All options put safe and accessible sustainable travel at the heart of the development, including new and improved pedestrian, cycle and bus routes, both within the site and to key destinations beyond. All options include two Park and Ride (P&R) sites in the north and south, albeit the Site allocation Masterplan locates the southern P&R adjacent to the A3052 with greater potential to 'intercept' passing car users than Scenarios 1 and 2 where it is around 500m north of the A3052. Residential development is located within a 15 minute walk of the town or local centre offering a variety of services and facilities, further encouraging non-car travel.			

Sites: New Community Masterplan				
Option / **SA Objective**	**Scenario 1**	**Scenario 2**	**Site allocation Masterplan**	
	All options strive to be net zero carbon, with building design that implements a fabric-first approach and creating adaptable, durable buildings with materials that minimise embodied emissions. All options also include on-site renewable generation such as floor mounted solar PV panels. Due to the Energy from Waste plant at Hill Barton, the site benefits from a potential on-site connection to a low carbon district heating network. Scenario 1 includes a road connection between the north (A30) and south (A3052) that is only for buses, pedestrians and cyclists to limit rat-running between the A30 and A3052 and encourage sustainable travel within the settlement. Scenario 2 offers the ability to drive from north (A30) to south (A3052) via a direct link, whilst the Site allocation Masterplan is flexible on this issue. Overall, all options are likely to have a major positive effect on minimising carbon emissions by reducing the need to travel, offering sustainable travel opportunities, low carbon building design, and through low carbon energy generation. These effects are mixed with a negative effect arising from carbon emissions associated with the construction of development.			
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. The watercourses are shown as flood zones 2 and 3 east to west through the site, and from the centre of the site south and then east. Surface water flood risk is also shown for these areas, as well as other small sections across the site. All Options avoid built development in areas of flood risk, and include surface water attenuation to minimise flood risk. Masterplan principles include the provision of high quality sustainable drainage systems and reduction of flood risk at the New Community and to areas beyond.			

Sites: New Community Masterplan				
Option / SA Objective	Scenario 1	Scenario 2	Site allocation Masterplan	
	Scenario 1 and the Site allocation Masterplan have a wider river corridor offering greater potential to adapt to climate change in the event of fluvial flooding, whilst Scenario 2 has slightly narrower river corridors but larger open space located in south eastern corner. The masterplan principles for high quality sustainable drainage systems, flood risk reduction, and the creation of adaptable, durable buildings, alongside the avoidance of built development in areas of medium-high flood risk, mean that development in all Options can likely adapt to the effects of climate change.			
6. Land resources	**-**	**-**	**-**	
Land resources commentary	The site is a broadly equal mix of Grade 2, 3a, and 3b agricultural land. Although just over 40% of the site will comprise open space, none of the site is likely to be retained as agricultural land, resulting in a large loss of best and most versatile agricultural land. The site contains a minerals safeguarding zone covering a small area close to Hill Barton Business Park, and a larger Waste zone that surrounds this Business Park associated with a strategic waste facility – Devon Minerals and Waste Plans seek to protect these zones from non-waste/mineral development. All masterplan options include open space, energy infrastructure, and material recycling facility which are considered suitable uses in these areas. All options include relatively high housing densities, making efficient use of land. As it is currently a large, greenfield site, that will result in the loss of best and most versatile agricultural land, with some areas affected by minerals and waste zones, a minor negative effect is likely for all options.			
7. Water resources	**+ / - ?**	**+ / - ?**	**+ / - ?**	

Sites: New Community Masterplan				
Option / SA Objective	Scenario 1	Scenario 2	Site allocation Masterplan	
Water resources commentary	A distribution water main travels through the site, north to south, and along the southern boundary on the A3052. Therefore, infrastructure is available to supply water, although reinforcements will be required given the large scale of the development. Scenarios 1 and 2 include a waste water treatment works, sized to provide sufficient capacity for the development. However, there is currently uncertainty as to whether South West Water will commit to delivering this, so the Site allocation Masterplan instead contains 10 package waste water treatment plants to be installed and run by an Inset Provider. High quality sustainable drainage systems will help ensure water quality is not adversely affected. A positive effect is likely due to provision of water supply, quality, and treatment infrastructure within each option. This is mixed with negative uncertainty given the current lack of commitment from South West Water on their delivery.			
8. Homes	+ +	+ +	+ +	
Homes commentary	All masterplan options provide the same total number of homes, with a mix of housing types, sizes, and tenures.			
9. Health and well-being	+	+	+	
Health and well-being commentary	All options provide a range of accessible green and recreational spaces along with indoor sports facilities, while locating residential areas away from major noise and pollution sources arising from Exeter Airport, the A30, and A3052. Scenario 1 provides 189 hectares of public open space, Scenario 2 provides a slightly higher figure of 214 hectares of public open space, and the Site allocation Masterplan includes 192 hectares of public open space. Scenarios 1 and 2 contain 2-3 smaller areas for sports			

Sites: New Community Masterplan				
Option / SA Objective	Scenario 1	Scenario 2	Site allocation Masterplan	
	pitches, whilst the Site allocation Masterplan consolidates the sports pitches into a single location in the south east which allows management efficiencies. Scenario 1 has a wider river corridor, whilst Scenario 2 has narrower river corridors, but larger open space located in south eastern corner. Overall, positive effects are likely for all Options.			
10. Access to services	+ +	+ +	+ +	
Access to services commentary	All options locate residential development within a 15 minute walk of a local centre or the town centre, offering a variety of services and facilities. Each option also includes high quality and attractive active travel routes within the site, whilst also promoting sustainable travel for services and facilities beyond.			
11. Jobs and employment	+ +	+ +	+ +	
Jobs/employment commentary	All Options include significant amounts of employment land in office, industrial, and warehouse sectors, with 48 hectares in Scenarios 1 and 2, and 41 hectares in the Site allocation Masterplan[103]. Numerous jobs will also be created at each option through the various retail, leisure and education uses in the town.			

[103] The lesser amount in the Site allocation Masterplan is due to the subsequent exclusion of areas of existing employment use at Hill Barton Business Park where the potential for redevelopment or intensification is limited, and areas adjacent to the A3052 that already have a committed employment use

Sites: New Community Masterplan				
Option / SA Objective	Scenario 1	Scenario 2	Site allocation Masterplan	
	In Scenario 1, employment uses are split between the north and south, benefiting from direct access to the A30 and A3052 and offering greater access to jobs for residents compared to Scenario 2 where industrial areas are clustered in the south around a retained Hill Barton Business Park, with a smaller area of office uses in the north. The Site allocation Masterplan provides a more balanced distribution of employment land between the A30 and A3052 with direct access to these roads. The masterplan options also include good quality travel links to a significance range of nearby employment, skills and training opportunities, such as Exeter Airport, Exeter Science Park, Skypark, and in Exeter itself. All Options will provide positive effects from job opportunities during construction.			
12. Town centres	+	+	+ +	
Town centres commentary	A town centre is included in all Options, and is planned to provide a range of retail, business, cultural, leisure and other community facilities. In Scenario 1, the Town centre is close to the centre of the site adjacent to large open space and listed buildings; Scenario 2 locates the town centre in the north on the river corridor; whilst the Site allocation Masterplan locates the town centre in a central and more visible/prominent position on a key route (north-south road linking the A30 with the A3052) which is likely to enhance its vitality and viability. A positive effect is likely for all Options, with a major positive for the Site allocation Masterplan given its more prominent town centre location.			
13. Connectivity and transport	+ + ?	+ + ?	+ + ?	

Sites: New Community Masterplan			
Option / **SA Objective**	**Scenario 1**	**Scenario 2**	**Site allocation Masterplan**
Connectivity and transport commentary	All Options put safe and accessible sustainable travel at the heart of the development, including new and improved pedestrian, cycle and bus routes, safe and direct walking and cycling links, both within the site and to key destinations beyond (including Clyst Valley Regional Park, Cranbrook, and local employment sites). All Options have two Park and Ride sites, in the north and south. The Site allocation Masterplan locates the southern Park and Ride site adjacent to the A3052, offering greater opportunities to encourage its use from passing motorists. Scenario 1 includes a connection between the north (A30) and south (A3052) only for buses, pedestrians and cyclists, which encourages sustainable travel within the settlement but reduces connectivity for private cars. Scenario 2 has multifunctional streets (for cars, buses, cyclists and pedestrians) connecting all neighbourhoods and ability to drive from north (A30) to south (A3052) by car. The primary road layout of the Site allocation Masterplan is similar to Scenario 2 in connecting all neighbourhoods, with flexibility on the possibility to travel north to south via private car. The New Community site is close to parts of the road network that are already congested at peak times. Traffic modelling shows that sustainable travel mitigation measures and physical highways improvements will be required to deliver the new community – whilst this can make development in the plan period acceptable, for the full 8,000 dwellings there is greater uncertainty on likely travel habits and the mitigation measures that will be required to ensure there is not a severe impact upon the surrounding road network. It is assumed that high quality, fibre broadband connectivity will occur for all Options. Overall, a major positive effect is likely for all Options given the proposed high quality transport connections. There is some uncertainty on longer term travel habits and mitigation measures required to acceptably deliver the full 8,000 dwellings.		
Mitigation measures to address likely significant adverse effects and maximise beneficial effects, and likely post-mitigation effects:			

Sites: New Community Masterplan			
Option / SA Objective	Scenario 1	Scenario 2	Site allocation Masterplan
The New Community Masterplan Options are informed by a detailed assessment of constraints and opportunities, set within a Vision, overarching concepts and principles for a highly sustainable place. The Masterplan Options have therefore already been designed to minimise significant adverse effects and maximise beneficial effects. The following general mitigation measures are recommended for inclusion in Local Plan policy: • Provide adequate Suitable Alternative Natural Greenspace (SANG). • Open space and high quality design to conserve and enhance the landscape, historic and built environment. • Highly sustainable construction and on-site renewable energy generation. • Provide a mix of housing types and sizes, including for older people and specialist housing. • Provide significant amount of affordable housing. • Provide Gypsy and Traveller sites alongside new housing. • Provide employment land alongside house building. • Deliver a wide range of community facilities and services alongside new housing, including a town centre. • Delivering infrastructure alongside new development. The Local Plan policy (WS01) for the New Community incorporates these mitigation measures, improving post-mitigation effects.			
Preferred alternative: Site allocation Masterplan. **Reasons for alternatives being preferred or rejected:** • **Scenario 1 is rejected** due to the less prominent location of the town centre which has fewer positive effects for its vitality and viability; the less prominent location of the southern Park and Ride site meaning fewer passing motorists using this facility and subsequent less positive effects on promoting sustainable travel. • **Scenario 2 is rejected** due to negative biodiversity effects arising from a road travelling through Ancient Woodland and Cat Copse Unconfirmed Wildlife Site; a poorer balance of employment land, with most in the south making it less accessible for workers living in the north of the site; the			

Sites: New Community Masterplan			
Option / SA Objective	Scenario 1	Scenario 2	Site allocation Masterplan
less prominent location of the town centre which has fewer positive effects for its vitality and viability; the less prominent location of the southern Park and Ride site meaning fewer passing motorists using this facility and subsequent less positive effects on promoting sustainable travel. • **Site allocation Masterplan is preferred** due to the delivery of a significant number of homes, jobs, community facilities and services, built to a high-quality design with good sustainable travel connections and substantial open space provision; the town centre is located in a more prominent location on a key route, likely to better support its vitality and viability; the southern Park and Ride site is adjacent to the A3052, enhancing sustainable travel by offering greater opportunities for use from passing motorists; and employment uses are more accessible to workers as they are split between the north and south.			

Settlement: West End of East Devon (excluding the new community)

Reasonable alternatives

Housing and mixed-use sites

- Land at Mosshayne Lane (Brcl_31a)
- Development next to the M5 and North of Topsham (Strategic Policy WS10)
- Land north of Exeter Science Park (Brcl_23) (Strategic Policy WS03)
- East of the M5 and south of the Exeter-Waterloo line (Gypsy and traveller site) (Brcl_26)

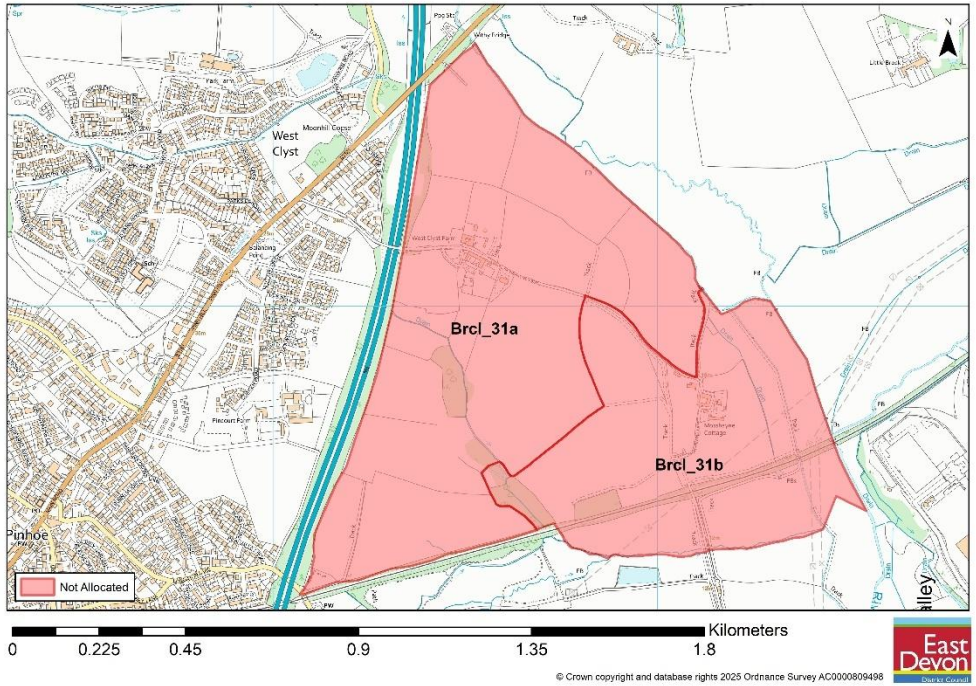
Outline of reasons for selecting the alternatives

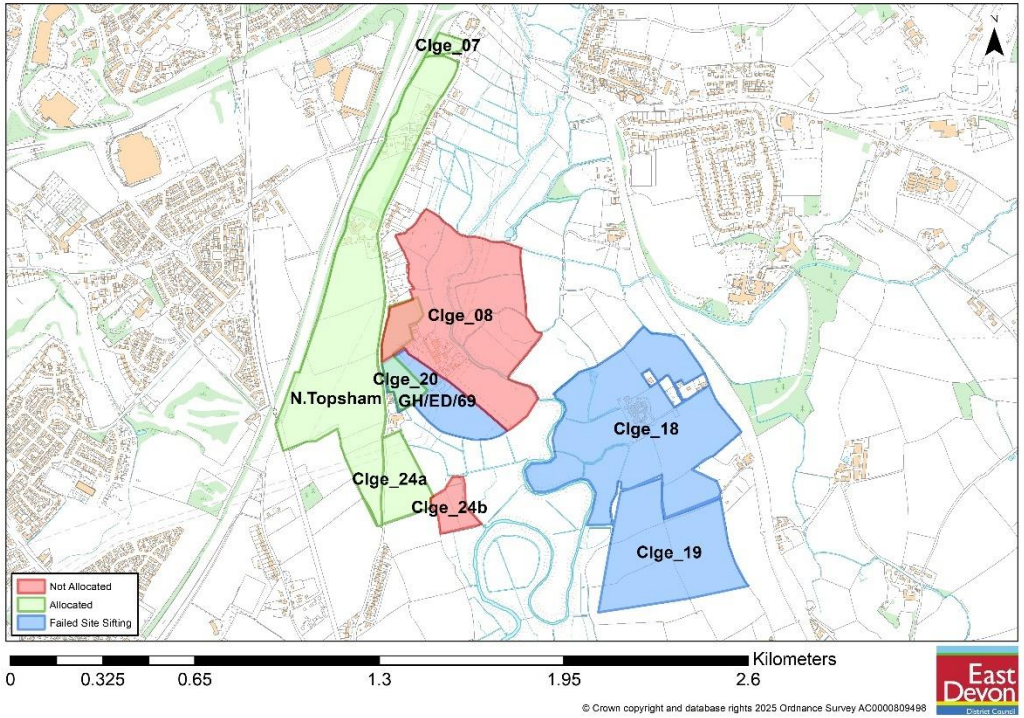
The Local Plan spatial strategy focusses new development on the West End of the district, including major strategic development close to Exeter. Within this strategy, there are a range of reasonable alternatives for sites for strategic-scale housing and mixed-use, and employment, development. The sites 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 the administrative boundary of Exeter City Council). Those sites that are not reasonable alternatives are for the most part comparatively remote from relatively larger population centres.

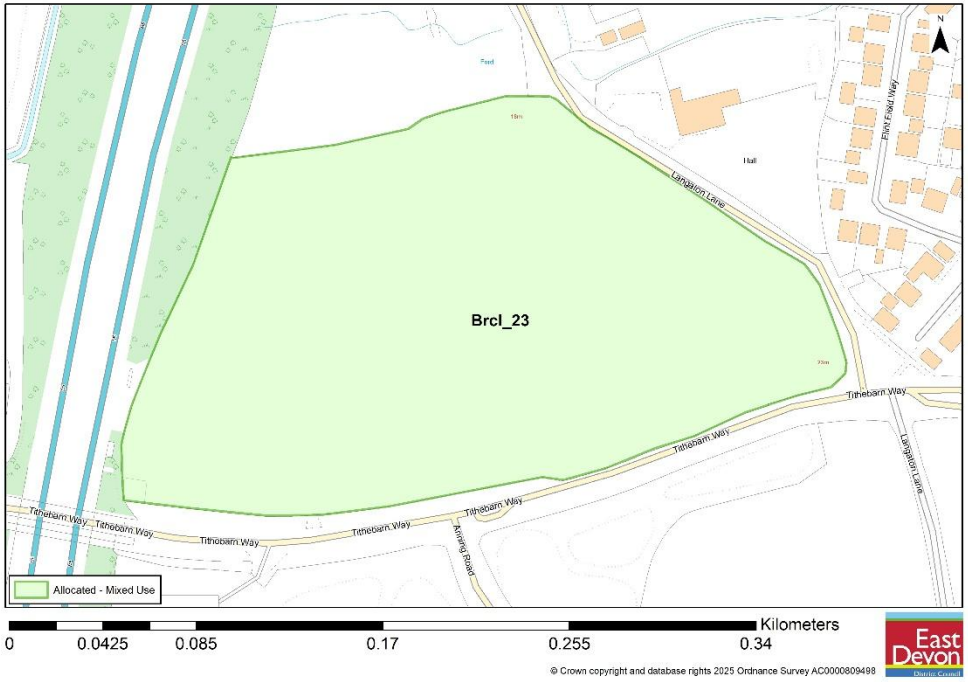
The reasonable alternatives listed above have all been assessed as suitable, available and achievable in the HELAA (though note specific reference to north of Topsham sites below). HELAA conclusions provides evidence that they have potential to be delivered (subject to further consideration through the planning process). In addition, the sites are not already allocated in a 'made' Neighbourhood Plan, and do not currently have planning permission.

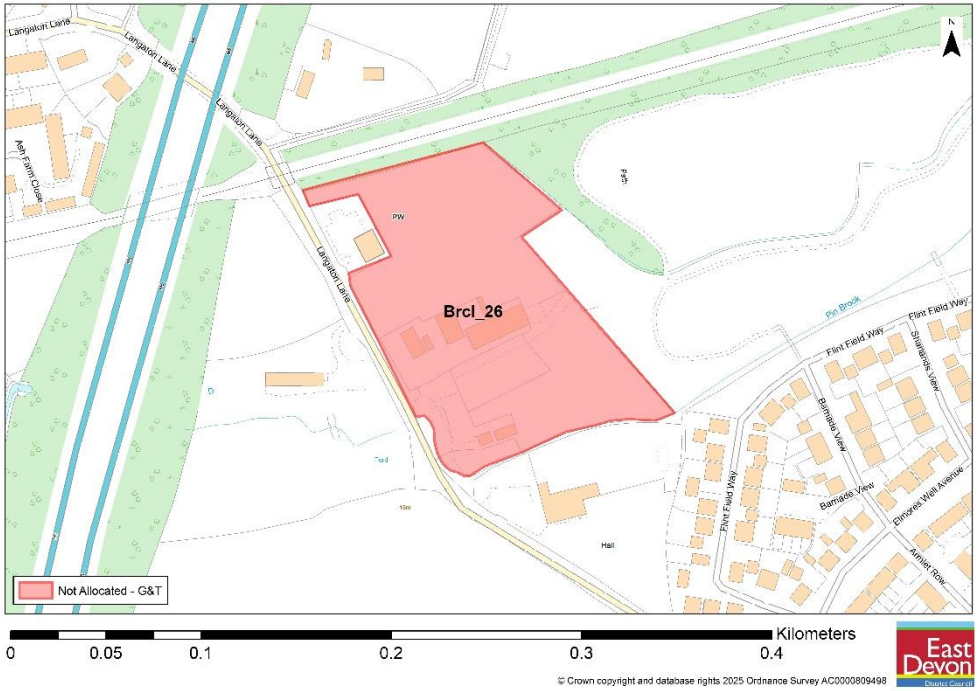
The land to the north of Topsham is made up of a series of sites (N. Topsham, Clge_20, Clge_24a) that have mostly been assessed as suitable, available and achievable in the HELAA. For some parcels of land, however, concern was raised in the HELAA over site access issues – in promoting a comprehensive development scheme in this area, the expectation is that access concerns can be addressed through achieving access through adjoining neighbouring sites. Clge_18 and 19 are probably unachievable in the HELAA, whilst GH/ED/69 overlaps with another site (Clge_20) – therefore, these three sites are not reasonable alternatives. Clge_08 and 24b are not reasonable alternatives as they are located mostly within flood zone 3 and adjacent to Clyst Marshes County Wildlife Site.

The HELAA concluded that a larger site that encompassed Land at Mosshayne Lane (known as Brcl_16 and subsequently Brcl_31 in the HELAA), is probably unachievable for the scale of development proposed (approximately 1,000 dwellings) due to access difficulties on Langaton Lane and B3181. However, a Draft Local Plan representation from a national housebuilder for this site plus land to the south east, submitted January 2023, state highways concerns can be addressed. Given its availability for development, location in an area where the emerging Local Plan spatial strategy focusses development, and representation from a national housebuilder that access issues can be addressed, this site is considered to be a 'reasonable alternative'. Brcl_31b is not a reasonable alternative as the landowner states their land is not available for development.









Sites: West End of East Devon (excl. the new community) – Housing and mixed-use sites					
Site / SA Objective	Brcl_31a	N. of Topsham	Brcl_23	Brcl_26	
1. Biodiversity	+ / -	+ / -	+ / -	+ / -	

Sites: West End of East Devon (excl. the new community) – Housing and mixed-use sites					
Site / SA Objective	Brcl_31a	N. of Topsham	Brcl_23	Brcl_26	
Biodiversity commentary	All sites are within the 10km buffer zone around the Exe Estuary and Pebblebed Heaths European sites with past evidence (South east Devon European Site Mitigation Strategy, 2014) indicating a likely significant effect in this area that must be mitigated through planning obligations. North eastern part of Brcl_31a contains an Unconfirmed Wildlife Site (Broadclyst Moor - Dymonds Bridge Marsh), with small areas of woodland priority habitat across central parts of the site along with long lengths of hedgerow. North of Topsham has no designated sites at or close to the site but 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. The HRA notes potential air quality impacts at East Devon Heaths SAC/SPA, 7.5km away, due to increased traffic from the site. Brcl_23 and Brcl_26 have no designated sites at or close to the site, although land of local biodiversity value and importance. These negative effects are mixed with a long-term minor positive effect due to the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.				
2. Landscape	**-**	**0**	**0**	**0**	

Sites: West End of East Devon (excl. the new community) – Housing and mixed-use sites					
Site / SA Objective	Brcl_31a	N. of Topsham	Brcl_23	Brcl_26	
Landscape commentary	Brcl_31a is a large site of mainly undeveloped fields is located in a wider context of human influence and built form, with the M5 and the new developments at Pinn Court Farm and Moonhill Copse to the west, the Exeter-Waterloo trainline and the new development at Tithebarn to the south, and Exeter Logistics Park & Skypark to the south-east. Medium landscape sensitivity, resulting in a minor negative effect. North of Topsham is a linear site that 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. Brcl_23 is an attractive agricultural field that provides a visual green space in an otherwise built up area but has the M5 to the west and existing/planned development to the south and east, so overall low landscape sensitivity. Brcl_26 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. No adverse landscape impacts.				
3. Historic and built environment	**-**	**0**	**0**	**- - ?**	

Sites: West End of East Devon (excl. the new community) – Housing and mixed-use sites					
Site / SA Objective	Brcl_31a	N. of Topsham	Brcl_23	Brcl_26	
Hist. built env. commentary	There is a Grade II listed building on Brcl_31a (West Clyst Farm on Mosshayne Lane), but this is already surrounded by a small development. There are no designated heritage assets in immediate vicinity of the North of Topsham 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. No heritage assets would be affected by developing Brcl_23. Brcl_26 is in an area with a concentration of regionally significant Neolithic funerary and settlement activity, so a likely major negative effect with uncertainty until further archaeological assessment.				
4. Climate change and carbon emissions	**+**	**0**	**+ +**	**+ +**	

Sites: West End of East Devon (excl. the new community) – Housing and mixed-use sites					
Site / SA Objective	Brcl_31a	N. of Topsham	Brcl_23	Brcl_26	
Climate change carbon emissions commentary	Brcl_31a has a wide range of employment opportunities, facilities and services in the area, including in Exeter, that should reduce the need to travel. The site is currently within 1,600m of four or more facilities, including a primary and secondary school, community hall, and a pub, with Pinhoe train station around 700m from the south west corner of the site. The district heating system in use on the Tithebarn estate to the south could potentially be extended, offering potential use of renewable and low carbon energy. 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. Brcl_23 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. Brcl_26 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	**0**	**+**	**+**	**- -**	

Sites: West End of East Devon (excl. the new community) – Housing and mixed-use sites					
Site / SA Objective	Brcl_31a	N. of Topsham	Brcl_23	Brcl_26	
Climate change adaptation commentary	Brcl_31a is partially located in areas that are affected by flood risk from rivers and surface water, predominantly along the eastern edge of the site, to the extent that it was included in the Strategic Flood Risk Assessment Level 2, which sets out further detail on key points and constraints to be considered through a site-specific Flood Risk Assessment. Nevertheless, the large scale of this site mean that built development can avoid areas of flood risk, so a neutral effect. North of Topsham and Brcl_23 have small areas of flood risk, but development can easily avoid these. Brcl_26 has a relatively large area (around one third of the site) that is covered by fluvial and surface flood risk, including the likely access point from Langaton Lane – therefore, a major negative effect.				
6. Land resources	**- ?**	**- -**	**- -**	**-**	
Land resources commentary	Brcl_31a is a greenfield site, only a small area in the south-east was classified in the post-1988 assessment (at Grade 2 and Grade 3b) but the 2002 strategic assessment work found the majority of the site to be Grade 1 (and Grade 3 in the north and along the boundary to the south-east of the site). Minor negative effect as partially covered by best and most versatile agricultural land, with some uncertainty where land in grade 3 is not broken down to 'a' and 'b'. The other three sites are Grade 1 agricultural land so a major negative effect, with the exception of Brcl_26 which is a relatively small site, with built development to most sides, that is unlikely to be a credible option for agricultural use and as such a minor negative effect is identified.				
7. Water resources	**- ?**	**- ?**	**0 ?**	**0 ?**	

Sites: West End of East Devon (excl. the new community) – Housing and mixed-use sites					
Site / SA Objective	Brcl_31a	N. of Topsham	Brcl_23	Brcl_26	
Water resources commentary	Brcl_31a is not within a water source protection zone, but the large scale of the site means a likely negative effect on water quality and quantity with some uncertainty dependent upon the capacity of existing treatment works. The proximity of North of Topsham site to the River Clyst also means a likely negative effect on water quality and quantity with some uncertainty. There is forecast to be marginal capacity exceedances at Countess Wear Wastewater Treatment Works, assuming development at N. of Topsham, Brcl_23 and 26, although this may not take into account planned investment so there is some uncertainty. South West Water forecast there will be adequate water supply.				
8. Homes	**+ +**	**+ +**	**+**	**+**	
Homes commentary	Brcl_31a and North of Topsham have major positive effects due to delivery of around 1,000 dwellings and 580 dwellings, respectively, likely to include a significant number of affordable homes. Minor positive for Brcl_23, delivering around 90 dwellings. Brcl_26 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	**+ / -**	**-**	**-**	**-**	

Sites: West End of East Devon (excl. the new community) – Housing and mixed-use sites					
Site / SA Objective	Brcl_31a	N. of Topsham	Brcl_23	Brcl_26	
Health and well-being commentary	Most of Brcl_31a is among the 40% least deprived neighbourhoods, with the northern edge being within the 50% most deprived neighbourhoods, so some benefits arise from delivering development in an area of higher deprivation. Within 800m of an existing children's play area at Westclyst. The western boundary comprises the M5, and its associated noise issues, with the railway line to south is also likely to be noisy an issue, albeit to a lesser degree. These noise issues mean a mixed positive and negative effect for this site. North of Topsham is close to the M5 Motorway and noise impacts could be of some concern. The railway line adjoins the south west edge of the site and is also a source of noise. Existing services and facilities are relatively remote, for pedestrians, from the site. Brcl_23 is adjacent to the M5, with Brcl_26 also close by. The railway line is immediately north of Brcl_26, also raising noise issues.				
10. Access to services	+	+	+	+	
Access to services commentary	Brcl_31a is within 1,600m of schools (primary and secondary), shop, community hall, and GP. These services can be reached via existing footpaths on the B3181 to the north and west, and Langaton Lane to the south west. The other three sites are within 1,600m of a range of services/facilities, so a positive effect is likely from all. The lack of footpaths along Clyst Road means that walking to services in Topsham is unlikely, but Old Rydon Lane provides a link over the motorway to a wide range of services in Exeter.				

Sites: West End of East Devon (excl. the new community) – Housing and mixed-use sites					
Site / SA Objective	Brcl_31a	N. of Topsham	Brcl_23	Brcl_26	
11. Jobs and employment	+ +	+ +	+ +	+	
Jobs/employment commentary	Brcl_31a, Brcl_23 and Brcl_26 are all within 800m of an existing employment site (Science Park), with 23 and 28 adjacent or very close. The large scale of Brcl_31a offers the potential to provide on-site employment opportunities. North of Topsham site and Brcl_23 include employment land on-site, so also have a major positive effect.				
12. Town centres	-	-	-	-	
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. Brcl_31a is close to the neighbourhood centre at Westclyst (400m away), and the large scale of the site means there is also potential for a neighbourhood centre on-site. However, beyond 1,600m of an existing town centre so a minor negative effect.				
13. Connectivity and transport	+ / - -	+	+ +	+ +	

Sites: West End of East Devon (excl. the new community) – Housing and mixed-use sites					
Site / SA Objective	Brcl_31a	N. of Topsham	Brcl_23	Brcl_26	
Connectivity and transport commentary	Post code data for Brcl_31a shows a median download speed of 80 mbps, with higher speeds in new development to west and south, so access to superfast broadband as a minimum can be assumed. The site is also within 800m of a train station and cycle routes along the B3181 to north and Tithebarn Way to the south, but beyond 800m of an 'A' road. This minor positive effect is mixed with a major negative effect due to significant highways concerns arising from a single motor vehicular access point for such a large scale site (from the B3181 to the north), with the landowner also stating their land is not available to access the site from this location. North of Topsham is located close to Junction 29 on the M5 Motorway and there is an existing hourly bus service along the A376 to the north, albeit there are no footpaths along Clyst Road for pedestrians to access this service. A pedestrian/cycle route along Old Rydon Lane provides access to the wide range of jobs and facilities in Exeter. Brcl_23 and 26 are 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: • Incorporate Broadclyst Moor - Dymonds Bridge Marsh Unconfirmed Wildlife Site into the Clyst Valley Regional Park. Nevertheless, given the large scale of Brcl_31a, a minor negative effect is likely to remain. • Incorporate a significant landscaping scheme at Brcl_31a but given the large scale of the site, a minor negative is likely to remain. • Sensitive design to reflect and avoid significant harm to Grade II listed West Clyst Farm at Brcl_31a, could reduce the negative effect to neutral. • Deliver a wide range of community services and facilities, employment land and sustainable travel opportunities alongside new housing – this will result in a likely major positive effect. • 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. • Secure high quality non-car based modes of transport to access the sites, especially public transport provision and cycle access.					

Sites: West End of East Devon (excl. the new community) – Housing and mixed-use sites					
Site / SA Objective	Brcl_31a	N. of Topsham	Brcl_23	Brcl_26	
• 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 some way from the National Landscape. Nonetheless, given site size and potential for adverse impacts it will be essential that high quality designed schemes are bought forward with landscape considerations at the forefront of thinking. • The M5 and railway line, from a noise perspective, that could adversely impact on a number of 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, 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, which 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. • Potential requirement for capacity upgrades to Countess Wear Wastewater Treatment Works – Strategic Policy AR02 requires infrastructure improvements to overcome water quality issues. These site-specific mitigation measures have been incorporated for the sites that are allocated in Local Plan Strategic Policies WS04, 10.					
Preferred alternatives: North of Topsham for 596 dwellings, 2.4 ha employment and community facilities and services; Brcl_23 for 90 dwellings and 2 ha employment land. **Reasons for alternatives being preferred or rejected:** • **Land at Mosshayne Lane (Brcl_31a) is rejected** due to significant highways concerns arising from a single motor vehicular access point for such a large scale site (from the B3181 to the north), with the landowner also stating their land is not available to access the site from this location.					

Sites: West End of East Devon (excl. the new community) – Housing and mixed-use sites					
Site / SA Objective	Brcl_31a	N. of Topsham	Brcl_23	Brcl_26	
• **North of Topsham is preferred** as 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 additional facilities as part of a mixed use development would be sought as part of the overall site development. • **Land north of Exeter Science Park (Brcl_23) is preferred** as it 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. This site provides a mix of housing and employment. • **Land east of the M5 and south of the Exeter-Waterloo line (Brcl_26) is rejected** because of a major negative effect upon the historic environment due to the likely presence of regionally significant archaeology, and high flood risk on site including at the likely access point.					

Reasonable alternatives

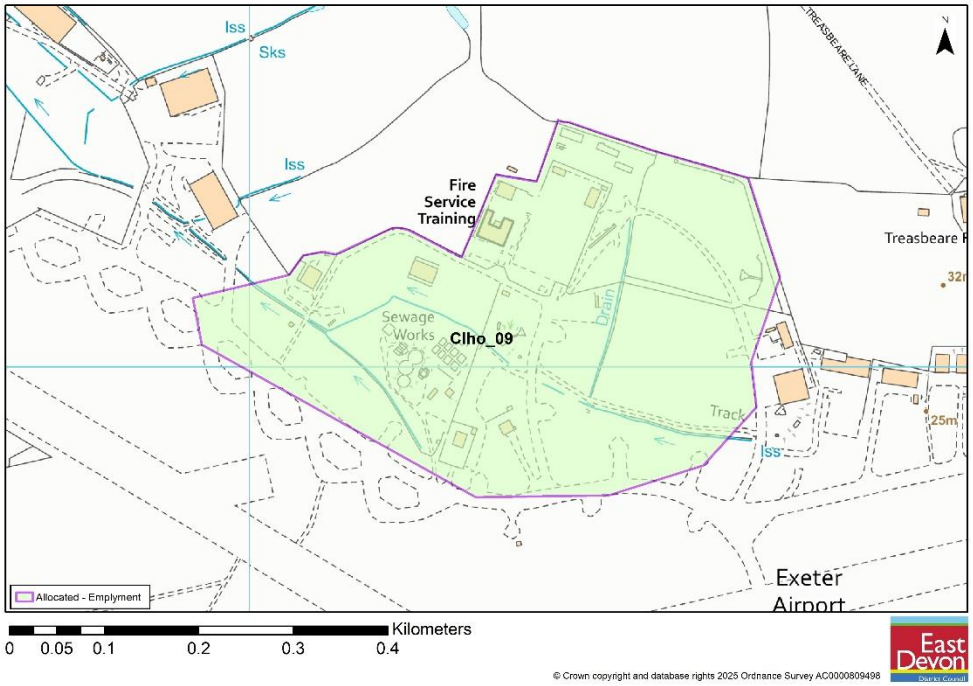
Employment sites – near Exeter Airport

- Land north of Exeter Airport (Clho_09) (Strategic Policy WS07)
- North of Sowton village (Land at Venn's Farm) (GH/ED/66)
- Land to the east of Exeter Airport and buildings (GH/ED/43, GH/ED/45, Rock_09a) (Strategic Policy WS06)
- Land south of Exeter Airport Business Park (Farr_01) (Strategic Policy WS08)

Outline of reasons for selecting the alternatives

The Local Plan spatial strategy focusses new development on the West End of the district, including major strategic development close to Exeter. These sites are reasonable alternatives as they have been assessed as suitable, available and achievable in the HELAA for employment use. The sites are adjacent to existing business parks, rather than isolated locations, where the emerging Local Plan supports employment development subject to meeting certain criteria. In addition, the sites are not already allocated in a 'made' Neighbourhood Plan, and do not currently have planning permission or a Local Development Order. Rock_09b is not a reasonable alternative as it would extend built form further into open countryside and, cumulatively with other allocations, would exceed the amount of employment likely to be needed in this location. GH/ED/44 is not a reasonable alternative as this site has a Local Development Order that provides permitted development rights for the specified types of development[104], so does not need to be allocated in the Local Plan to bring development forward.

[104] Power Park Exeter Local Development Order, adopted October 2022


Iss
Sks
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Clho_09
Drain
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Treasbeare Lane
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Allocated - Emplyment
Kilometers
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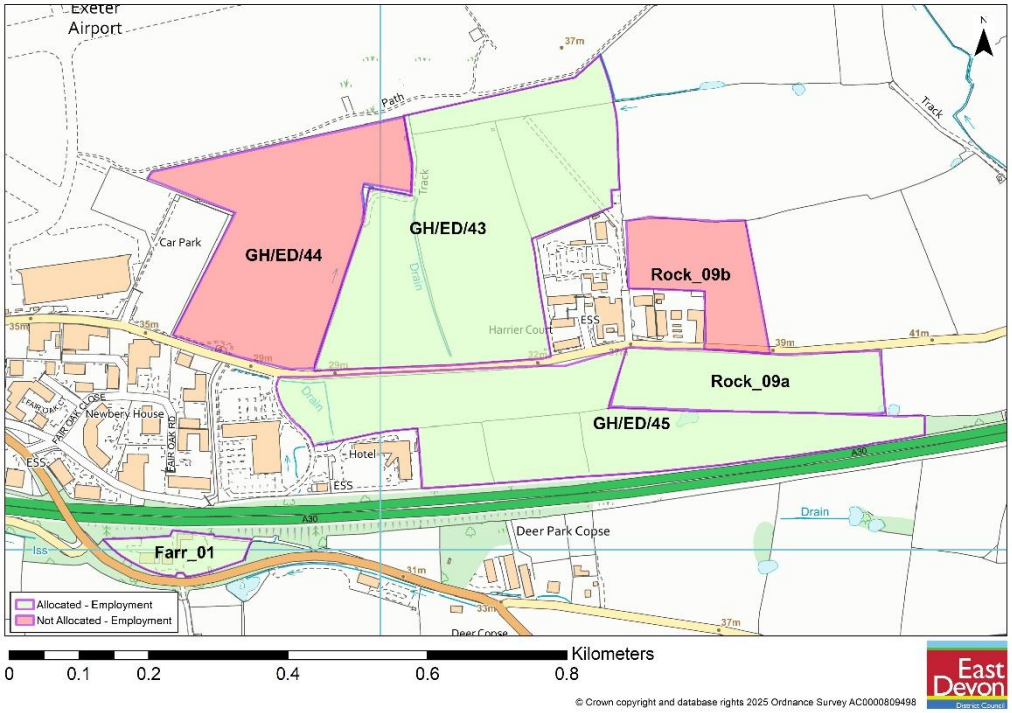
East Devon


Exeter
Airport
Path
Track
Car Park
GH/ED/44
GH/ED/43
Drain
Rock_09b
Harrier Court
ESS
Rock_09a
GH/ED/45
Newbery House
Fair Oak Close
Fair Oak Close Rd
Hotel
ESS
A30
Deer Park Copse
Drain
Iss
Farr_01
Allocated - Employment
Not Allocated - Employment
Kilometers
0 0.1 0.2 0.4 0.6 0.8
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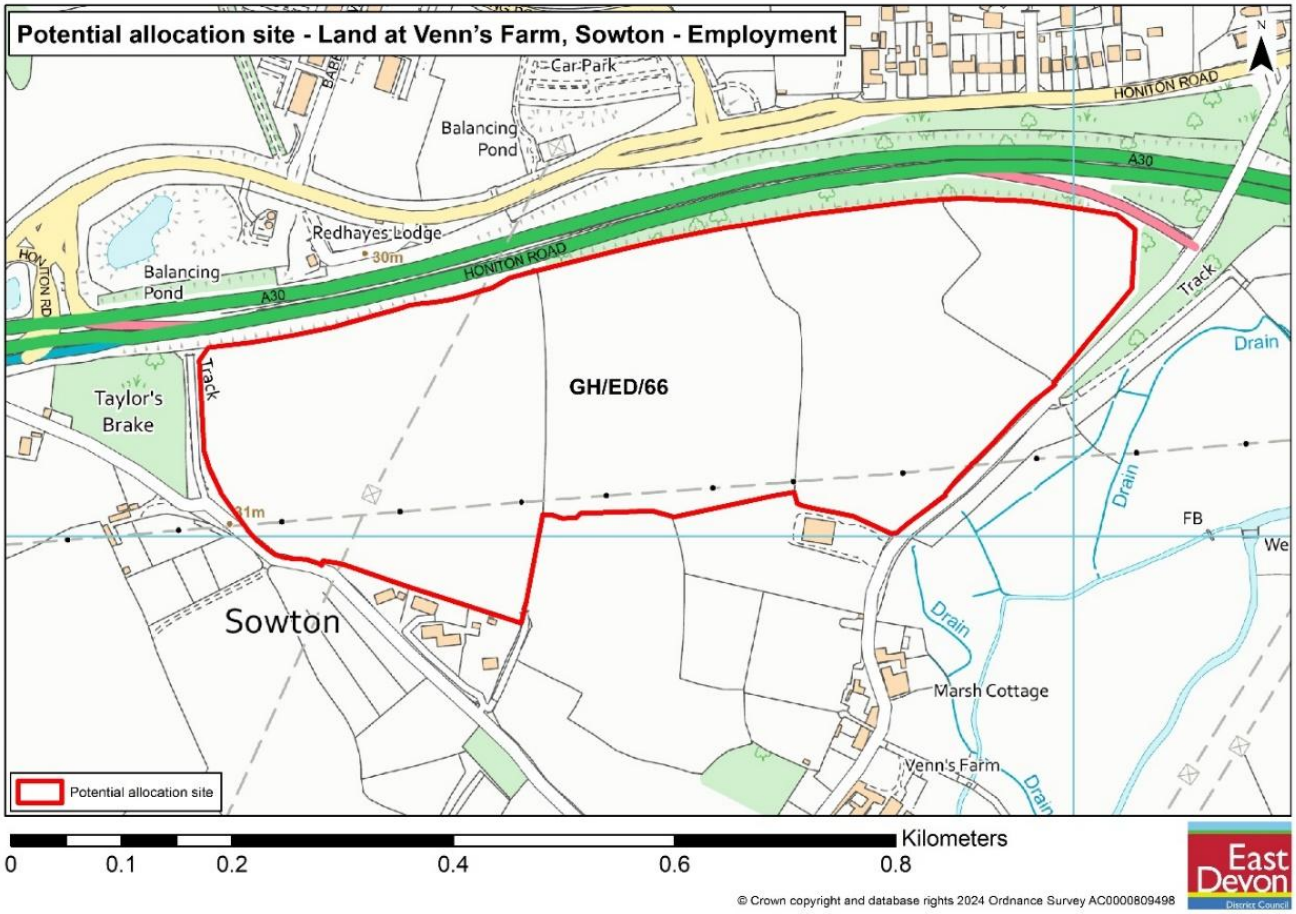
East Devon


Potential allocation site - Land at Venn's Farm, Sowton - Employment
Car Park
Balancing Pond
HONITON ROAD
A30
Redhayes Lodge
30m
Balancing Pond
HONITON ROAD
A30
HONITON RD
Track
Taylor's Brake
GH/ED/66
31m
Sowton
Track
Drain
Drain
FB
Drain
Marsh Cottage
Venn's Farm
Drain
Potential allocation site
Kilometers
0
0.1
0.2
0.4
0.6
0.8
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District Council

Sites: West End of East Devon (excl. the new community) – Employment sites – near Exeter Airport					
Site / SA Objective	Clho_09	GH/ED/66	GH/ED/43, GH/ED/45, Rock_09a	Farr_01	
1. Biodiversity	+ / - ?	+ / - ?	+ / - ?	+ / - ?	
Biodiversity commentary	Although the sites are within the 10km buffer zone around the Exe Estuary and Pebblebed Heaths European sites, this only requires mitigation for residential development and other developments providing overnight accommodation, so not applicable for these sites. There are no designated biodiversity sites at or close to these sites, but the HRA notes potential air quality impacts at East Devon Heaths SAC/SPA from increased traffic, so uncertain negative effect given the around 5km distance from the site options. These effects are mixed with a long-term minor positive effect due to the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.				
2. Landscape	+	- -	0	+	
Landscape commentary	Clho_09 and Farr_01 are a mix of greenfield and previously developed land, with several existing buildings and hardstanding on site, with low landscape sensitivity so a minor positive effect. GH/ED/66 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 Exeter Airport and buildings (GH/ED/43, 45, Rock_09a) is quite open though is viewed and read within the context and backdrop of the built form and managed land of the airport, within the context the airport and also the A30 which runs alongside (noting tree screening along this road). As such it recorded as having a neutral rating.				
3. Historic and built environment	- ?	-	0	- ?	

Sites: West End of East Devon (excl. the new community) – Employment sites – near Exeter Airport					
Site / SA Objective	Cllho_09	GH/ED/66	GH/ED/43, GH/ED/45, Rock_09a	Farr_01	
Hist. built env. commentary	Clho_09 contains infrastructure on the HER associated with the airfield use. An early medieval farmstead is noted in the HER for Farr_01 – a minor negative effect with some uncertainty for both sites, until further investigations reveal otherwise. GH/ED/66 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, although 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, so a negative effect overall. No significant effect for employment land to the east of Exeter Airport and buildings (GH/ED/43, 45, Rock_09a) because there are no heritage assets that would be affected by developing the site.				
4. Climate change and carbon emissions	**+ ?**	**+**	**0**	**0**	
Climate change carbon emissions commentary	The location of these sites offers the potential to connect to the district heating network provided by the energy centre at Skypark, a source of renewable and low carbon energy. All sites are within 800m of an hourly or greater bus service, and cycle routes, providing sustainable travel links, but Clho_09 is some distance from the nearest road, so uncertainty as to whether a link with this is possible. GH/ED/66 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 energy generation, so minor positive effects are expected. Employment land to the east of airport buildings (GH/ED/43, 45, Rock_09a) 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.				

Sites: West End of East Devon (excl. the new community) – Employment sites – near Exeter Airport					
Site / SA Objective	Clho_09	GH/ED/66	GH/ED/43, GH/ED/45, Rock_09a	Farr_01	
5. Climate change adaptation	-	+	-	-	
Climate change adaptation commentary	The sites north, east and south east of Exeter Airport are located within areas of surface water flood risk, which also affects the access for those sites on Long Lane. These sites are included in the Strategic Flood Risk Assessment Level 2, which sets out further detail on key points and constraints to be considered through a site-specific Flood Risk Assessment. GH/ED/66 does not suffer from flood risk.				
6. Land resources	+ ?	- -	0	-	
Land resources commentary	Clho_09 and Farr_01 are a mix of greenfield and previously developed land, with several existing buildings and hardstanding on site. Clho_09 is shown as “other” in the agricultural land classification, Farr_01 mostly “other” with some Grade 2. Clho_09 is potentially contaminated, so some uncertainty as to whether allocating will have a positive effect. GH/ED/66 is mostly Grade 2 agricultural land, with the remainder Grade 3a, and therefore significant negative effects are noted. Employment land to the east of airport buildings (GH/ED/43, 45, Rock_09a) are greenfield, mostly Grade 3a agricultural land but with some Grade 3b, so a minor negative effect.				
7. Water resources	- ?	- ?	0 ?	0 ?	
Water resources commentary	Clho_09 is adjacent to a tributary of the River Clyst, which flows into the Exe Estuary SPA/Ramsar, so a minor negative effect from potential deterioration of water quality, with some uncertainty due to the distance. Similar findings for GH/ED/66 which lies adjacent to the river Clyst, which feeds into the River Exe SPA/Ramsar. Employment land to the east of airport buildings (GH/ED/43, 45, Rock_09a) is unlikely to have any significant effects on water quality and quantity. South West Water forecast there will be adequate water supply. There is forecast to be marginal capacity exceedances at Countess Wear Wastewater				

Sites: West End of East Devon (excl. the new community) – Employment sites – near Exeter Airport					
Site / SA Objective	**Clho_09**	**GH/ED/66**	**GH/ED/43, GH/ED/45, Rock_09a**	**Farr_01**	
	Treatment Works assuming development at GH/ED/43, 45, Farr_01, although this may not take into account planned investment so there is some uncertainty.				
8. Homes	**- -**	**- -**	**- -**	**- -**	
Homes commentary	Proposed for employment uses and will not provide homes, a major negative effect is likely for this objective.				
9. Health and well-being	**+ / -**	**+ / -**	**+ / -**	**+ / -**	
Health and well-being commentary	A positive effect on well-being in general through the provision of jobs. 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 as less potential to alleviate deprivation. A positive effect on well-being for all sites through the provision of jobs. Clyst Valley Regional Park extends into Clho_09, offering potential outdoor recreation space for employees. Farr_01 is adjacent to the A30, and Clho_09 is within the 63db noise contour relating to Exeter Airport – employment is less sensitive to noise than residential uses, so a minor negative effect mixed with the positive of job provision. GH/ED/66 is 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. Employment land to the east of airport buildings (GH/ED/43, 45, Rock_09a) 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.				
10. Access to services	**-**	**- -**	**- -**	**-**	

Sites: West End of East Devon (excl. the new community) – Employment sites – near Exeter Airport					
Site / SA Objective	Cllho_09	GH/ED/66	GH/ED/43, GH/ED/45, Rock_09a	Farr_01	
Access to services commentary	Clho_09 has relatively good accessibility to services in Cranbrook, being within 1km of the primary school, shop, GP and community hall. Farr_01 is further away (beyond 1,600m) from such services, although within 800m of an hourly or greater bus service, and cycle routes. Access to some of these services is arguably less important for employment compared to residential uses. GH/ED/66 and Employment land to the east of airport buildings (GH/ED/43, 45, Rock_09a) have poor accessibility to services and facilities and this accounts for a significant negative impact.				
11. Jobs and employment	+ +	+ +	+ +	+ +	
Jobs/employment commentary	As the sites are proposed for employment use, all will have a major positive effect.				
12. Town centres	-	-	-	-	
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.				
13. Connectivity and transport	+	+	+	+	
Connectivity and transport commentary	Clho_09 is around 1,300m from Cranbrook train station; whilst all sites are within 800m of an hourly or greater bus service, and cycle routes, providing sustainable travel links. All sites are 1.5-2km from the junction to access the A30, so relatively good road links. Post code data shows all sites have a median download speed of 80 mbps, so superfast broadband would be available. A minor positive effect overall.				

Sites: West End of East Devon (excl. the new community) – Employment sites – near Exeter Airport					
Site / SA Objective	Cllho_09	GH/ED/66	GH/ED/43, GH/ED/45, Rock_09a	Farr_01	
	GH/ED/66 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 is identified. Employment land to the east of airport buildings (GH/ED/43, 45, Rock_09a) is located close to bus services and A roads.				

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.
- Undertake a comprehensive site-specific Flood Risk Assessment at the planning application stage, informed by the results of the SFRA Level 2.
- Several 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 several 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 National Landscapes. Nonetheless, given site size and potential for adverse impacts (for example land north of Sowton village) it will be essential that high quality designed schemes are bought 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 will require 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.

Sites: West End of East Devon (excl. the new community) – Employment sites – near Exeter Airport					
Site / SA Objective	Clho_09	GH/ED/66	GH/ED/43, GH/ED/45, Rock_09a	Farr_01	
• All of the sites offer scope for building to high green standards and incorporating renewable energy generation which 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. • Archaeological assessment of early medieval farmstead in Farr_01 will reduce the negative uncertainty on this site. • Require contamination assessment of Clho_09 to address the uncertainty on whether it potentially contaminated land. • Provide walking and cycling links from the sites to connect to existing routes and services in the vicinity. • Potential requirement for capacity upgrades to Countess Wear Wastewater Treatment Works – Strategic Policy AR02 requires infrastructure improvements to overcome water quality issues. These site-specific mitigation measures have been incorporated for the sites that are allocated in Local Plan Strategic Policies WS06, 07, 08.					
Preferred alternatives: Employment land at Land north of Exeter Airport (Clho_09) (15.3 hectares); Land to the east of Exeter Airport and buildings (GH/ED/43, GH/ED/45, Rock_09a) (24.34 ha); Land south of Exeter Airport Business Park Farr_01 (1 ha). **Reasons for alternatives being preferred or rejected:** • **Land north of Exeter Aiport (Clho_09) is preferred** as it is well located in respect of proximity to recent and planned development as part of the Treasbeare expansion of Cranbrook. There are facilities in reasonably close proximity to the site and few constraints to development. • **North of Sowton village (GH/ED/66) is rejected** due to its close proximity to the Sowton Conservation Area and potential impact on heritage assets reduces the site capacity and restricts development. The need for a cycle bridge and complex access arrangements will result in potential further harm to the heritage assets and adversely impact the financial viability of the scheme, and these impacts cannot be quantified or satisfactorily assessed without much more detailed information. It will have an adverse landscape impact due to 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. In addition, it is located on best and most versatile agricultural land.					

Sites: West End of East Devon (excl. the new community) – Employment sites – near Exeter Airport					
Site / SA Objective	Cllho_09	GH/ED/66	GH/ED/43, GH/ED/45, Rock_09a	Farr_01	
• **Land to the east of Exeter Airport and buildings (GH/ED/43, GH/ED/45, Rock_09a) is preferred** as it is well related to existing employment sites and close to the airport and its facilities, with a bus service that runs relatively close to the site that provides sustainable travel access. • **Land south of Exeter Airport Business Park (Farr_01) is preferred** as it has few constraints and could provide an alternative to the very high quality employment sites at the Airport.					

Reasonable alternatives

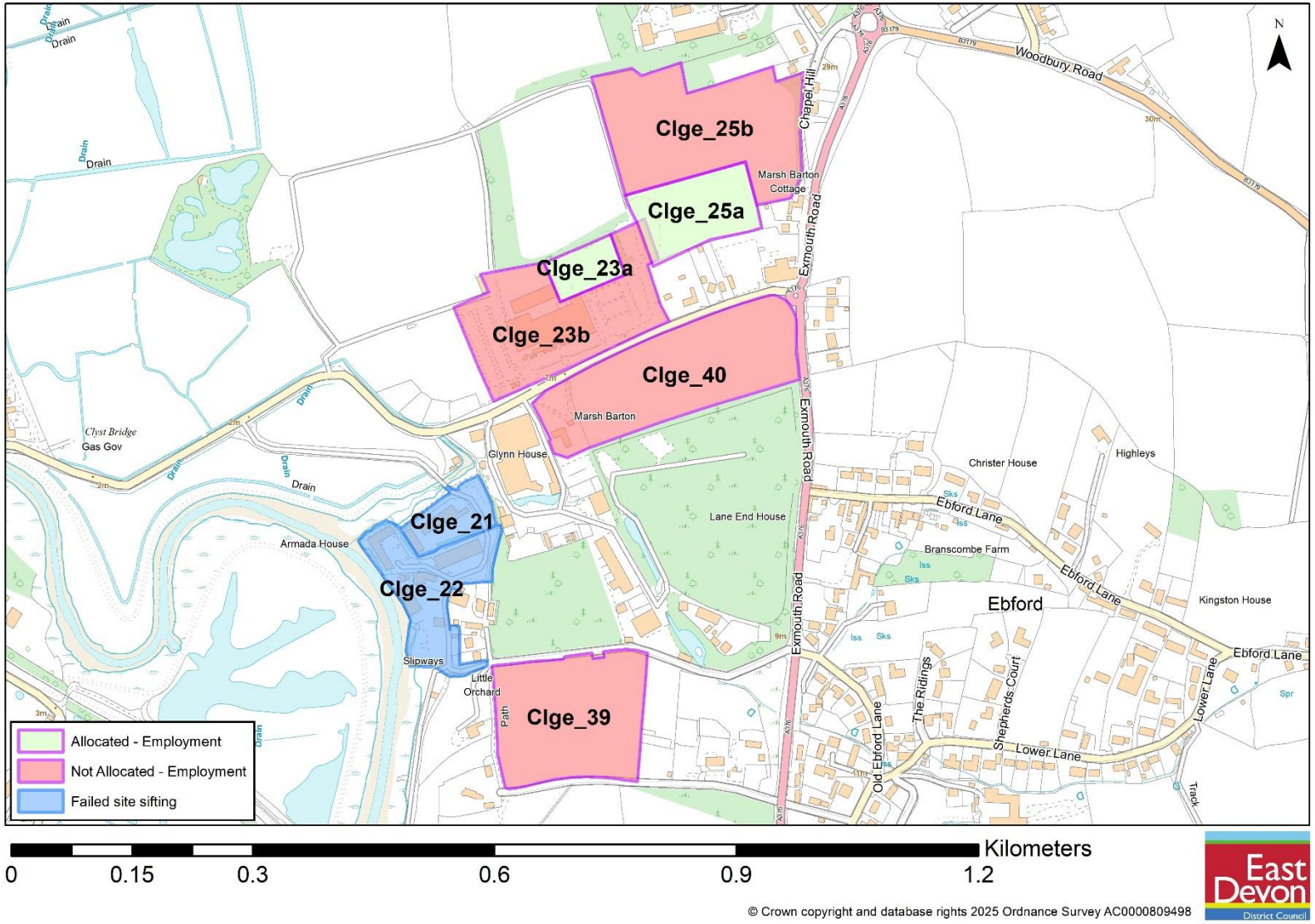
Employment sites – Darts Farm and Darts Business Park

- Clge_23a – Darts Farm (Strategic Policy WS15)
- Clge_25 – Land adjoining Darts Farm (Strategic Policy WS15)
- Clge_39 – Land south of Ebford Lane
- Clge_40 – Land south of Topsham Road

Outline of reasons for selecting the alternatives

These sites are reasonable alternatives as they have been assessed as suitable, available and achievable in the HELAA for employment use. They are located in the West End of East Devon, where the emerging Local Plan spatial strategy focusses new development. They are adjacent to an existing employment use (Darts Farm and Darts Business Park), where the emerging Local Plan supports employment development subject to meeting certain criteria. In addition, the sites are not already allocated in a 'made' Neighbourhood Plan, and do not currently have planning permission. Clge_23b is not considered a reasonable alternative as it contains an existing building of a successful business (Darts Farm Shopping Village) and its car park with no evidence of plans to redevelop this site. The site shown as Clge_23a is an area of hardstanding adjoining the existing business and car park, and therefore a reasonable alternative for development.

Clge_21 and 22 are not suitable in the HELAA due to being located within flood zone 3, so are not reasonable alternatives.


Clge_25b
Clge_25a
Clge_23a
Clge_23b
Clge_40
Clge_21
Clge_22
Clge_39
Marsh Barton Cottage
Marsh Barton
Glynn House
Lane End House
Armada House
Slipways
Little Orchard
Path
Chapel Hill
Exmouth Road
Woodbury Road
Christer House
Highleys
Ebford Lane
Branscombe Farm
Ebford
Kingston House
The Ridings
Shepherds Court
Lower Lane
Old Ebford Lane
Track
Clyst Bridge
Gas Gov
Drain
N
Allocated - Employment
Not Allocated - Employment
Failed site sifting
Kilometers
0
0.15
0.3
0.6
0.9
1.2
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Sites: West End of East Devon (excl. the new community) – Employment sites – Darts Farm and Darts Business Park					
Site / SA Objective	Clge_23a	Clge_25	Clge_39	Clge_40	
1. Biodiversity	+ / - - ?	+ / - - ?	+ / - - ?	+ / - - ?	
Biodiversity commentary	Within the 10km buffer zone around the Exe Estuary and Pebblebed Heaths European sites, but this only requires mitigation for residential development and other developments providing overnight accommodation, so not applicable for these sites. However, the close proximity to the Exe Estuary SPA/Ramsar (Clge_39 and 40 within 100m, the other sites only slightly further) means there is potential for a major negative effect, with uncertainty subject to lower-level assessment. The HRA notes potential air quality impacts at East Devon Heaths SAC/SPA from increased traffic. These negative effects are mixed with a long-term minor positive effect due to the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.				
2. Landscape	+	-	- -	- -	
Landscape commentary	Clge_23a is of low-medium sensitivity, as it is previously developed land comprising tarmac hardstanding. Clge_25 is an undeveloped, open field that rises to the north, albeit with limited existing development providing some context of built form. Developing Clge_39 will urbanise a currently rural area, visual impact will be significantly increased if a major access is required. Sensitivity is increased because the site is bounded by footpaths/cycleways which access the wider footpath/cycle network along the Exe Estuary approx 100m away. Clge_40 is a large field that features in some medium-long range views and is relatively flat and open, development of the western end would be seen in the context of existing development, so a medium sensitivity. Clge_39 and 40 are within the Coastal Preservation Area, designated to protect the undeveloped coast from development.				
3. Historic and built environment	0	- ?	- ?	-	

Sites: West End of East Devon (excl. the new community) – Employment sites – Darts Farm and Darts Business Park					
Site / SA Objective	Clge_23a	Clge_25	Clge_39	Clge_40	
Hist. built env. commentary	No heritage assets will be affected by developing Clge_23a. There is a concentration of later prehistoric or Romano-British settlement activity in the vicinity of Clge_25 – geophysical surveys indicate the enclosure is located on land immediately to the east, possibly extending into Clge_25, therefore a negative uncertain effect until a scheme of archaeological work to be agreed through a planning application. There is evidence of medieval earthworks and field remnants at Clge_39 so a minor negative effect with uncertainty at this stage as to what the asset may comprise. There is a Grade II listed farmhouse within the western section of Clge_40 meaning potential harm to this asset.				
4. Climate change and carbon emissions	+	+	+	+	
Climate change carbon emissions commentary	The close proximity to a large workforce in Exeter reduces the need to travel. The sites are around 1km from Topsham train station. There is a 15 minute bus frequency along the A376 and Topsham Road, to Exeter in one direction and Exmouth in the other. The nearby Exe Estuary Trail can be used by cyclists and walkers; all offering the potential for employees to access the sites by sustainable travel.				
5. Climate change adaptation	+	0	+	+	

Sites: West End of East Devon (excl. the new community) – Employment sites – Darts Farm and Darts Business Park					
Site / SA Objective	Clge_23a	Clge_25	Clge_39	Clge_40	
Climate change adaptation commentary	The south west part of Clge_25 has surface water flood risk but development can avoid this area. No risk identified on the other sites.				
6. Land resources	+ +	- -	- -	- -	
Land resources commentary	Clge_23a is previously developed land with no contamination or minerals records, but all other sites are greenfield and grade 1 agricultural land.				
7. Water resources	- ?	- ?	- ?	- ?	
Water resources commentary	No sites are located in a water source protection zone, but the close proximity to the Exe Estuary SPA/Ramsar (Clge_39 and 40 within 100m, the other sites slightly further) means there is potential for a negative effect upon water quality at this European site, with uncertainty subject to lower-level assessment. South West Water forecast there will be adequate water supply. There is forecast to be marginal capacity exceedances at Countess Wear Wastewater Treatment Works assuming development at Clge_25, although this may not take into account planned investment so there is some uncertainty.				
8. Homes	- -	- -	- -	- -	
Homes commentary	Proposed for employment uses and will not provide homes, a major negative effect is likely for this objective.				
9. Health and well-being	+	+	+	+	

Sites: West End of East Devon (excl. the new community) – Employment sites – Darts Farm and Darts Business Park					
Site / SA Objective	Clge_23a	Clge_25	Clge_39	Clge_40	
Health and well-being commentary	A positive effect on well-being in general through the provision of jobs. Within 30% least deprived neighbourhoods, so less potential to alleviate deprivation. Potential air and noise pollution from traffic along the A376 and Topsham Road, but employment is less sensitive that residential.				
10. Access to services	+	+	+	+	
Access to services commentary	A primary school, community hall, pubs, and retail at Darts Farm shopping village are all within 1km of the sites, with further services in Topsham just over 1km away. However, accessing many of these facilities involves travelling alongside, and crossing, busy roads with limited crossing points.				
11. Jobs and employment	+ +	+ +	+ +	+ +	
Jobs/employment commentary	As the sites are proposed for employment use, a major positive effect.				
12. Town centres	+	+	+	+	
Town centres commentary	All sites are within 1,600m of Topsham town centre.				

Sites: West End of East Devon (excl. the new community) – Employment sites – Darts Farm and Darts Business Park					
Site / SA Objective	**Clge_23a**	**Clge_25**	**Clge_39**	**Clge_40**	
13. Connectivity and transport	**+ +**	**+ +**	**+ + ?**	**+ +**	
Connectivity and transport commentary	Good road connectivity, with the A376 adjoining or in close proximity to the sites, although Clge_39 is accessed 200m along a narrow lane that links to the A376 meaning uncertainty as to whether suitable access can be achieved. There are also various sustainable travel modes with a 15 minute bus frequency along the A376 and Topsham Road, to Exeter in one direction and Exmouth in the other; the nearby Exe Estuary Trail; and Topsham train station 1km away. Superfast broadband exists in local post codes.				
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: • Mitigation to minimise adverse biodiversity effect on the Exe Estuary SPA/Ramsar, to be considered through the HRA and lower level surveys. • Change the site boundary of Clge_25 to limit development to the lower part of the site, adjacent to existing buildings and with less landscape impact – this reduced area is known as Clge_25a. • Clge_40 development should be restricted to the eastern field and not encroach onto the farmhouse garden in any way. Harm could be reduced through landscaping, design, reducing density and height, and reflecting the agricultural charater of the area. • An archaeological survey is needed prior to development of Clge_39 and it may be possible to design a layout to incorporate any subterranean remains. • Significant landscaping at Clge_39 could reduce the major negative to a minor negative effect. • Part of the site is at risk of flooding and development should be informed by the SFRA Level 2. • Potential requirement for capacity upgrades to Countess Wear Wastewater Treatment Works – Strategic Policy AR02 requires infrastructure improvements to overcome water quality issues. These site-specific mitigation measures have been incorporated for the sites that are allocated in Local Plan Strategic Policy WS15.					
Preferred alternatives: Clge_23a and Clge_25a – comprising a total of 2.13 hectares of employment land.					

Sites: West End of East Devon (excl. the new community) – Employment sites – Darts Farm and Darts Business Park					
Site / SA Objective	CIge_23a	CIge_25	CIge_39	CIge_40	

Reasons for alternatives being preferred or rejected:

- **CIge_23a – Darts Farm is preferred** as it is previously developed land, well-related to existing employment with no significant adverse sustainability effects (apart from the lack of on-site housing).
- **CIge_25b – Land adjoining Darts Farm is rejected** as it would create a large employment site in the countryside with consequent adverse landscape impacts, and the scale is excessive to meet local needs.
- **CIge_25a – Land adjoining Darts Farm is preferred** as it would deliver relatively small-scale employment development adjacent to existing businesses where adverse impacts, particularly relating to landscape, are minimised and can be mitigated.
- **CIge_39 – Land south of Ebford Lane is rejected** due to being located in a rural position accessed along single track roads. Development, along with additional commercial traffic, would change the landscape character to an unacceptable degree. In addition, it is grade 1 agricultural land.
- **CIge_40 – Land south of Topsham Road is rejected** as it forms the pastoral setting to the Grade II listed farmhouse to the west. The site is quite exposed, so development will be highly visible, and the land is grade 1 agricultural land.

Reasonable alternatives

Employment sites – elsewhere in the West End

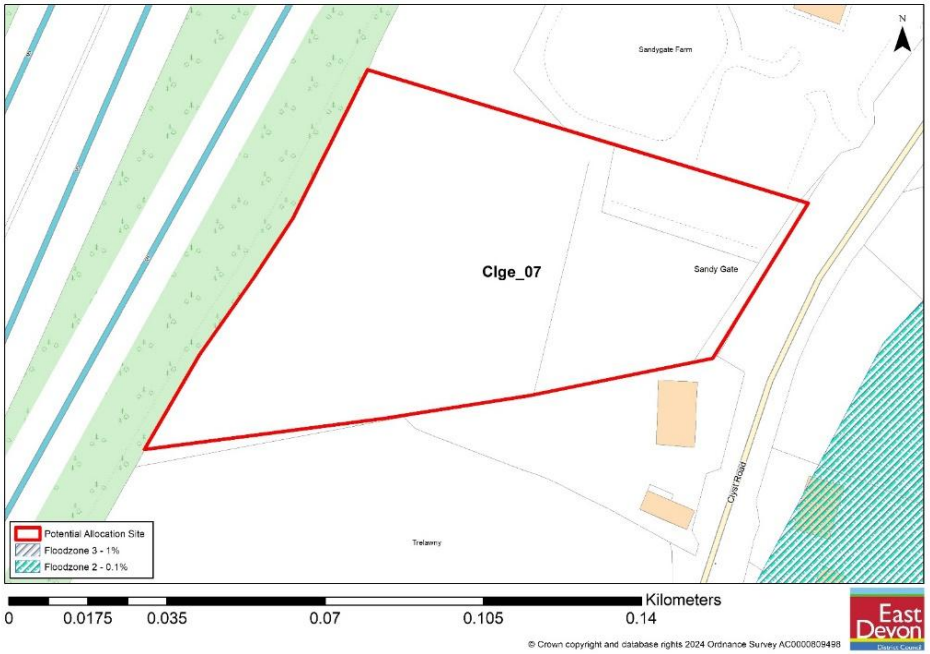
- Land at Sandygate (Clge_07) (Strategic Policy WS12)
- Land at Lodge Trading Estate, Station Road (Brcl_27a) (Strategic Policy WS13)
- Land south of Langdon's Business Park (Sowt_15a) (Strategic Policy WS14)
- Land at Poltimore Barton (Polt_04) and Land at Poltimore/Broadclyst (Polt_06) overlap so are considered together (proposed use for employment/service station)
- Land adjoining Greendale Business Park (Wood_38)

Outline of reasons for selecting the alternatives

The Local Plan spatial strategy focusses new development on the West End of the district, including major strategic development close to Exeter. Within this strategy, there are a range of reasonable alternatives for sites for strategic-scale housing and mixed-use, and employment, development. The employment sites are located adjacent to existing employment areas, rather than isolated locations, consistent with Local Plan and national policies.

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, the sites are not already allocated in a 'made' Neighbourhood Plan, and do not currently have planning permission.

The larger site of Brcl_27 is not considered a reasonable alternative as it contains large parts of high flood risk and is partly developed. The area in the east is mostly outside of high flood risk (flood zone 3) and undeveloped, known as Brcl_27a. The larger site of Sowt_15 has been reduced to the area shown on the map as Sowt_15a due to adverse landscape and historic environment impacts from the larger site.


N
Sandygate Farm
CIge_07
Sandy Gate
Oyster Road
Trefanny
Potential Allocation Site
Floodzone 3 - 1%
Floodzone 2 - 0.1%
Kilometers
0
0.0175
0.035
0.07
0.105
0.14
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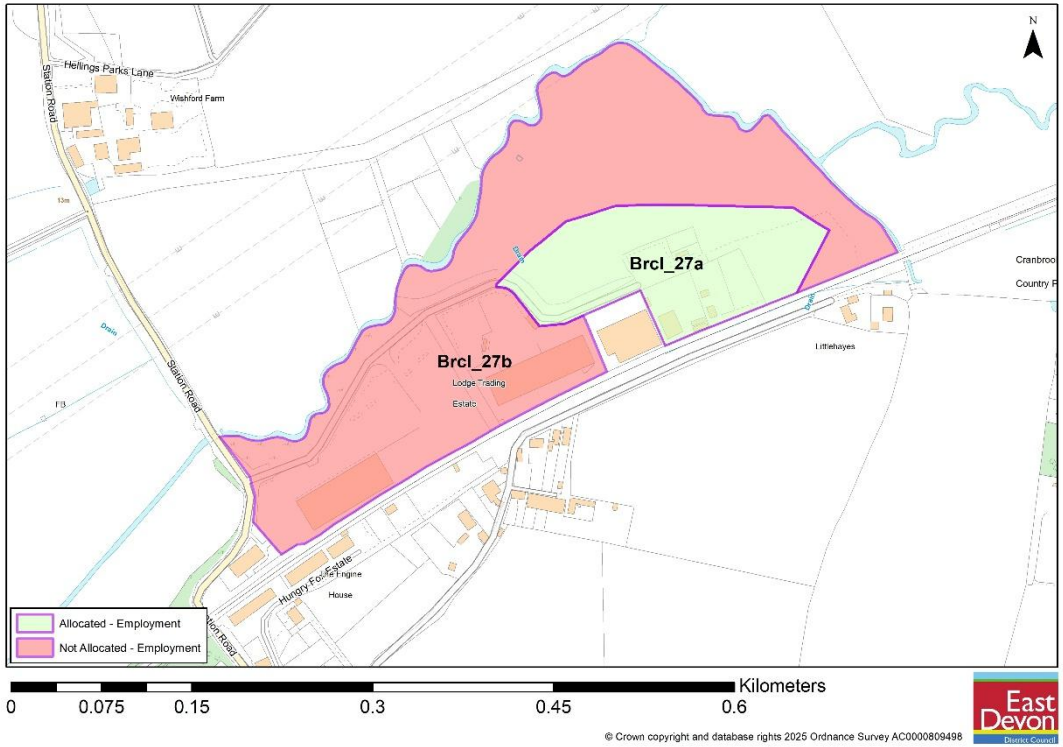
East Devon


N
Hellings Parks Lane
Wishford Farm
Station Road
Brcl_27a
Brcl_27b
Lodge Trading Estate
Littlehayes
Hungry Fox Estate
Engine House
Allocated - Employment
Not Allocated - Employment
Kilometers
0
0.075
0.15
0.3
0.45
0.6
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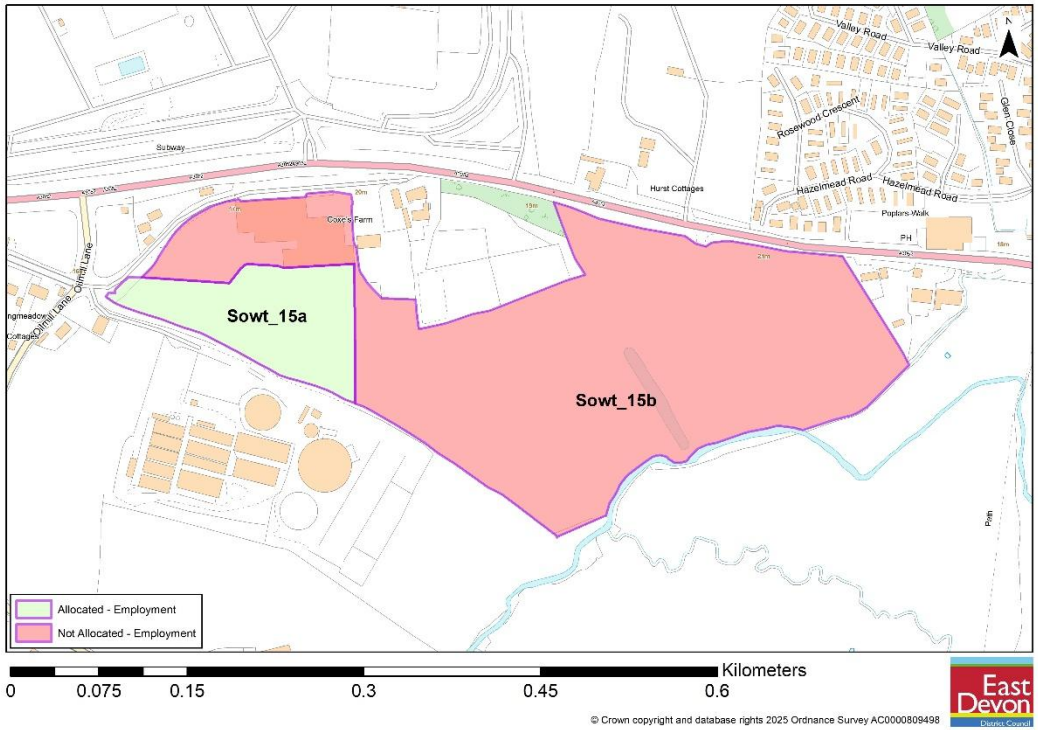
East Devon


Sowt_15a
Sowt_15b
Allocated - Employment
Not Allocated - Employment
Kilometers
0
0.075
0.15
0.3
0.45
0.6
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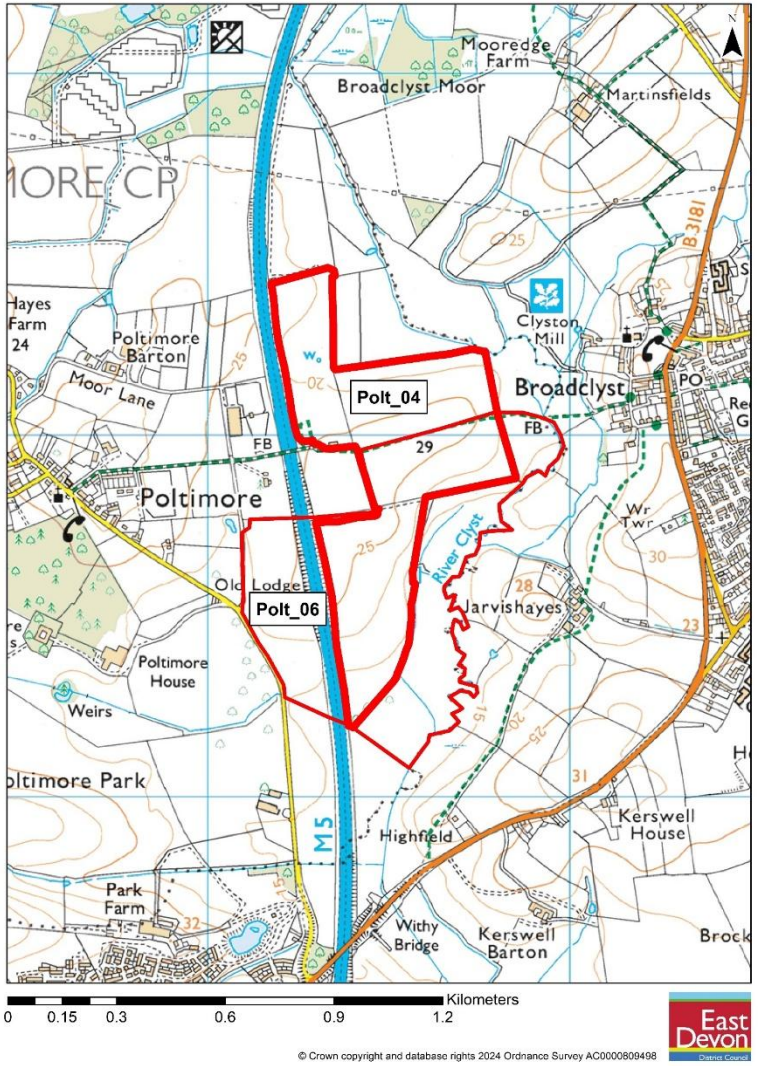
Polt_04
Polt_06
Poltimore
Broadclyst
Broadclyst Moor
Mooredge Farm
Martinsfields
Clyston Mill
Poltimore Barton
Moor Lane
Old Lodge
Jarvishayes
Poltimore House
Weirs
Highfield
Kerswell House
Park Farm
Withy Bridge
Kerswell Barton
River Clyst
M5
B3181
Kilometers
0
0.15
0.3
0.6
0.9
1.2
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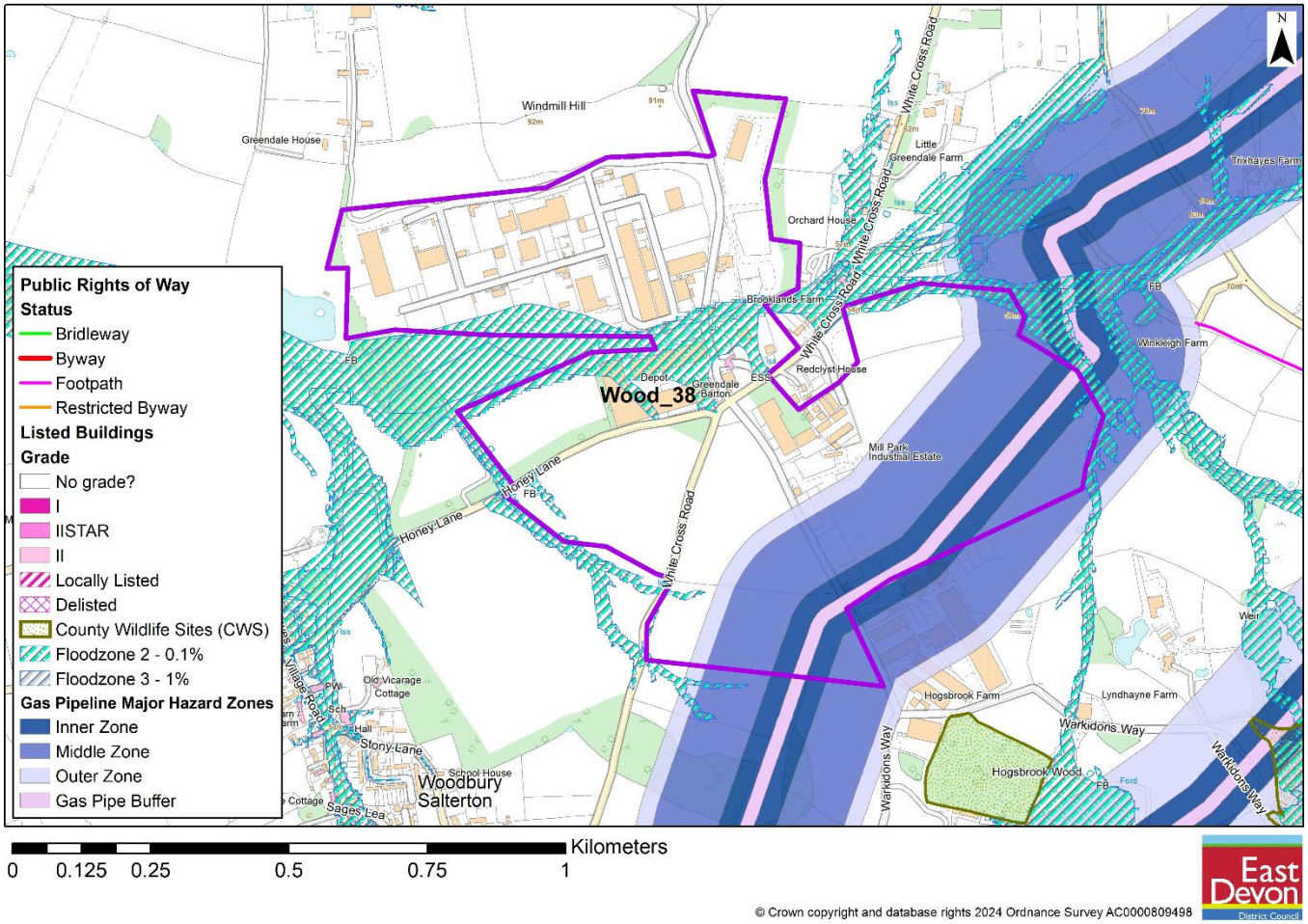
Public Rights of Way
Status
Bridleway
Byway
Footpath
Restricted Byway
Listed Buildings
Grade
No grade?
I
IISTAR
II
Locally Listed
Delisted
County Wildlife Sites (CWS)
Floodzone 2 - 0.1%
Floodzone 3 - 1%
Gas Pipeline Major Hazard Zones
Inner Zone
Middle Zone
Outer Zone
Gas Pipe Buffer
Wood_38
Windmill Hill
Greendale House
Little Greendale Farm
Trixhayes Farm
Orchard House
Brooklands Farm
White Cross Road
Redclyst House
Depot
Greendale Barton
Winkleigh Farm
Mill Park Industrial Estate
Honey Lane
Hogsbrook Farm
Lyndhayne Farm
Warkidons Way
Hogsbrook Wood
Weir
Old Vicarage Cottage
Stony Lane
School House
Woodbury Salterton
Sages Lea
Kilometers
0 0.125 0.25 0.5 0.75 1
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East Devon
District Council

Sites: West End of East Devon (excl. the new community) – Employment sites – elsewhere in the West End						
Site / SA Objective	Clge_07	Brcl_27a	Sowt_15a	Polt_04, 06	Wood_38	
1. Biodiversity	**+ / 0**	**+ / -**	**+ / 0**	**+ / - ?**	**+ / -**	
Biodiversity commentary	Although within the 10km buffer zone around the Exe Estuary and Pebblebed Heaths European sites, this only requires mitigation for residential development and other developments providing overnight accommodation, so not applicable for employment sites. The northern and eastern part of Brcl_27a is an Unconfirmed Wildlife Site, the northern part is also a priority habitat floodplain grazing marsh, so a minor negative effect. The majority of the area of both sites is covered by an Unconfirmed Wildlife Site, with a County Wildlife Site adjoining the western boundary of Polt_06, so a negative effect with some uncertainty as to whether overnight accommodation will be provided on-site. Hogsbrook Farm County Wildlife Site located 131m to south of Wood_38, but there is intervening development so not likely to be adversely affected by development. The neutral and negative effects are mixed with a long-term minor positive effect due to the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.					
2. Landscape	**+**	**+**	**-**	**-**	**-**	

Sites: West End of East Devon (excl. the new community) – Employment sites – elsewhere in the West End						
Site / SA Objective	Clge_07	Brcl_27a	Sowt_15a	Polt_04, 06	Wood_38	
Landscape commentary	Clge_07 is near the developed area of Exeter and alongside the busy M5 motorway, seen in the context of caravan dealer, M5 and Sandy Park rugby ground, where the overall landscape sensitivity of the site is considered low. Brcl_27a is a relatively flat and open site, with medium-low sensitivity as development would be seen in the context of the existing trading estate and, in the future, the Bluehayes area of Cranbrook to the south of the railway line. Sowt_15a has a context of built form as the site is wedged between the business park to the north, and a cluster of agricultural buildings and an anaerobic digester to the south. The single on-site tree is protected by a TPO. Polt_04, 06 are adjacent to the M5 but set in a wider rural landscape, with Poltimore Park adjoining the west of Polt_06, and topography meaning that development would be visible in long range views. Within the Clyst Valley Regional Park. Wood_38 has some built context with the existing business park to the north, and Hogsbrook Farm buildings to the south; but overall the site has a predominantly rural context, and a medium sensitivity to new development.					
3. Historic and built environment	**0**	**- ?**	**-**	**- -**	**-**	

Sites: West End of East Devon (excl. the new community) – Employment sites – elsewhere in the West End						
Site / SA Objective	Clge_07	Brcl_27a	Sowt_15a	Polt_04, 06	Wood_38	
Hist. built env. commentary	The nearest designated asset to Clge_07 is Clyst St Mary bridge, a Scheduled Monument around 220m to the east, but the site is not visible from this asset, due to the distance and intervening vegetation which minimises intervisibility. Brcl_27a has evidence of a pre-historic enclosure and field boundaries on the Historic Environment Record, but some uncertainty until more detailed surveys are undertaken. Grade II listed Coxes Farm Cottage is around 90m north of Sowt_15a, but intervening vegetation and buildings restrict views of the site. Polt_04, 06 have a major negative effect on the setting of the Grade II* listed Poltimore House (around 300m to the west of Polt_06, and 550m to the west of Polt_06), along with its historic parkland which adjoins the western boundary of Polt_06. Also potential for adverse impact upon Killerton House Registered Park and Garden, 1.7km to the north. Grade II listed Greendale Barton is located in the centre of Wood_38, on the southern edge of the existing business park. Grade II listed Brooklands Farm is around 30m from edge of site in north west – mature trees obscure views into the site, but potential negative impact upon this asset.					
4. Climate change and carbon emissions	**+**	**0 ?**	**0**	**0**	**-**	

Sites: West End of East Devon (excl. the new community) – Employment sites – elsewhere in the West End						
Site / SA Objective	Clge_07	Brcl_27a	Sowt_15a	Polt_04, 06	Wood_38	
Climate change carbon emissions commentary	Clge_07 is located close to a 15 minute bus frequency along the A376, and just over 1km from Newcourt train station, offering sustainable travel links for employees at the site. Also close to a large potential workforce in Exeter, minimising the need to travel. Brcl_27a has a variety of services and workers in Broadclyst, located around 1.5km north, with an hourly or greater bus service along London Road 900m to the south, but the journey along Station Road is relatively narrow and lacks footpaths so not a realistic route for pedestrians and challenging for cyclists. When the Bluehayes part of Cranbrook is delivered to the south, it will provide additional facilities, workers, and potentially improved walking/cycling routes in the area. This means a neutral effect overall, with some uncertainty. Sowt_15a lies around 400m from Clyst St Mary, adjacent to an existing business park with established access and close to a pub, an exhibition centre and a residential caravan park. Bus stop within easy walking distance (although there is limited pavement). The proposed use of Polt_04, 06 as a motorway service station means the site is not likely to be a 'destination' for additional trips that will increase travel and associated carbon emissions, but rather a facility that will be used by existing motorists travelling along the M5. The large size of the site offers the potential to install renewable and low carbon energy. Wood_38 is in a rural location, some distance from existing settlements, means that development will increase the need to travel. There is a bus service every two hours to Exeter in one direction, and Exmouth in the other, that travels through the centre of the site, with a bus stop on the junction of Honey Lane and White Cross Road. An hourly bus service runs along the A3052 to the north, but there are no bus stops that are easily accessible for pedestrians from the site. Overall, limited opportunities for sustainable travel.					
5. Climate change adaptation	**+**	**-**	**+**	**0**	**0**	

Sites: West End of East Devon (excl. the new community) – Employment sites – elsewhere in the West End						
Site / SA Objective	Clge_07	Brcl_27a	Sowt_15a	Polt_04, 06	Wood_38	
Climate change adaptation commentary	Clge_07, Sowt_15a have no sources of on-site flood risk, and not located in a critical drainage area. The northern and north eastern part of Brcl_27a is within flood zone 2. The eastern and southern edge of Polt_04, 06 are located in flood zone 3, but it is likely that built development can avoid this area. A slither of fluvial and surface flood risk extends into the western part of Wood_38 and around the western and eastern fringes.					
6. Land resources	**- -**	**-**	**- ?**	**- -**	**- ?**	
Land resources commentary	Clge_07 has no records of minerals of contaminated land, but a major negative effect as Grade 1 agricultural land in the strategic assessment. Brcl_27a is a mix of brownfield land with existing buildings and hardstanding in the south west, and greenfield land in the north and east. The greenfield part is a mix of Grade 3a and 3b agricultural land, so some best and most versatile land would be lost if the site is developed. Sowt_15a is a greenfield site; the strategic agricultural land classification shows around 0.3 hectares of Grade 1 agricultural land in the western part of the site, with the remainder Grade 3 (uncertain if 'a' or 'b'). South west part of Polt_06 is grade 1 agricultural land in the (more detailed) post-1988 classification, with most of the remaining area of Polt_04 and Polt_06 also grade 1 in the strategic assessment. Wood_38 is a greenfield site, comprised entirely of grade 3 agricultural land, with uncertainty as to grade 3a or 3b.					
7. Water resources	**- ?**	- ?	**0**	**-**	**-**	

Sites: West End of East Devon (excl. the new community) – Employment sites – elsewhere in the West End						
Site / SA Objective	Clge_07	Brcl_27a	Sowt_15a	Polt_04, 06	Wood_38	
Water resources commentary	The River Clyst is 250m to the east of Clge_07, which flows into the Exe Estuary SPA/Ramsar, so a minor negative effect from potential deterioration of water quality, but some uncertainty as to whether there is a direct pathway. Brcl_27a, Polt_04, 06 are adjacent to the River Clyst, which flows into the Exe Estuary SPA/Ramsar, so a minor negative effect from potential deterioration of water quality. No significant effects are likely from Sowt_15a. Southern part of Wood_38 is within a water source protection zone. The Grindle Brook adjacent to the north drains into the Exe Estuary SPA/Ramsar. There is forecast to be marginal capacity exceedances at Countess Wear Wastewater Treatment Works assuming development at Clge_07, Brcl_27a, although this may not take into account planned investment so there is some uncertainty. South West Water forecast there will be adequate water supply.					
8. Homes	**- -**	**- -**	**- -**	**- -**	**- -**	
Homes commentary	Proposed for employment uses and will not provide homes, a major negative effect is likely for all sites.					
9. Health and well-being	**+ / -**	**+ / -**	**+ / -**	**+ / -**	**+**	

Sites: West End of East Devon (excl. the new community) – Employment sites – elsewhere in the West End						
Site / SA Objective	Clge_07	Brcl_27a	Sowt_15a	Polt_04, 06	Wood_38	
Health and well-being commentary	A positive effect on well-being in general through the provision of jobs. Clge_07 is within 30% least deprived neighbourhoods, so less potential to alleviate deprivation. Location next to the M5 means air, noise and light pollution is likely to affect the site, but employment is a less sensitive use than residential. Clyst Valley Regional Park, around 100m to the north, offers potential outdoor recreation space for employees, with formal sports facility at David Lloyd's 400m to the west. Brcl_27a is in an area amongst the least 50% deprived areas in England; nevertheless, a positive effect on well-being through the provision of jobs, and location within Clyst Valley Regional Park which offers potential outdoor recreation space for employees, mixed with a negative effect due to noise pollution from the adjacent railway line. Sowt_15a is within 30% least deprived neighbourhoods, so less potential to alleviate deprivation. Location near to the A3052 means air, noise and light pollution is likely to affect the site, but employment is a less sensitive use than residential. Polt_04, 06 are located in an area amongst the least 50% deprived areas in England; nevertheless, a positive effect on well-being through the provision of jobs, and location within Clyst Valley Regional Park which offers potential outdoor recreation space for employees, mixed with a negative effect due to noise/air pollution from the M5. Wood_38 is within 50% least deprived neighbourhoods, so less potential to alleviate deprivation. Rural location means no significant pollution issues.					
10. Access to services	**+**	**+**	**+**	**0**	**-**	

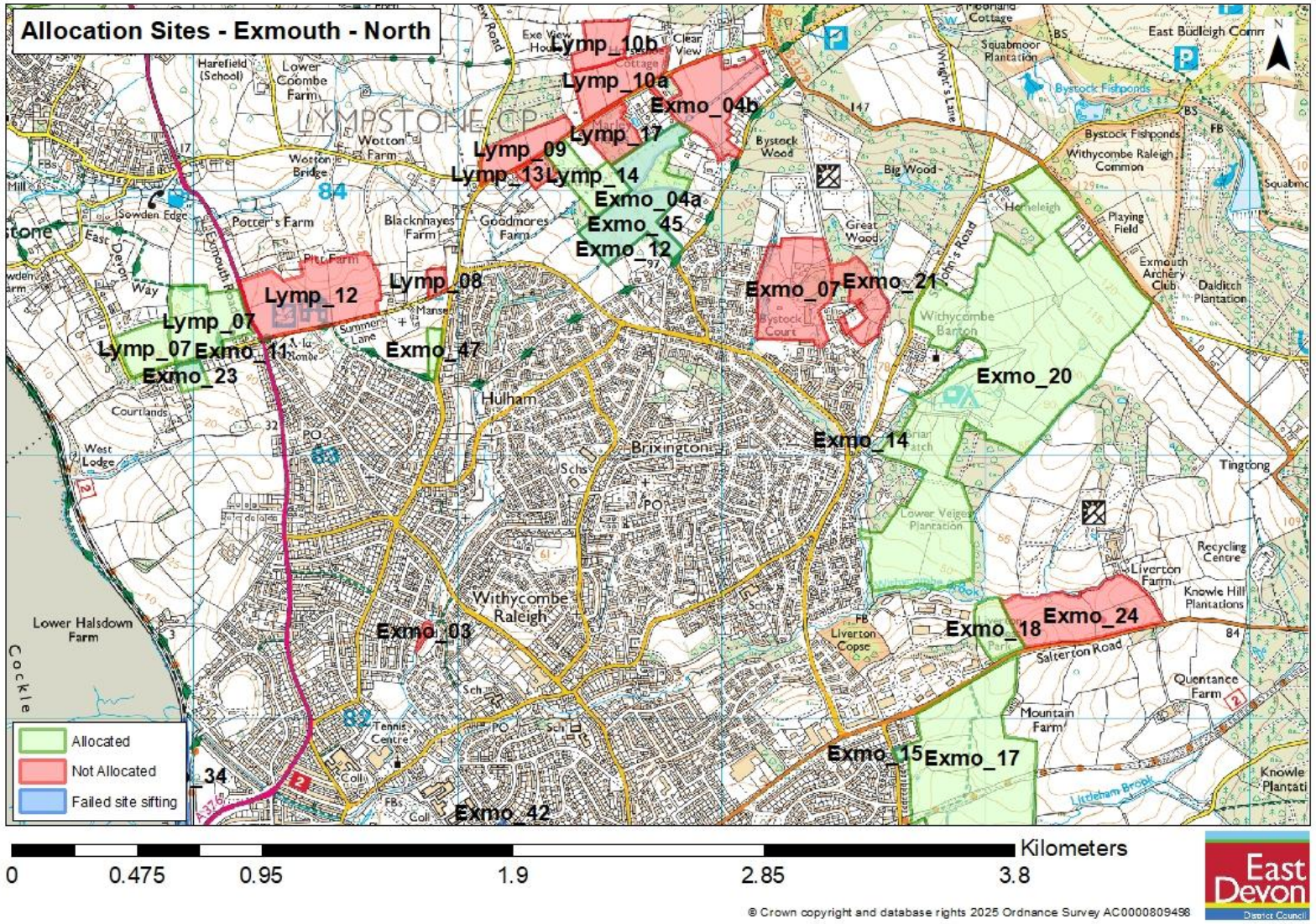
Sites: West End of East Devon (excl. the new community) – Employment sites – elsewhere in the West End						
Site / SA Objective	Clge_07	Brcl_27a	Sowt_15a	Polt_04, 06	Wood_38	
Access to services commentary	At Clge_07, a range of services are available (primary school, shop, pub, sports facilities) within 800m at Exeter to west and Clyst St Mary to the east, but a barrier of busy roads (M5, A376) extends this distance and not particularly attractive routes for pedestrians, so a minor positive. Brcl_27a is relatively accessible, located within 1,600m of schools (primary and secondary), shop, community, and GP, although access to such services is arguably less important for employment compared to residential uses. Access to such services along Station Road is relatively narrow and lacks footpaths so not a realistic route for pedestrians and challenging for cyclists. Sowt_15a has a range of services are available (primary school, shop, pub, community hall) in Clyst St Mary 1km to the east. Hourly or greater bus service along the A3052 to the north. Polt_04, 06 proposed use as a motorway service station means that access to services for residents is not considered relevant, and is less of an issue for on-site workers, so a neutral effect. Wood_38 is in a rural location, but there is a bus service every two hours to Exeter in one direction, and Exmouth in the other, with a bus stop on the junction of Honey Lane and White Cross Road. A primary school, community hall, shop, and pub are all within 1km of the site, but these are accessed along country lanes, a poor quality route for pedestrians.					
11. Jobs and employment	+ +	+ +	+ +	+ +	+ +	
Jobs/employment commentary	As the sites are proposed for employment use, a major positive effect.					
12. Town centres	-	-	-	-	-	

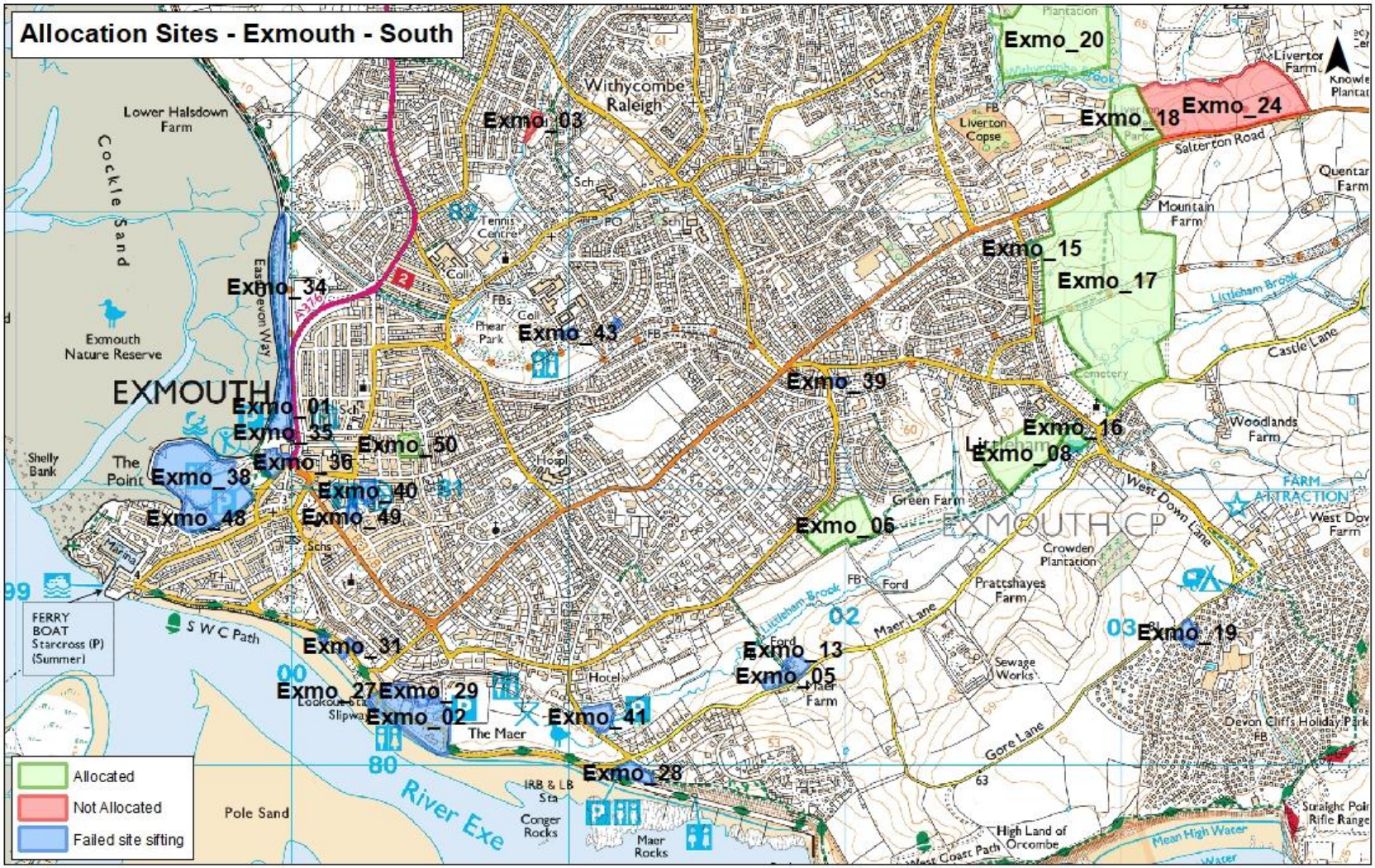
Sites: West End of East Devon (excl. the new community) – Employment sites – elsewhere in the West End						
Site / SA Objective	**Clge_07**	**Brcl_27a**	**Sowt_15a**	**Polt_04, 06**	**Wood_38**	
Town centres commentary	Beyond 1,600m of an existing town centre, so development will not support a town centre.					
13. Connectivity and transport	**+ +**	**+**	**+**	**+ ?**	**-**	
Connectivity and transport commentary	Clge_07 has 81mbps average download speed within the post code, so superfast broadband is assumed. Located close to a 15 minute bus frequency along the A376, cycle route on northern side of A376 that travels into Exeter, and just over 1km from Newcourt train station, offering sustainable travel links for employees at the site. Also very good road links being adjacent to M5 junction 30, and the A376. Brcl_27a has an hourly or greater bus route, and cycle path is around 900m to the south on London Road. Cranbrook train station is only 400m away to the east 'as the crow flies' but there is no direct route, with the railway being a barrier. The A30 is around 1.8km south. Nearest post code has a median download speed of 13 mbps, so not superfast. Sowt_15a has good road access with the A3052 to the north, along which an hourly or better bus service runs. Superfast broadband exists in local post codes. The provision of a motorway service station at Polt_04, 06 will enhance the road network, but there is some uncertainty on the need for motorway services, given the presence of existing services 5km to the south at M5 junction 30. A3052 can be accessed 1km to the north of Wood_38, and a two hourly bus service runs past the site. Superfast broadband exists in local post codes. No recognised cycle routes nearby, so overall a minor negative effect.					
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: • Provide walking and cycling links from the sites to connect to existing routes and services in the vicinity will maximise beneficial effects.						

Sites: West End of East Devon (excl. the new community) – Employment sites – elsewhere in the West End						
Site / SA Objective	Clge_07	Brcl_27a	Sowt_15a	Polt_04, 06	Wood_38	
• Avoid built development in flood zones 2 and 3. • Clge_07 should conserve and enhance the setting of Clyst St Mary Bridge and causeway Scheduled Monument. • Archaeological assessment is required prior to development. • Investigate potential to improve sustainable travel to the site. • At Clge_07, protect the existing on-site TPO tree, with a new hedge of native species and a strip of woodland to soften the transition between the site and the remaining part of the field to the east. • Provide links with the Clyst Valley Regional Park, to enhance walking/cycling connectivity in the area (Polt_04, 06). • Do not provide overnight accommodation to reduce adverse effect on biodiversity (Polt_04, 06). • The large size of the site offers the potential to install renewable and low carbon energy, which will enhance a neutral effect to a minor positive for objective 4 (Polt_04, 06). • Incorporate SUDS to compensate for the large area of land likely to be lost to hard surfacing (car park) to enhance a neutral effect to a minor positive for objective 4 and reduce adverse impact upon water resources (Polt_04, 06). • Potential requirement for capacity upgrades to Countess Wear Wastewater Treatment Works – Strategic Policy AR02 requires infrastructure improvements to overcome water quality issues. • Limit the retail provision so that service station does not become a retail 'destination' to minimise adverse impacts upon existing town centres (Polt_04, 06). These site-specific mitigation measures have been incorporated for the sites that are allocated in Local Plan Strategic Policies WS12, 13, 14.						
Preferred alternatives: Employment site allocations at Clge_07 (0.7 ha); Brcl_27a (1.89 ha); Sowt_15a (1 ha). **Reasons for alternatives being preferred or rejected:** • **Clge_07 – Land at Sandygate is preferred** as good access to existing facilities and employment opportunities. The site will have limited impact upon the historic environment, limited impact on the landscape and minor ecological impact.						

Sites: West End of East Devon (excl. the new community) – Employment sites – elsewhere in the West End						
Site / SA Objective	Clge_07	Brcl_27a	Sowt_15a	Polt_04, 06	Wood_38	
• **Brcl_27a – Lodge Trading Estate, Station Road is preferred** as it is reasonably well located adjacent to development (and including existing commercial development), close to facilities and public transport. It could function as an expansion to the existing business park. • **Sowt_15a – Land south of Langdon's Business Park is preferred** as it is reasonably well located adjacent and opposite development, close to facilities and public transport, and would function as an expansion to the existing business park. • **Polt_04 and Polt_06 – Land at Poltimore Barton is rejected** due to negative impacts upon the landscape and historic environment, and the loss of Grade 1 agricultural land. In addition, at the time of writing, there is no confirmation of a need for a service station given the presence of existing motorway services at M5 Junction 30, 5km to the south. • **Wood_38 – Land adjoining Greendale Business Park is rejected** due to countryside location with poor access to services and adverse landscape impact.						

Tier One – Principal Centre. Settlement: Exmouth




Allocation Sites - Exmouth - South
Exmo_20
Exmo_24
Exmo_18
Exmo_03
Exmo_15
Exmo_17
Exmo_34
Exmo_43
Exmo_39
Exmo_01
Exmo_35
Exmo_50
Exmo_16
Exmo_08
Exmo_36
Exmo_38
Exmo_40
Exmo_48
Exmo_49
Exmo_06
Exmo_31
Exmo_13
Exmo_05
Exmo_19
Exmo_27
Exmo_29
Exmo_02
Exmo_41
Exmo_28
Allocated
Not Allocated
Failed site sifting
Kilometers
0
0.475
0.95
1.9
2.85
3.8
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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_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_20 – Land at St John's
- Exmo_23 – Courtlands Barn, Courtlands Lane
- Exmo_24 – Land to the north Salterton Road
- Lymp_07 – Land at Courtland Cross, Exeter Road
- Lymp_08 – Land off Summer Lane
- Lymp_09 – Land fronting Hulham Road
- Lymp_10 – Land off Hulham Road
- Lymp_12 – Land fronting A376 and Summer Lane
- Lymp_13 – King's Garden & Leisure, Higher Hulham Road
- Lymp_14 – Coles Field, Hulham Road
- Lymp_17 – Land SW of Marley Hayes, Hulham Road
- Exmo_50 – Disused police station
- Exmo_21 – Land east of Bystock Court
- Exmo_47 – Land to the south west of Hulham Road

Outline of reasons for selecting the alternatives

The majority of the sites listed as reasonable alternatives above have 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, they are located within or adjacent to Exmouth (and therefore consistent with the spatial strategy), are not already allocated in a 'made' Neighbourhood Plan, and do not currently have planning permission.

The following sites are reasonable alternatives despite being not suitable or achievable in the HELAA:

- Exmo_03 is a reasonable alternative despite being unsuitable in the HELAA, because the yield could meet the five-dwelling threshold.
- Exmo_08 is a reasonable alternative despite being unachievable in the HELAA because it is considered there is potential to access the site.
- Exmo_20 is a reasonable alternative despite being unachievable in the HELAA, because it is considered that issues relating to site access, minerals, and proximity to the Pebblebed Heaths can be addressed; and the spatial strategy for significant development at Exmouth. In addition, the site boundary shown on the map above has been amended from the HELAA to reflect more recent information on the land being promoted for development.
- Exmo_47 is a reasonable alternative despite being not suitable in the HELAA as the Registered Historic Park and Garden designation on this site was removed after publication of the HELAA.
- Lymp_10 is a reasonable alternative despite being unachievable in the HELAA due to TPO coverage limiting necessary improvements to Hulham Road. It is considered the loss of TPO trees is outweighed by the benefits of allocating the site, given the spatial strategy for significant development at Exmouth.

For the reasons given, the following sites are not considered to be reasonable alternatives:

- Exmo_01 (Public car park, Royal Avenue) - is probably unachievable in the HELAA because of location within flood zone 3.
- Exmo_02 (Queens Drive) - although assessed in HELAA as 'Potential achievable subject to passing Sequential and Exceptions test', fail site sifting as housing is a more vulnerable use and because only 0.2 Ha is not in Flood Zone 3 and that 0.2 Ha is wholly surrounded by a very wide area of Flood Zone 3.
- Exmo_05 (Buildings and land at Maer Farm) - is not within or adjacent, or otherwise well-related, to Exmouth.
- Exmo_09 (Land to east of Capel Lane) - overlaps with Exmo_17 (note that Exmo_09 is referenced in assessment of Exmo_17)

- Exmo_10 (Land to north of Salterton Road) - overlaps with Exmo_24.
- Exmo_11 (Land to south of Courtland Lane) - overlaps with Exmo_23.
- Exmo_12 (Land off Marley Road) - overlaps with Exmo_45.
- Exmo_13 (Green Farm Buildings) - overlaps with Exmo_05 – not within or adjacent, or otherwise well-related, to Exmouth.
- Exmo_14 (Land at South Lodge St Johns Road) - not suitable in HELAA as below site size threshold.
- Exmo_15 (Land off Capel Lane) - overlaps with Exmo_17 (note that Exmo_15 is referenced in assessment of Exmo_17).
- Exmo_19 (Land adjacent to Upper Deck, Gore Lane, Sandy Bay) - is not within or adjacent, or otherwise well-related, to Exmouth.
- Exmo_22 (Land adjacent to 14 Bampton Lane) - not suitable in HELAA as below site size threshold (although the site also overlaps Exmo_03 that was assessed).
- Exmo_25 (family Amusements Queens Drive) - not suitable in HELAA as within Flood Zone 3 (this site falls within boundaries of Exmo_02).
- Exmo_26 (Beach Gardens Car Park) - not suitable in HELAA as below site size threshold (this site falls close to and to the south west of site Exmo_31).
- Exmo_27 (Harbour View Café) - not suitable in HELAA as within Flood Zone 3.
- Exmo_28 (Foxholes Car Park) - not suitable in HELAA as submitter did not indicate use.
- Exmo_29 (Queens Drive Car Park) - not suitable in HELAA as within Flood Zone 3.
- Exmo_30 (The Octagon, The Pavilion) - not suitable in HELAA as within Flood Zone 3 and below site size threshold (this site falls close to and to the north of site Exmo_31).
- Exmo_31 (The Pavilion, The Esplanade) - not suitable in HELAA as below site size threshold.
- Exmo_32 (Camperdown Car Park) - not suitable in HELAA as within Flood Zone 3.
- Exmo_33 (Camperdown Depot) - not suitable in HELAA as within Flood Zone 3.
- Exmo_34 (Old Coal Depot, The Royal Avenue) - not suitable in HELAA as within Flood Zone 3.
- Exmo_35 (Estuary Car and Lorry Park) - not suitable in HELAA as within Flood Zone 3.
- Exmo_36 (Exmouth Sports Centre) - not suitable in HELAA as below site size threshold.
- Exmo_37 (GWRSA Social Club) - not suitable in HELAA as below site size threshold.
- Exmo_38 (Imperial Road Rec and Car Park) - not suitable in HELAA as within Flood Zone 3.

- Exmo_39 (Jarvis Close Car Park) - not suitable in HELAA as below site size threshold.
- Exmo_40 (London Inn Car Park) - not suitable in HELAA as submitter did not indicate use.
- Exmo_41 (Maer Road Car Park) - not suitable in HELAA as submitter did not indicate use.
- Exmo_42 (Marlpool Workshops) - not suitable in HELAA as below site size threshold.
- Exmo_43 (Phear Park Depot) - not suitable in HELAA as below site size threshold.
- Exmo_44 (Exmouth Station Public Convenience) - not suitable in HELAA as below site size threshold.
- Exmo_45 (land off Marley Road) - overlaps with Exmo_04
- Exmo_46 (Veiges Farm St Johns Road) - overlaps with Exmo_20.
- Exmo_48 (Camperdown Creek) - suggested by third party in Draft Local Plan consultation. Located within Flood Zone 3, overlap with Exmo_32, 33.
- Exmo_49 (Former Post Office) - suggested by third party in Draft Local Plan consultation, but no evidence of land availability. Appears to be in active use as Royal Mail delivery centre.
- Exmo_51 (Land east of Liverton Business Park) - overlaps with Exmo_18
- Exmo_52 and GH/ED/76 (land at St Johns Road) - overlaps with Exmo_20.

Sites: Exmouth																						
Site / SA Objective	**Exmo_03**	**Exmo_04**	**Exmo_06**	**Exmo_07**	**Exmo_08**	**Exmo_24**	**Exmo_23**	**Exmo_16**	**Exmo_17**	**Exmo_18**	**Exmo_20**	**Exmo_47**	**Exmo_21**	**Lymp_07**	**Lymp_08**	**Lymp_09**	**Lymp_10**	**Lymp_12**	**Lymp_13**	**Lymp_14**	**Exmo_50**	**Lymp_17**	
1. Biodiversity	**+ / -**	**+ / - -**	**+ / -**	**+ / -**	**+ / -**	**+ / -**	**+ / -**	**+ / -**	**+ / -**	**+ / 0**	**+ / - -**	**+ / -**	**+ / -**	**+ / -**	**+ / -**	**+ / -**	**+ / -**	**+ / -**	**+ / -**	**+ / -**	**+ / -**	**+ / -**	
Biodiversity commentary	All sites in Exmouth fall well within the adopted 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. Furthermore, in some cases sites are very close to these designations. In addition the HRA notes potential air quality impacts at East Devon Heaths SAC/SPA from increased traffic from																						

Sites: Exmouth																						
Site / SA Objective	Exmo_03	Exmo_04	Exmo_06	Exmo_07	Exmo_08	Exmo_24	Exmo_23	Exmo_16	Exmo_17	Exmo_18	Exmo_20	Exmo_47	Exmo_21	Lymp_07	Lymp_08	Lymp_09	Lymp_10	Lymp_12	Lymp_13	Lymp_14	Exmo_50	Lymp_17	
	sites at Exmouth. Falling within catchments, and proximity to sites, is a key factor in negative scores. 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, 14 and 17 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 and recreation impacts, hence the overall major negative effect at this site. However, parts of the site outside the exclusion zone, if considered alone, would have less adverse effects. 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. Lymp_17 has a substantial number of mature trees within the site and to its boundaries, some of which are subject to Tree Preservation Orders, and is an Unconfirmed County Wildlife site. 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, 08, 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. Exmo_50 contains no designated wildlife sites at or in close proximity of the site, which is currently occupied by a police station building with limited formal green spaces around the existing building and a small number of existing trees, so a neutral effect.																						

Sites: Exmouth																							
Site / **SA Objective**	**Exmo_03**	**Exmo_04**	**Exmo_06**	**Exmo_07**	**Exmo_08**	**Exmo_24**	**Exmo_23**	**Exmo_16**	**Exmo_17**	**Exmo_18**	**Exmo_20**	**Exmo_47**	**Exmo_21**	**Lymp_07**	**Lymp_08**	**Lymp_09**	**Lymp_10**	**Lymp_12**	**Lymp_13**	**Lymp_14**	**Exmo_50**	**Lymp_17**	
	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 eastern 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_18 and 24 similar concerns will apply. Further north, Exmo_20 is covered by the 'Lowland Heath' Strategic Nature Area and draft Nature Recovery Network, and partly covered by woodland, shown as an Unconfirmed Wildlife Site. The Pebblebed Heaths SPA/SAC/NNR is across the road to the east of Exmo_20, with the 400m exclusion zone for new residential development extending into the site. Site Exmo_07 and the Exmo_21 have features of some significant within them and can be expected to be of more significant biodiversity sensitivity. These negative effects are mixed with a long-term minor positive effect due to the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.																						
2. Landscape	**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 National Landscape 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. Exmo_03 is located in an urban context and landscape impacts from development will be neutral. Exmo_50 is close to the town centre and surrounded by built development, and offers the potential to regenerate previously developed land, so a minoir positive effect.																						

Sites: Exmouth																						
Site / SA Objective	Exmo_03	Exmo_04	Exmo_06	Exmo_07	Exmo_08	Exmo_24	Exmo_23	Exmo_16	Exmo_17	Exmo_18	Exmo_20	Exmo_47	Exmo_21	Lymp_07	Lymp_08	Lymp_09	Lymp_10	Lymp_12	Lymp_13	Lymp_14	Exmo_50	Lymp_17	
	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 to the National Landscape 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, 46, 21 and 24. Exmo_20 is a large site of some 85 hectares, with the north easterly parts being higher, more prominent and visually open, whilst the western and southern parts are well-screened with comparatively limited views in or out of the site on a local scale. The 400m buffer from the Pebblebed Heaths SPA/SAC coincides with the higher, more prominent parts of Exmo_20, meaning built development will not be permitted in this area and so reducing adverse landscape effects to a minor negative. Also close to the National Landscape, but more visually open to it, are sites Exmo_24 and 18. Exmo_24 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 National Landscape. To the south of these sites is Exmo_17 which falls within the National Landscape and as such significant adverse impacts are likely through development. On the south West End 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 National Landscape and all have some degree of visual connectivity with the National Landscape, though less so for Exmo_16. Though all sites sit against and within the urban built context of Exmouth. A number of sites on the northern side of Exmouth are of greater prominent in coastal/estuary openness terms. Lymp_07 and Exmo_23 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 surrounding areas. Whilst to the west, and less estuarine in setting, 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. Lymp_17 is well screened with mature trees, and has a quiet and remote countryside feel, with a medium-high landscape sensitivity.																					

Sites: Exmouth																							
Site / SA Objective	**Exmo_03**	**Exmo_04**	**Exmo_06**	**Exmo_07**	**Exmo_08**	**Exmo_24**	**Exmo_23**	**Exmo_16**	**Exmo_17**	**Exmo_18**	**Exmo_20**	**Exmo_47**	**Exmo_21**	**Lymp_07**	**Lymp_08**	**Lymp_09**	**Lymp_10**	**Lymp_12**	**Lymp_13**	**Lymp_14**	**Exmo_50**	**Lymp_17**	
3. Hist. built env	**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 Grade II listed Green Farmhouse close to the south west of the site. Exmo_23 is close to the listed Courtland House and listed wall to this property. Exmo_16 is around 140m away from a Grade II* listed church but with little indivisibility so limited possibility for adverse impacts. Exmo_17 has a Grade II* listed church to the south of the site, and development in the southern part of the site would likely harm its rural setting. Exmo_47 adjoins the A la Ronde and The Point-in-View Grade II Registered Park and Garden, and is also within 100m of two Grade I listed buildings (Point in View Chapel, The Manse), and development will likely have a major negative effect. 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. 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. Exmo_50 is within the Conservation Area, with a significant number of Grade II listed residential properties around the site, leading to a minor negative effect. Lymp_17, on the otherhand, does not have any listed buildings in the vicinity and no significant effects. Exmo_20 has a small number of heritage assets whose setting could be adversely affected by developing the site – of most importance is the Grade II* St John in the Wilderness church, but also Grade II listed Barton House and St John's Lodge. Given the large size of Exmo_20, mitigation is likely to be possible, including avoiding development in the most sensitive areas, so a minor negative effect for Exmo_20. Neutral effect identified for all other sites as no significant effects upon heritage assets from developing these sites.																						
4. Climate change	**+**	**-**	**+**	**0**	**+**	**0**	**0**	**+**	**0**	**0**	**+**	**0**	**0**	**0**	**0**	**-**	**-**	**+**	**-**	**-**	**+ +**	**-**	

Sites: Exmouth																						
Site / **SA Objective**	**Exmo_03**	**Exmo_04**	**Exmo_06**	**Exmo_07**	**Exmo_08**	**Exmo_24**	**Exmo_23**	**Exmo_16**	**Exmo_17**	**Exmo_18**	**Exmo_20**	**Exmo_47**	**Exmo_21**	**Lymp_07**	**Lymp_08**	**Lymp_09**	**Lymp_10**	**Lymp_12**	**Lymp_13**	**Lymp_14**	**Exmo_50**	**Lymp_17**	
carbon emissions																							
Climate change carbon emissions commentary	Sites assessed at and around Exmouth generally performed well in terms of accessibility to facilities. As the largest settlement in the district, Exmouth has a wide range of jobs, services, facilities and sustainable travel links to minimise carbon emissions from travel. Of the sites where measurements have been taken: o Exmo_23 has 9 facilities within 1,600 metres. o Exmo_03, Lymp_07 and Lymp_12 have 8 facilities within 1,600 metres. o Exmo_04, 06, 07, 08, 20 and Lymp_13 and 14 have seven facilities within 1,600 metres. o Exmo_16, 17, 18, 24 have six facilities within 1,600 metres. Because of proximity of facilities all 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_21, 46, 47 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.																						

Sites: Exmouth																						
Site / SA Objective	Exmo_03	Exmo_04	Exmo_06	Exmo_07	Exmo_08	Exmo_24	Exmo_23	Exmo_16	Exmo_17	Exmo_18	Exmo_20	Exmo_47	Exmo_21	Lymp_07	Lymp_08	Lymp_09	Lymp_10	Lymp_12	Lymp_13	Lymp_14	Exmo_50	Lymp_17	
	Exmo_50 is particularly well-located, being in the centre of the settlement.																					
5. Climate change adaptation	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, and 17, have been given a neutral rating though this has been taken into account in respect of adjustments to possible yields. Exmo_50 has slithers of surface water flood risk around the existing building which development can avoid, so a neutral effect. No flood risk identified for Lymp_17.																						
6. Land resources	-	-	-	-	- -	-	- -	-	-	-	-	-	-	- -	-	-	-	- -	+ +	-	+ +	-	
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. All of the Greenfield sites are wholly or mostly in Agricultural Grade 1, 2 and 3. Sites 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. Lymp_13 and Exmo_50 are brownfield sites, not affected by contamination, so a major positive effect. Lymp_17 is a greenfield site, but the (more detailed) post-1988 agricultural land classification shows the eastern part is Grade 3b agricultural land, remaining area is “other”, so no loss of best and most versatile agricultural land. Exmo_20 is mostly grade 3b agricultural land,																						

Sites: Exmouth																						
Site / SA Objective	**Exmo_03**	**Exmo_04**	**Exmo_06**	**Exmo_07**	**Exmo_08**	**Exmo_24**	**Exmo_23**	**Exmo_16**	**Exmo_17**	**Exmo_18**	**Exmo_20**	**Exmo_47**	**Exmo_21**	**Lymp_07**	**Lymp_08**	**Lymp_09**	**Lymp_10**	**Lymp_12**	**Lymp_13**	**Lymp_14**	**Exmo_50**	**Lymp_17**	
	apart from the eastern edge which is grade 3a. The north eastern part of Exmo_20 is in a mineral safeguarding area, but this largely coincides with the 400m buffer from the Pebblebed Heaths SPA/SAC where development will not be allowed in any case.																					
7. Water resources	**0 ?**	**0**	**0**	**0 ?**	**0**	**0 ?**	**0**	**0**	**0**	**0**	**0**	**0**	**0 ?**	**0**	**0 ?**	**0 ?**	**0 ?**	**0 ?**	**0 ?**	**0**	**0**	**0 ?**	
Water resources commentary	No sites are located within a groundwater source protection zone. South West Water forecast there will be adequate water supply; and Maer Lane Wastewater Treatment Works has sufficient capacity and environmental permit limits for the proposed development at Exmouth, site refs Exmo_04, 06, 08, 16, 17, 18, 20, 23, 47, 50, Lymp_07, 14 (Water Cycle Study, November 2025). Therefore, a neutral effect is likely for these sites, with uncertainty for the others.																					
8. Homes	**+**	**+**	**+**	**+**	**+**	**- -**	**+**	**+**	**+ +**	**+**	**+ +**	**+**	**+**	**+ +**	**+**	**+**	**+**	**+ +**	**+**	**+**	**+**	**+**	
Homes commentary	Exmo_17, 20 and Lymp_07 and 12 have a maximum yield in the HELAA at or over 100 dwellings (around 700 dwellings at Exmo_20), meaning a major positive effect. 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_24 is not proposed for housing, rather it is proposed as an employment allocation, and as such is attributed with a negative score.																					
9. Health and well-being	**+ +**	**-**	**+**	**+**	**+ +**	**+**	**+**	**+ +**	**+ +**	**+**	**+**	**+**	**+**	**+**	**+**	**-**	**-**	**+**	**-**	**-**	**+ +**	**-**	

Sites: Exmouth																						
Site / **SA Objective**	**Exmo_03**	**Exmo_04**	**Exmo_06**	**Exmo_07**	**Exmo_08**	**Exmo_24**	**Exmo_23**	**Exmo_16**	**Exmo_17**	**Exmo_18**	**Exmo_20**	**Exmo_47**	**Exmo_21**	**Lymp_07**	**Lymp_08**	**Lymp_09**	**Lymp_10**	**Lymp_12**	**Lymp_13**	**Lymp_14**	**Exmo_50**	**Lymp_17**
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 a major positive and those within 800 metres a minor positive effect. It is only the sites on the north eastern edge of Exmouth, Exmo_04 and Lymp_09, 10, 13, 14 and 17, 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 adjoin 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-residential uses. Exmo_50 is within a 50% most deprived neighbourhood, and adjacent to a neighbourhood that is amongst the most 40% deprived, and also within 800m of open space, and away from major sources of air, light and noise pollution.																					
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, 20. Many of the sites on the periphery of the town are more than 800 metres from many of the services, under 5 services within 800 metres, and as such they achieve a single positive score only, these specifically include Exmo_04, 06, 23, 24, 16, 17, and Lymp_07, 08, and 12. Pedestrian																					

Sites: Exmouth																							
SA Objective \ Site	Exmo_03	Exmo_04	Exmo_06	Exmo_07	Exmo_08	Exmo_24	Exmo_23	Exmo_16	Exmo_17	Exmo_18	Exmo_20	Exmo_47	Exmo_21	Lymp_07	Lymp_08	Lymp_09	Lymp_10	Lymp_12	Lymp_13	Lymp_14	Exmo_50	Lymp_17	
	access is difficult to services for sites in the north east as Hulham Road is narrow with no pavement, so a negative effect for Lymp_09, 10, 13, 14, 17. Exmo_18 is an employment site and proximity issues are not so significant though it is some distance from services and achieves a positive. Exmo_50 is in town centre, within 800m of a wide range of services, so a major positive effect.																						
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 eastern side of Exmouth. In addition, there are 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 is major 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. Exmo_50 is around 1.1km from the nearest employment site at Pound Lane Industrial Estate but given the numerous jobs much closer in the town centre, and likely retention of police station on-site which will provide jobs, a major positive effect is likely. All other identified sites fall within 1,600 metres of an employment site and as such achieve a minor positive effect. 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_24**	**Exmo_23**	**Exmo_16**	**Exmo_17**	**Exmo_18**	**Exmo_20**	**Exmo_47**	**Exmo_21**	**Lymp_07**	**Lymp_08**	**Lymp_09**	**Lymp_10**	**Lymp_12**	**Lymp_13**	**Lymp_14**	**Exmo_50**	**Lymp_17**
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. Exmo_03, 06, are within the 1,600 metre catchment. A major positive effect for Exmo_50 due to its close proximity to the town centre.																					
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. The area around Exmo_50 has a median download speed of 50 mbps, so has access to superfast broadband. This site is also within 800m of the train station, an 'A' road and the Exe Estuary Trail cycle route. Sites in the north east (Exmo_04, Exmo_20, Lymp_09, 10, 13, 14, 17) have standard-superfast broadband (11-52 mbps) in the closest post codes, are beyond 1,600m away from the train station, but within 1,600m of an hourly bus route on Dinan Way, so a minor positive effect. All other sites fall within 1,600 metres of an hourly or better bus service, a main 'A' or 'B' road, and a cycle route and, as such, have 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 areas of Exmo_04 and 20 within 400 metres of the Pebblebed Heaths mitigation would not be seen as possible. Exmo_04 can be amended to exclude the most sensitive area, resulting in Exmo_04a. • Sites on the north eastern edge of Exmouth (Exmo_04, Exmo_20, Lymp_09, 10, 13, 14, 17) contain and abut features and areas of biodiversity value and any development would need to be carefully managed and mitigated.																					

Sites: Exmouth																						
Site / SA Objective	Exmo_03	Exmo_04	Exmo_06	Exmo_07	Exmo_08	Exmo_24	Exmo_23	Exmo_16	Exmo_17	Exmo_18	Exmo_20	Exmo_47	Exmo_21	Lymp_07	Lymp_08	Lymp_09	Lymp_10	Lymp_12	Lymp_13	Lymp_14	Exmo_50	Lymp_17	
• For sites in the East Devon National 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 National Landscape that have direct inter-visibility with it or with other important landscape assets that would require mitigation, namely Exmo_18, Exmo_20. • Specifically, Exmo_17 should include new walking and cycling routes, including to the South West Coast Path, to maximise opportunities to conserve and enhance the natural beauty of the National Landscape – a minor negative effect will likely remain. • No built development in the southern part of Exmo_18 will reduce the adverse landscape effects of developing this site for employment. • Significant open space buffer areas around the Grade II* listed Church of St John the Wilderness near to Exmo_20 to lessen the potential for adverse impacts, with the design of development ensuring careful account is taken of open view points and vistas, and open space and development forms promoted to lessen or minimise potential for adverse impacts. Despite this, a minor negative effect will likely remain given the proximity to the Grade II* listed church. • The southern part of Exmo_17 is particularly sensitive with regards to the setting of the Grade II* listed church, and any development should conserve and enhance its setting – a minor negative effect will likely remain. • Exmo_08 should be designed to conserve and enhance the setting of Grade II listed Green Farmhouse. • The location of part of Exmo_20 in a minerals safeguarding area means that further assessment of the resource should be undertaken through a planning application. • At Exmo_50, the sites past use and history plus the relevance of surrounding assets can form a positive cue to inform a well designed and implemented scheme that offers scope for enhancement of the setting of designated heritage assets. • The results of the SFRA Level 2 should inform the development of Exmo_50.																						

Sites: Exmouth																						
Site / SA Objective	Exmo_03	Exmo_04	Exmo_06	Exmo_07	Exmo_08	Exmo_24	Exmo_23	Exmo_16	Exmo_17	Exmo_18	Exmo_20	Exmo_47	Exmo_21	Lymp_07	Lymp_08	Lymp_09	Lymp_10	Lymp_12	Lymp_13	Lymp_14	Exmo_50	Lymp_17	

- 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), particularly in the north east, are some distance from the town 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.
- Exmo_23 should ensure safe pedestrian access to surrounding areas.
- Lymp_07 should be sensitively designed to avoid adverse effects on landscape and historic environment, retain the East Devon Way footpath, and provide safe off-street pedestrian and cycle access to adjoining areas at Lympstone Manor and Exmo_23.
- Exmo_47 should be sensitively designed to avoid adverse effects on the adjacent Registered Park or Garden, including limiting development to the southern end of the site and a landscape buffer.
- The large size of Exmo_17 and Exmo_20 means a that mix of uses should be allocated to ensure a comprehensive, sustainable development.
- Built development at Exmo_20 should be concentrated in the southern parts of the site to minimise adverse landscape effects, and designed to conserve and enhance biodiversity interest on or near to the site.
- Exmo_08 and 16 are partly steep sloping, so high quality design and landscaping should minimise adverse landscape effects.

These site-specific mitigation measures have been incorporated for the sites that are allocated in Local Plan Strategic Policy SD01.

Preferred alternatives at Exmouth: Exmo_04a for 50 dwellings; Exmo_06 for 44 dwellings; Exmo_08 for 40 dwellings; Exmo_16 for 5 dwellings; Exmo_17 for 410 dwellings; Exmo_18 for 2.7 hectares of employment land; Exmo_20 for 700 dwellings and 2 hectares of employment land; Exmo_23 for 12 dwellings; Exmo_47 for 15 dwellings; Exmo_50 for 20 dwellings; Lymp_07 for 100 dwellings; Lymp_14 for 59 dwellings.

Reasons for preferred alternatives:

Sites: Exmouth																						
Site / SA Objective	Exmo_03	Exmo_04	Exmo_06	Exmo_07	Exmo_08	Exmo_24	Exmo_23	Exmo_16	Exmo_17	Exmo_18	Exmo_20	Exmo_47	Exmo_21	Lymp_07	Lymp_08	Lymp_09	Lymp_10	Lymp_12	Lymp_13	Lymp_14	Exmo_50	Lymp_17	

- Exmo_04a – Land at Marley Drive is preferred as it is consistent with the spatial strategy, the extensive planting at and around the site limits views in and out which minimises landscape impact, and there are no designated heritage assets in the vicinity.
- Exmo_06 – Land at Douglas Gardens is preferred as it is consistent with the spatial strategy, the site performs well in sustainability terms being closer to the town centre than other options and limited biodiversity or heritage concerns.
- Exmo_08 and 16 – Littleham Fields is preferred as it is consistent with the spatial strategy, these sites are close to facilities at Littleham with no major adverse effects.
- Exmo_17 – Land to the South of Littleham is preferred as it is consistent with the spatial strategy, close to a range of services and facilities and offers significant development at the only Principal Centre in the district.
- Exmo_18 – Land directly to the East of Liverton Business Park is preferred for employment as it is consistent with the spatial strategy, this land abuts an existing employment site, with good road access, and is relatively unobtrusive in landscape terms.
- Exmo_20 – Land at St John's is preferred as it is consistent with the spatial strategy, generally well-screened which minimises landscape impact, and so long as development was predominantly in central and southerly site parts building work could be comparatively unobtrusive. It offers significant development at the only Principal Centre in the district.
- Exmo_23 – Land to the South of Courtlands Lane is preferred as it is consistent with the spatial strategy, accessible to a range of facilities and services, with environmental impacts that can be suitably mitigated.
- Exmo_47 – Land west of Hulham Road (South East of Point in View) is preferred as it is consistent with the spatial strategy, provides a good opportunity for smaller scale housing development at the only Principal Centre. Adverse historic environment impacts can be mitigated by limiting built development in the northern part of the site.
- Exmo_50 – Disused police station is preferred as it is consistent with the spatial strategy, occupies an urban residential location on a brownfield, close to numerous jobs, services and facilities.

Sites: Exmouth																						
Site / SA Objective	Exmo_03	Exmo_04	Exmo_06	Exmo_07	Exmo_08	Exmo_24	Exmo_23	Exmo_16	Exmo_17	Exmo_18	Exmo_20	Exmo_47	Exmo_21	Lymp_07	Lymp_08	Lymp_09	Lymp_10	Lymp_12	Lymp_13	Lymp_14	Exmo_50	Lymp_17

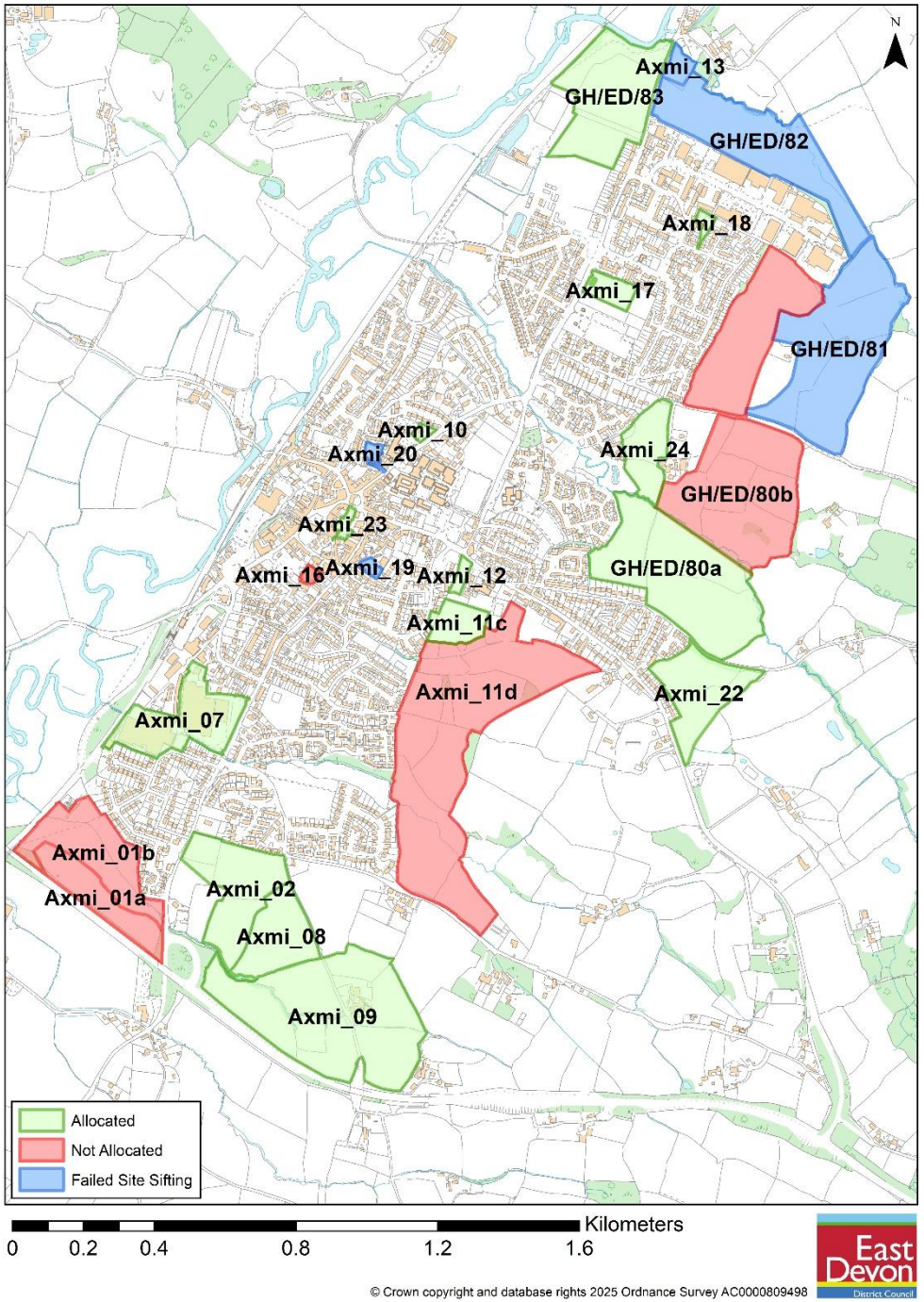
- Lymp_07 – Land at Courtland Cross is preferred as it is consistent with the spatial strategy, located at the largest settlement in the district and while it is on the outer limits of walking distance from services and facilities it is within 1600m of a range of facilities with good access to public transport to a much wider range of services and facilities. Although its development would erode the green wedge between Exmouth and Lympstone there would still be a substantial separation distance and it would have limited impact on settlement coalescence overall.
- Lymp_14 – Coles Field, Hulham Road is preferred as it is consistent with the spatial strategy, whilst the site has some nature conservation constraints and has an enclosed attractive feel in landscape terms it is seen as a reasonable site for allocation for development though noting there are some site sensitivities.

Reasons for rejecting sites:

- Land on the north-eastern side of Exmouth – the land area is made up (parts or all) of Exmo_04b, Lymp_09, Lymp_10, Lymp_17. These sites rejected due to the wildlife value, landscape sensitivity and concerns around acceptability of highway and pedestrian access.
- Exmo_03 - Land at bottom of Bapton Lane is rejected as it is contrary to Valley Park aspirations, explicitly identified as a suggested area of Land of Local Amenity Importance that is proposed for protection from development.
- Exmo_04b – Land at Marley Drive is rejected due to major adverse biodiversity effect arising from its location within 400 metre Pebblebed Heaths exclusion zone.
- Exmo_07 – Bystock Court is rejected as it is very sensitive in respect of heritage and nature conservation considerations. The less sensitive part of the site is in a northern area though in this position it is somewhat divorced from built-up areas of the town and further from services and facilities.
- Exmo_24 - Land to the north of Salterton Road is rejected as it is quite open and exposed in landscape terms and large parts have a rural rather than urban fringe character, with visual impacts on areas of open countryside and designated National Landscape. In addition, easterly parts of the site, in particular, are remote from services and facilities.

Sites: Exmouth																						
Site / SA Objective	Exmo_03	Exmo_04	Exmo_06	Exmo_07	Exmo_08	Exmo_24	Exmo_23	Exmo_16	Exmo_17	Exmo_18	Exmo_20	Exmo_47	Exmo_21	Lymp_07	Lymp_08	Lymp_09	Lymp_10	Lymp_12	Lymp_13	Lymp_14	Exmo_50	Lymp_17	
• Exmo_21 - Land North East of Old Bystock Drive is rejected due to adverse biodiversity impacts, being mostly covered by an Unconfirmed Wildlife Site. • Lymp_08 – Land off Summer Lane is rejected as it is comparatively remote from facilities and has countryside feel and character. • Lymp_12 – Land north of Summer Lane is rejected due to adverse heritage impacts at this site, should development go ahead, can be expected to be significant and this is a major consideration. Allied to this are concerns around adverse landscape impacts from development. • Lymp_13 - Kings Garden & Leisure, Higher Hulham Road is rejected as the site has an existing commercial use which is desirable to retain and which would be lost if developed for housing.																						

Tier Two – Main Centres. Settlement: Axminster



Reasonable alternatives

- GH/ED/80 – Prestaller Farm, Beavor Lane
- 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 – Millway Garages
- Axmi_22 – land east of Axminster
- Axmi_23 – Webster's Garage, 9 Lyme Street
- Axmi_24 – Land west of Prestaller Farm, Beavor 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). In addition, they are located within or adjacent to Axminster (and therefore consistent with the spatial strategy), are not already allocated in a 'made' Neighbourhood Plan, and do not currently have planning permission. Axmi_10 is a reasonable alternative despite being not suitable in the HELAA, because of an increase in its density to reflect its urban location near to the town centre that takes it above the five dwelling threshold.

For the reasons given, the following sites are not considered to be reasonable alternatives:

- Axmi_03 is below site size threshold so not suitable in the HELAA. However, Axmi_03 can provide access to Axmi_11 via Lyme Close so assess Axmi_03 as part of Axmi_11.
- Axmi_04 overlaps with Axmi_11.
- Axmi_13 not suitable in HELAA due to unacceptable environmental impact (on heritage assets).
- Axmi_19 has uncertainty on whether land is truly available as currently in use as an EDDC car park – further work is required to assess the need for parking before its redevelopment is considered.
- Axmi_20 has uncertainty on whether land is truly available as currently in use as an EDDC car park – further work is required to assess the need for parking before its redevelopment is considered.
- GH/ED/79 overlaps with Axmi_22.
- GH/ED/81 – the call for sites 2022 submitter confirmed Axmi_22 is available but not GH/ED/81 or GH/ED/82.
- GH/ED/82 – the call for sites 2022 submitter confirmed Axmi_22 is available but not GH/ED/81 or GH/ED/82.

Sites: Axminster																	
Site / **SA Objective**	**Axmi_22**	**GH/ED/80**	**Axmi_23**	**Axmi_24**	**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**	
1. Biodiversity	**+ / - -**	**+ / -** **-**	**+ / -** **-**	**+ / -** **-**	**+ / -** **-**	**+ / -** **-**	**+ / -** **-**	**+ / -** **-**	**+ /** **- -**	**+ /** **- -**	**+ /** **- -**	**+ /** **- -**	**+ /** **- -**	**+ /** **- -**	**+ / -** **-**	**+ / -** **-**	
Biodiversity commentary	All sites are within River Axe SAC Nutrient catchment area – at the time of writing, mitigation is likely to be difficult, so a major negative effect. In addition, there are likely adverse effects from recreation on the River Axe SAC. 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. Axmi_16																

Sites: Axminster																	
Site / SA Objective	Axmi_22	GH/ED/80	Axmi_23	Axmi_24	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	
	is within 50 metres of the draft nature recovery network (grassland) and a habitat of principle importance (a small stream), whilst Axmi_17 is a draft nature recovery network site (grassland) itself. Axmi_16, 18, and 23 are previously developed land where adverse effects may normally be lower but given the location within River Axe SAC Nutrient Management Zone, a major adverse effect is likely. These negative effects are mixed with a long-term minor positive effect due to the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.																
2. Landscape	**-**	**-**	**+**	-	**-**	**-**	**-**	**+ +**	**-**	**- -**	**-**	**- -**	**+**	**+**	**+**	**+**	
Landscape commentary	Generally, the greenfield sites around the town (Axmi_01, 02, 08, 22 and GH/ED/80 and 83) have a medium sensitivity to landscape change and in the case of GH/ED/80 and Axmi_22, 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 National Landscape because it has few of its key characteristics and is seen in the context of the urban area and major transport links. Axmi_12, 16, 17, 18, and 23 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. Axmi_11 is very attractive countryside providing a landscape setting for town, with southern parts comprising steeply sloping attractive fields, and intervisibility to the National Landscape. North west parts of Axmi_11 have closer relationship with the settlement edge and are less sensitive.																
3. Hist. built env	**-**	**-**	**-**	**0**	**- -**	**- - ?**	**- - ?**	**0**	**- - ?**	**- - ?**	**-**	**- - ?**	**-**	**-**	**0**	**0**	
Hist. built env. commentary	Axmi_22 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/83 – development of these sites has the potential for a major																

Sites: Axminster																	
Site / SA Objective	Axmi_22	GH/ED/80	Axmi_23	Axmi_24	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	
	negative impact on this group. Axmi_01 is around 400m west of a Roman Fort and later Roman-British Settlement Scheduled Monument and within 100m of Newenham Abbey Scheduled Monument, with other archaeological interest noted on the Devon HER including the potential route of the Fosse Way Roman Road, the Axminster-Lyme Regis light railway, and findspots for prehistoric flint and medieval pottery – this means a potential for a major negative effect with uncertainty subject to more detailed archaeological assessment. There are also many non-designated heritage assets on Axmi_01 from prehistoric times to the 20th Century on the site including WWII pill boxes and a WWII tank ditch. The Scheduled Monument around a Roman Fort and later Roman-British Settlement is likely to be adversely affected by development of Axmi_02, Axmi_08, Axmi_09 and Axmi_11, with investigations (autumn 2025) showing a concentration of archaeological deposits in the north of Axmi_02 (autumn 2025) – there is some uncertainty subject to more detailed archaeological assessment. The potential route of the Fosse Way Roman Road also affects Axmi_02, 08 and 09. 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_16 also has the potential to affect the setting designated heritage assets, but to a lesser extent than Axmi_20. Axmi_23 is within the Conservation Area. Axmi_07, 17, 18 and 24 would not affect designated heritage assets, so are neutral.																
4. Climate change carbon emissions	+	+	+ +	+	+	+	+	+ +	+	+	+ +	+	+ +	+ +	+	+	
Climate change carbon emissions commentary	All of the sites considered are within 1600 metres of at least 9 different types of services and facilities, including the town centre. Axmi_22 is adjacent to a bus route with an hourly service and has reasonable pedestrian access to the town centre. Parts of GH/ED/80 is somewhat remote from the train station and an hourly bus route. GH/ED/83 is 1.8-2km metres from the train station, but 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																

Sites: Axminster																	
Site / **SA Objective**	**Axmi_22**	**GH/ED/80**	**Axmi_23**	**Axmi_24**	**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**	
	station. Axmi_07 is adjacent to a bus stop with an 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 and 23 are all very close to the town centre. There are no particular opportunities for the use of renewable or low carbon energy.															
5. Climate change adaptation	**-**	**- -**	**+**	**-**	**-**	**-**	**-**	**-**	**0**	**0**	**+**	**0**	**+**	**+**	**-**	**+**	
Climate change adaptation commentary	The whole of Axmi_22 and most of GH/ED/80 are within a critical drainage area. Significant parts of GH/ED/83, Axmi_01, and Axmi_07 are within flood zone 2 and 3 together with smaller parts of GH/ED/80, Axmi_02, Axmi_08, Axmi_09 and Axmi_11. The only sites without surface or river flooding constraints are Axmi_10 and Axmi_12. Axmi_17 and 24 have areas of surface water flood risk and flood zone 3 which extend into the site, with Axmi_24 also located entirely within a critical drainage area, so a minor negative effect. The flood risk that affects GH/ED/80, Axmi_07 and 17 mean they are included in the Strategic Flood Risk Assessment Level 2, which sets out further detail on key points and constraints to be considered through site-specific Flood Risk Assessments.															
6. Land resources	**- ?**	**- ?**	**+**	**- ?**	**- ?**	**- ?**	**- ?**	**+**	**- ?**	**- ?**	**+**	**- ?**	**- ?**	**+**	**+**	**+**	
Land resources commentary	Axmi_02, 08, 09, 11 and 12 and 22 are greenfield sites mostly on Grade 3 agricultural land, which could be 3a (best and most versatile) so uncertain negative effect. GH/ED/80, 83 and Axmi_01 are on both Grade 3 and 4 agricultural land. Axmi_07, 10, 12, 16, 18, and 23 will not result in the loss of any greenfield or agricultural land but may require remediation. Axmi_24 is a greenfield															

Sites: Axminster																	
Site / **SA Objective**	**Axmi_22**	**GH/ED/80**	**Axmi_23**	**Axmi_24**	**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**	
	site of mostly Grade 4 agricultural land, with the northern part being Grade 3, so a negative effect with some uncertainty as to whether Grade 3 is a or b. None of the sites are in a mineral consultation zone.																
7. Water resources	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Water resources commentary	No sites are located within a groundwater source protection zone. South West Water forecast there will be adequate water supply; and Kilmington Wastewater Treatment Works has sufficient capacity and environmental permit limits for the proposed development at Axminster, site refs Axmi_01, 02, 07, 08, 09, 10, 11, 12, 17, 18, 22, 23, 24, GH/ED/80, GH/ED/83 (Water Cycle Study, November 2025). However, all sites are within the River Axe SAC phosphates catchment so development could negatively affect water quality, meaning a negative effect on water resources.																
8. Homes	+ +	+ +	+	+	- -	+ +	+ +	+	+	+ +	+	+ +	+	+	+	+	
Homes commentary	Axmi_22, GH/ED/80, 83, Axmi_02, 09 and 11 have a maximum yield in the HELAA of over 100 dwellings, meaning a significant positive effect. Axmi_01 is 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/83, Axmi_01, 02, 07 and 10 are adjacent to an A road and/or railway line meaning a negative																

Sites: Axminster																	
Site / SA Objective	**Axmi_22**	**GH/ED/80**	**Axmi_23**	**Axmi_24**	**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**	
	effect. Axmi_17 would involve developing on a site previously used for sports pitches, so mitigation will be required to provide an alternative elsewhere; and is adjacent to the A358, with associated noise and air pollution, so a minor negative effect																
10. Access to services	+	+	+	+	+	+	+	+ +	+	+	+ +	+ +	+ +	+ +	+	+	
Access to services commentary	Only Axmi_07, 10, 11, 12, 16 are within 800m of a school, GP, pub, library and community hall, but all sites are within 1600 metres. There are limited issues relating to safety, quality and topography or route for pedestrians/cyclists.																
11. Jobs and employment	+	+ +	+	+	+ +	+ +	+ +	+	+	+ +	+	+ +	+	+	+	+	
Jobs/employment commentary	Axmi_01 is proposed for employment use only. Sites GH/ED/80, 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, 12 16, 17, 23 and 24 are within 800 metres of the town centre (Axmi_23 is actually in the town centre). For Axmi_16, this major positive effect is mixed with a negative effect as it would result in a loss of a supermarket, a key facility for the vitality and viability of the town centre. The remaining sites are within 1600 metres.																

Sites: Axminster																	
Site / SA Objective	**Axmi_22**	**GH/ED/80**	**Axmi_23**	**Axmi_24**	**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**	
13. Connectivity and transport	+	+	+ +	+	+	+ +	+ +	+ +	+ +	+	+	+ +	+ +	+ +	+	+	
Connectivity and transport commentary	Axminster has 100% gigabit availability. Sites Axmi_01, 02, 07, 08, 11, 12, 16 and 23 are within 800 metres of a railway station, an A road and a recognised cycle route. There are also regular buses through Axminster. The remaining sites are within 1600 metres of these sustainable travel facilities. Difficult road access to Axmi_02, 08 and 09 as Wykes Road is a narrow, single track lane.																

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, to lessen the negative effects upon biodiversity and water resources.
- 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 Axmi_22, GH/ED/80, 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 major negative historic environment effect for Axmi_02, 08, 09 and 11 can be lessened by avoiding built development next to the Scheduled Monument, in particular along the northern edge of Axmi_02 where recent work (autumn 2025) shows a concentration of archaeological deposits – this area should be open space with publicly accessible heritage information. A major negative uncertain effect remains until further archaeological surveys are undertaken.
- High quality design across all sites can reduce negative effects and maximise beneficial effects on the built environment.
- The major negative historic environment effect for GH/ED/83 may be reduced by avoiding development on part of the site within the setting of the listed buildings to the north.
- Sites in critical drainage areas (Axmi_22, Axmi_24 and GH/ED/80) could contribute to a scheme that will reduce risks for existing properties liable to flooding.

Sites: Axminster																
Site / SA Objective	Axmi_22	GH/ED/80	Axmi_23	Axmi_24	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	
• No built development in flood zones 2 and 3. • The results of the level 2 SFRA should be incorporated into the design of Axmi_01a, Axmi_07, Axmi_17, GH/ED/80a. • Noise attenuation will lessen the negative health and well-being effect for GH/ED/83, Axmi_01, 02, 07, 10 and 17 caused by their location close to the A358 and/or railway. • Axmi_17 would involve developing on a site previously used for sports pitches, so mitigation will be required in the form of alternative provision elsewhere. • 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 at GH/ED/83. • 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. • Appropriate landscaping can help mitigate the negative effect of Axmi_24 upon the landscape, although a minor negative is likely to remain. • High quality design that conserves and enhances designated heritage assets is required for Axmi_16 and 23, although a minor negative effect remains. • The adjoining sites Axmi_02, 08 and 09 should be subject to a comprehensive masterplan, considering active travel links, addressing the adverse landscape and historic environment effects, and provide community facilities. • Axmi_12 should be designed to protect trees and the setting of nearby heritage assets. • Axmi_02, 08, and 09 should have highways access off the A358 as access from Wykes Road would not be appropriate. These site-specific mitigation measures have been incorporated for the sites that are allocated in Local Plan Strategic Policy SD02.																
Preferred alternatives: Axmi_02 for 100 dwellings and 0.6 ha of employment land; Axmi_07 for 50 dwellings and 0.5 ha of employment land; Axmi_08 for 68 dwellings; Axmi_09 for 270 dwellings and 1 ha of employment land; Axmi_10 for 5 dwellings; Axmi_11c for 50 dwellings; Axmi_12 for 9 dwellings;																

Sites: Axminster																
Site / SA Objective	Axmi_22	GH/ED/80	Axmi_23	Axmi_24	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_17 for 19 dwellings; Axmi_18 for 6 dwellings; Axmi_22 for 100 dwellings; Axmi_23 for 10 dwellings; Axmi_24 for 29 dwellings; GH/ED/80a for 225 dwellings and one ha of employment land; and GH/ED/83 for 140 dwellings and 0.8 ha employment land.																	

Reasons for preferred alternatives:

- Axmi_02 – Land north of Shoals, Musbury Road is preferred as consistent with spatial strategy, good access to facilities and employment.
- Axmi_07 – Axminster Carpets Factory site is 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 is preferred as consistent with spatial strategy, good access to facilities and employment
- Axmi_09 – Great Jackleigh Farm is preferred 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 is preferred as consistent with spatial strategy, good access to facilities and employment and makes use of brownfield site.
- Axmi_11c – land south east of Axminster is preferred as consistent with spatial strategy, good access to facilities and employment, with an acceptable landscape impact given its good relationship with settlement edge (compared to the larger Axmi_11).
- Axmi_12 – land at Lea Combe, Field End is preferred as consistent with spatial strategy, good access to facilities and employment.
- Axmi_17 – Land at Millwey Chard Road is preferred as it is located within the existing urban fabric of the town and is well related to a very good range of services and facilities. However, it has an existing use as open space with a previous use for sports pitches so it would need to be demonstrated that any net loss would be acceptable in planning terms taking into account, if relevant, potential replacement provision elsewhere before confirming this site as an allocation.
- Axmi_18 – Millwey Garages, St Andrews Drive is preferred as it is located within the existing urban fabric of the town and is well related to a very good range of services and facilities.

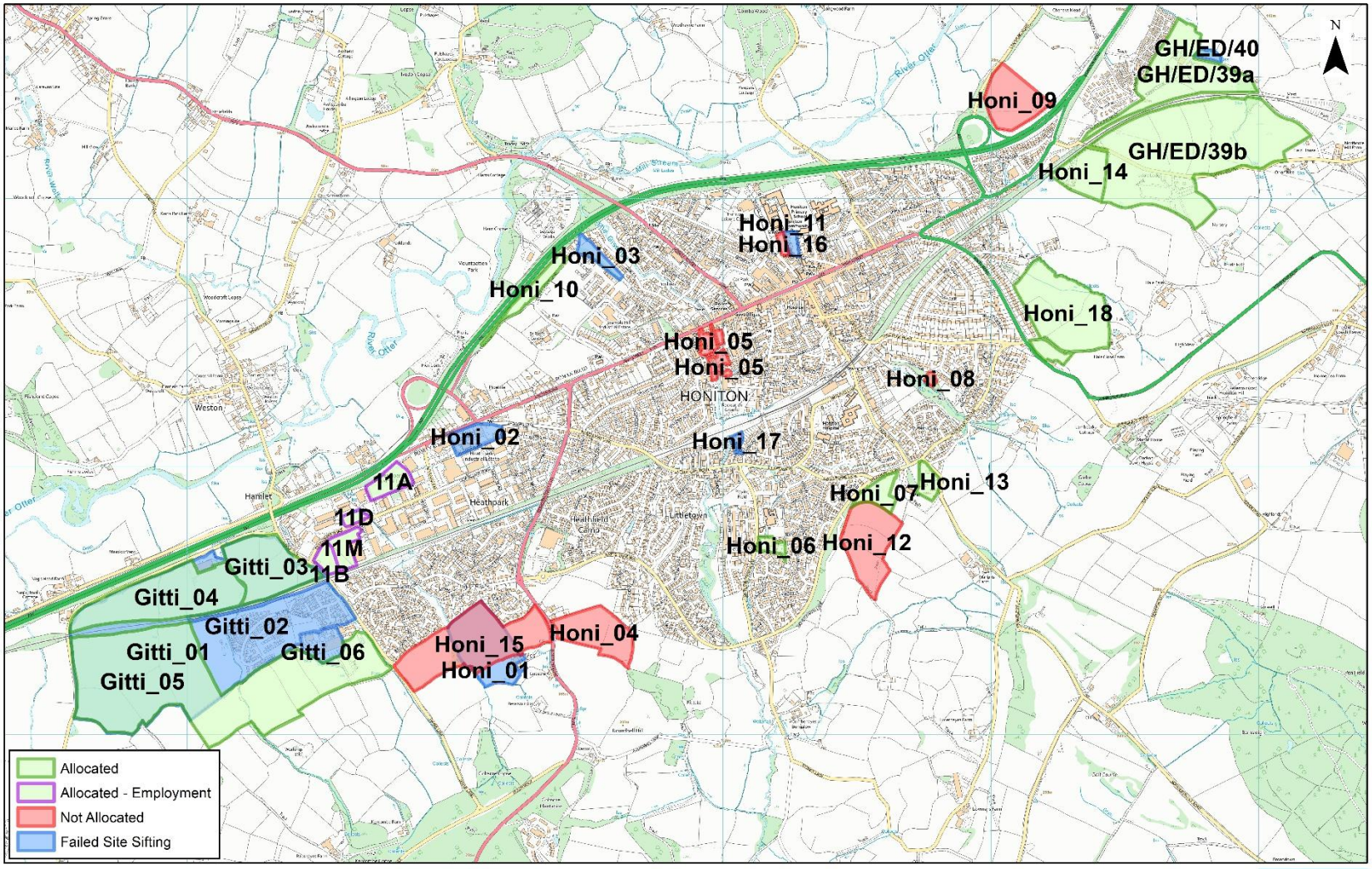
Sites: Axminster																
Site / SA Objective	Axmi_22	GH/ED/80	Axmi_23	Axmi_24	GH/ED/83	Axmi_01	Axmi_02	Axmi_07	Axmi_08	Axmi_09	Axmi_10	Axmi_11	Axmi_12	Axmi_16	Axmi_17	Axmi_18	

- Axmi_22 – Land east of Axminster is preferred as consistent with spatial strategy, good access to facilities and employment.
- Axmi_23 – Webster's Garage, 9 Lyme Street is preferred as it is located within the existing urban fabric of the town and is well related to a very good range of services and facilities. Residential use is acceptable as part of a mixed use redevelopment scheme.
- Axmi_24 – Land west of Prestaller Farm, Beavor Lane is preferred as it is well connected to a range of services and facilities.
- GH/ED/80a – Prestaller Farm, Beavor Lane is 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/83 – land at Chard Road is preferred as consistent with spatial strategy, good access to facilities and employment.

Reasons for rejecting sites:

- Axmi_01a – Land off Musbury Road is rejected for employment due to the potential for a major negative effect on the historic environment, particularly upon the Roman Fort Scheduled Monument, Newenham Abbey Scheduled Monument, the potential route of the Fosse Way Roman Road, the Axminster-Lyme Regis light railway, and findspots for prehistoric flint and medieval pottery along with two World War II pill boxes; and there are alternative, less sensitive, employment sites allocated at Axminster.
- Axmi_01b – Land off Musbury Road is rejected due to most of the site having a high flood risk, including the site access (from the A358) that requires crossing the floodplain, and due to the potential for a major negative effect on the historic environment upon Roman Fort Scheduled Monument, Newenham Abbey Scheduled Monument, the potential route of the Fosse Way Roman Road, the Axminster-Lyme Regis light railway, and findspots for prehistoric flint and medieval pottery along with two World War II pill boxes.
- Axmi_11d - land south east of Axminster is rejected due to major adverse landscape impact, uncertainty that satisfactory highway access is possible for the large scale of development, and flood risk across the southern part of the site.
- Axmi_16 – The Co-operative Food, West Street is rejected as the loss of a supermarket in this location (adjacent to the town centre), will harm the vitality and viability of the town centre.
- GH/ED/80b – Prestaller Farm, Beavor Lane is rejected due to adverse landscape impact.

Settlement: Honiton



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Reasonable alternatives

- Gitti_03 – Land on the western side of Hayne Lane
- Gitti_04 – Land to the West of Combe Garden Centre
- Gitti_05 – Land to west of Hayne Lane
- Gitti_06 – Hayne Farm, Hayne Lane
- Honi_01 – Land at Heathfield, East Of Hayne Lane
- Honi_04 – Land lying to the North East of Heathfield Manor Farm
- Honi_05 – Land to the north and south of King Street, including former Foundry Yard
- Honi_06 – Former Millwater School, Honiton Bottom Road
- Honi_07 – Land adjacent to St Michaels Church
- Honi_08 – Land at the South Side of The Glen
- Honi_09 – Former Honiton Showground, Langford Road
- Honi_10 – Land at Ottery Moor Lane
- Honi_12 – Land on the south-east side of Cuckoo Down Lane and land at Lower Marlpits Farm
- Honi_13 – Middle Hill, Church Hill
- Honi_14 – Hurlakes, Northcote Hill
- Honi_18 – Land at King's Road
- GH/ED/39a and b – Land south of Northcote Hill
- Plots 11A, 11B, 11D and 11M, Heathpark Industrial Estate.

Outline of reasons for selecting the alternatives

The majority of the sites listed as reasonable alternatives above have 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). In addition, they are located within or adjacent to Honiton (and therefore consistent with the spatial strategy), are not already allocated in a 'made' Neighbourhood Plan, and do not currently

have planning permission. The exception is GH/ED/39, which is considered a reasonable alternative despite being not achievable in the HELAA, because of known developer interest and it is considered there is potential to overcome highways constraints.

For the reasons given, the following sites are not considered to be reasonable alternatives:

- Gitti_01 overlaps Gitti_05.
- Gitti_02 is built/under construction.
- Giti_06 has planning permission.
- Honi_01 overlaps with Honi_15.
- Honi_02 has been developed.
- Honi_03 is probably unachievable in the HELAA due to poor access to the site.
- Honi_11 has been developed.
- Honi_16 - Uncertainty on whether land is truly available as currently in use as an EDDC car park - further work is required to assess the need for parking before its redevelopment is considered.
- Honi_17 - Although site just meets the threshold (5 dwellings), given its urban location the principle of development would be acceptable, and can come forward via a planning application.
- GH/ED/40 is probably unachievable in the HELAA due to access constraints, and the site was subsequently withdrawn from consideration in the Local Plan.

Sites: Honiton																		
Site / SA Objective	Gitti_03	Gitti_04	Gitti_05	Gitti_06	Honi_15	Honi_04	Honi_05	Honi_06	Honi_07	Honi_08	Honi_09	Honi_10	Honi_12	Honi_13	Honi_14	GH/ED/39	Honi_18	
1. Biodiversity	+ / 0	+ / -	+ / -	+ / 0	+ / 0	+ / - -	+	+	+ / -	+ / -	+ / 0	+	+ / -	+ / 0	+ / 0	+ / -	+ / 0	
Biodiversity commentary	The HRA notes potential air quality impacts at East Devon Heaths SAC/SPA from increased traffic from sites at Honiton. 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, S.41 Habitat of Principle Importance 70m away, 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 S.41 Habitat of Principle Importance and 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 S.41 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. Same for Honi_15 which is just over 100m from woodlands and TPO and it is surrounded by a similar environment. Honi_04 is covered by unimproved grassland, including overgrown grass with vegetation on the edge of the site boundary. S.41 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. Honi_07 is covered by Unimproved grassland, grazed by sheep with trees and vegetation on the edge of the site boundary. S.41 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 S.41 Habitat of Principle Importance. Adjoining busy A30 & A35 roads is not likely to have positive or negative effects. Honi_10 covered by Unimproved grassland, S.41 Habitat of Principle Importance and TPOs within 100m of																	

Sites: Honiton																		
Site / SA Objective	Gitti_03	Gitti_04	Gitti_05	Gitti_06	Honi_15	Honi_04	Honi_05	Honi_06	Honi_07	Honi_08	Honi_09	Honi_10	Honi_12	Honi_13	Honi_14	GH/ED/39	Honi_18	
	the site. Honi_12 covered by improved grassland with trees and vegetation on the edge of the site boundary and adjoining Honi_07. S.41 Habitat of Principle Importance within 100m of site, so 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. Development of the two small woodlands within the site would have a negative effect. Honi_18 is primarily covered by unimproved grassland, with vegetation lining the site boundary. Mature trees are located along the northern boundary adjacent to the brook, while trees and hedges are found on the eastern side of the site. No ecological designations within 100m of the site, it is not likely to have positive or negative effects. These effects are mixed with a long-term minor positive effect due to the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.																	
2. Landscape	-	-	- -	-	- -	- -	+	+	- -	-	- -	+	- -	- -	-	-	-	
Landscape commentary	Gitti_05, Honi_15, Honi_04, Honi_07, Honi_09, Honi_12 and Honi_13 are all located in the National Landscape, and have very high landscape value, which means a major negative landscape effect. Gitti_04, Gitti_06, Honi_14, GH/ED/39 and Honi_18 are outside but adjoin the National Landscape, which would have a visual impact on the National Landscape and likely minor negative effect. Gitti_03 is sheltered by trees, next to the A30. It is outside but abuts the National Landscape, with 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 but as the site has a strong connection with The Glen it is likely to																	

Sites: Honiton																		
Site / SA Objective	Gitti_03	Gitti_04	Gitti_05	Gitti_06	Honi_15	Honi_04	Honi_05	Honi_06	Honi_07	Honi_08	Honi_09	Honi_10	Honi_12	Honi_13	Honi_14	GH/ED/39	Honi_18	
	have negative effects. Honi_05 and 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**	**-**	
Hist. built env. commentary	Gitti_03, Gitti_04, and Gitti_06 are located on the edge of Honiton, with no designated heritage asset within 100m, thus no significant effect. Gitti_05 is visible from the historic village of Gittisham, with numerous designated heritage assets, 700m to the south, so a negative effect is likely. Honi_15 and 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, with several listed buildings in close proximity, so a minor negative effect is likely with uncertainty as a well-designed scheme could enhance what is currently a brownfield site. Honi_06, Honi_08 and Honi_10 are located in a built-up area and have no designated heritage asset within 100m so no significant effect. Honi_07 and Honi_13 are adjacent to Grade II* listed Church of St Michael, with Honi_07 also adjacent to Grade II listed Former Sexton's House. Honi_12 is around 100m from this listed church and development is also likely to adversely affect its setting, but to a lesser degree given it is further away. Honi_09, Honi_14 and GH/ED/39 are located in a remote location in Honiton, with no designated heritage asset within 100m, so no significant effect. Honi_18 has two Grade II listed buildings located within 20m of the south western edge of the site, are the Copper Castle Gate Toll House and the Copper Castle, which would be directly affected by the likely new junction/ access point.																	
4. Climate change carbon emissions	**-**	**-**	**-**	**-**	**+**	**+**	**+ +**	**+ +**	**+ +**	**+ +**	**0**	**+ +**	**+ +**	**+ +**	**0**	**0**	**+ +**	

Sites: Honiton																	
Site / SA Objective	Gitti_03	Gitti_04	Gitti_05	Gitti_06	Honi_15	Honi_04	Honi_05	Honi_06	Honi_07	Honi_08	Honi_09	Honi_10	Honi_12	Honi_13	Honi_14	GH/ED/39	Honi_18	
Climate change carbon emissions commentary	Gitti_03, Gitti_04, and Gitti_06 have 4 out of 12 and Gitti_05 has 5 out of 12 facilities within 1,600m of the site, around 2km 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. Honi_15 has 7 out of 12 and Honi_04 has 9 out of 12 facilities within 1,600m of site, less than 1km 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 and Honi_18 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 and GH/ED/39 have 9 out of 12 facilities within 1,600m of the site, and over 1km to the town centre, an hourly or better bus service is available but all the sites are located on the periphery of Honiton so development is likely to increase car travel.																
5. Climate change adaptation	+	+	+	+	0	+	-	+	+	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 and Honi_14 are not located in an area of flood risk, leading to a positive effect. Honi_15, Honi_08, Honi_09 and 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 is mostly within flood zone 2, with surface water flood also affecting parts of the site – development cannot avoid areas of flood risk, so a minor negative effect. The southern																

Sites: Honiton																		
Site / SA Objective	Gitti_03	Gitti_04	Gitti_05	Gitti_06	Honi_15	Honi_04	Honi_05	Honi_06	Honi_07	Honi_08	Honi_09	Honi_10	Honi_12	Honi_13	Honi_14	GH/ED/39	Honi_18	
	part of Honi_18 has a small area affected by surface water flooding, and along the brook adjacent to the site, there are patches of surface water flooding, but development can avoid these areas.																	
6. Land resources	- ?	- ?	- ?	- ?	- ?	- ?	+	+	-	- ?	-	+	- ?	-	-	-	-	
Land resources commentary	Gitti_03, Gitti_04, Gitti_05, Gitti_06, Honi_15, 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. Similarly, 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. Western half of Honi_18 is Grade 2 agricultural land, with the remainder Grade 3b.																	
7. Water resources	-	- ?	-	- ?	-	- ?	- ?	-	-	- ?	- ?	-	-	-	-	-	-	
Water resources commentary	No sites are located within a groundwater source protection zone, although a zone is around 50m west of Gitti_05. South West Water forecast there will be adequate water supply; but the capacity of Honiton Wastewater Treatment Works is forecast to be exceeded by proposed development at the settlement, site refs GH/ED/39, Gitti_03, 05, Honi_06, 07, 10, 12, 13, 14, 18, albeit environment permit compliance is sufficient (Water Cycle Study, November 2025). Therefore, a negative effect is likely for all sites included in the Water Cycle Study, with uncertainty for others.																	
8. Homes	- -	- -	+ +	+	+	+	+	+	+	+	+	+	+	+	+	+ +	+ +	

Sites: Honiton																		
Site / SA Objective	Gitti_03	Gitti_04	Gitti_05	Gitti_06	Honi_15	Honi_04	Honi_05	Honi_06	Honi_07	Honi_08	Honi_09	Honi_10	Honi_12	Honi_13	Honi_14	GH/ED/39	Honi_18	
Homes commentary	Gitti_03 and Gitti_04 are promoted for employment uses only, meaning a negative impact. Gitti_05, GH/ED/39 and Honi_18 each have a maximum yield of 100 plus 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 and Gitti_06 are within 1,600m of open space/allotment and a play area, but adjacent to A30 meaning a negative effect. Honi_15 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 and 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. Similar findings for Honi_18 which partly adjoins the A35.																	
10. Access to services	-	-	-	-	+	+	+ +	+	+	+	+	+	+	+	+	+	+ +	

Sites: Honiton																		
Site / **SA Objective**	**Gitti_03**	**Gitti_04**	**Gitti_05**	**Gitti_06**	**Honi_15**	**Honi_04**	**Honi_05**	**Honi_06**	**Honi_07**	**Honi_08**	**Honi_09**	**Honi_10**	**Honi_12**	**Honi_13**	**Honi_14**	**GH/ED/39**	**Honi_18**	
Access to services commentary	Gitti_03 and 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 minor negative effect. Gitti_04, 05 are further away to the west, around 1km from the nearest shop, but within 800m of an hourly bus service, although there is a less frequent bus (every 2-3 hours) travelling around the site boundary. On balance, a minor negative effect for these sites. Honi_15, and Honi_04 are within 1,600m of a primary school, shop, GP surgery and library, a minor positive effect. Honi_05 and 18 are within 800m from a primary school, secondary school, pub, shop, GP surgery, community hall, 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, 04, and 05 are within 800m of an employment site (Heathpark Industrial Estate) and are proposed for employment uses on-site, so major positive effect. Gitti_06 is within 800m of employment sites (Heathpark Industrial Estate), and within 1600m to jobs in the town centre, so minor positive effect. Honi_15, Honi_04, Honi_05, Honi_06, Honi_07, Honi_08, Honi_10, Honi_12, Honi_13 and Honi_18 are within 800m to jobs in the town centre, so minor positive effects. 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	**-**	**-**	**-**	**-**	**+**	**+**	**+ +**	**+ +**	**+ +**	**+ +**	**+ +**	**+ +**	**+ +**	**+ +**	**+ +**	**+**	**+ +**	

Sites: Honiton																		
Site / **SA Objective**	**Gitti_03**	**Gitti_04**	**Gitti_05**	**Gitti_06**	**Honi_15**	**Honi_04**	**Honi_05**	**Honi_06**	**Honi_07**	**Honi_08**	**Honi_09**	**Honi_10**	**Honi_12**	**Honi_13**	**Honi_14**	**GH/ED/39**	**Honi_18**	
Town centres commentary	Gitti_03, Gitti_04, Gitti_05 and Gitti_06 are beyond 1,600m of the town centre, so minor negative effect. Honi_15 & Honi_04 are beyond 800m but within 1,600m of the town centre, so a minor positive effect The rest of the sites are in the town centre or within 800m of the town centre, so a 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. Most sites are located within 800m of A30 or A35 and an hourly or better bus service; Honi_05, Honi_06, Honi_07, Honi_08, Honi_12, Honi_13 and Honi_18 are also within 800m of the train station. Whilst GH/ED/39 is within 800m of a bus stop, the service is less than daily and only serves rural locations. Several sites are accessed off narrow lanes where highways and footpath improvements will be required to deliver development, including GH/ED/39, Honi_14, Gitti_03, 04 ,05, 06.																	

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 National Landscape, considerable landscaping would be required at these sites due to major negative effects on the landscape.
- Honi_18 adjoins the National Landscape and a planning application should be informed by more detailed assessment to conserve and enhance the natural beauty of the site and its setting.
- Parts of GH/ED/39 are visible from Blackdown Hills National Landscape and further assessment through a planning application should development is appropriate to the National Landscape.
- Development at Honi_18 should conserve and enhance the nearby Grade II listed Copper Castle.
- The western edge of Gitt_05 is visible from the historic village of Gittisham, so built development should be avoided in this part of the site.

Sites: Honiton																	
Site / SA Objective	Gitti_03	Gitti_04	Gitti_05	Gitti_06	Honi_15	Honi_04	Honi_05	Honi_06	Honi_07	Honi_08	Honi_09	Honi_10	Honi_12	Honi_13	Honi_14	GH/ED/39	Honi_18	
• Honi_07, 12 and 13 require sensitive design to take account of the setting of the Grade II* listed church. • 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. Bus service enhancements should be sought at stops close to GH/ED/39. • The adjoining sites Gitti_03, Gitti_04, and Gitti_05 should come forward as a comprehensive, masterplanned development, including walking and cycling links north to south, to ensure high quality design and easy access to facilities and employment on the site. • Noise attenuation will lessen the negative health and well-being effect for Gitti_03, Gitti_04, Gitti_05, Honi_09, Honi_10, Honi_14, Honi_18 and GH/ED/39 caused by their location close to the railway line and/or A30 and A35. • 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 flood risk. • Significant capacity upgrades are required to Honiton Wastewater Treatment Works – Strategic Policy AR02 requires infrastructure improvements to overcome water quality issues. These site-specific mitigation measures have been incorporated for the sites that are allocated in Local Plan Strategic Policy SD03.																	
Preferred alternatives: Gitti_03, Gitti_04, and Gitti_05 for 310 dwellings, 14.6 ha of employment land, and community facilities; Honi_06 for 30 dwellings; Honi_07 for 30 dwellings; Honi_10 for 21 dwellings; Honi_13 for 10 dwellings; Honi_14 for 30 dwellings; Honi_18 for 136 dwellings; GH/ED/39a for 115 dwellings; GH/ED/39b for 195 dwellings; and Plots 11A, 11B, 11D and 11M for 3.3 ha employment land at Heathpark Industrial Estate. **Reasons for preferred alternatives:** • Gitti_03 – Land on the West End of Hayne Lane preferred for mixed-use development as consistent with spatial strategy, providing a mix of employment, housing and community facilities. The employment land benefits from good access to the A30.																	

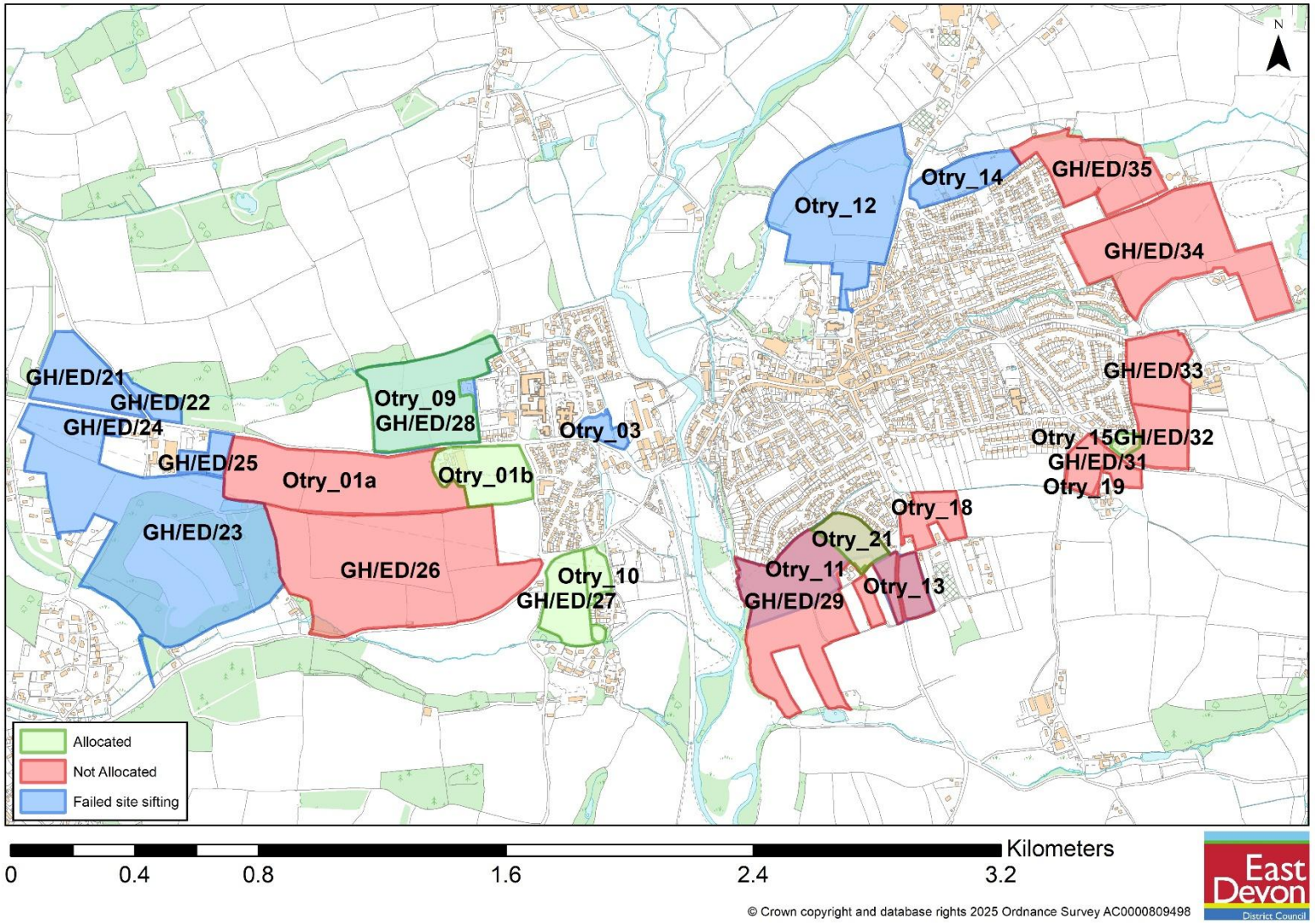
Sites: Honiton																	
Site / SA Objective	Gitti_03	Gitti_04	Gitti_05	Gitti_06	Honi_15	Honi_04	Honi_05	Honi_06	Honi_07	Honi_08	Honi_09	Honi_10	Honi_12	Honi_13	Honi_14	GH/ED/39	Honi_18	
• Gitti_04 – Land to the West of Combe Garden Centre preferred for mixed-use development as consistent with spatial strategy, providing a mix of employment, housing and community facilities. The employment land benefits from good access to the A30. • Gitti_05 – Land to the west of Hayne Lane is preferred for mixed-use development as consistent with spatial strategy, providing a mix of employment, housing and community facilities. The employment land benefits from good access to the A30. • Honi_06 – Former Millwater School, Honiton Bottom Road, Littletown preferred as developing existing brownfield site with good access to facilities, public transport, town centre and employment land, with a positive landscape and biodiversity effect. • Honi_07 – Land adjacent to St Michaels Church is preferred as it is consistent with spatial strategy, good access to facilities, public transport, town centre and employment land. • Honi_10 – Land at Ottery Moor Lane preferred as it is consistent with spatial strategy, good access to facilities and employment, and positive effect on biodiversity and landscape. • Honi_13 – Middle Hill, Church Hill preferred as it is consistent with spatial strategy, good access to facilities neighbourhood, public transport, town centre and employment land. • Honi_14 – Hurlakes, Northcote Hill preferred as it is consistent with spatial strategy, good access to facilities neighbourhood, public transport, town centre and employment lands. • Honi_18 – Land at King's Road is preferred as consistent with spatial strategy in a highly accessible location with limited ecological impacts, with mitigation possible to address adverse impacts upon the historic environment and landscape. • GH/ED/39a and b – Land south of Northcote Hill is preferred as consistent with spatial strategy, with good access to facilities, neighbourhood and town centre. • Heathpark Industrial Estate Plots 11A, 11B, 11D and 11M carry forward adopted Local Plan 2013-31 allocations. They are well-located within an existing industrial estate and will have major positive effects on the economy with limited negative effects.																	

Sites: Honiton																	
Site / SA Objective	Gitti_03	Gitti_04	Gitti_05	Gitti_06	Honi_15	Honi_04	Honi_05	Honi_06	Honi_07	Honi_08	Honi_09	Honi_10	Honi_12	Honi_13	Honi_14	GH/ED/39	Honi_18	

Reasons for rejecting sites:

- Honi_04 – Land lying to the North East of Heathfield Manor Farm is rejected due to likely significant adverse landscape effect
- Honi_05 – Land to the north and south of King Street, including the former Foundry Yard, is rejected due to adverse impact on the historic environment and most of site located in an area of flood risk.
- Honi_08 – Land at the South Side of The Glen is rejected due to the likely significant adverse biodiversity effect.
- Honi_09 – Former Honiton Showground, Langford Road is rejected due to likely significant adverse landscape effect.
- Honi_12 – Land on the south-east side of Cuckoo Down Lane, Honiton and land at Lower Marlpits Farm is rejected due to a major negative impact upon the landscape, particularly given its location within the Blackdown Hills National Landscape, that cannot be justified.
- Honi_15 – Land at Heathfield, East Of Hayne Lane is rejected due to significant negative effects upon the landscape, being located entirely within the East Devon National Landscape. Other sites at Honiton are allocated that would have less environment harm.

Settlement: Ottery St Mary



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
- Otry_21 – Gerway Farm
- Otry_18 – 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). In addition, they are located within or adjacent to Ottery St Mary (and therefore consistent with the spatial strategy), are not already allocated in a 'made' Neighbourhood Plan, and do not currently have planning permission.

For the reasons given, the following sites are not considered to be reasonable alternatives:

- Otry_03 not suitable due to location within flood zones 2 and 3.
- Otry_11 overlaps with GH/ED/29 and Otry_21.

- Otry_12 did not pass HELAA due a combination of location in a Conservation Area and forms the setting of a number of Grade I, Grade II* and Grade II listed buildings. It is also highly visible from several approaches to the town. Insufficient school capacity. Access would require widening and footpath. Flood zone on northern 1/3 of site reduces capacity.
- Otry_14 did not pass HELAA due a combination of being a sports field immediately to the north of the town. Accessible by car and on foot (although the roads are extremely congested) but road improvements required. Northern section of site is within flood zone 2 and 3. Insufficient school capacity.
- Otry_23 overlaps with GH/ED/26.
- GH/ED/21, 22, 23 and 24 are not adjacent, or otherwise well related, to Ottery St Mary.
- GH/ED/28 overlaps with Otry_09.
- GH/ED/29 overlaps with the smaller site Otry_21 – Otry_21 is the chosen reasonable alternative as it is the more recent landowner submission.
- GH/ED/30 overlaps with Otry_18.

Sites: Ottery St Mary														
Site / SA Objective	**Otry_01**	**Otry_09**	**Otry_10**	**Otry_15**	**GH/ED/26**	**GH/ED/27**	**Otry_21**	**Otry_18**	**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. Otry_21 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. The HRA notes potential air quality impacts at East Devon Heaths SAC/SPA from increased traffic from sites at Ottery.													

Sites: Ottery St Mary														
Site / SA Objective	Otry_01	Otry_09	Otry_10	Otry_15	GH/ED/26	GH/ED/27	Otry_21	Otry_18	GH/ED/31	GH/ED/32	GH/ED/33	GH/ED/34	GH/ED/35	
	These negative effects are mixed with a long-term minor positive effect due to the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.													
2. Landscape	-	-	-	-	- -	-	-	-	-	-	-	-	-	
Landscape commentary	All of the sites lie outside the National Landscape, 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 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. Otry_01 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 the eastern part of this site will not significantly undermine this aim. GH/ED/26 is likely to have a significant impact on the local landscape due to the rural character of the site and it's visibility in short and long range views, with a medium-high landscape sensitivity overall.													
3. Hist. built env	- ?	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 II 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 to the south of OSM (Otry_18 and Otry_21) 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).													

Sites: Ottery St Mary														
Site / SA Objective	Otry_01	Otry_09	Otry_10	Otry_15	GH/ED/26	GH/ED/27	Otry_21	Otry_18	GH/ED/31	GH/ED/32	GH/ED/33	GH/ED/34	GH/ED/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. Otry_21 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 Otry_21 but otherwise it, and Otry_18, 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 unpavemented 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**	**Otry_21**	**Otry_18**	**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**	
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 as being unreasonable (Otry_03). The remaining sites are largely unaffected by river or surface water flooding constraints, however those which have small parts within flood zone 2 and 3 are Otry_09, GH/ED/26, Otry_21, Otry_18, 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. Otry_10 and GH/ED/27 are partially located within surface water and Flood Zone 2 and 3 which mean they are included in the Strategic Flood Risk Assessment Level 2, which sets out further detail on key points and constraints to be considered through a site-specific Flood Risk Assessment.													
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/35 and Otry_18 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	**-**	**-**	**-**	**-**	**- ?**	**-**	**-**	**- ?**	**- ?**	**- ?**	**- ?**	**- ?**	**- ?**	
Water resources commentary	Sites in the eastern part of Ottery (Otry_15, 18, 21, GH/ED/31, 32, 33, 34, 35) – groundwater bodies that fall into this category are located between Ottery St Mary and Otterton. South West Water forecast there will be adequate water supply; but the capacity of Fluxton Wastewater Treatment Works is forecast to be exceeded by proposed development at the settlement, sites refs													

Sites: Ottery St Mary														
Site / **SA Objective**	**Otry_01**	**Otry_09**	**Otry_10**	**Otry_15**	**GH/ED/26**	**GH/ED/27**	**Otry_21**	**Otry_18**	**GH/ED/31**	**GH/ED/32**	**GH/ED/33**	**GH/ED/34**	**GH/ED/35**	
	GH/ED/27, Otry_01, 09, 10, 15, 21, albeit environment permit compliance is sufficient (Water Cycle Study, November 2025). Therefore, a negative effect is likely for all sites included in the Water Cycle Study, with uncertainty for others.													
8. Homes	**+**	**+**	**+**	**+**	**+ +**	**+**	**+**	**+**	**+**	**+**	**+**	**+ +**	**+ +**	
Homes commentary	Otry_01, GH/ED/26, 34 and 35 have a maximum yield 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	A short-term negative effect due to construction noise applies to all sites. Parts of all of the sites on the West End 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 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 Otry_21 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	Otry_21	Otry_18	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 metres of a school, GP, pub, library and community hall, but all sites are within 1600 metres. Part of Otry_09 is protected in the current Local Plan and Neighbourhood Plan for education use and Devon County Council 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 – the loss of the site to housing means the positive is mixed with a negative effect.													
11. Jobs and employment	+ +	+	+	0	+ +	+	+	0	0	0	0	+	+	
Jobs/employment commentary	Site Otry_01 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/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 Otry_18 and Otry_21 are just within this distance (albeit along narrow, unpavemented road). All of sites are within 1600 metres.													
13. Connectivity and transport	+	+	+	+	+	+	+	+	+ ?	+ ?	+ ?	+	+	

Sites: Ottery St Mary													
Site / SA Objective	**Otry_01**	**Otry_09**	**Otry_10**	**Otry_15**	**GH/ED/26**	**GH/ED/27**	**Otry_21**	**Otry_18**	**GH/ED/31**	**GH/ED/32**	**GH/ED/33**	**GH/ED/34**	**GH/ED/35**
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, but all are within 1,600m of a regular (hourly or better) bus service from the town centre. No apparent safe walking/cycling access from GH/ED/32 and 33, means some uncertainty for these sites.												

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.
- Related to the above point, the western part of Otry_01 is located far from services and extends into the countryside with consequent negative landscape impacts. Therefore, it has been separated into ‘a’ and ‘b’, with Otry_01b well-related to existing facilities and built-up area of Ottery, with Otry_01a to the west. The negative effects associated with Otry_01 are reduced for Otry_01b.
- Requiring an archaeological assessment for Otry_01b, Otry_10 and GH/ED/27 will address the uncertain negative effect on the historic environment.
- 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.
- Ancient trees should be protected from development at Otry_10.
- Parts of Otry_10 and GH/ED/27 are at risk of flooding, so the results of the Level 2 SFRA should be taken into account.
- Incorporate education use on Otry_09 to avoid negative impact upon access to services.
- The major negative historic environment effect for GH/ED/26 can be lessened by reducing the site area to the west. The 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.

Sites: Ottery St Mary														
Site / SA Objective	Otry_01	Otry_09	Otry_10	Otry_15	GH/ED/26	GH/ED/27	Otry_21	Otry_18	GH/ED/31	GH/ED/32	GH/ED/33	GH/ED/34	GH/ED/35	
• High quality design across all sites can reduce negative effects and maximise beneficial effects on the built environment. • Otry_21 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. • Significant capacity upgrades are required to Fluxton Wastewater Treatment Works – Strategic Policy AR02 requires infrastructure improvements to overcome water quality issues. • 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. This particularly applies at Otry_01b, 10, 21 and GH/ED/27. • 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. These site-specific mitigation measures have been incorporated for the sites that are allocated in Local Plan Strategic Policy SD04.													
Preferred alternatives: Otry_01b for 70 dwellings and 1.25 ha employment; Otry_09 for 90 dwellings, education use; Otry_10 for 20 dwellings; Otry_15 for 8 dwellings; Otry_21 for 70 dwellings, GH/ED/27 for 60 dwellings. **Reasons for preferred alternatives:** • Otry_01b - Barrack Farm is preferred as consistent with the spatial strategy, with good access to facilities, provision of employment within the site, medium landscape and low ecological sensitivity. • Otry_09 – Land at Thorne Farm, Exeter Road is preferred as consistent with the spatial strategy, with good access to facilities. The mitigation measures for a wildlife buffer and space for education use aviods negative effects.													

Sites: Ottery St Mary														
Site / SA Objective	Otry_01	Otry_09	Otry_10	Otry_15	GH/ED/26	GH/ED/27	Otry_21	Otry_18	GH/ED/31	GH/ED/32	GH/ED/33	GH/ED/34	GH/ED/35	

- Otry_10 – Land North and South of Salston Barton is preferred as it is consistent with the spatial strategy, reasonably well located adjacent and opposite development on the periphery of the town. It is accessible to most facilities and performs well in landscape, ecology and heritage terms.
- Otry_15 – Land at Bylands, Slade Road is preferred as it is consistent with the spatial strategy is an existing garden with minimal landscape, ecology or heritage impact that would 'round-off' development.
- Otry_21 is preferred as it is consistent with the spatial strategy with no major negative environmental effects.
- GH/ED/27 – Land South of Strawberry Lane is preferred as it is consistent with the spatial strategy, with no major negative environmental effects. It could be considered to 'round-off' this part of the town.

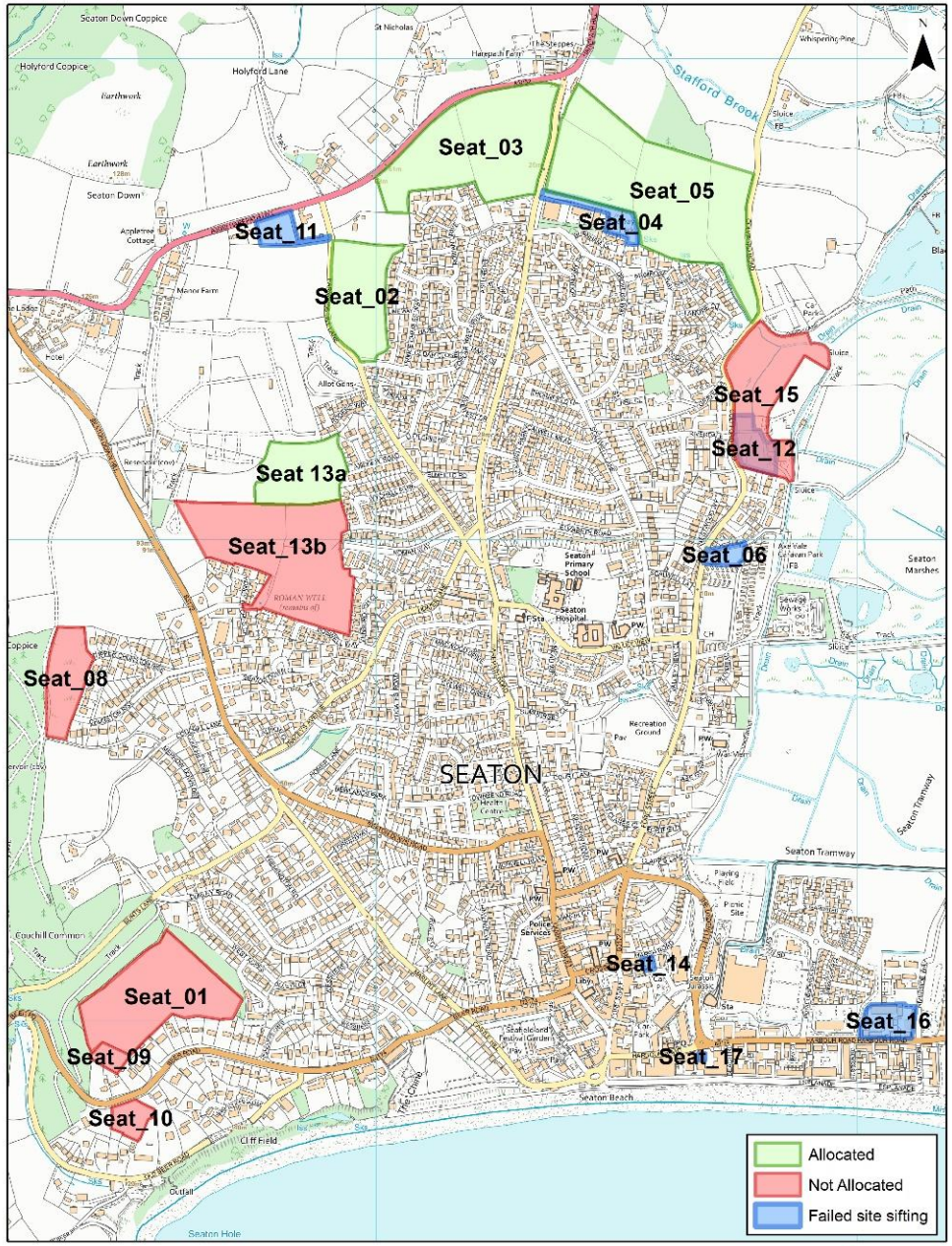
Reasons for rejecting sites:

- Otry_01a – Barrack Farm is rejected due to negative ecology, heritage and landscape impacts, in a location that is some distance from facilities and services in Ottery.
- GH/ED/26 – Land West of Cadhay Lane is rejected as it 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.
- Otry_18 – Sidmouth Road, junction with Gerway Lane is rejected as it is sensitive in landscape and heritage terms, unable to achieve satisfactory access and pavement (this site has a history of refused planning permissions)
- GH/ED/31 – Slade Farm is rejected due to adverse landscape impact from extending into open countryside. Development would be visible from a considerable distance. Concerns regarding insufficient highway capacity

Sites: Ottery St Mary														
Site / SA Objective	Otry_01	Otry_09	Otry_10	Otry_15	GH/ED/26	GH/ED/27	Otry_21	Otry_18	GH/ED/31	GH/ED/32	GH/ED/33	GH/ED/34	GH/ED/35	

- GH/ED/32 – Church Path Field, land east of Chineway Gardens is rejected as 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 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 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 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: Seaton



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_08 – Land between Churston Rise and Couchill Copse
- Seat_09 – Land at Clay Common (Little Paddock)
- Seat_10 – Land south of Beer Road
- Seat_13a – Land adjacent Axe View Road
- Seat_15 – White Cross, Colyford 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). In addition, they are located within or adjacent to Seaton (and therefore consistent with the spatial strategy), are not already allocated in a 'made' Neighbourhood Plan, and do not currently have planning permission.

For the reasons given, the following sites are not considered to be reasonable alternatives:

- Seat_04 already has planning permission for 7 industrial units (14/0047/FUL).
- Seat_06 already has planning permission for 14 no. industrial units (14/0046/FUL).
- Seat_07 overlaps with Seat_15.
- Seat_11 is not within or adjacent, or otherwise well-related, to Seaton.
- Seat_12 overlaps with Seat_15.

- Seat_13 not suitable in the HELAA because of unacceptable impact on the environment (that part of the Roman And Earlier Settlement At Honeyditches Scheduled Ancient Monument within the site)
- Seat_14 is below site size threshold so not suitable in the HELAA.
- Seat_16 suggested by third party in Draft Local Plan consultation, but no evidence of land availability.
- Seat_17 suggested by third party in Draft Local Plan consultation, but no evidence of land availability.

Sites: Seaton										
Site / **SA Objective**	**Seat_01**	**Seat_02**	**Seat_03**	**Seat_05**	**Seat_15**	**Seat_08**	**Seat_09**	**Seat_10**	**Seat_13a**	
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_15 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.									

Sites: Seaton										
Site / SA Objective	Seat_01	Seat_02	Seat_03	Seat_05	Seat_15	Seat_08	Seat_09	Seat_10	Seat_13a	
	These negative effects are mixed with a long-term minor positive effect due to the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.									
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 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_15 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									

Sites: Seaton										
Site / SA Objective	Seat_01	Seat_02	Seat_03	Seat_05	Seat_15	Seat_08	Seat_09	Seat_10	Seat_13a	
	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, means a minor 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 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_15 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. 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									

Sites: Seaton										
Site / SA Objective	Seat_01	Seat_02	Seat_03	Seat_05	Seat_15	Seat_08	Seat_09	Seat_10	Seat_13a	
	due to distance and intervening dwellings. 3x archaeological records on site identified in the HER, so uncertain minor negative effect. The Honeyditches Roman Settlement Scheduled Monument runs along the southern boundary of Seat_13a, and a geophysics survey (October 2025) identifies some potential archaeological features that could be associated with the SM, although the features are not particularly clear. It is considered there would be limited harm to the setting as it has already been compromised by modern development. Overall a major negative effect for Seat_13a due to the potential for archaeology associated with the SM to extend into Seat_13a with uncertainty until further archaeological work in the form of trial trenching is undertaken.									
4. Climate change and carbon emissions	+	+	+	+	+	0	+	+	+	
Climate change carbon emissions commentary	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_15 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.									

Sites: Seaton										
Site / SA Objective	Seat_01	Seat_02	Seat_03	Seat_05	Seat_15	Seat_08	Seat_09	Seat_10	Seat_13a	
	Seat_13a 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_13a. Note that Colyton Grammar secondary school is not included as it is a selective school, so not accessible for all pupils.									
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 13a 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_15 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 13a 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									

Sites: Seaton										
Site / SA Objective	Seat_01	Seat_02	Seat_03	Seat_05	Seat_15	Seat_08	Seat_09	Seat_10	Seat_13a	
	effect. Seat_15 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	- ?	-	-	-	- ?	- ?	- ?	- ?	-	
Water resources commentary	South West Water forecast there will be adequate water supply; but the capacity of Seaton South Wastewater Treatment Works is forecast to be exceeded by proposed development at the settlement, site refs Seat_02, 03, 05, 13a, albeit environment permit compliance is sufficient (Water Cycle Study, November 2025). Therefore, a negative effect is likely for all sites included in the Water Cycle Study, with uncertainty for others.									
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, 08, 09, 10, 11, 13a and 15 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.									

Sites: Seaton										
Site / **SA Objective**	**Seat_01**	**Seat_02**	**Seat_03**	**Seat_05**	**Seat_15**	**Seat_08**	**Seat_09**	**Seat_10**	**Seat_13a**	
10. Access to services	**+**	**+**	**+**	**+**	**+**	**+ / -**	**+**	**+**	**+**	
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 13a 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_15 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									

Sites: Seaton										
Site / **SA Objective**	**Seat_01**	**Seat_02**	**Seat_03**	**Seat_05**	**Seat_15**	**Seat_08**	**Seat_09**	**Seat_10**	**Seat_13a**	
	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. Seat_13a 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_15 is adjacent to off-road cycle route adjacent to Colyford Road, 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									

Sites: Seaton										
Site / **SA Objective**	**Seat_01**	**Seat_02**	**Seat_03**	**Seat_05**	**Seat_15**	**Seat_08**	**Seat_09**	**Seat_10**	**Seat_13a**	
	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_13a as within 800m of an hourly or better bus route, the A3052, and cycle route.									

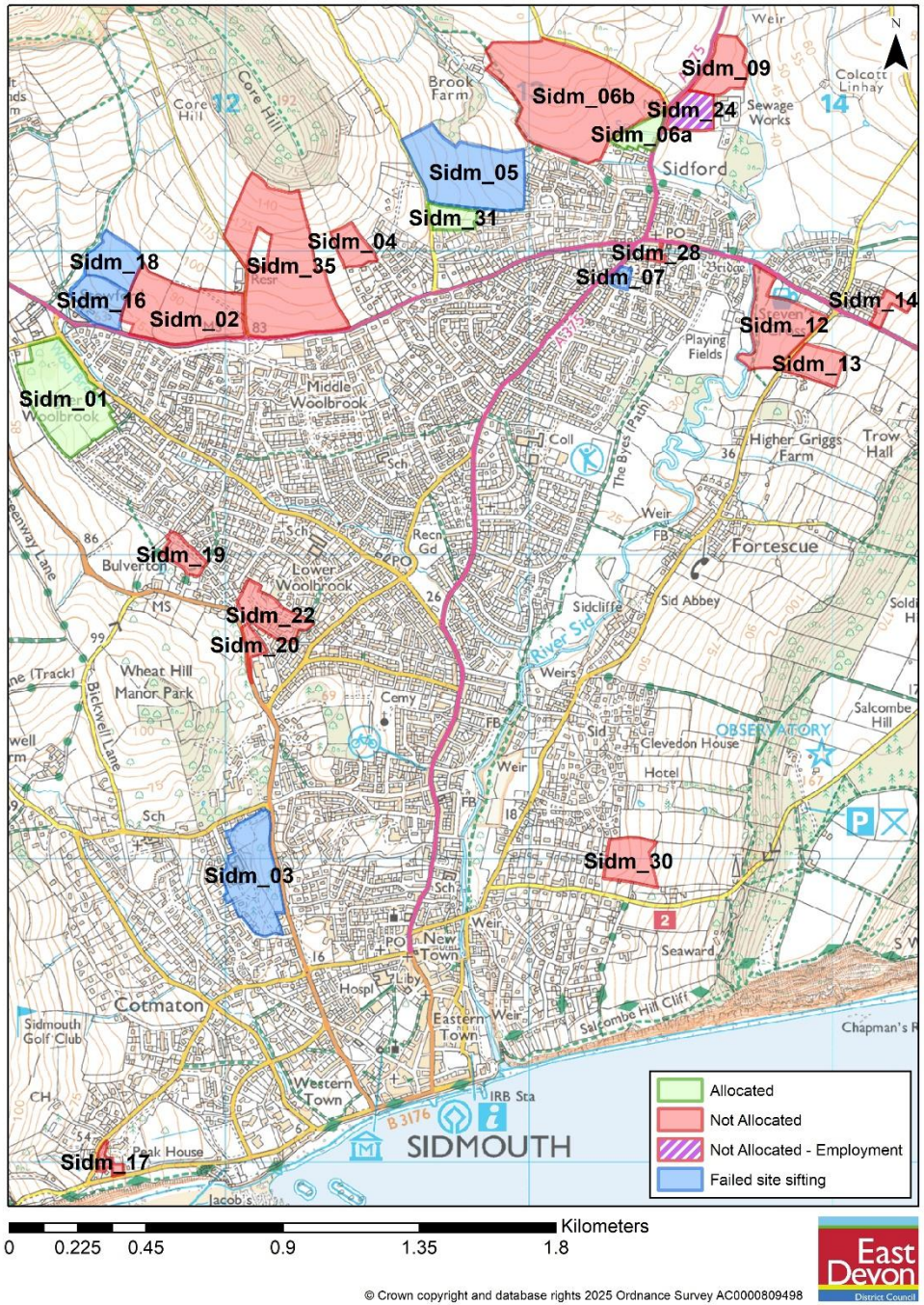
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects:

- 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 negative effects upon the landscape, but their sensitivity is such that a major 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.
- Specifically, at Seat_03, built development should be concentrated in less sensitive eastern and southern parts of the site, with a wide buffer to the northern and western boundaries.
- Development of Seat_03 should respect the setting of Grade II listed Harepath Farm, which overlooks the site.
- Development at Seat_05 should enhance the existing woodland to the north, with additional landscaping on the northern edge to soften the boundary with the countryside.
- As Seat_03 and 05 are of a large scale and located in close proximity to each other, a co-ordinated approach should deliver a mixed-use development, including housing, employment, and the long-standing need for a football pitch at the town.
- The major negative historic environment effect at Seat_13a can be lessened by requiring archaeological assessment and ensuring a buffer to the Scheduled Monument adjacent to the south, but a major negative uncertain effect would likely remain until a more detailed archaeological assessment is undertaken.
- High quality design across all sites can reduce negative effects and maximise beneficial effects on the built environment.
- Significant capacity upgrades are required to Seaton South Wastewater Treatment Works – Strategic Policy AR02 requires infrastructure improvements to overcome water quality issues.
- Noise attenuation will lessen the negative health and well-being effect for Seat_03 and 05 caused by their location close to the A3052.

Sites: Seaton										
Site / **SA Objective**	**Seat_01**	**Seat_02**	**Seat_03**	**Seat_05**	**Seat_15**	**Seat_08**	**Seat_09**	**Seat_10**	**Seat_13a**	
• 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. This particularly applies at Seat_03, 05, 13a. • 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. These site-specific mitigation measures have been incorporated for the sites that are allocated in Local Plan Strategic Policy SD05.										
Preferred alternatives: Seat_02 for 40 dwellings; Seat_03 for 75 dwellings; Seat_05 for 130 dwellings and 2.2 hectares of employment land (a football pitch should be located on either Seat_03 or 05); Seat_13a for 39 dwellings. **Reasons for preferred alternatives:** • Seat_02 – Land at Barnards Hill Lane preferred as consistent with spatial strategy, good access to facilities and employment, and medium landscape sensitivity. • Seat_03 – Land to south of Harepath Hill preferred 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_13a – Land adjacent Axe View Road is preferred as consistent with spatial strategy, good access to facilities and employment, no on-site flood risk, and medium landscape sensitivity. **Reason for rejected sites:** • Seat_01 – Clay Common rejected due to likely significant adverse landscape effect. • Seat_15 – White Cross, 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.										

Sites: Seaton										
Site / SA Objective	Seat_01	Seat_02	Seat_03	Seat_05	Seat_15	Seat_08	Seat_09	Seat_10	Seat_13a	
• Seat_09 – Land at Clay Common (Little Paddock) rejected as even allocating the minimum of five dwellings would be contrary to character and appearance of the surrounding area. • Seat_10 – Land south of Beer Road rejected due to likely significant adverse landscape effect.										

Settlement: Sidmouth



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Reasonable alternatives

- Sidm_01 – Land south west of Woolbrook Road
- Sidm_02 - Land at Sidford High Street
- Sidm_04 - Land to the east of The Lookout Coreway
- Sidm_06 - Land west of Two Bridges Road
- Sidm_09 - Land east of Two Bridges Road
- Sidm_12 - The Hams, Fortescue Road
- Sidm_13 - Land adjoining Fortescue Road
- Sidm_14 - Land adj Stevens Cross Close
- Sidm_17 - Peak Coach House, (Numbers 1-3 Belfry Cottages), Cotmaton Road
- Sidm_19 - Land at Dark Lane
- Sidm_20 - Station Yard, Station Road
- Sidm_22 - Alexandria Industrial Estate, Alexandria Road
- Sidm_28 - EDDC carpark serving local shops south of Church Street
- Sidm_29 – Land at Two Bridges (considered for employment)
- Sidm_30 – Land east of Redwood Road
- Sidm_31 - Land east of Burscombe Lane, to south of track
- Sidm_35 - Land to east of Core Hill Road, north of Sidford High Street

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, they are located within or adjacent to Sidmouth (and therefore consistent with the spatial strategy), are not already allocated in a 'made' Neighbourhood Plan, and do not currently have planning permission. Sidm_29 was not suitable or achievable for housing in the HELAA, but it was achievable for employment.

For the reasons given, the following sites are not considered to be reasonable alternatives:

- Sidm_32 overlaps Sidm_01.
- Sidm_03 – extant planning permission;
- Sidm_05 – unachievable in the HELAA;
- Sidm_08 – extant planning permission;
- Sidm_16 – unachievable in the HELAA;
- Sidm_18 – unachievable in the HELAA.

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_29**	
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 likely negative effect as a minimum. In addition, the HRA notes potential air quality impacts at East Devon Heaths SAC/SPA from increased traffic from sites at Sidmouth. Sidm_01, 02, 06, 09, 12, 13, 17, 22, 29 include or are in close proximity to a Nature Recovery Network Area. Sidm_17 is also in close proximity to a County Wildlife Site. Sidm_01, 06, 09, 14, 19, 20, and 22 are all within 100m of an unconfirmed wildlife site. Similarly, Sidm_06, 09, 12, 13, 17, 20, and 22 are within 100m of a Section 41 (S41) Habitat of Principle Importance. Sidm_01, 04, 06, 14, and 19 feature habitat rich areas where impact on biodiversity would be increased.																	

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_29**	
	Sidm_17, 20, 22 and 28 are brownfield sites where, despite the identified constraints, the impact on biodiversity from development is considered neutral. These negative effects are mixed with a long-term minor positive effect from the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.																	
2. Landscape	**- -**	**- -**	**- -**	**- -**	**- -**	**- -**	**- -**	**- -**	**- -**	**- -**	**+**	**+**	**+**	**- -**	**- -**	**- -**	**- -**	
Landscape commentary	East Devon National Landscape surrounds Sidmouth, which is a significant constraint on development. With the exception of sites Sidm_20, 22 and 28, all sites are set entirely within the National Landscape, 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, and Sidm_28 is a car park, where landscape enhancement is likely from new development.																	
3. Hist. built env	**-**	**0**	**0**	**- -**	**-**	**- -**	**0**	**0**	**-**	**-**	**0**	**0**	**- -**	**0**	**0**	**0**	**-**	
Hist. built env. commentary	Sidm_01 has Grade II listed buildings to the north and east (60-80m away) but intervening dwelling and mature vegetation limit views into site. Sidm_02 - Two Grade II listed buildings around 200-250m to south, but numerous existing buildings mean no intervening views. 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. Sidm_06 - Grade II listed Brook Farm 18m to West, Sidford Conservation Area 129m away has																	

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_29	
	views into the eastern edge of site, Sidbury Castle Scheduled Monument to north west with intervisibility and impact on setting, so a major negative effect. 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. 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, and a major negative effect. Sidm_13 - Sidford Bridge is Grade II listed and a Scheduled Monument, located 300m north west of the site, neutral effect on this asset. 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. Sidm_17 - Potential for adverse impact upon Grade II listed Peak House 24m to east, which has open views into site. 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, so a major negative effect. Sidm_20 and 22 - Cluster of six Grade II listed buildings to west-north west, around 100m away but intervening vegetation obscures views to some degree. Sidm_28 – Adjacent and partly within Sidford Conservation Area – potential for major impact. Sidm_29 – Sidford Conservation Area and listed buildings around 200m to south with views of the site, with Sidbury Castle Scheduled Monument to north west with intervisibility and impact on setting. Sidm_30, 31 and 35 are over 200m from heritage assets so neutral effect.																	
4. Climate change carbon emissions	+	+	+	+	+	+	0	+	+	+	+	+	0	+	+	+	+	

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_29**	
Climate change carbon emissions commentary	Sites assessed at and around Sidmouth generally performed well in terms of minimising carbon emission from travel. Sidm_17, 19, 20, 22, 30 are all within 1,600 metres of Sidmouth town centre and as such they have access to a good range of facilities in the centre and elsewhere in the town, so a positive effect. Sidm_13 has 7 facilities within 1600 metres, so a neutral effect. A positive effect for 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, 29, 35 have 10 facilities within 1,600 metres; Sidm_19, 20, 22 have 11 facilities within 1,600 metres; and Sidm_30 which is within 800m of the town centre and a range of services and facilities.																	
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 as they have areas of flood risk but development can avoid these areas, and 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																	

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_29	
	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, which means some uncertainty.																	
7. Water resources	**0**	**0 ?**	**0 ?**	**0**	**0 ?**	**0 ?**	**0 ?**	**0 ?**	**0 ?**	**0 ?**	**0 ?**	**0 ?**	**0 ?**	**0 ?**	**0**	**0 ?**	**0 ?**	
Water resources commentary	No sites are located within a groundwater source protection zone. South West Water forecast there will be adequate water supply; and Sidmouth Wastewater Treatment Works has sufficient capacity and environmental permit limits for the proposed development at Sidmouth, site refs Sidm_01, 06a, 31 (Water Cycle Study, November 2025). Therefore, a neutral effect is likely for all sites included in the Water Cycle Study, with uncertainty for others.																	
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. Sidm_29 is considered for employment uses, so a major negative effect.																	
9. Health and well-being	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**+**	**-**	**+**	**+**	**-**	**-**	**-**	**-**	**-**	

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_29**	
Health and well-being commentary	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 Sidm_01, 02, 04, 06, 09, 12, 13, 14, 28, 29, 30, 35. where open spaces would also be lost. Sidm_17, 20, 22 are brownfield sites away from A roads where open spaces are not jeopardised, resulting in a positive impact overall. Sidm_19 and 30 are greenfield sites in the 20% least deprived areas in the country where negative scores are appropriate.																	
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_13, 14 and 17 suffers from poor proximity to either a primary of secondary school, also being over 800m from most facilities, and scores less well as a result.																	
11. Jobs and employment	+	+	+	+	+	-	-	-	+	+	+ / - -	+ / - -	+	+	+	+	+ +	

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_29**	
Jobs/employment commentary	Sidm_20 and 22 are existing employment sites and developing these could mean a loss of employment, so a major negative effect. This is mixed with a positive effect if the site is redeveloped for employment uses. Major positive for Sidm_29 which is being considered for employment uses. Most sites are within 1,600m of an existing employment site, so a positive effect; apart from Sidm_12, 13, 14 which are beyond, leading to a minor negative effect.																	
12. Town centres	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**+**	**+**	**+**	**+**	**-**	**+ +**	**-**	**-**	**-**	
Town centres commentary	Sidm_30 is within 800m of the town centre, so a major positive effect. Sidm_17, 19, 20, 22 are beyond 800m but within 1,600m. All other sites are beyond 1,600m, leading to a minor negative effect.																	
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 to have access to superfast broadband. There is no train station at Sidmouth, but all sites fall within 800 metres of an hourly or better bus service, with most sites also within 800m an 'A' road (A3052, A375), except Sidm_17, 30. Sidm_17 has very narrow access (via Cotmaton Road) with no footway. Sidm_19 and 31 also have narrow access roads that lack footways.																	
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects:																		

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_29	
• Appropriate landscaping at all National Landscape 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 apart from Sidm_01, 06a and 31 where there is an existing context of built form. • Development should avoid the northern part of Sidm_01 as it is an existing woodland, to reduce negative landscape and biodiversity effects. • The significant negative historic environment effect for Sidm_06 can be lessened by reducing the site area in the setting of the Scheduled Monument. • Given the major negative landscape and historic environment effects, a smaller site Sidm_06a is recommended as an alternative – this lessens the major negative landscape and historic environment effects to a minor negative, but it would reduce the major positive on Homes to a minor positive. • Sidm_31 is within the National Landscape and close to predominantly single storey buildings, so will require careful design. • 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. • 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. Specifically, Sidm_06a should support the delivery of the Sidford – Sidbury cycle route. • 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. These site-specific mitigation measures have been incorporated for the sites that are allocated in Local Plan Strategic Policy SD06, including a reduction in the yield of Sidm_06a from 30 to 15 dwellings to lessen the impact upon the National Landscape.																	
Preferred alternatives: Sidm_01 for 160 dwellings; Sidm_06a for 15 dwellings; Sidm_31 for 15 dwellings. **Reasons for preferred alternatives:**																		

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_29	

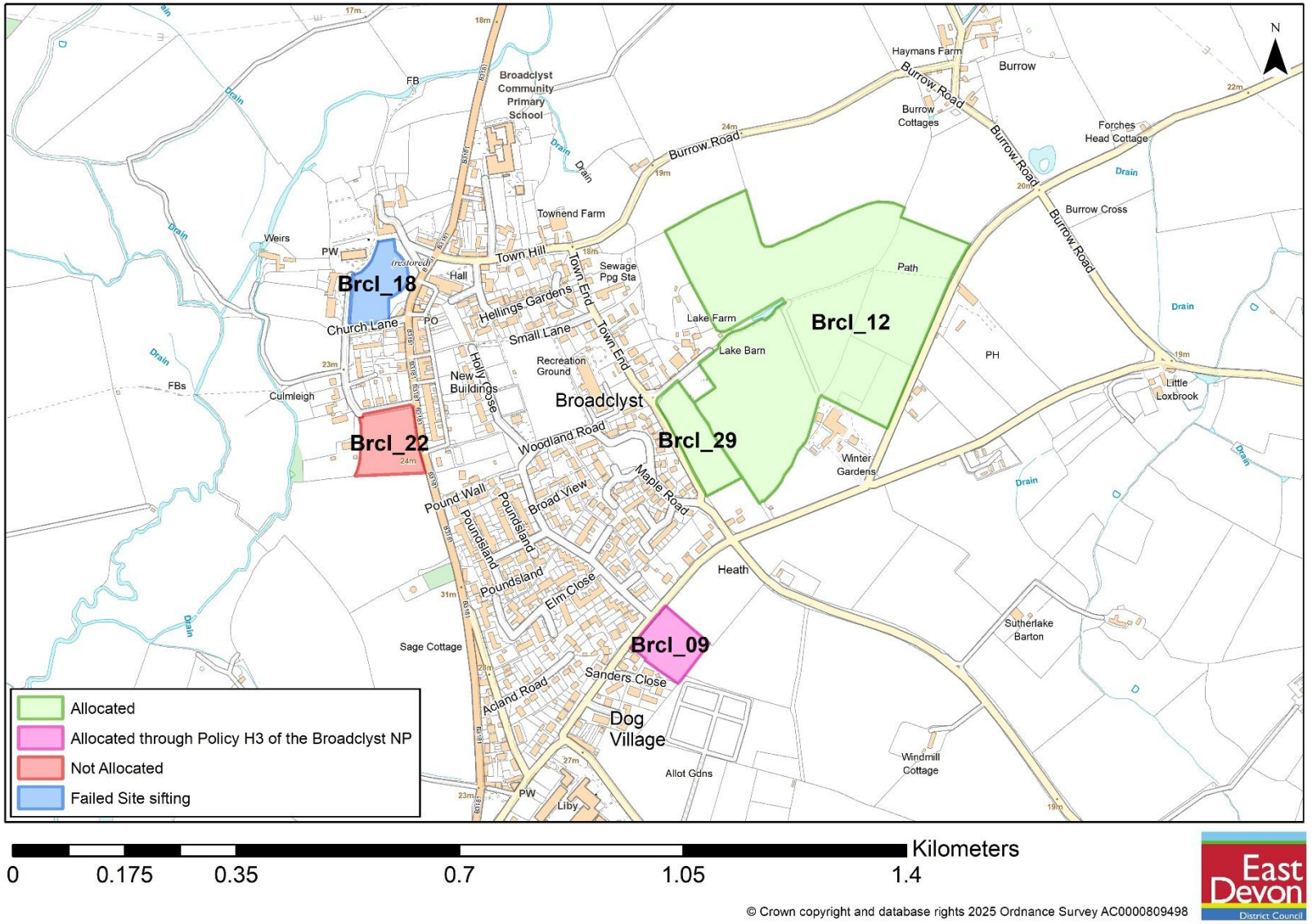
- Sidm_01 – Land south west of Woolbrook Road is preferred as it is consistent with the spatial strategy with good access to facilities and employment. Negative biodiversity, landscape and historic environment impacts can be effectively mitigated.
- Sidm_06a – Land west of Two Bridges Road is preferred as it is consistent with the spatial strategy with good access to facilities and employment. Negative biodiversity, landscape and historic environment impacts can be effectively mitigated. Note the area has been reduced from the original Sidm_06 to avoid major negative effects.
- Sidm_31 – Land to the east of Burscombe Lane is preferred as it is consistent with the spatial strategy with good access to facilities and employment, and no major biodiversity or historic environment effects. Negative landscape effects are lessened by the presence of existing housing on two sides and can be effectively mitigated.

Reasons for rejected sites:

- Sidm_02 – Land at Sidford High Street is rejected as it would have a high landscape impact and adverse effect on ecology.
- Sidm_04 – Land to the east of The Lookout Coreway is rejected as it would have a high landscape impact.
- Sidm_06b – Land west of Two Bridges Road is rejected as it would have a high landscape impact and major negative heritage impact.
- Sidm_09 – Land east of Two Bridges Road is rejected as it would have a high landscape impact, major negative heritage impact, adverse effect on ecology.
- Sidm_12 – The Hams, Fortescue Road is rejected as it would have a high landscape impact, major heritage impact, adverse effect on ecology.
- Sidm_13 – Site to south east of Fortescue Road is rejected as it would have a high landscape impact.
- Sidm_14 – Land adj Stevens Cross Close is rejected as it would have a high landscape impact.

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_29	
• Sidm_17 – Peak Coach House, (Numbers 1-3 Belfry Cottages), Cotmaton Road is rejected due to poor access, high landscape impact, and likely low net yield due to the presence of existing homes on site. • Sidm_19 – Land at Dark Lane is rejected as it would have a high landscape impact, major heritage impact, negative effect on ecology, and poor access with narrow lanes adjacent to heritage. • Sidm_20 – Station Yard, Station Road is rejected due to the loss of an active employment site. • Sidm_22 – Alexandria Industrial Estate, Alexandria Road is rejected due to the loss of an active employment site. • Sidm_28 – EDDC car park serving local shops south of Church Street is 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. • Sidm_29 – Land at Two Bridges is rejected (for employment) due to major adverse landscape impact. • Sidm_30 – Land east of Redwood Road is rejected due to high landscape impact. • Sidm_35 – Land at Sidford High Street is rejected due to a high landscape impact, negative effect on ecology.																	

Tier Three – Local Centres. Settlement: Broadclyst



Reasonable alternatives

- Brcl_12 - Land west of Whimple Road
- Brcl_22 - Land at Jarvishayes Farm
- Brcl_29 - Land to east of Town End

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, they are located within or adjacent to Broadclyst (and therefore consistent with the spatial strategy), are not already allocated in a 'made' Neighbourhood Plan, and do not currently have planning permission. The exception is Brcl_29, which is considered a reasonable alternative despite being unachievable in the HELAA, because it is considered there is potential to access the site.

For the reasons given, the following sites are not considered to be reasonable alternatives:

- Brcl_09 – Land at Heathfield (south east of Woodbury View) has already been allocated (for 16 dwellings) in the Broadclyst Neighbourhood Plan.
- Brcl_18 – Land at Church Lane is within a conservation area and surrounded on all sides by listed buildings, including the grade I listed St John the Baptist Church. The combination of these factors makes the site wholly unacceptable to be developed on heritage grounds alone.

Sites: Broadclyst				
Site / **SA Objective**	**Brcl_12**	**Brcl_22**	**Brcl_29**	
1. Biodiversity	**+ / -**	**+ / -**	**+ / -**	

Sites: Broadclyst				
Site / **SA Objective**	**Brcl_12**	**Brcl_22**	**Brcl_29**	
Biodiversity commentary	All sites are within both the Exe Estuary SPA HRA mitigation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone. The HRA also notes potential air quality impacts at East Devon Heaths SAC/SPA from increased traffic from sites at Broadclyst. Brcl_12 is adjacent to Nature Recovery Network and Section 41 Habitat of Principle Importance. These negative effects are mixed with a long-term minor positive effect from the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.			
2. Landscape	**-**	**-**	**-**	
Landscape commentary	All sites are likely to have a minor negative landscape effect. Brcl_12 is 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. Brcl_22 is a single greenfield site with mature hedgerows and trees to borders, and residential development to north, east, and west that provide some context of built form. Brcl_29 is adjacent to Brcl_12, comprised of a single greenfield site with mature hedgerows and trees to borders, residential development to west provides some context of built form but site is otherwise bordered by agricultural fields.			
3. Hist. built env	**-**	**- -**	**-**	
Hist. built env. commentary	Brcl_12 and 29 are affected by 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, leading to a minor negative effect overall. Grade II listed Priors Court (20m), multiple Grade II listed buildings and Broadclyst Conservation Area adjacent, mean a major negative effect for Brcl_22.			

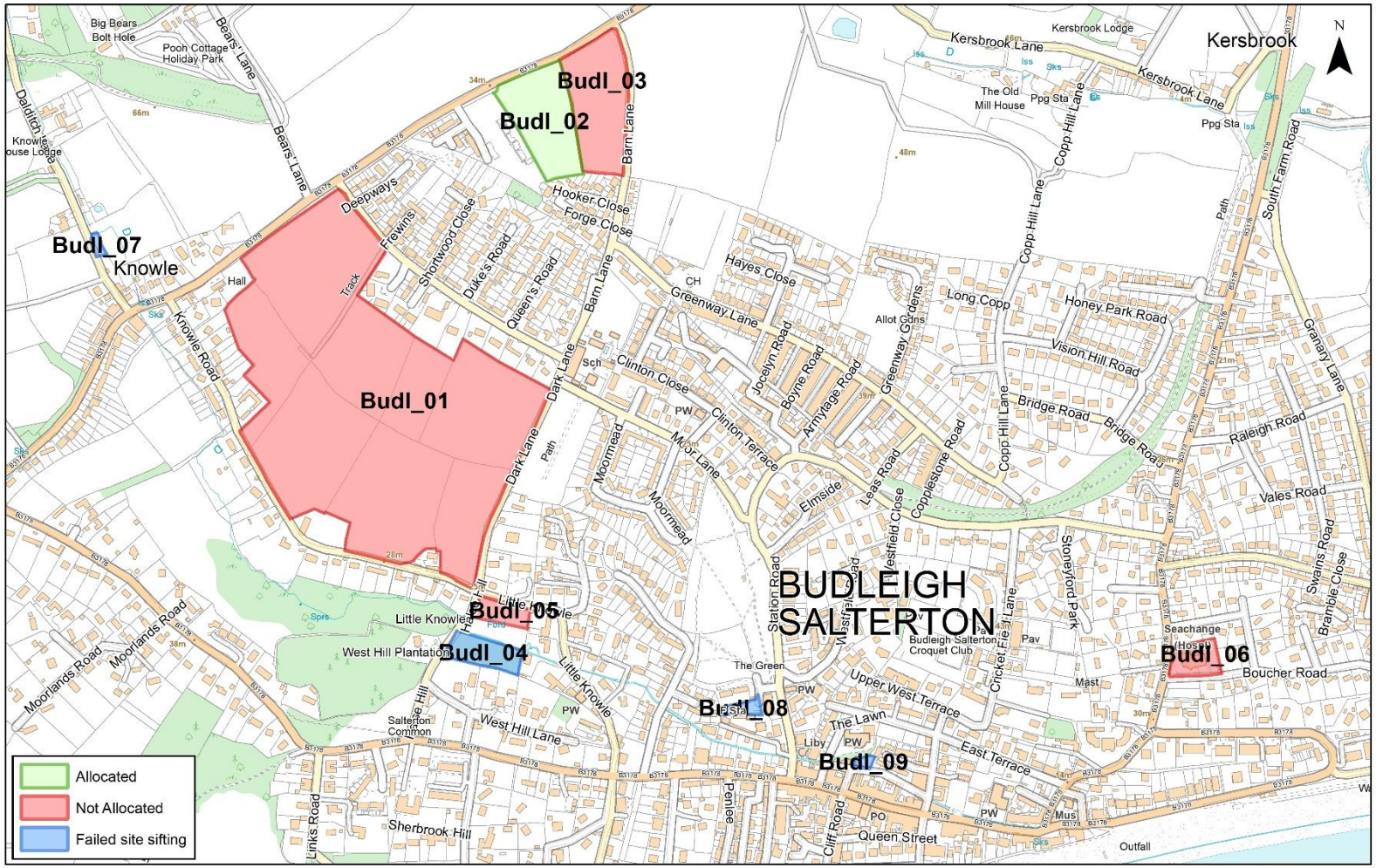
Sites: Broadclyst				
Site / **SA Objective**	**Brcl_12**	**Brcl_22**	**Brcl_29**	
4. Climate change carbon emissions	**+**	**+**	**+**	
Climate change carbon emissions commentary	All sites have 8 out of 12 facilities within 1,600m of site. A bus service runs every 20 mins through the settlement along the B3181 to a further range of jobs and facilities in Exeter. Primary school, shop and GP around 400m away from the sites. This potential to reduce travel and use sustainable travel links means a minor positive effect.			
5. Climate change adaptation	**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. Part of Brcl_12 is in flood zone 2 and has subsequently been given a neutral rating as development can avoid this area.			
6. Land resources	**- -**	**- -**	**- -**	
Land resources commentary	All sites are greenfield, on Grade 1 agricultural land, so a significant negative effect is likely.			
7. Water resources	**- ?**	**- ?**	**- ?**	

Sites: Broadclyst				
Site / **SA Objective**	**Brcl_12**	**Brcl_22**	**Brcl_29**	
Water resources commentary	No sites are located within a groundwater source protection zone. There is forecast to be marginal capacity exceedances at Countess Wear Wastewater Treatment Works, assuming development at Brcl_12, 29, although this may not take into planned investment so there is some uncertainty. South West Water forecast there will be adequate water supply.			
8. Homes	**+ +**	**+**	**+**	
Homes commentary	Major positive effect for Brcl_12 which can accommodate 100 dwellings, and a minor positive effect for the other sites. 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 within 100-200m of open space, with play area slightly further at 200-300m. There is limited noise and light pollution in the local area.			
10. Access to services	**+**	**+**	**+**	
Access to services commentary	All sites have 8 out of 12 facilities within 1,600m of site. A bus service runs every 20 mins through the settlement along the B3181 to a further range of jobs and facilities in Exeter. Primary school, shop and GP around 400m away from the sites.			
11. Jobs and employment	**+**	**-**	**+**	

Sites: Broadclyst				
Site / **SA Objective**	**Brcl_12**	**Brcl_22**	**Brcl_29**	
Jobs/employment commentary	Brcl_12 and 29 are within 1,600m of existing employment site, whilst the large size of Brcl_12 offers the potential for on-site employment uses. Brcl_22 is beyond 1,600m of existing employment site.			
12. Town centres	**-**	**-**	**-**	
Town centres commentary	All sites are beyond 1,600 metres of a town centre.			
13. Connectivity and transport	**+**	**+**	**+**	
Connectivity and transport commentary	All sites have 8 out of 12 facilities within 1,600m of site. A bus service runs every 20 mins through the settlement along the B3181 to a wide range of jobs and facilities in Exeter. Primary school, shop and GP around 400m away from the sites. Broadband speeds vary with 30-102 Mbps median speeds for area, all sites are assumed to have access to superfast broadband.			
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: • Development should conserve and enhance the settings of nearby designated heritage assets. • High quality design that respects the rural and historic character of the settlement will reduce negative effects and maximise beneficial effects on the built environment. Brcl_12 and 29 are adjacent to each other, so should be subject to a masterplan showing a comprehensive development scheme for both sites. • To minimise adverse landscape effects, built development at Brcl_12 should be focused on land north west of Winter Gardens and south of Lake Farm, where there is an existing context of built form.				

Sites: Broadclyst				
Site / **SA Objective**	**Brcl_12**	**Brcl_22**	**Brcl_29**	
• Potential requirement for capacity upgrades to Countess Wear Wastewater Treatment Works – Strategic Policy AR02 requires infrastructure improvements to overcome water quality issues. • 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. As Brcl_12 and 29 are adjacent to each other, a vehicle and pedestrian link should be provided between the sites. • 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. Brcl_12 and 29 are adjacent to each other, and their combined large scale justifies on-site employment. These site-specific mitigation measures have been incorporated for the sites that are allocated in Local Plan Strategic Policy SD07.				
Preferred alternative: Brcl_12 for 100 dwellings and 0.6 hectares of employment land; Brcl_29 for 24 dwellings and 0.1 hectares of employment land. **Reasons for preferred alternatives**: • Brcl_12 – Land west of Whimple Road is preferred as consistent with spatial strategy with limited adverse effects. • Brcl_29 – Land to east of Town End is preferred as consistent with spatial strategy with limited adverse effects. **Reasons for rejected sites:** • Brcl_22 – Land at Jarvishayes Farm is rejected due to major negative effect on the historic environment as the site is surrounded to three sides by the conservation area with a high presence of listed buildings.				

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

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, they are located within or adjacent to Budleigh Salterton (and therefore consistent with the spatial strategy), are not already allocated in a 'made' Neighbourhood Plan, and do not currently have planning permission.

For the reasons given, the following sites are not considered to be reasonable alternatives:

- Budl_04 is unachievable in the HELAA for the minimum site size of five dwellings due to protected trees.
- Budl_07 is below site size threshold so not suitable in the HELAA.
- Budl_08 has uncertainty on whether land is truly available as currently in use as an EDDC car park – further work is required to assess the need for parking before its redevelopment is considered.
- Budl_09 is below site size threshold so not suitable in the HELAA.

Sites: Budleigh Salterton						
Site / **SA Objective**	**Budl_01**	**Budl_02**	**Budl_03**	**Budl_05**	**Budl_06**	
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 within 40m of a county wildlife site. The HRA also notes potential air quality impacts at East Devon Heaths SAC/SPA from increased traffic from sites at Budleigh Salterton. These negative effects are mixed with a long-term minor positive effect from the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.					
2. Landscape	**- -**	**- -**	**- -**	**- -**	**+**	
Landscape commentary	Budl_01, 02, 03 and 05 are within the East Devon National Landscape and are highly sensitive to change. Budl_06 is also in the National Landscape, which washes over the town, but given the urban context there is potential for landscape improvement.					
3. Hist. built env	**-**	**-**	**-**	**-**	**0**	
Hist. built env. commentary	With the exception of Budl_06 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 – all of the Budleigh Salterton sites are within 1600 metres of 8 of these, generally along safe and convenient pedestrian and cycle					

Sites: Budleigh Salterton						
Site / SA Objective	Budl_01	Budl_02	Budl_03	Budl_05	Budl_06	
	routes, although for Budl_05 the only option is to use narrow lanes with no pavement. Budl_06 is particularly well related to the town centre.					
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. 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 of 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 is a brownfield site in the urban area.					
7. Water resources	-	-	-	0 ?	0 ?	
Water resources commentary	South West Water forecast there will be adequate water supply; and Maer Lane Wastewater Treatment Works has sufficient capacity and environmental permit limits for the proposed development site (Budl_02) at Budleigh Salterton (Water Cycle Study, November 2025), but uncertainty for the other sites. Therefore, a neutral uncertain effect is likely for Budl_05, 06. However, Budl_01, 02 and 03 are in water source protection zones so a minor negative effect.					
8. Homes	+	+	+	+	+	

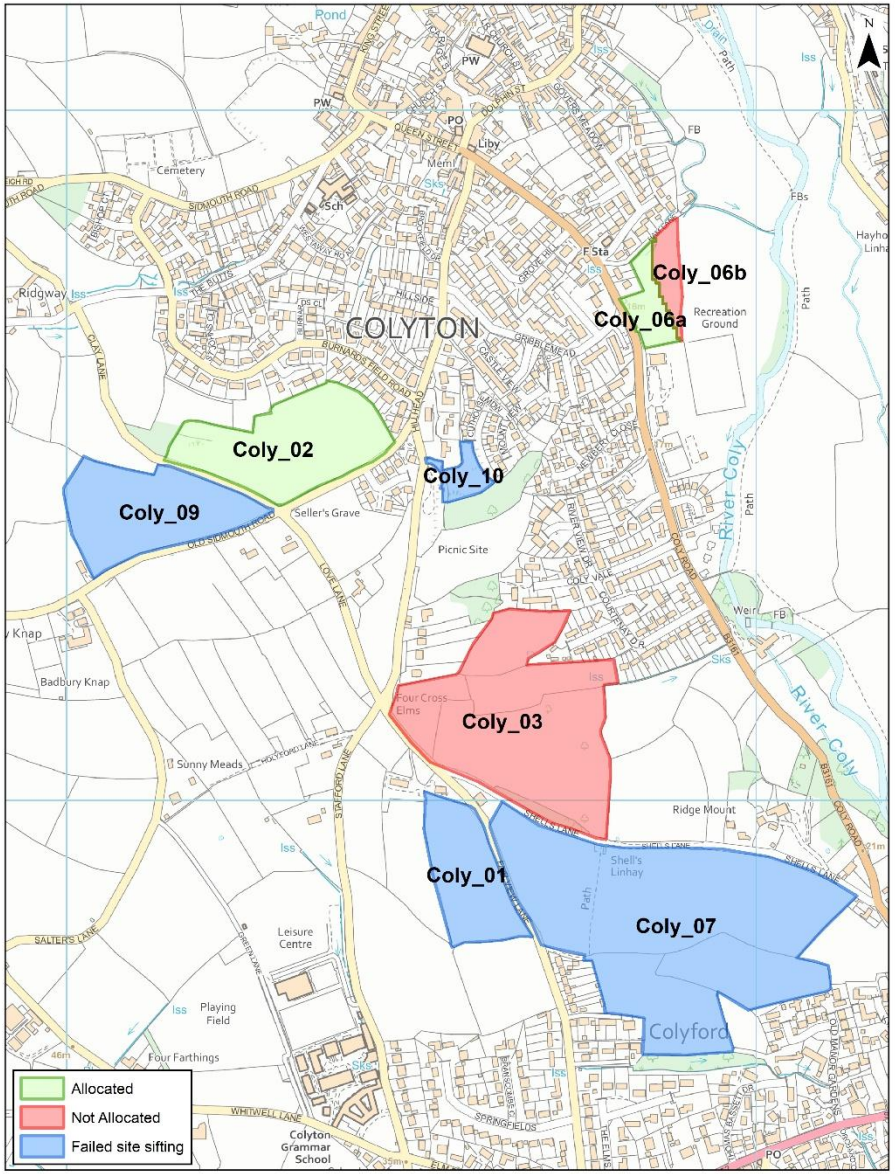
Sites: Budleigh Salterton						
Site / **SA Objective**	**Budl_01**	**Budl_02**	**Budl_03**	**Budl_05**	**Budl_06**	
Homes commentary	Only Budl_01 has a maximum yield in the HELAA of over 100 dwellings and this has been reduced to 50 through site assessment work so a positive effect is given to all sites. An appropriate mix of tenures and sizes including affordable housing is assumed for all sites.					
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. Developing Budl_06 would result in the loss of its current use as a health and well-being hub, so a major negative effect.					
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. Developing Budl_06 would result in the loss of its current use as a health and well-being hub, so a major negative effect.					
11. Jobs and employment	**+**	**+**	**+**	**+**	**+ / - -**	

Sites: Budleigh Salterton						
Site / **SA Objective**	**Budl_01**	**Budl_02**	**Budl_03**	**Budl_05**	**Budl_06**	
Jobs/employment commentary	All sites are within 1600 metres of an employment site and the town centre. This positive is mixed with a major negative effect for Budl_06 as it would result in the loss of its current use as a health and well-being hub.					
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.					
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.					
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 Further mitigation measures may be necessary on Budl_01 and 05 given their proximity to a county wildlife site. • Considerable landscaping and high quality design 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 major 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 – at Budl_02, the design should avoid adverse impacts upon Grade II* listed Tidwell House. High quality design across all sites can reduce negative effects and maximise beneficial effects on the built environment.						

Sites: Budleigh Salterton						
Site / SA Objective	Budl_01	Budl_02	Budl_03	Budl_05	Budl_06	
• All sites have relatively good access to facilities, but these beneficial effects can be maximised by enhancing sustainable travel links e.g. provision of safe footpath access to Budleigh primary school from Budl_02. • 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. These site-specific mitigation measures have been incorporated for the site that is allocated in Local Plan Strategic Policy SD08.						
Preferred alternatives: Budl_02 for 35 dwellings. **Reasons for preferred alternatives:** • Budl_02 – land at Barn Lane, Knowle is preferred as consistent with spatial strategy with good access to facilities. This site is major development in a National Landscape for which there are considered to be exceptional circumstances. **Reasons for rejected sites:** • Budl_01 – land adjacent to Clyst Hayes farmhouse is rejected due to major adverse landscape impact, being a large site in the East Devon National Landscape and its allocation would constitute 'major' development in a National Landscape for which there are not considered to be "exceptional circumstances"; located within the Green Wedge; and is Grade 1 agricultural land. • Budl_03 – land at Barn Lane is rejected as a prominent site within the East Devon National Landscape that is considered to be highly susceptible to change that would be difficult to mitigate. Allocation would constitute 'major' development in a National Landscape for which there are not considered to be "exceptional circumstances". It would also mean loss of Grade 1 agricultural land and potential impact on the setting of a Grade II* listed building. • Budl_05 – Little Knowle is rejected due to constraints that limit the site capacity to less than five dwellings minimum for site allocations.						

Sites: Budleigh Salterton						
Site / SA Objective	Budl_01	Budl_02	Budl_03	Budl_05	Budl_06	
• Budl_06 – Budleigh Salterton Community Hospital is rejected as development would lead to the loss of its current use by the NHS as a health and wellbeing hub, providing local employment and a community facility.						

Settlement: Colyton



Reasonable alternatives

- Coly_02 – Land at Hillhead
- Coly_03 – Land adjacent Fair View Lane
- Coly_06a – Land adjacent to the Peace Memorial Playing Fields

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, they are located within or adjacent to Colyton (and therefore consistent with the spatial strategy), are not already allocated in a 'made' Neighbourhood Plan, and do not currently have planning permission.

For the reasons given, the following sites are not considered to be reasonable alternatives:

- Coly_01 is not adjoining or not well related to Colyton.
- Coly_06b is within flood zone 3.
- Coly_07 is not adjoining or not well related to Colyton.
- Coly_09 is not adjoining or not well related to Colyton.
- Coly_10 is unachievable in the HELAA because of poor access.

Sites: Colyton				
Site / **SA Objective**	**Coly_02**	**Coly_03**	**Coly_06a**	
1. Biodiversity	**+ / -**	**+ / -**	**+ / -**	
Biodiversity commentary	All sites are within the Beer Quarry Caves SAC consultation area. These negative effects are mixed with a long-term minor positive effect from the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.			
2. Landscape	**- -**	**- -**	**+**	
Landscape commentary	Coly_02 and 03 have a medium high sensitivity to changes, with inter-visibility with the East Devon National Landscape. Coly_06a lies adjacent to a busy road and opposite/adjacent to established development where there is a low sensitivity to experiential change.			
3. Hist. built env	**0**	**0**	**0**	
Hist. built env. commentary	Coly_03 and 06 are both 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 – all 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.			

Sites: Colyton				
Site / **SA Objective**	**Coly_02**	**Coly_03**	**Coly_06a**	
5. Climate change adaptation	**+**	**+**	**-**	
Climate change adaptation commentary	Coly_02 and 03 are not located in an area of flood risk or critical drainage area. Coly_06a is mostly within flood zone 2, to the extent that it was included in the Strategic Flood Risk Assessment Level 2, which sets out further detail on key points and constraints to be considered through a site-specific Flood Risk Assessment, so a minor negative effect.			
6. Land resources	**- ?**	**- ?**	**- ?**	
Land resources commentary	All 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	South West Water forecast there will be adequate water supply; but the treatment and environmental permit capacity of Colyton Wastewater Treatment Works is forecast to be exceeded by proposed development (Coly_02, 06a) at the settlement, and development cannot proceed without upgrades to the WwTW (Water Cycle Study, November 2025). However, the WCS incorrectly assumes an additional 72 dwellings in Colyton, so there is some uncertainty on these findings.			
8. Homes	**+**	**+**	**+**	
Homes commentary	All sites have the potential to provide new homes (less than 100 dwellings), with an appropriate mix of tenures and sizes including affordable housing.			

Sites: Colyton				
Site / **SA Objective**	**Coly_02**	**Coly_03**	**Coly_06a**	
9. Health and well-being	+	+	+	
Health and well-being commentary	The sites are not 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, notably Coly_06a which is adjacent to a playing field and play area beyond.			
10. Access to services	+	+	+	
Access to services commentary	The sites are within 800 metres of key services and facilities, but steep topography for Coly_02 and 03 limit attractiveness for walking and cycling. Coly_06a is a level walk to the settlement centre.			
11. Jobs and employment	+	+	+	
Jobs/employment commentary	All sites are within 1600 metres of an employment site and Colyton Town Centre.			
12. Town centres	+	+	+	
Town centres commentary	All sites are within 800 metres of a town centre, but it is relatively small with a limited range of shops and other uses, reducing a major positive to a minor positive effect.			

Sites: Colyton				
Site / **SA Objective**	**Coly_02**	**Coly_03**	**Coly_06a**	
13. Connectivity and transport	**+ / -**	**+**	**+**	
Connectivity and transport commentary	Average broadband speeds are not consistently over 30 mbps but all sites are within 1600 metres of an hourly bus route, an A road and a national cycle route. The access roads to Coly_02 are narrow, currently only fit for single vehicular width, so this positive is mixed with a negative effect.			

Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects:

- Mitigate impact on Beer Quarry Caves SAC bats to be considered in the Habitats Regulations Assessment.
- Considerable landscaping of Coly_02 and 03 would be required due to negative effects upon the landscape, but the sensitivity is such that a negative effect is likely to remain.
- Highway improvements at Coly_02 due to narrow access roads.
- Part of Coly_06 is at risk of flooding, and the level 2 SFRA should inform the development of this site.
- Subject to the Water Cycle Study reviewing the scale of development at Colyton, there is potential for significant capacity upgrades to be required to Colyton Wastewater Treatment Works – Strategic Policy AR02 requires infrastructure improvements to overcome water quality issues.

These site-specific mitigation measures have been incorporated for the sites that are allocated in Local Plan Strategic Policy SD09.

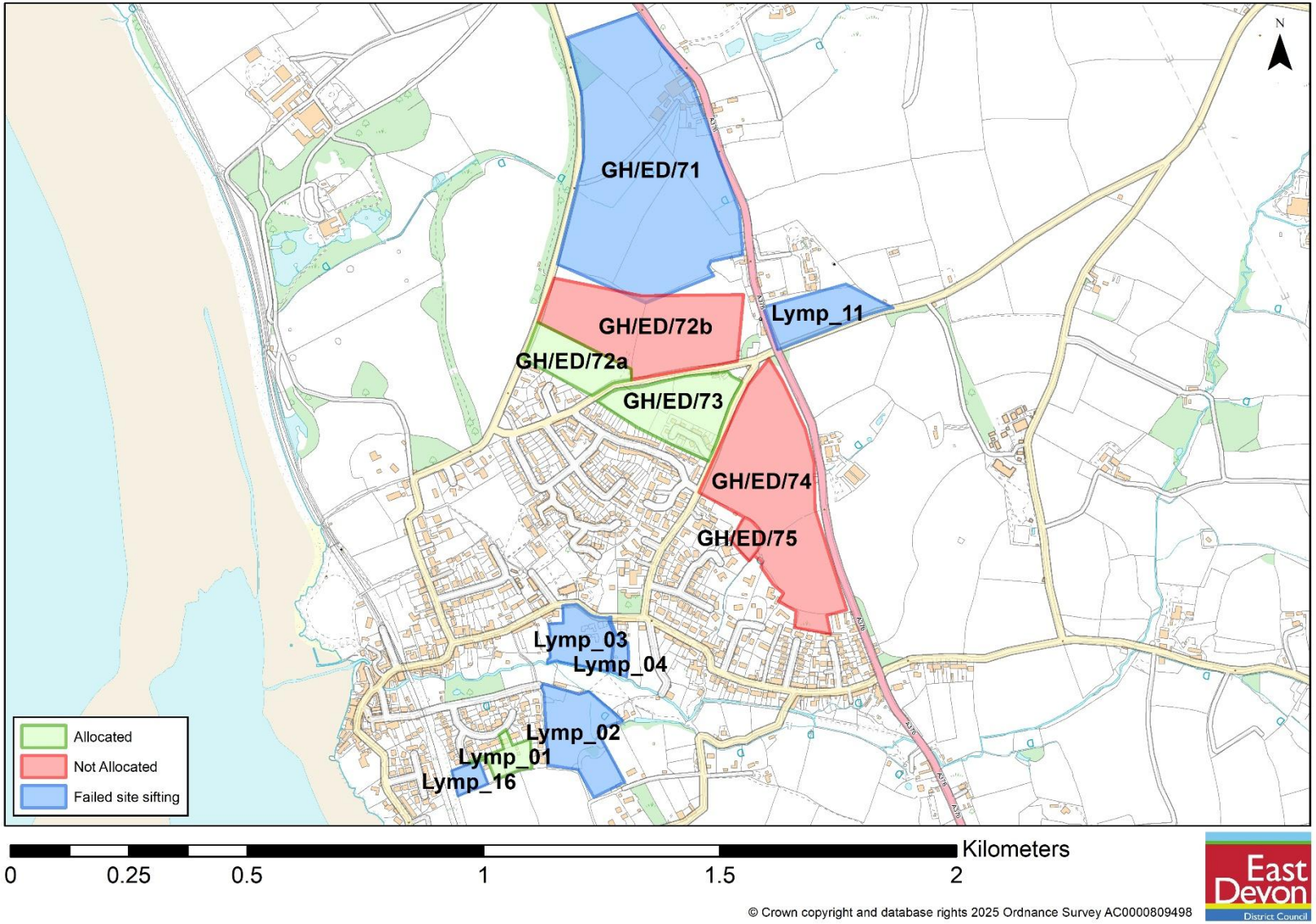
Preferred alternatives: Coly_02 for 49 dwellings; Coly_06a for 12 dwellings.

Reasons for preferred alternatives:

- Coly_02 – Land at Hillhead is preferred because it is consistent with spatial strategy, has good access to services/facilities and minimises the

Sites: Colyton				
Site / SA Objective	Coly_02	Coly_03	Coly_06a	
• Coly_06a – Land adjacent to the Peace Memorial Playing Fields is preferred as it is consistent with spatial strategy, well located for facilities and services, with low landscape impact in a context of built development from existing housing to the north and west. **Reasons for rejected sites:** • Coly_03 – land adjacent Fair View Lane is rejected because the site has a high/medium landscape sensitivity to new development.				

Settlement: Lympstone



Reasonable alternatives

- Lymp_01 – Little Paddocks, 22 Underhill Crescent
- GH/ED/72 – Land at Meeting Lane
- GH/ED/73 – Land north west of Strawberry Hill
- GH/ED/74 – Land at Strawberry Hill

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, they are located within or adjacent to Lympstone (and therefore consistent with the spatial strategy), are not already allocated in a 'made' Neighbourhood Plan, and do not currently have planning permission.

For the reasons given, the following sites are not considered to be reasonable alternatives:

- Lymp_02 – Land lying to the north of Clay Lane, is probably unachievable in the HELAA due to poor access.
- Lymp_03 – Lympstone Nurseries, Church Road, has been constructed.
- Lymp_04 – Land to the south of Meadowgate Cottage, Church Road, is probably unachievable in the HELAA due to poor access.
- Lymp_16 – Temporary car park, end of Underhill Crescent, already has planning permission, and was submitted for 2-3 dwellings in the HELAA which is below the site capacity threshold so not suitable in the HELAA.
- GH/ED/71 – Gulliford Farm, Exmouth Road, is not within or adjacent, or otherwise well-related, to Lympstone.
- GH/ED/75 – Land off Grange Close – following further assessment, the local characteristics of low density, urban fringe, development means that the standard HELAA yield of six dwellings should be reduced to three – below the threshold of five dwellings to be considered for allocation in the Local Plan.

Note that during the process of Local Plan and SA preparation, site GH/ED/73 has been granted planning permission.

Sites: Lympstone					
Site / **SA Objective**	**Lymp_01**	**GH/ED/72**	**GH/ED/73**	**GH/ED/74**	
1. Biodiversity	**+ / -**	**+ / -**	**+ / -**	**+ / -** **-**	
Biodiversity commentary	All sites are within both the Exe Estuary SPA HRA mitigation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone, leading to a minor negative effect. In addition, the HRA notes potential air quality impacts at East Devon Heaths SAC/SPA from increased traffic from sites at Lympstone. Lymp_01 is around 75m from the draft Nature Recovery Network, and Section 41 Habitat of Principle Importance. GH/ED/72 is adjacent to an Unconfirmed Wildlife Site (Nutwell Park), with draft Nature Recovery Network and Section 41 Habitat of Principle Importance on site. GH/ED/73 is close to an Unconfirmed Wildlife Site across Strawberry Lane, with the draft Nature Recovery Network 25m away. GH/ED/74 is covered by an Unconfirmed Wildlife Site, with the draft Nature Recovery Network and Section 41 Habitat of Principle Importance around 25m away, so a major negative effect. These negative effects are mixed with a long-term minor positive effect from the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.				
2. Landscape	**0**	**- -**	**-**	**- -**	
Landscape commentary	Lymp_01 is a fairly level garden and field adjacent to Coastal Preservation Area. Site features multiple small parcels of land with some garden areas with mature trees across site, and mature hedgerows throughout. Small scale site with existing dwellings around provide a built context, and overall, low landscape sensitivity to new development. GH/ED/72 is entirely within the Coastal Preservation Area. Site comprises two rectangular agricultural fields on a gentle slope upwards from south to north, bounded by				

Sites: Lympstone					
Site / SA Objective	Lymp_01	GH/ED/72	GH/ED/73	GH/ED/74	
	mature trees and hedgerows. The southern part of west field is slightly contained within a 'bowl' with a ridge to north, but the northern part and the east field are higher, more open and more exposed. GH/ED/73 is entirely within the Coastal Preservation Area. Three level irregularly shaped fields bounded by hedgerows and mature trees. Enclosed by two lanes on the NE edge of Lympstone, with existing dwellings along southern boundary and to NE, medium landscape sensitivity. GH/ED/74 is 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. Parkland with field trees landcover. Little context of existing built form, despite being located on the edge of the settlement, medium-high landscape sensitivity.				
3. Hist. built env	**0**	**-**	**-**	**-**	
Hist. built env. commentary	No heritage assets would be affected by developing Lymp_01. GH/ED/72 has three assets within 100m (Grade II listed Boundary Cottage, Grade II Listed Burial Ground, Grade II listed Gulliford Cottages), with Grade II* listed Nutwell Cottages (569m), Grade II* listed Nutwell Court (459m), outbuilding, and curtilage beyond the site to the west. GH/ED/73 has the Grade II listed Boundary Cottage, Grade II Listed Burial Ground, within 100m. GH/ED/74 has four assets within 100m: Grade II listed Boundary Cottage (51m), Grade II Listed Burial Ground (25m), Grade II listed Thorn Farm (27m), Grade II listed Crooks Court (34m). This means a minor negative effect for GH/ED/72, 73, 74.				
4. Climate change carbon emissions	**+**	**+**	**+**	**+**	

Sites: Lympstone					
Site / **SA Objective**	**Lymp_01**	**GH/ED/72**	**GH/ED/73**	**GH/ED/74**	
Climate change carbon emissions commentary	All sites offer the potential to minimise carbon emissions by reducing travel and access to sustainable travel links, with 8 out of 12 facilities within 1,600m of the sites. Lymp_01 – Nearest train station 320m, nearest bus stop / service 668m, nearest hourly bus stop / service 626m, nearest primary 318m, nearest convenience store 233m. GH/ED/72, 73, 74 are all on an existing bus route with a 15 minute service to Exeter City Centre, with a train station around 650m away in Lympstone Village, the nearest primary school and shop both 600m away.				
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. GH/ED/72 and 74 has a neutral effect as the site is partially located in an area of flood risk, but development can avoid this area.				
6. Land resources	**- ?**	**- - ?**	**- - ?**	**- ?**	
Land resources commentary	Lymp_01 and GH/ED/74 comprise Grade 3 agricultural land. GH/ED/72 and 73 comprise a mix of Grade 1 and Grade 3 agricultural land, so uncertain major negative effect.				
7. Water resources	**0**	**0**	**0**	**0 ?**	

Sites: Lympstone					
Site / **SA Objective**	**Lymp_01**	**GH/ED/72**	**GH/ED/73**	**GH/ED/74**	
Water resources commentary	No sites are located within a groundwater source protection zone. South West Water forecast there will be adequate water supply; and Maer Lane Wastewater Treatment Works has sufficient capacity and environmental permit limits for the proposed development sites (Lymp_01, GH/ED/72, 73) at Lympstone (Water Cycle Study, November 2025), but uncertainty for the other sites. Therefore, a neutral effect is likely for these sites, with uncertainty for the others. 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	Lymp_01 – 14 dwellings max yield; GH/ED/72 - 131 dwellings max yield; GH/ED/73 – 46 dwellings max yield; GH/ED/74 – 141 dwellings max yield. Major positive where site offers maximum yield of greater than 100 dwellings. All other sites have potential to deliver up to 100 dwellings with a minor 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 within 800m of open space and play areas, but they are affected by noise, meaning a mixed positive and negative effect. Lymp_01 – Open Space 98m, Play Area 381m, 100m from railway with noise. GH/ED/72 - Open Space 600m, Play Area 200m, close proximity to busy A376 with noise. GH/ED/73 – Open Space 500m, Play Area 200m, close proximity to busy A376 with noise. GH/ED/74 - Open Space 500m, Play Area 300m, close proximity to busy A376 with noise				

Sites: Lympstone					
Site / **SA Objective**	**Lymp_01**	**GH/ED/72**	**GH/ED/73**	**GH/ED/74**	
10. Access to services	**+**	**+**	**+**	**+**	
Access to services commentary	All sites are within close proximity to a range of services, with 8 out of 12 facilities within 1,600m. However, footpaths are lacking at some points, so a minor positive rather than major. Lymp_01 – Nearest train station 320m, nearest hourly bus stop / service 626m, nearest primary 318m, nearest convenience store 233m. GH/ED/72 is on an existing bus route with a 15 minute service to Exeter City Centre, with the train station around 650m away in Lympstone Village. Nearest primary school and convenience store are both 600m away. GH/ED/73 is on an existing bus route with a 15 minute service to Exeter City Centre, with the train station around 650m away. Nearest primary school is 500m, nearest convenience store is 550m. GH/ED/74 is on an existing bus route with a 15 minute service to Exeter City Centre, the train station is around 650m away. Nearest primary school 500m, nearest convenience store 550m.				
11. Jobs and employment	**-**	**+**	**+**	**+**	
Jobs/employment commentary	There are no employment sites within 1,600m of Lymp_01. The other sites have realistic potential to accommodate employment on site due to scale of site with potential for good access to the A376.				
12. Town centres	**-**	**-**	**-**	**-**	

Sites: Lympstone					
Site / **SA Objective**	**Lymp_01**	**GH/ED/72**	**GH/ED/73**	**GH/ED/74**	
Town centres commentary	All sites are beyond 1,600m of an existing town centre.				
13. Connectivity and transport	**+ +**	**+ +**	**+ +**	**+ +**	
Connectivity and transport commentary	All sites are within 800m of a train station, hourly bus service and cycle route, with superfast broadband (35-80 Mbps median speeds for area) also available. This means a major positive effect. Lymp_01 – Nearest train station 320m, nearest hourly bus stop / service 626m. GH/ED/72 is on an existing bus route with a 15 minute service to Exeter City Centre, and the train station located approximately 650m away. GH/ED/73, 74 are on an existing bus route with a 15 minute service to Exeter City Centre. The nearest train station is located approximately 650m away.				

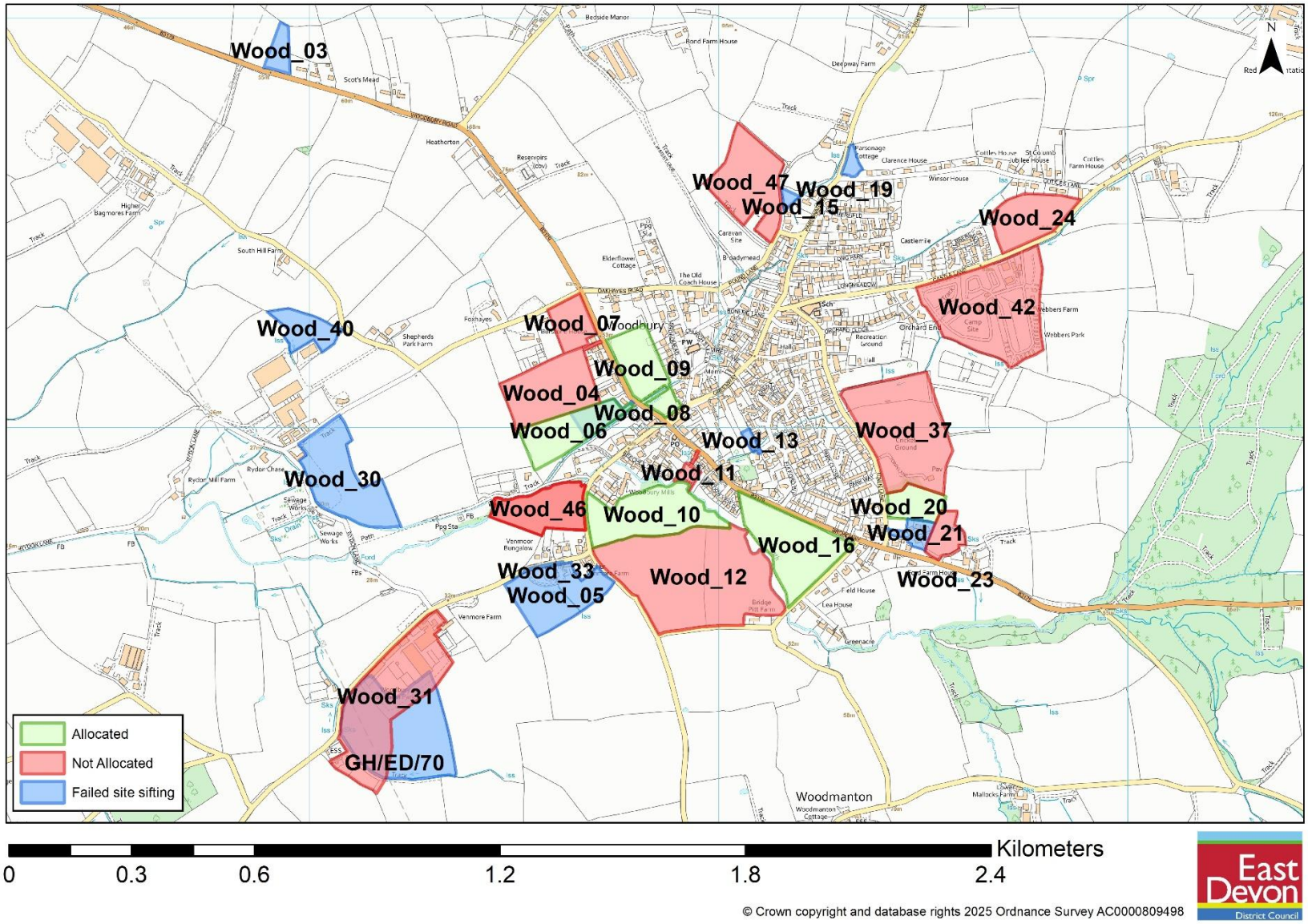
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects:

- Additional tree planting along the southern boundary of Lymp_01 would minimise any adverse landscape impacts.
- There is potential to allocate the south western part of GH/ED/72 for development, adjacent to existing dwellings and better contained within the existing landform than the rest of the site. This reduced site (GH/ED/72a) will have a minor negative effect on the landscape, recommend tree planting along the western and northern edge to mitigate the impact upon Nutwell Park.
- Part of GH/ED/72 is at risk of flooding and the results of the SFRA Level 2 should be incorporated into the development.
- The reduction in site area to GH/ED/72a means a lower housing yield (around 42 dwellings), so a minor positive effect rather than major positive for the larger GH/ED/72 on objective 8.
- At GH/ED/73, built development should avoid the triangular central area that is a “lost” orchard and ridge and furrow.

Sites: Lympstone					
Site / **SA Objective**	**Lymp_01**	**GH/ED/72**	**GH/ED/73**	**GH/ED/74**	
• 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. Specifically, a pedestrian link from GH/ED/72a and GH/ED/73 should connect to the existing footpath on Meeting Lane. • 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. These site-specific mitigation measures have been incorporated for the sites that are allocated in Local Plan Strategic Policy SD10.					
Preferred alternatives: Lymp_01 for 8 dwellings; GH/ED/72a for 42 dwellings; GH/ED/73 for 42 dwellings. **Reasons for preferred alternatives:** • Lymp_01 – Little Paddocks, 22 Underhill Crescent is preferred as it is consistent with the spatial strategy in an accessible location with a low impact on the landscape and historic environment, and a minor adverse ecological impact that can be mitigated with relative ease through the planning application process. • GH/ED/72a – Land at Meeting Lane is preferred as it is consistent with the spatial strategy in an accessible location. Landscape impact is reduced by being adjacent to existing dwellings and relatively well contained within the existing landform. • GH/ED/73 – Land north west of Strawberry Hill is preferred as it is consistent with the spatial strategy in an accessible location, with medium landscape sensitivity and minor adverse ecological impact that can be mitigated with relative ease through the planning application process.					

Sites: Lympstone					
Site / **SA Objective**	**Lymp_01**	**GH/ED/72**	**GH/ED/73**	**GH/ED/74**	
Reasons for rejected sites: • GH/ED/72b – Land at Meeting Lane is rejected due to adverse landscape impact, and adverse impact on the historic environment with 3x Grade II listed assets within 100m, and potential harm to Nutwell Court, an attractive parkland around a Grade II* country house adjacent to west boundary. • GH/ED/74 – Land at Strawberry Hill is rejected due to adverse landscape impact; adverse impact on historic environment with 3x Grade II listed buildings within 100m; it is an Unconfirmed Wildlife Site with a significant moderate adverse effect on ecology; poor pedestrian accessibility. In addition, whilst the site in isolation accords with the spatial strategy, when combined with other (more preferable) sites, the level of growth is too high and would not be consistent with the spatial strategy.					

Settlement: Woodbury



Reasonable alternatives

- Wood_04 – Land off Globe Hill
- Wood_06 – Land to the rear of Orchard House, Globe Hill
- Wood_07 – Land off 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_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
- Wood_47 – Land at Pound Lane
- Wood_31 – Land adjoining Woodbury Business Park (employment only)

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, they are located within or adjacent to Woodbury (and therefore consistent with the spatial strategy), are not already allocated in a 'made' Neighbourhood Plan, and do not currently have planning permission. Wood_31 is adjacent to an existing employment use (Woodbury Business Park) where the emerging Local Plan supports employment development subject to meeting certain criteria.

For the reasons given, the following sites are not considered to be reasonable alternatives:

- Wood_03 is not within or adjacent, or otherwise well-related, to Woodbury.
- Wood_05 is not within or adjacent, or otherwise well-related, to Woodbury (overlaps with Wood_33).
- Wood_08 overlaps with Wood_06.
- Wood_13 is below site size threshold so not suitable in the HELAA.
- Wood_14 overlaps with Wood_47 (Wood_14 being a smaller part of the field that comprises Wood_47).
- Wood_15 is below site size threshold so not suitable in the HELAA.
- Wood_19 not suitable in the HELAA due to high pressure gas pipeline zone underneath the site.
- Wood_21 already has planning permission.
- Wood_30 is not within or adjacent, or otherwise well-related, to Woodbury.
- Wood_40 is not within or adjacent, or otherwise well-related, to Woodbury.
- Wood_33 is not within or adjacent, or otherwise well-related, to Woodbury (overlaps with Wood_05).
- GH/ED/70 overlaps Wood_31.

Sites: Woodbury																		
Site / **SA Objective**	**Wood_04**	**Wood_07**	**Wood_06**	**Wood_09**	**Wood_10**	**Wood_11**	**Wood_12**	**Wood_47**	**Wood_16**	**Wood_19**	**Wood_20**	**Wood_23**	**Wood_24**	**Wood_37**	**Wood_42**	**Wood_46**	**Wood_31**	
1. Biodiversity	**+ / -**	**+ / -**	**+ / -**	**+ / -**	**+ / -**	**+ / -**	**+ / -**	**+ / -**	**+ / -**	**+ / -**	**+ / -**	**+ / -**	**+ / -**	**+ / -**	**+ / -**	**+ / -**	**+ / 0**	
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. In addition, the HRA notes potential air quality impacts at East Devon Heaths SAC/SPA from increased traffic from sites at Woodbury.																	

Sites: Woodbury																	
Site / SA Objective	Wood_04	Wood_07	Wood_06	Wood_09	Wood_10	Wood_11	Wood_12	Wood_47	Wood_16	Wood_19	Wood_20	Wood_23	Wood_24	Wood_37	Wood_42	Wood_46	Wood_31	
	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_31 proposed use for employment development means a limited effect compared to residential. Wood_04, 07, 06, 10, 12, 16, 24 and 46 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, 47, 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. These negative effects are mixed with a long-term minor positive effect from the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.																
2. Landscape	- -	- -	-	-	-	+	- -	-	-	-	-	-	- -	-	+	- -	-	
Landscape commentary	Wood_04 and 07 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. Wood_06 adjoins built development to its east and south, but countryside to north and west. 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 Conservation Area and Grade I listed church overlooking site to east. 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																

Sites: Woodbury																	
Site / SA Objective	Wood_04	Wood_07	Wood_06	Wood_09	Wood_10	Wood_11	Wood_12	Wood_47	Wood_16	Wood_19	Wood_20	Wood_23	Wood_24	Wood_37	Wood_42	Wood_46	Wood_31	
	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. Wood_47 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. Wood_19 adjoins dwellings to the south, with public views limited into site due to boundary trees and thick hedgerow, and a rural character. 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 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 National Landscape is around 500m to the east. Wood_46 is a large, level, arable field adjoining the western tip of Woodbury with open, short distance views of the site from the public right of way to the north of the site. The site protudes into open countryside, with limited context of built form, so major negative effect.																

Sites: Woodbury																		
Site / SA Objective	Wood_04	Wood_07	Wood_06	Wood_09	Wood_10	Wood_11	Wood_12	Wood_47	Wood_16	Wood_19	Wood_20	Wood_23	Wood_24	Wood_37	Wood_42	Wood_46	Wood_31	
	Wood_31 is a rolling portion of a larger field in arable cultivation. Bounded by historic hedgerow on north west and west boundary. Woodbury Business Park is adjacent to the north, bounded by modern planting with fields on other sides of the site, with a single carriageway road adjacent to north west.																	
3. Hist. built env	-	-	-	- -	-	-	-	-	-	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. Woodbury has a historic core covered by a Conservation Area and numerous listed buildings, most notably the Grade I listed church. Wood_04, 07, 06, 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, so 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. 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_47 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. 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 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. Wood_46 has Woodbury Conservation Area 30m to NE but intervening trees mean limited intervisibility, also with two Grade II listed buildings 90m to east and 65m to south, but intervening dwellings mean no adverse impact upon these assets. Grade II listed Venmore Farm is around 110m from NE edge of Wood_31, but the intervening Woodbury																	

Sites: Woodbury																		
Site / **SA Objective**	**Wood_04**	**Wood_07**	**Wood_06**	**Wood_09**	**Wood_10**	**Wood_11**	**Wood_12**	**Wood_47**	**Wood_16**	**Wood_19**	**Wood_20**	**Wood_23**	**Wood_24**	**Wood_37**	**Wood_42**	**Wood_46**	**Wood_31**	
	Business Park, existing mature trees to the south of the Grade II listed Venmore Farm, and distance (over 100m) all limit/obscure views between the site and the listed building.																	
4. Climate change carbon emissions	**+**	**+**	**+**	**+**	**0**	**+**	**-**	**+**	**+**	**+**	**0**	**0**	**0**	**0**	**0**	**0**	**- -**	
Climate change carbon emissions commentary	All sites in Woodbury are located within 1,600m of 10 out of the 12 services, facilities and employment 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, 06, 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_47 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. Car travel is the only realistic means of travel for people travelling to work at Wood_31, and to access facilities elsewhere, due to its countryside location with no bus service and a narrow,																	

Sites: Woodbury																		
Site / SA Objective	**Wood_04**	**Wood_07**	**Wood_06**	**Wood_09**	**Wood_10**	**Wood_11**	**Wood_12**	**Wood_47**	**Wood_16**	**Wood_19**	**Wood_20**	**Wood_23**	**Wood_24**	**Wood_37**	**Wood_42**	**Wood_46**	**Wood_31**	
	winding road adjacent to the business park that is likely to deter cyclists. Pedestrians could potentially use the public right of way 300m north via Rydon Lane to access Woodbury, but this is not hard surfaced for regular use.																	
5. Climate change adaptation	**+**	**+**	**0**	**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_06, 09 and 42 are within flood zone 3 and also have high surface water flood risk, but development can avoid these areas. 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. 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_47, 19, 20, 23 and 24 are not affected by flood risk, so will have a positive effect. Flood Zone 3 covers northern part of Wood_46, overlapping with surface water flood risk, so net area of 0.95 ha and yield reduced accordingly, and a minor negative effect. Slither of 1/30 year surface water flood risk crosses western part of Wood_31.																	
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, 06, 09, 47, 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, 46 and 31 are all greenfield sites on Grade 3 agricultural land, which could be 3a (best and most versatile), so uncertain negative effect for these sites.																	

Sites: Woodbury																		
Site / SA Objective	Wood_04	Wood_07	Wood_06	Wood_09	Wood_10	Wood_11	Wood_12	Wood_47	Wood_16	Wood_19	Wood_20	Wood_23	Wood_24	Wood_37	Wood_42	Wood_46	Wood_31	
7. Water resources	- ?	- ?	-	-	-	- ?	- ?	- ?	-	- ?	-	- ?	- ?	- ?	- ?	- ?	- ?	
Water resources commentary	South West Water forecast there will be adequate water supply; but the capacity of Woodbury Wastewater Treatment Works is forecast to be exceeded by proposed development at the settlement (Wood_06, 09, 10, 16, 20), albeit environment permit compliance is sufficient (Water Cycle Study, November 2025). Therefore, a negative effect is likely for these sites, with uncertainty for the others. 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 sensitivity and classification as “moderate” quality.																	
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. Wood_31 is proposed for employment uses and will not provide homes; so a major negative effect.																	
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, 06, 09, 16 and 23 are located adjacent to the B3179, meaning potential																	

Sites: Woodbury																		
Site / **SA Objective**	**Wood_04**	**Wood_07**	**Wood_06**	**Wood_09**	**Wood_10**	**Wood_11**	**Wood_12**	**Wood_47**	**Wood_16**	**Wood_19**	**Wood_20**	**Wood_23**	**Wood_24**	**Wood_37**	**Wood_42**	**Wood_46**	**Wood_31**	
	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. Wood_46 is located in an area of the least deprived 10% neighbourhoods in England, so development will not be located in an area of higher deprivation. Within 800m of a children's play area and open space/allotment, offering opportunities to support healthy lifestyles and therefore a positive effect. Wood_31 has a positive effect on well-being in general through the provision of jobs.																	
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. 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, 47, 20, 23, 37 and 46 all have a mixed positive and negative effect. Wood_31 is around 1km from the facilities in Woodbury, but there is no public transport, and the narrow, winding and relatively busy road with no footpath is likely to deter cyclists and pedestrians. Pedestrians could potentially use the public right of way 300m north via Rydon Lane to access Woodbury, but this is not hard surfaced for regular use.																	
11. Jobs and employment	**+**	**+**	**+**	**+**	**+**	**+**	**+**	**+**	**+**	**+**	**+**	**+**	**+**	**+**	**- -**	**+**	**+ +**	

Sites: Woodbury																		
Site / **SA Objective**	**Wood_04**	**Wood_07**	**Wood_06**	**Wood_09**	**Wood_10**	**Wood_11**	**Wood_12**	**Wood_47**	**Wood_16**	**Wood_19**	**Wood_20**	**Wood_23**	**Wood_24**	**Wood_37**	**Wood_42**	**Wood_46**	**Wood_31**	
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, apart from a major negative for Wood_42 due to the loss of an existing employment use (Webbers Park caravan and camping park). As Wood_31 is proposed for employment use, a major positive effect.																	
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.																	
13. Connectivity and transport	**+**	**+**	**+**	**+**	**+ / -**	**+ / - -**	**+ / -**	**+ / -**	**+**	**+**	**+**	**+ / -**	**+**	**+ / -**	**+**	**+ / -**	**-**	
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, 37 and 46 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. At Wood_31, Woodbury Business Park has																	

Sites: Woodbury																	
Site / **SA Objective**	**Wood_04**	**Wood_07**	**Wood_06**	**Wood_09**	**Wood_10**	**Wood_11**	**Wood_12**	**Wood_47**	**Wood_16**	**Wood_19**	**Wood_20**	**Wood_23**	**Wood_24**	**Wood_37**	**Wood_42**	**Wood_46**	**Wood_31**	
	a median download speed of 300mbps, way in excess of the definition of superfast broadband (30 mbps). The site has reasonable access to an 'A' road (A376), 1.1km to the west, but lacks sustainable transport links.																

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.
- Ensure development protects existing trees on Wood_09.
- Significant landscaping would be required for sites Wood_04, 07, 12, 24 and 46 but major negative effect is still likely. Limiting the site area to adjoin existing built form at Wood_04, 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.
- Tree planting along the western boundary of Wood_06 will soften the boundary edge, reducing adverse landscape effects.
- Tree planting at Wood_10 should be encourage to reflect the historic "lost" orchard that covered much of the site.
- Wood_20 should incorporate tree planting to bolster the existing woodland to the north, and reduced building height or avoid built development in the eastern edge to minimise landscape impact upon surrounding countryside.
- The design and layout of Wood_06, Wood_10, and Wood_16 should reflect the key characteristics of the adjoining Woodbury Conservation Area, to lessen negative historic environment effects.
- Wood_10 should also incorporate landscaping buffers to conserve the setting of Grade II listed Gilbrook House and Higher Venmore.
- At Wood_09, limiting the scale of development and high quality design that respects the Conservation Area, Grade II Oakhayes House, and the Grade I listed church would reduce major negative to minor negative.
- For sites that contain watercourses, such as Wood_10 and 16, an 8m buffer zone of no built development should be incorporated into the design.
- Noise buffer to B3179 for Wood_07, 06, 09, 16 and 23.
- Significant capacity upgrades are required to Woodbury Wastewater Treatment Works – Strategic Policy AR02 requires infrastructure improvements to overcome water quality issues before development is approved.
- To encourage walking: construct a pedestrian link from Wood_10 northwards to settlement centre

Sites: Woodbury																	
Site / SA Objective	Wood_04	Wood_07	Wood_06	Wood_09	Wood_10	Wood_11	Wood_12	Wood_47	Wood_16	Wood_19	Wood_20	Wood_23	Wood_24	Wood_37	Wood_42	Wood_46	Wood_31	
• The public right of way just beyond the northern edge of Wood_46 offers the opportunity for a continous footway to settlement centre that avoids the main road, but would require upgrading to a suitable surface and a bridge over the intervening stream. • Ensure Wood_16 includes a suitable provision to safely cross the B3179 to access the pavement route to the settlement centre; and protect and enhance Woodbury Footpath 3. • Wood_20 should ensure safe and suitable pedestrian access along Town Lane. • Reinstate the bus service to Woodbury Business Park, utilising the existing bus stops. • For Wood_31, install a hard surface along the public right of way 300m north via Rydon Lane, to enable pedestrians to walk to Woodbury to reduce adverse effects associated with the countryside location. These site-specific mitigation measures have been incorporated for the sites that are allocated in Local Plan Strategic Policy SD11.																	
Preferred alternatives: Wood_06 for 30 dwellings; Wood_09 for 28 dwellings; Wood_10 for 60 dwellings; Wood_16 for 70 dwellings; Wood_20 for 28 dwellings. **Reasons for preferred alternatives:** • Wood_06 – Land to the rear of Orchard House, Globe Hill preferred as it is consistent with the spatial strategy, close to shops and facilities in the settlement centre, as well as primary school slightly further but still within walking distance, with limited ecological impact and an acceptable landscape impact. • Wood_09 – Land off Globe Hill preferred as it is consistent with the spatial strategy, the provision of housing in an accessible location close to facilities in the settlement centre and the primary school, and medium landscape sensitivity with a context of built form – these benefits outweigh the negative heritage impact. • Wood_10 – Land at Gilbrook preferred as it is consistent with the spatial strategy, low landscape sensitivity and good access to facilities (assuming pedestrian/cycle link can be created through development adjoining to the north).																	

Sites: Woodbury																	
Site / SA Objective	Wood_04	Wood_07	Wood_06	Wood_09	Wood_10	Wood_11	Wood_12	Wood_47	Wood_16	Wood_19	Wood_20	Wood_23	Wood_24	Wood_37	Wood_42	Wood_46	Wood_31	

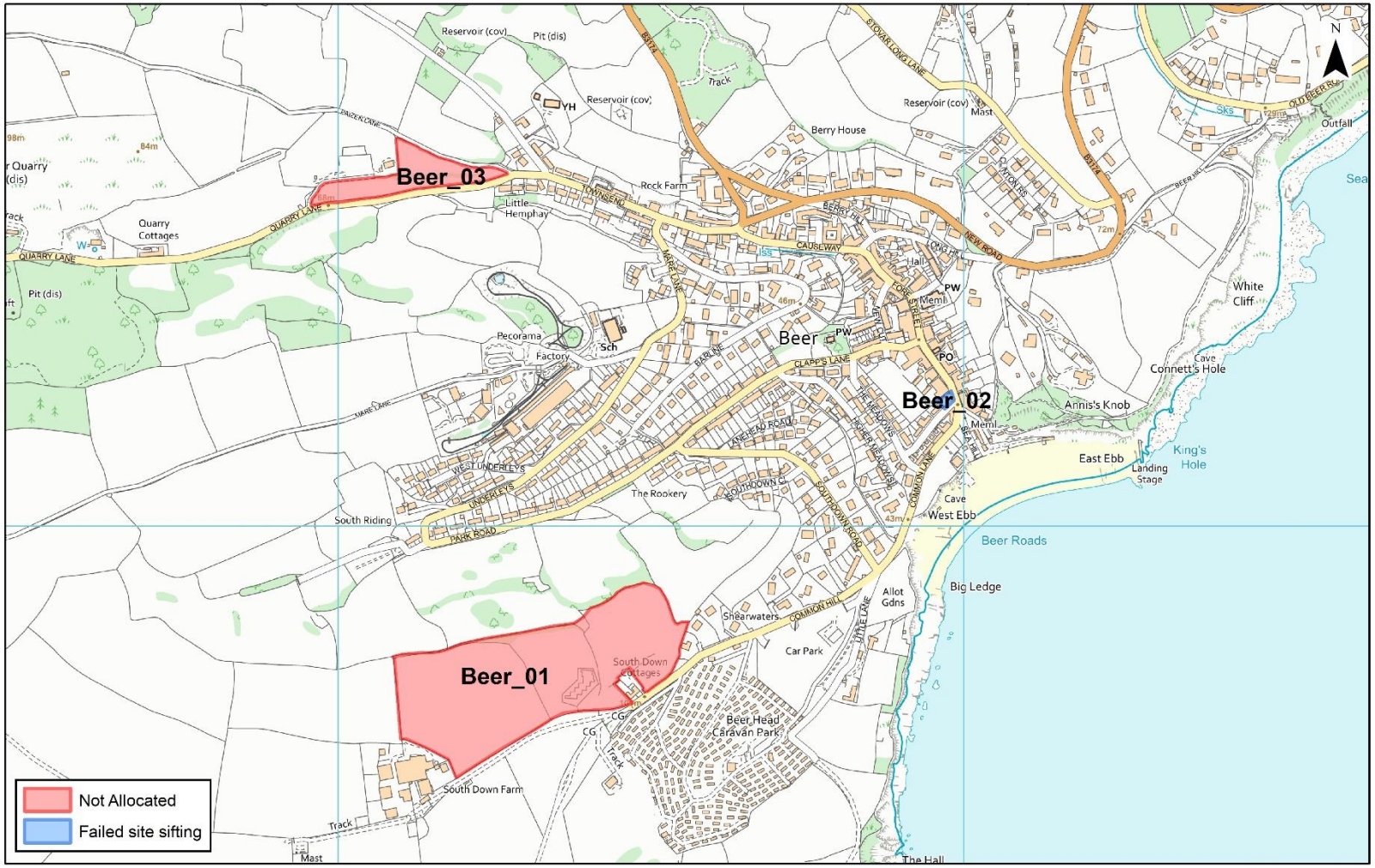
- Wood_16 – Land off Broadway preferred as it is consistent with the spatial strategy, low landscape sensitivity and good access to facilities and services (assuming pedestrian/cycle link can be created through development adjoining to the north).
- Wood_20 – Land at Town Lane preferred as it is consistent with the spatial strategy, moderate landscape impact, good access to facilities and services, no change to heritage assets, and limited ecological impact.

Reasons for rejected sites:

- 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_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_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_23 – Ford Farm rejected as the site lacks footpaths to the school and facilities in the settlement centre (missing an 80m section between the site and Knoll Cottage on the busy B3179) and medium-high landscape sensitivity due to semi-rural character of the site.
- 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.
- Wood_46 – Land west of Wood_10 rejected due to medium/high landscape impact, poorly related to the existing built form in Woodbury. Whilst the site in isolation accords with the spatial strategy, there are other more preferable sites in Woodbury to meet this strategy.

Sites: Woodbury																	
Site / SA Objective	Wood_04	Wood_07	Wood_06	Wood_09	Wood_10	Wood_11	Wood_12	Wood_47	Wood_16	Wood_19	Wood_20	Wood_23	Wood_24	Wood_37	Wood_42	Wood_46	Wood_31	
• Wood_31 – Land adjoining Woodbury Business Park (employment only) is rejected due to its significant scale in a countryside location that is only accessible by private car, with no public transport service or walking/cycling potential to access the site. In addition, medium landscape sensitivity to development. There are other more sustainable employment sites in East Devon to meet the employment land requirement. • Wood_47 – Land at Pound Lane rejected due to adverse landscape impact and loss of best and most versatile agricultural land.																	

Tier Four – Service Villages. Settlement: Beer



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Reasonable alternatives

- Beer_01 – Part South Down Farm, Common Hill
- Beer_03 – Land at Quarry Lane

Outline of reasons for selecting the alternatives

Beer_01 is a reasonable alternative despite being unachievable in the HELAA because of limited alternatives in Beer, where the spatial strategy supports limited development. Beer_03 was submitted too late for consideration in the HELAA, but initial assessment indicates it is a reasonable alternative given its size, its location within or adjacent to Beer (and therefore consistent with the spatial strategy), it is not already allocated in a 'made' Neighbourhood Plan and does not have planning permission. Beer_02 is below the site size threshold so not suitable in the HELAA.

Sites: Beer			
Site / **SA Objective**	**Beer_01**	**Beer_03**	
1. Biodiversity	**+ / - -**	**+ / - -**	
Biodiversity commentary	Beer_01 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. Beer Quarry and Caves SAC and SSSI lies in close proximity (220m) to the west of Beer_03 and in an area used by foraging bats, within the Consultation, Sustenance and Landscape Connectivity Zones. Also lies within 100m of Bovey Lane Fields County Wildlife Site and opposite (across Quarry Lane) from areas identified on both priority habitat inventory and in draft nature recovery network.		

Sites: Beer			
Site / SA Objective	Beer_01	Beer_03	
	These negative effects are mixed with a long-term minor positive effect from the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.		
2. Landscape	- -	- -	
Landscape commentary	Beer_01 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 site is within the East Devon National Landscape, 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 would be above the existing skyline and significantly impact the open and exposed character of the landscape. Beer_03 lies entirely within the East Devon National Landscape and the Coastal Preservation Area, just beyond the far extent of built development at Beer along Quarry Lane. The site forms part of the setting and approach to Beer at this point, and has an intact tranquil and rural character.		
3. Hist. built env	-	0	
Hist. built env. commentary	Beer_01 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 in 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. Beer_03 lies around 200m from the far eastern extremity of the Beer Conservation Area which covers the historic centre of Beer, and around 230m from the nearest Listed Building within it, with intervening modern / new residential development.		

Sites: Beer			
Site / **SA Objective**	**Beer_01**	**Beer_03**	
4. Climate change carbon emissions	**-**	**0**	
Climate change carbon emissions commentary	Beer_01 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. However, as noted by DCC Highways, access to this site 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. 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. Beer_03 has 9 community facilities and services within 1600m, with an hourly or better bus service, primary school, convenience shop(s), post office, community hall, pub(s), open space/allotment, GP and children's play area. The majority of these facilities are within the village centre to which there is a direct safe walking route on pavements from immediately opposite the easternmost end of the site.		
5. Climate change adaptation	**-**	**+**	
Climate change adaptation commentary	Beer_01 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. Site is located in an exposed location in terms of wind and exposure to the sun, so exposed to more extreme weather as a result of climate change. Beer_03 is not within an area of flood risk, or critical drainage area, so a positive effect for the site.		
6. Land resources	**- ?**	**- ?**	

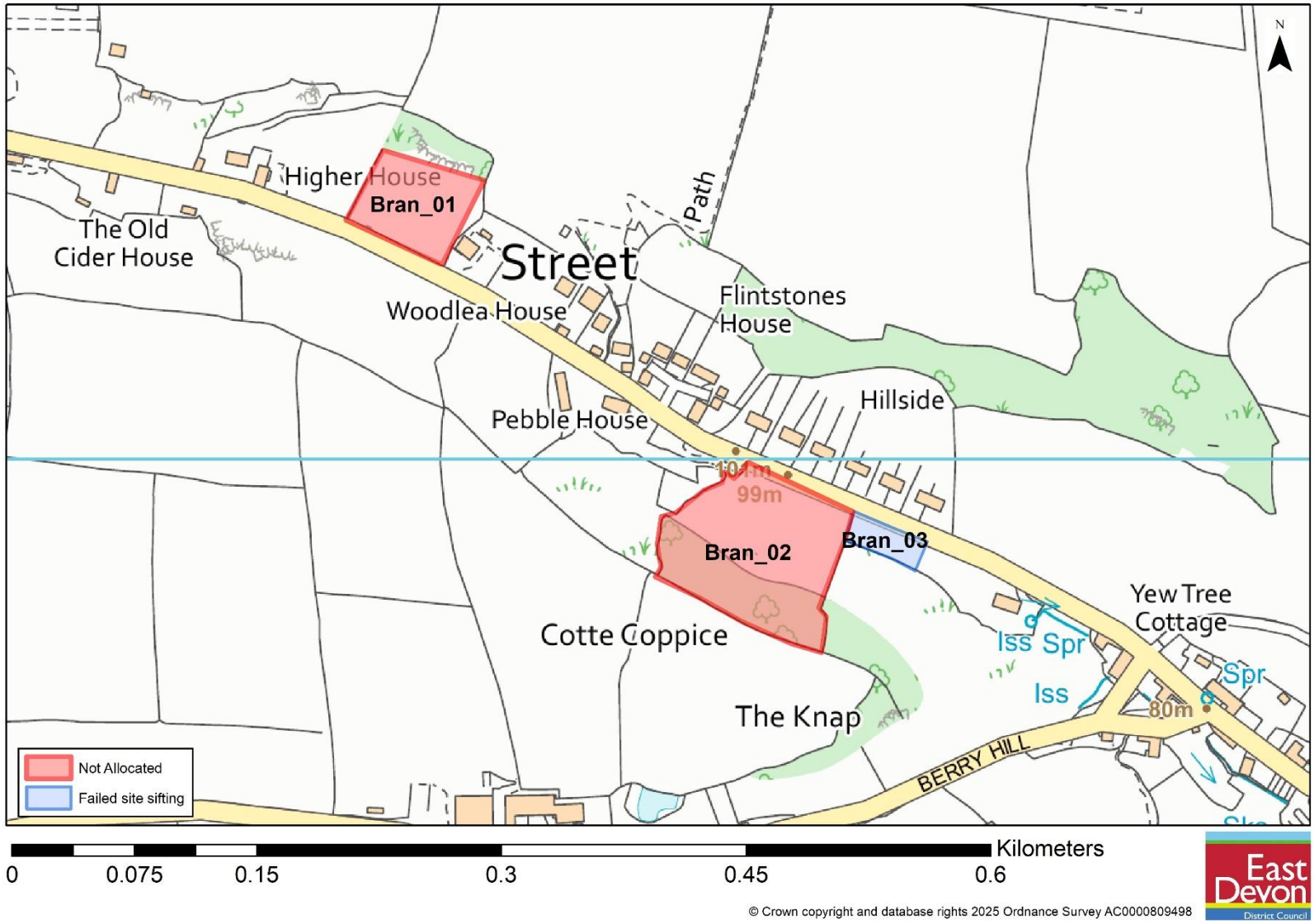
Sites: Beer			
Site / **SA Objective**	**Beer_01**	**Beer_03**	
Land resources commentary	Both are greenfield land on Grade 3 agricultural land, which could be 3a (best and most versatile) so uncertain negative effect is recorded. Sites also located around 100m from a Mineral Consultation Area.		
7. Water resources	**0 ?**	**0 ?**	
Water resources commentary	Development at these sites are unlikely to have any significant effects on water quality and quantity as they do not lie within a groundwater source protection zone or the River Axe SAC phosphates catchment. However, Beer_03 is within a drinking water source protection zone and Beer_01 is around 500m south of this zone. There is uncertainty on the capacity of local sewage treatment works to accommodate additional demand from new housing, so an overall uncertain / neutral effect.		
8. Homes	**+ + ?**	**+ ?**	
Homes commentary	Beer_03 could deliver approximately 130 dwellings, so a significant positive effect; whilst Beer_03 is lower at up to 35 dwellings. An appropriate mix of tenures and sizes including affordable housing is assumed. However, there is uncertainty over achievability, for reasons of access and supporting infrastructure for Beer_01 and shape and topography of Beer_03.		
9. Health and well-being	**+ / -**	**+**	
Health and well-being commentary	Both sites are within a neighbourhood recorded under the Indices of Multiple Deprivation of being amongst the 30% least deprived nationally and not in close proximity to areas of higher deprivation. The sites are not in close proximity to sources of significant noise and light pollution, but they are within 1600m of open space. Beer_01 access on foot is along the steep narrow access lane		

Sites: Beer			
Site / **SA Objective**	**Beer_01**	**Beer_03**	
	and highway beyond with little or no foot/cycle way provision, so a mixed positive/negative effect. A minor positive for Beer_03 which is connected by pavement and on the level to the centre of Beer.		
10. Access to services	**-**	**+**	
Access to services commentary	Both sites are 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 from Beer_01 due to both the steep topography and the little or no foot/cycle way provision along the access. Beer_03 has a direct safe walking route on along pavements immediately opposite the eastern part of the site. There is also limited capacity at the primary school.		
11. Jobs and employment	**-**	**-**	
Jobs/employment commentary	Neither site is 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 sites are 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	**+ +**	**+ +**	

Sites: Beer			
Site / **SA Objective**	**Beer_01**	**Beer_03**	
Town centres commentary	The sites are 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 sites for residential use could reasonably be expected to support the vitality of the town centre to some degree, although the poor access for Beer_01 and the limited local employment opportunities, could reduce this to a minor positive effect.		
13. Connectivity and transport	**+**	**+**	
Connectivity and transport commentary	The sites are 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 '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 sites are located within 800m of National Cycle Route 2 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. Superfast broadband is not currently available for Beer_01, but it is for Beer_03.		
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: • Biodiversity measures such as sensitive lighting and compensatory bat foraging will be required but given the proximity to the Beer Quarry and Caves SAC, a major negative effect is likely to remain. • Significant landscaping measures will be required but given the location in an AONB a major negative effect is likely to remain. • Extend the existing footpath from immediately opposite the eastern edge of Beer_03 to improve access to services and employment. • Theoretically as Beer_01 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		

Sites: Beer			
Site / SA Objective	Beer_01	Beer_03	
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 alternatives: None. **Reasons for rejected sites:** • 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. • Beer_03 – Land at Quarry Lane rejected due to significant adverse effect upon landscape and biodiversity.			

Settlement: Branscombe



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, they are located within or adjacent to Branscombe (and therefore consistent with the spatial strategy), are not already allocated in a 'made' Neighbourhood Plan, and do not currently have planning permission. A smaller site (Bran_03) was not suitable for housing or employment through the HELAA process due to its small size and is therefore not a reasonable alternative.

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 30m deep stretching the full length of the site, along the southern boundary (back) of the site.		

Sites: Branscombe			
Site / SA Objective	Bran_01	Bran_02	
	These negative effects are mixed with a long-term minor positive effect from the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.		
2. Landscape	- -	- -	
Landscape commentary	Both sites lie entirely within the East Devon National Landscape 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) to 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 is 127m away from a second Grade II listed building but with limited direct relationship/intervisibility. Bran_02 lies close to (68m from) this same 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		

Sites: Branscombe			
Site / **SA Objective**	**Bran_01**	**Bran_02**	
	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	**- -**	**- -**	
Climate change carbon emissions commentary	Both sites have 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 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.		

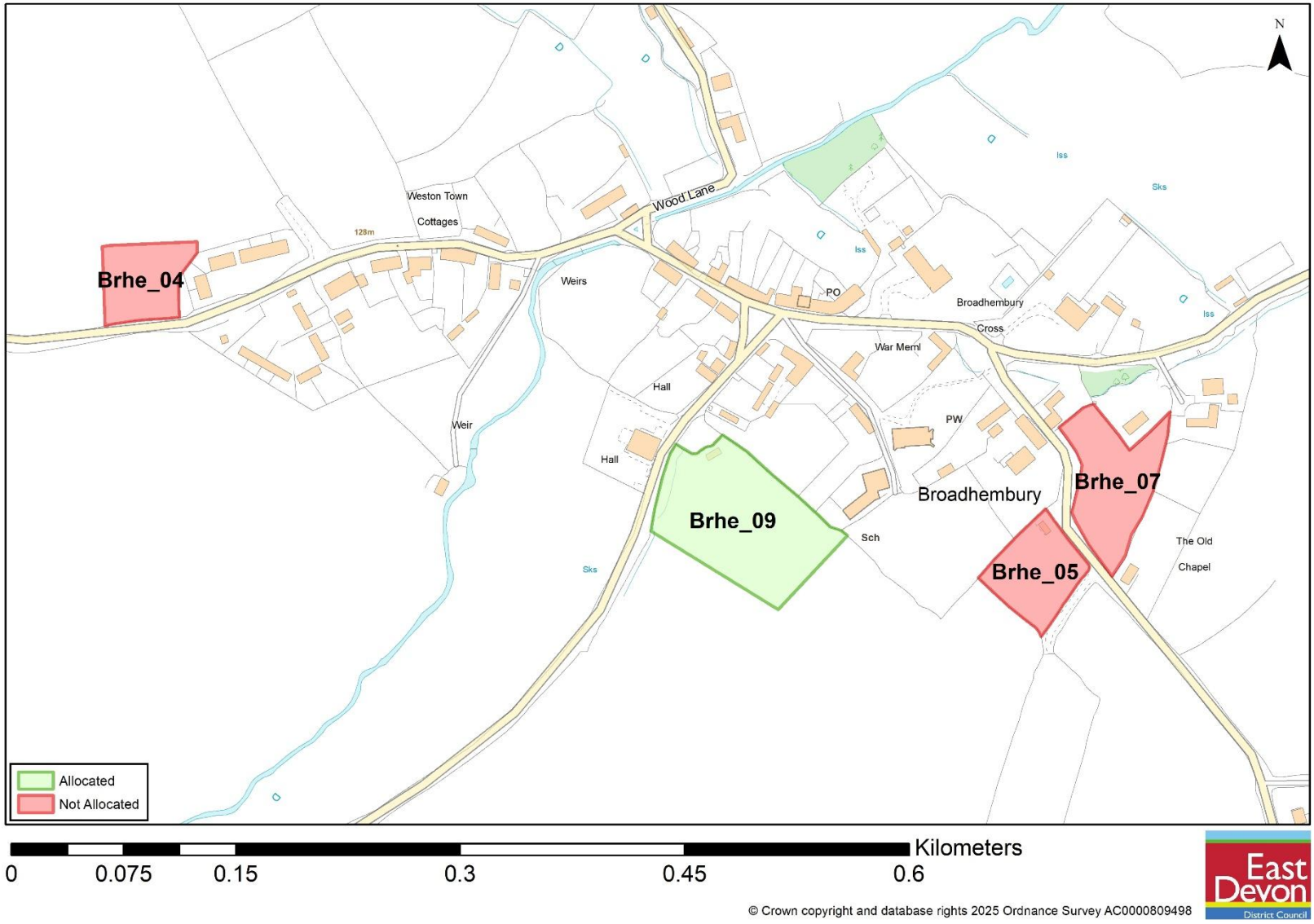
Sites: Branscombe			
Site / SA Objective	Bran_01	Bran_02	
6. Land resources	- ?	-	
Land resources commentary	Bran_01 includes both Grade 3 and Grade 4 agricultural land. Grade 3 agricultural land could be 3a (best and most versatile) so uncertain negative effect. Bran_02 is entirely within Grade 4 agricultural 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 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		

Sites: Branscombe			
Site / SA Objective	Bran_01	Bran_02	
	and noise pollution, including A roads, although the narrow lane along that runs along the site boundaries can be congested in the 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 (1.3km from Bran_01 and 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	Both sites are 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 unpavemented 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.		

Sites: Branscombe			
Site / **SA Objective**	**Bran_01**	**Bran_02**	
12. Town centres	**-**	**-**	
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 1500m away along the narrow unpavemented 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, there are no premises in this postcode with a median download speed of 10 Mbps.		
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 rejected sites:**			

Sites: Branscombe			
Site / SA Objective	Bran_01	Bran_02	
• 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 National Landscape 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 National Landscape and is remote from most of the very limited facilities the village offers.			

Settlement: Broadhembury



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

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, they are located within or adjacent to Broadhembury (and therefore consistent with the spatial strategy), are not already allocated in a 'made' Neighbourhood Plan, and do not currently have planning permission. Brhe_03 is not a reasonable alternative as it is not within or adjacent, or otherwise well-related, to Broadhembury.

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. These effects are mixed with a long-term minor positive effect from the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.				

Sites: Broadhembury					
Site / **SA Objective**	**Brhe_04**	**Brhe_05**	**Brhe_07**	**Brhe_09**	
2. Landscape	**- -**	**- -**	**- -**	**-**	
Landscape commentary	Brhe_04 ,05 and 07 lie within the National Landscape so any development is considered to have a significant adverse effect. Site Brhe_09 lies outside, but adjacent, to the National Landscape so impact is less significant but still harmful.				
3. Hist. built env	**0**	**- -**	**- -**	**0**	
Hist. built env. commentary	Brhe_05 and 07 are within the setting of the Grade I listed Church and development would have a significant negative impact. Site Brhe_01 also has historic earthworks within its boundary. The other sites are close to, but do not directly impact upon, Grade II 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, unpavemented 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 2 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 ?**	**-**	
Water resources commentary	South West Water forecast there will be adequate water supply; but the capacity of Honiton Wastewater Treatment Works is forecast to be exceeded by proposed development, albeit environment permit compliance is sufficient (Water Cycle Study, November 2025). Therefore, a negative effect is likely for proposed site Brhe_09, with neutral uncertainty for others.				
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 unpavemented, unlit 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	**-**	**-**	**-**	**-**	

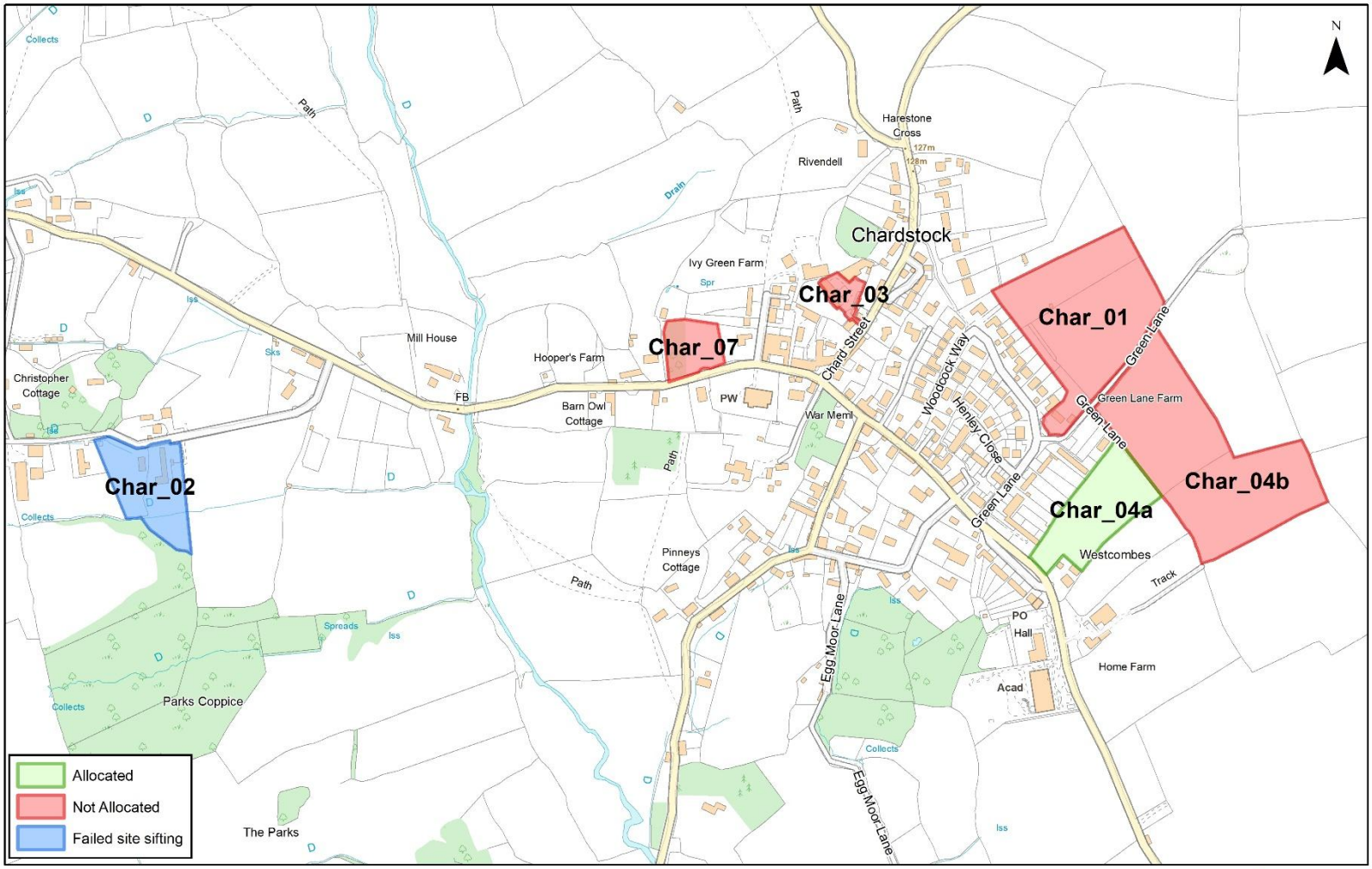
Sites: Broadhembury					
Site / **SA Objective**	**Brhe_04**	**Brhe_05**	**Brhe_07**	**Brhe_09**	
Town centres commentary	None of the sites are within 1600m of a town centre.				
13. Connectivity and transport	**-**	**-**	**-**	**-**	
Connectivity and transport commentary	Broadhembury does not have 100% 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 I listed structure.
- Development at Brhe_09 should avoid adverse impacts upon the Grade I listed church and the Conservation Area.
- Landscape impacts on all the sites could be reduced by sensitive design that reflects the historic character of the village and Blackdown Hills National Landscape, a reduction in density and long-term landscaping/screening, however negative effects cannot be completely mitigated due to the sensitivity of the National Landscape.

Sites: Broadhembury					
Site / SA Objective	Brhe_04	Brhe_05	Brhe_07	Brhe_09	
• Significant capacity upgrades are required to Honiton Wastewater Treatment Works – Strategic Policy AR02 requires infrastructure improvements to overcome water quality issues before development is approved. • Sites should consider how to enhance pedestrian access to local services. These site-specific mitigation measures have been incorporated for the site that is allocated in Local Plan Strategic Policy SD12.					
Preferred alternative: Brhe_09 for 10 dwellings. **Reasons for preferred alternatives:** • Brhe_09 – Land opposite the village hall is preferred as it is consistent with the spatial strategy, 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. Likely to deliver on-site affordable housing. **Reasons for rejected sites:** • Brhe_04 – Causeway End is rejected as it lies in the National Landscape and comprises the corner of a very large and open agricultural field with major negative landscape impacts. • Brhe_05 – The Old Orchard is rejected due to its high landscape value as it lies in the National Landscape and significant impact on the setting of the Grade I listed Church. • Brhe_07 – Land south of the Vicarage is rejected due to its location on prominent, rising land, in the National Landscape and adverse affect on the listed buildings and the setting of the Grade I listed Church.					

Settlement: Chardstock



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Reasonable alternatives

- Char_01 – Green Lane Farm
- Char_03 – Chubbs Yard
- Char_04 – Land off Green Lane
- Char_07 – Land at north west edge of 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). In addition, they are located within or adjacent to Chardstock (and therefore consistent with the spatial strategy), are not already allocated in a 'made' Neighbourhood Plan, and do not currently have planning permission. Char_02 is not a reasonable alternative as it is not within or adjoining, or otherwise well-related to Chardstock, being nearly 600m to the west of the village.

Sites: Chardstock					
Site / **SA Objective**	**Char_01**	**Char_03**	**Char_04**	**Char_07**	
1. Biodiversity	**+ / - -**	**+ / - -**	**+ / - -**	**+ / - -**	
Biodiversity commentary	All sites are within River Axe SAC Nutrient catchment area – at the time of writing, mitigation is likely to be difficult, so a major negative effect. Char_03 and 07 are both within 100m of the draft Nature Recovery Network, Section 41 Habitat. Char_04 is adjacent to a County Wildlife Site, draft Nature Recovery Network, and Section 41 Habitat.				

Sites: Chardstock					
Site / **SA Objective**	**Char_01**	**Char_03**	**Char_04**	**Char_07**	
	These negative effects are mixed with a long-term minor positive effect from the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.				
2. Landscape	**- -**	**-**	**- -**	**- -**	
Landscape commentary	Char_01 and 07 are greenfield sites within the Blackdown Hills National Landscape. Although they are adjacent to the village context of built form, they have a high or high-medium landscape sensitivity to new development. Char_03 is also in the National Landscape but is a less sensitive brownfield site located within the village. Char_04 is located on rising land outside of, but adjacent to, the Blackdown Hills National Landscape with many medium-long distance views into site, including from the National Landscape. The lower field of Char_04 is less sensitive (see reference to Char_04a below).				
3. Hist. built env	**0**	**-**	**0**	-	
Hist. built env. commentary	Char_01 and 04 are not affected by heritage assets, with Chardstock Conservation Area being nearly 100m away with intervening modern estate development. Char_03 adjoins the Conservation Area, with several Grade II listed buildings within 50m of the site. Char_07 is within the Conservation Area with several Grade II listed buildings and the Grade II* listed church within 50m of the site.				
4. Climate change carbon emissions	**0**	**0**	**0**	**0**	

Sites: Chardstock					
Site / **SA Objective**	**Char_01**	**Char_03**	**Char_04**	**Char_07**	
Climate change carbon emissions commentary	All sites have 6 out of 12 facilities within 1,600m of site, meaning residents can access key day-to-day facilities by walking and cycling with the primary school and convenience store less than 500m from all sites. Char_04 is particularly well located, with the shop, village hall, and primary just across the road. However, the lack of jobs and a fuller range of facilities means that car travel is likely with consequent carbon emissions, so a neutral effect overall.				
5. Climate change adaptation	**+**	**+**	**+**	**+**	
Climate change adaptation commentary	None of these sites are affected by flood risk or 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	Char_01, 04 and 07 are greenfield, Grade 3 agricultural land, so uncertain negative effect. Char_03 is a brownfield site so would use land efficiently.				
7. Water resources	**- ?**	**- ?**	**-**	**- ?**	
Water resources commentary	All sites are within the River Axe SAC phosphates catchment so development could negatively affect water quality. South West Water forecast there will be adequate water supply; and Tatworth & Forton Wastewater Treatment Works has sufficient capacity				

Sites: Chardstock					
Site / **SA Objective**	**Char_01**	**Char_03**	**Char_04**	**Char_07**	
	and environmental permit limits for the proposed development site (Char_04) Water Cycle Study, November 2025), but uncertainty for the other sites. Overall, a negative effect is likely for Char_04, with uncertainty for the others.				
8. Homes	**+**	**+**	**+**	**+**	
Homes commentary	All sites have the potential to deliver less than 100 dwellings. 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	Chardstock is amongst the 40% least deprived neighbourhoods in England. All sites are away from air, noise and light pollution, and within 200m of open space, and a children's play area in the village.				
10. Access to services	**+**	**+**	**+**	**+ / -**	
Access to services commentary	All sites are within 1,600m of a primary school, shop, and community hall. Char_04 is particularly well located, with the shop, village hall, and primary just across the road. Intermittent footways from Char_07 to these services mean a relatively poor quality route for pedestrians, so a mixed effect for this site.				

Sites: Chardstock					
Site / **SA Objective**	**Char_01**	**Char_03**	**Char_04**	**Char_07**	
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	All sites are beyond 1,600 metres of a town centre.				
13. Connectivity and transport	**+ / - ?**	**+ / -**	**+ / -**	**+ / -**	
Connectivity and transport commentary	All sites are beyond 800m of an hourly or better bus service, 'A' road and cycle route. Broadband speeds vary with 30-50 Mbps median speeds for area, all sites are assumed (at this stage) to have access to superfast broadband. This means a mixed positive and negative effect for all sites. Uncertain negative effect for Char_01 as access will likely require demolition of a private property and/or substantial hedgerow removal.				
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects:					

Sites: Chardstock					
Site / SA Objective	Char_01	Char_03	Char_04	Char_07	

- The landscape value and susceptibility varies across Char_04, with high-moderate for the upper fields (Char_04b) and moderate for the lower field (Char_04a). Therefore, allocating Char_04a will lessen the negative landscape effect from major negative to minor negative, given the built context of the existing village along its eastern boundary and to the south.
- Char_04a should include appropriate boundary screening to reduce the effect upon the Blackdown Hills National Landscape.
- All sites have relatively good access to facilities, but these beneficial effects can be maximised by enhancing sustainable travel links – Char_04a should provide a connection to Chardstock Footpath 30 along with pedestrian links to existing footways.

These site-specific mitigation measures have been incorporated for the site that is allocated in Local Plan Strategic Policy SD13.

Preferred alternative: Char_04a for 30 dwellings.

Reasons for preferred alternatives:

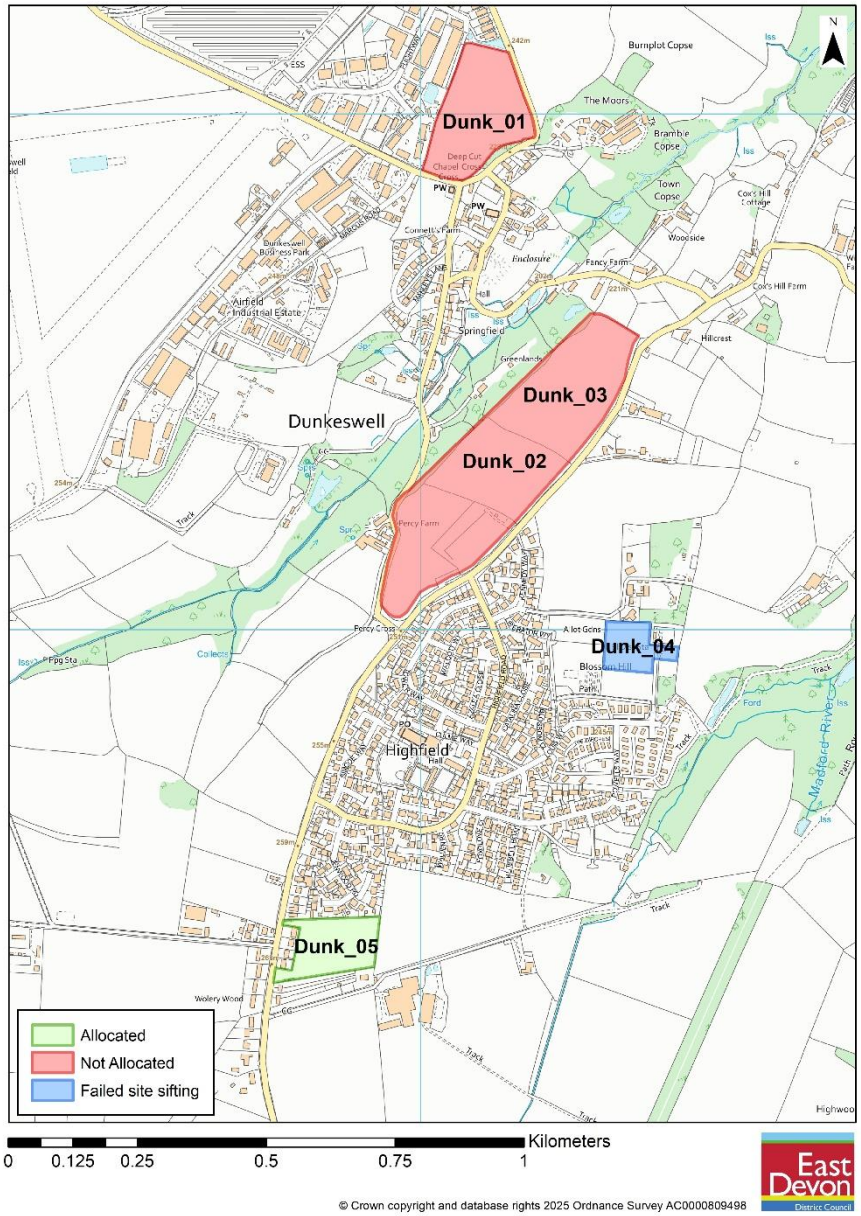
- Char_04a – Land off Green Lane is preferred as consistent with spatial strategy, good access to facilities, limited harm to the historic environment, and located where adverse landscape impact is minimised.

Reasons for rejected sites:

- Char_01 – Green Lane Farm is rejected due to major adverse impact upon the landscape, being located with the Blackdown Hills National Landscape, and poor site access that will require demolition of a dwelling and/or likely substantial hedgerow removal.
- Char_03 – Chubbs Yard is rejected due to adverse impact upon the historic environment, being adjacent to Chardstock Conservation Area and in close proximity to multiple designated heritage assets; and would mean the loss of an active employment site.

Sites: Chardstock					
Site / **SA Objective**	**Char_01**	**Char_03**	**Char_04**	**Char_07**	
• Char_04b – Land off Green Lane is rejected due to adverse landscape and potential biodiversity impact. • Char_07 – Land at north west edge of Chardstock is rejected due to adverse impact on landscape and the historic environment, with numerous trees on site, limiting the potential development area to below the five dwelling threshold to allocate in the Local Plan.					

Settlement: Dunkeswell



Reasonable alternatives

- Dunk_01 – Land at Hutshayes Farm
- Dunk_02 – Land East of Manleys Farm
- Dunk_05 – Broomfields

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, they are located within or adjacent to Dunkeswell (and therefore consistent with the spatial strategy), are not already allocated in a 'made' Neighbourhood Plan, and do not currently have planning permission.

For the reasons given, the following sites are not considered to be reasonable alternatives:

- Dunk_03 overlaps with Dunk_02.
- Dunk_04 is not adjacent or well-related to the settlement and is unachievable in the HELAA as no access from public highway.

Sites: Dunkeswell				
Site / **SA Objective**	**Dunk_01**	**Dunk_02**	**Dunk_05**	
1. Biodiversity	**+ / -**	**+ / -**	**+ / -**	

Sites: Dunkeswell				
Site / **SA Objective**	**Dunk_01**	**Dunk_02**	**Dunk_05**	
Biodiversity commentary	Dunk_01 is close to a County Wildlife Site, and adjacent to an Unconfirmed Wildlife Site, draft Nature Recovery Network and Section 41 Habitat. Similarly, Dunk_02 is just 12m from an Unconfirmed Wildlife Site, with draft Nature Recovery Network and Section 41 Habitat located on site. Dunk_05 is entirely covered by grassland identified in the draft Nature Recovery Network, so will also have a minor negative effect. These negative effects are mixed with a long-term minor positive effect from the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.			
2. Landscape	**- -**	**- -**	**- -**	
Landscape commentary	All sites are located within the Blackdown Hills National Landscape. Dunk_01 is a triangular field adjoining former airfield/employment site which provides some context of built form, but this is softened by landscaping and the presence of mature hedgerows and trees meaning the site has mostly a rural, countryside appearance. Dunk_02 is on a high, open plateau, with limited context of built form and long distance views. Dunk_05 is less sensitive, being a level, rectangular field adjacent to existing development.			
3. Hist. built env	**-**	**-**	**0**	
Hist. built env. commentary	Dunk_01 is in close proximity to several designated assets, being adjacent to Dunkeswell Conservation area with three listed buildings within 100m. Dunk_02 is within 50m of the conservation area including a number of listed buildings – topography and intervening woodland reduces the effect, but it remains at minor negative. No assets affect Dunk_05.			
4. Climate change carbon emissions	**-**	**0**	**0**	

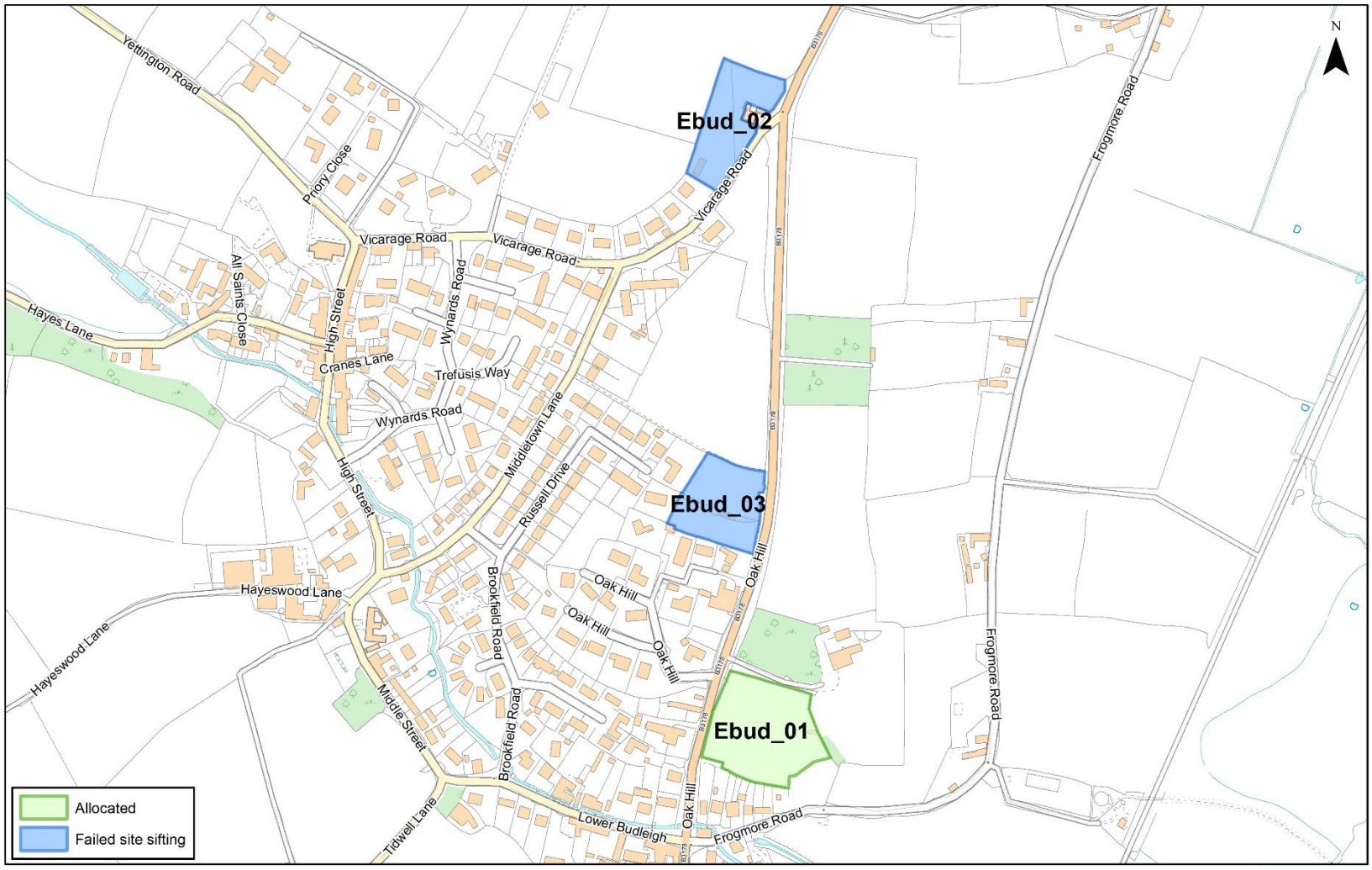
Sites: Dunkeswell				
Site / **SA Objective**	**Dunk_01**	**Dunk_02**	**Dunk_05**	
Climate change carbon emissions commentary	Dunkeswell lacks a primary school, so travel elsewhere will be needed from all sites to access this key facility, with consequent carbon emissions. Dunk_01 is close to a bus service and adjacent to employment at the Airfield and Flightway Business Park which helps reduce travel but is located around 1km from the facilities at Highfield, so a minor negative overall. Dunk_02 and 05 are within 250m of facilities at Highfield, so a neutral effect as fewer emissions from travel.			
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 sites comprise Grade 3 agricultural land, which could be best and most versatile, so an uncertain negative effect.			
7. Water resources	**0 ?**	**0 ?**	**0**	

Sites: Dunkeswell				
Site / **SA Objective**	**Dunk_01**	**Dunk_02**	**Dunk_05**	
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. South West Water forecast there will be adequate water supply; and Dunkeswell Wastewater Treatment Works has sufficient capacity and environmental permit limits for the proposed development sites (Dunk_05) at Dunkeswell (Water Cycle Study, November 2025), but uncertainty for the other sites. Therefore, a neutral effect is likely for Dunk_05, with uncertainty for the others.			
8. Homes	**+**	**+ +**	**+**	
Homes commentary	Dunk_02 has a maximum yield of 150 dwellings, so a major positive effect. Both Dunk_01 and 05 can deliver around 50 dwellings, so a minor positive. 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 have good access to recreation spaces, being within 200m of open space and children's play area. However, Dunk_01 is adjacent to the Airfield and Flightway Business Park and its associated air, noise and light pollution.			
10. Access to services	**-**	**+**	**+**	

Sites: Dunkeswell				
Site / **SA Objective**	**Dunk_01**	**Dunk_02**	**Dunk_05**	
Access to services commentary	There is no primary school in Dunkeswell, so residents are not able to easily access this key service. There is a shop, GP and community hall in the Highfield part of the settlement, within 250m of Dunk_02 and 05. However, Dunk_01 is over 1km from these services, along a narrow, hilly lane that lack pavement, so a negative effect.			
11. Jobs and employment	**+**	**+**	**+**	
Jobs/employment commentary	All sites are within 1,600m of employment at the Airfield and Flightway Business Park, with Dunk_01 adjacent but does not have realistic potential to provide on-site employment due to adverse landscape impact.			
12. Town centres	**-**	**-**	**-**	
Town centres commentary	All sites are beyond 1,600 metres of a town centre.			
13. Connectivity and transport	**-**	**-**	**-**	
Connectivity and transport commentary	Dunkeswell is around 5km from the nearest A road. Although all sites are close to bus stops, it is an infrequent service of less than hourly. 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. A negative effect for all sites due to relatively poor transport connectivity.			

Sites: Dunkeswell				
Site / SA Objective	Dunk_01	Dunk_02	Dunk_05	
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: • The location of all sites within the Blackdown Hills National Landscape means that further detailed assessment should accompany a planning application to maximise opportunities to conserve and enhance the National Landscape. • More specifically, ancient trees adjoining Dunk_05 should be protected to reduce adverse landscape impact. • Noise attenuation will lessen the negative health and well-being effect for those sites adjacent or close to the airfield. • Dunk_05 should provide a pedestrian link from the south east corner of the site to link to Dunkeswell footpath 2 and access to local facilities. These site-specific mitigation measures have been incorporated for the site that is allocated in Local Plan Strategic Policy SD15.				
Preferred alternative: Dunk_05 for 43 dwellings. **Reasons for preferred alternatives:** • Dunk_05 – Broomfields is preferred as it is consistent with the spatial strategy, close to facilities that can be accessed on foot, with acceptable landscape impacts as it is well-contained in the wider landscape and adjacent to existing development. **Reasons for rejected sites:** • Dunk_01 – Land at Hutshayes Farm is rejected due to major adverse landscape impact, adverse historic environment impact being adjacent to Dunkeswell Conservation Area and close to several listed buildings, and poor access to services and facilities in Dunkeswell. • Dunk_02 – Land east of Manleys Farm is rejected due to major adverse landscape impact, and adverse ecological impact with draft Nature Recovery Network and Section 41 Habitat located on site, including impact upon mature trees significant hedgerow removal to gain access.				

Settlement: East Budleigh



Reasonable alternatives

- Ebud_01 – Land off Frogmore Road

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 they have potential to be delivered (subject to further consideration through the planning process). In addition, it is located within or adjacent to East Budleigh (and therefore consistent with the spatial strategy), not already allocated in a 'made' Neighbourhood Plan and does not currently have planning permission.

For the reasons given, the following sites are not considered to be reasonable alternatives:

- Ebud_02 is not achievable in the HELAA due to the Grade II* listed building and designated Local Green Space precluding development on the frontage triangle of land.
- Ebud_03 is not achievable in the HELAA because of highway safety related to pedestrian access, unless satisfactory means to secure viability splays can be achieved.

Sites: East Budleigh		
Site / **SA Objective**	**Ebud_01**	
1. Biodiversity	**+ / -**	
Biodiversity commentary	Located within the Exe Estuary and Pebblebed Heaths Mitigation Zones, and adjacent to draft nature recovery network (woodland to north and east of site) and priority habitat sites. In addition, the HRA notes potential air quality impacts at East Devon Heaths SAC/SPA from increased traffic from the site at East Budleigh.	

Sites: East Budleigh		
Site / **SA Objective**	**Ebud_01**	
	These negative effects are mixed with a long-term minor positive effect from the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.	
2. Landscape	**- -**	
Landscape commentary	Within the East Devon National Landscape, but well-related to existing settlement and adjacent to the main road that runs through the village.	
3. Hist. built env	**-**	
Hist. built env. commentary	Ebud_01 has the potential to affect the setting of non-designated heritage assets: Syon House and 1 Oakhill Cottages.	
4. Climate change carbon emissions	**0**	
Climate change carbon emissions commentary	The site is within 800 metres of several facilities and an hourly bus route, which helps reduce carbon emissions from travel. Increased car travel is likely to access a greater range of facilities and employment beyond East Budleigh, so a neutral effect overall.	

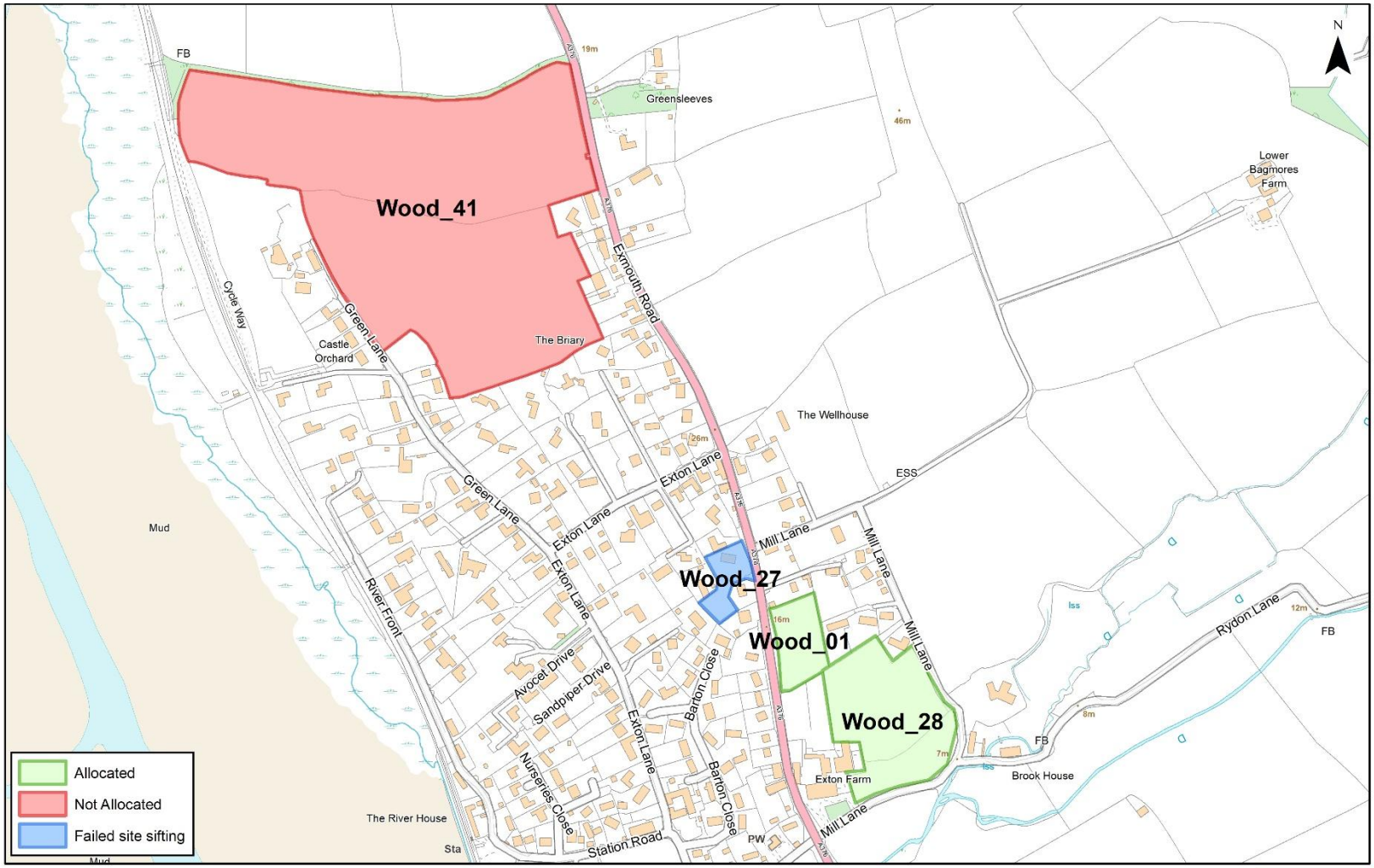
Sites: East Budleigh		
Site / **SA Objective**	**Ebud_01**	
5. Climate change adaptation	**+**	
Climate change adaptation commentary	Not located in an area of flood risk.	
6. Land resources	**- -**	
Land resources commentary	Grade 1 agricultural land.	
7. Water resources	**-**	
Water resources commentary	Located in a ground water source protection zone, but Otterton Wastewater Treatment Works has sufficient capacity and environmental permit limits for the site (Water Cycle Study, November 2025), so minor negative effect overall.	
8. Homes	**+**	

Sites: East Budleigh		
Site / **SA Objective**	**Ebud_01**	
Homes commentary	Minor positive effect from the delivery of 22 dwellings.	
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 the services in the village, including a primary school, convenience store, pub and village hall.	
11. Jobs and employment	**-**	
Jobs/employment commentary	No employment sites within 1,600 metres and unlikely to be delivered on site due to its small scale.	

Sites: East Budleigh		
Site / **SA Objective**	**Ebud_01**	
12. Town centres	**-**	
Town centres commentary	Beyond 1,600 metres of a town centre.	
13. Connectivity and transport	**+**	
Connectivity and transport commentary	Close to hourly bus route and within 1,600 metres of recognised cycle route and with broadband speeds of 70-80 mbps in closest post codes, offering superfast broadband.	
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. • Given its location in the National Landscape and proximity to the non-designated heritage asset of Syon House, further detailed assessment should accompany a planning application to maximise opportunities to conserve and enhance the National Landscape, including high quality design and layout related to its context, to reduce adverse landscape effects. • Suitable pedestrian crossing over the B3178 should be provided from Ebud_01 to access village facilities. • 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.		

Sites: East Budleigh	
Site / **SA Objective**	**Ebud_01**
• Designing new development for low water use and requiring sustainable drainage systems can address the negative effect of being located in a groundwater source protection zone. These site-specific mitigation measures have been incorporated for the site that is allocated in Local Plan Strategic Policy SD16, including a reduction in yield from 22 to 15 dwellings to lessen the impact upon the National Landscape and Syon House.	
Preferred alternative: Ebud_01 for 15 dwellings. **Reasons for preferred alternatives:** • Ebud_01 – Land off Frogmore Road is preferred as it is consistent with the spatial strategy, close to a reasonable range of facilities and services. There are no other reasonable alternative sites in East Budleigh and, whilst it would constitute major development in a National Landscape, there are exceptional circumstances that justify its allocation.	

Settlement: Exton



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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). In addition, they are located within or adjacent to Exton (and therefore consistent with the spatial strategy), are not already allocated in a 'made' Neighbourhood Plan, and do not currently have planning permission.

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 evidence[105] indicates a likely significant effect that must be mitigated through planning obligations. In addition, the HRA notes potential air quality impacts at East Devon Heaths SAC/SPA from increased traffic from sites at Exton.			

[105] se-devon-mitigation-strategy.pdf (eastdevon.gov.uk)

Sites: Exton				
Site / **SA Objective**	**Wood_01**	**Wood_28**	**Wood_41**	
	Wood_01 and Wood_28 are comprised of agriculturally improved grassland of limited biodiversity value, with Exe Estuary SPA and Ramsar just over 400m to west. 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. These negative effects are mixed with a long-term minor positive effect from the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.			
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. Wood_28 has low density dwellings to the north, south east, and west but generally set within a rural landscape. 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-high landscape sensitivity. Human disturbance from adjacent A376, but significant negative effect remains.			
3. Historic and built environment	**-**	**-**	**-**	
Hist. built env. commentary	Wood_01 has Grade II* listed Exton Farmhouse 87m to south with windows on its northern side that offer views of this site, but separated by hedgerow and field, limiting the effect on this asset. Grade II* listed Exton House 110m to south/south west of Wood_01 but adjoined by dwellings to north and there is thick hedgerow (along eastern side of A376) which limit intervening views. Wood_28 is 46m away from Grade II* listed Exton Farmhouse to the west – views are partially obstructed by the existing single storey barn north east of the farmhouse. Developing the site could affect the rural/agricultural setting of the farmhouse.			

Sites: Exton				
Site / **SA Objective**	**Wood_01**	**Wood_28**	**Wood_41**	
	Two Grade II listed dwellings to south/south west have glimpsed views of Wood_28, but intervening trees and hedgerow limit these views. The closest heritage asset to Wood_41 is Grade II listed 1 Mount Ebford which overlooks the site from higher ground 250m to the north.			
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 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 the busy A376 which could deter pedestrians. 20-minute 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. 20-minute 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**	**+**	

Sites: Exton				
Site / **SA Objective**	**Wood_01**	**Wood_28**	**Wood_41**	
Climate change adaptation commentary	Low surface water flood risk (1/100 year) along A376 just beyond the western boundary of Wood_01. 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	**- ?**	**- ?**	**- - ?**	
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_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.			
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 Exe Estuary SPA/Ramsar nearby to the west could adversely affect water quality given its proximity, sensitivity and classification as “moderate” quality. South West Water forecast there will be adequate water supply; but the capacity of Woodbury Wastewater Treatment Works is forecast to be exceeded by proposed development in the area (including Wood_01, 28), albeit environment permit compliance is sufficient (Water Cycle Study, November 2025). Therefore, a negative effect is likely for proposed allocations, with uncertainty for others.			
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. An appropriate mix of tenures and sizes including affordable housing is assumed for all sites.			

Sites: Exton				
Site / **SA Objective**	**Wood_01**	**Wood_28**	**Wood_41**	
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 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 20-minute 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.			
11. Jobs and employment	**+**	**+**	**+**	

Sites: Exton				
Site / **SA Objective**	**Wood_01**	**Wood_28**	**Wood_41**	
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 20-minute 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.			
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.			
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, 20-minute 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.				

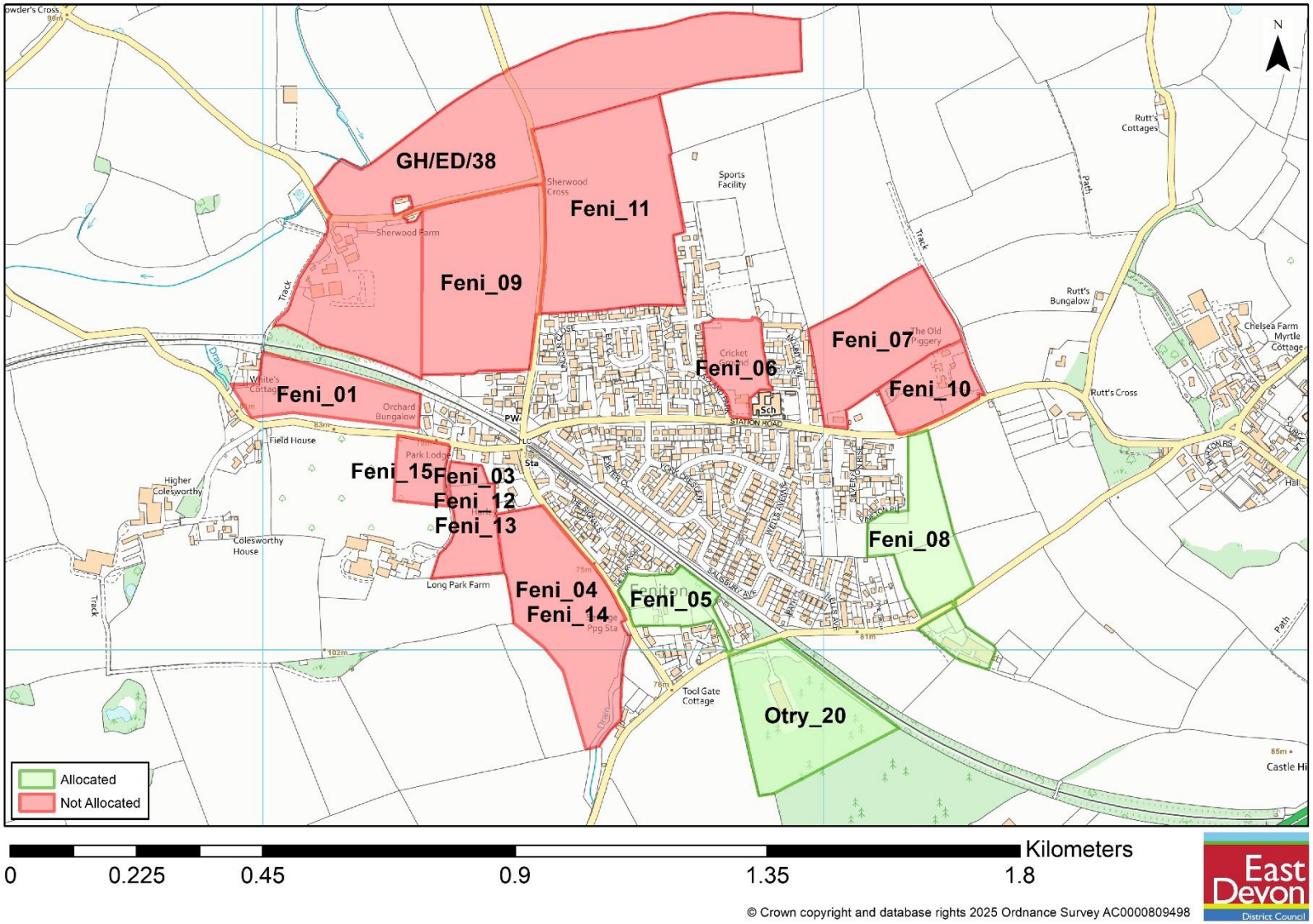
Sites: Exton				
Site / SA Objective	Wood_01	Wood_28	Wood_41	
• Considerable landscaping at Wood_41 would be required due to significant negative effects upon the landscape, but the sensitivity is such that a significant negative effect is likely to remain. A minor negative landscape effect for the other sites means that appropriate landscaping should be incorporated, although as all sites are currently greenfield, a negative effect would remain. • The design and layout of Wood_28 should conserve and enhance grade II* Exton Farmhouse, including through the provision of public open space in the northern part of the site. • Wood_28 should include tree planting in the southern field, to reflect their historic presence, and retain the hedgerow that dissects the site, to reduce adverse landscape effects. • Development of Wood_28 should ensure existing surface water flood risk along Mill Lane is not exacerbated. • Significant capacity upgrades are required to Woodbury Wastewater Treatment Works – Strategic Policy AR02 requires infrastructure improvements to overcome water quality issues before development is approved. • Provide a pedestrian crossing over the A376 from Wood_01 and 28, to enable access to village facilities. • As Wood_01 and Wood_28 adjoin each other, pedestrian links should be provided between the two sites, to facilitate onward journeys from the sites. • Noise buffer to A376. These site-specific mitigation measures have been incorporated for the sites that are allocated in Local Plan Strategic Policy SD17.				
Preferred alternative: Wood_01 for 14 dwellings; Wood_28 for 39 dwellings. **Reasons for preferred alternatives:** • Wood_01 – Field 4583, Exmouth Road is 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 is preferred as consistent with spatial strategy, good access to services/facilities and jobs, excellent sustainable travel links.				

Sites: Exton				
Site / SA Objective	Wood_01	Wood_28	Wood_41	

Reasons for rejected sites:

- 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.

Settlement: Feniton



Reasonable alternatives

- Feni_01 – Land at Feniton forming part of Sherwood Farm
- Feni_05 – Land and buildings at Burland Mead
- Feni_06 – FPFA Club, Station Road
- Feni_07 – Lyndale
- Feni_08 – Land Southeast of Beechwood, Station Road
- Feni_09 – Land at Sherwood Cross
- Feni_10 – Westlades
- Feni_11 – Land at Sherwood Cross
- Feni_13 – Land at Long Park Farm
- Feni_14 – Land off Ottery Road
- Feni_15 – Long Park Farm
- GH/ED/38 – Land at Sherwood Cross
- Otry_20 – Land to the south-east of Bridge Cottages (employment site)

Outline of reasons for selecting the alternatives

The majority of the sites listed as reasonable alternatives above have 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, they are located within or adjacent to Feniton (and therefore consistent with the spatial strategy), are not already allocated in a 'made' Neighbourhood Plan, and do not currently have planning permission. Otry_20 was submitted for employment uses and has been assessed on this basis. Feni_13, 14 and 15 are reasonable alternatives despite being unachievable in the HELAA, as it is considered that minerals constraints can be addressed on these sites.

The table below shows 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 Feni_09 and Feni_11 as shown on the map. However, for the purposes of SA work, GH/ED/38 is the northerly area only. At the next call for sites, Feni_09 was submitted and this included the area shown as Feni_09 as the westerly field,

even though a HELAA submission covered it and also Feni_11. Feni_11 was submitted in the 2022 call for sites and relates just to the area as shown on the map – note that Feni_11 has recently (July 2025) been granted planned permission (on appeal) for up to 86 dwellings (application 24/0431/MOUT).

For the reasons given, the following sites are not considered to be reasonable alternatives:

- Feni_03 overlaps with Feni_13.
- Feni_04 overlaps with Feni_14.
- Feni_12 is unachievable in the HELAA due to minerals constraints.

Sites: Feniton														
Site / SA Objective	**Feni_01**	**Feni_13**	**Feni_14**	**Feni_05**	**Feni_06**	**Feni_07**	**Feni_08**	**Feni_09**	**Feni_11**	**GH/ED/38**	**Feni_10**	**Feni_15**	**Otry_20**	
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. In addition, the HRA notes potential air quality impacts at East Devon Heaths SAC/SPA from increased traffic from sites at Feniton. Other than this there are no designated biodiversity sites that are at or close to allocated sites. Otry_20 is intensively managed for fruit production so it is likely to have limited on site wildlife value. However tree coverage, with some mature trees, to boundaries are likely to be of some value. All sites have been attributed with a neutral 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.													

Sites: Feniton														
Site / SA Objective	Feni_01	Feni_13	Feni_14	Feni_05	Feni_06	Feni_07	Feni_08	Feni_09	Feni_11	GH/ED/38	Feni_10	Feni_15	Otry_20	
	This neutral effect is mixed with a long-term minor positive effect from the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.													
2. Landscape	**0**	**-**	**-**	**+**	**0**	**0**	**0**	**0**	**0**	**-**	**0**	**0**	**-**	
Landscape commentary	Feniton lies to the west of the East Devon National Landscape 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 less adverse impacts upon the landscape, so a neutral effect for most sites. 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, namely Feni_13, Feni_14 and GH/ED/38. Otry_20 juts out in a south easterly direction from the existing built form of Feniton and would constitute new development south of Green Lane that for the most part forms the southerly boundary of built development in/at the village. The site is, however, flat and quite low lying and with some mature planting to parts of site boundaries. The site is currently predominantly used as an orchard, though with a poultry house within. Feni_05, was previously used as a plant nursery and has a slightly derelict character and as such is afforded a minor positive effect 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**	

Sites: Feniton														
Site / **SA Objective**	**Feni_01**	**Feni_13**	**Feni_14**	**Feni_05**	**Feni_06**	**Feni_07**	**Feni_08**	**Feni_09**	**Feni_11**	**GH/ED/38**	**Feni_10**	**Feni_15**	**Otry_20**	
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_14 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, albeit footpaths are lacking in places as would be expected in a village. 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 basic facilities and wider range of jobs would entail travelling to locations and centres elsewhere.													
5. Climate change adaptation	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	

Sites: Feniton														
Site / **SA Objective**	**Feni_01**	**Feni_13**	**Feni_14**	**Feni_05**	**Feni_06**	**Feni_07**	**Feni_08**	**Feni_09**	**Feni_11**	**GH/ED/38**	**Feni_10**	**Feni_15**	**Otry_20**	
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, meaning a minor negative effect. 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. The flood risk that affects Feni_07 means it is included in the Strategic Flood Risk Assessment Level 2, which sets out further detail on key points and constraints to be considered through a site-specific Flood Risk Assessment.													
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, and Feni_10 fall wholly or nearly all within this highest grade classification and as such are attributed with a major negative effect. Otry_20 is currently in use as an orchard and the west part of site is grade 2 agricultural land, remainder is grade 3 (uncertain if 'a' or 'b'). Potentially contaminated land along the western edge, under the former railway line. 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 (except small parts of Feni_01 and GH/ED/38) are identified as falling in a Drinking Water Source Protection Zone 'Total Catchment' area category. South West Water forecast there will be adequate water supply; but the capacity of Feniton Wastewater Treatment Works is forecast to be exceeded by proposed development at the settlement													

Sites: Feniton														
Site / SA Objective	Feni_01	Feni_13	Feni_14	Feni_05	Feni_06	Feni_07	Feni_08	Feni_09	Feni_11	GH/ED/38	Feni_10	Feni_15	Otry_20	
	(Feni_05, 08, Otry_20), albeit environment permit compliance is sufficient (Water Cycle Study, November 2025). Therefore, a negative effect is likely for proposed allocations, with uncertainty for others.													
8. Homes	+	+	+	+	+	+	+	+	+	+	+	+	- -	
Homes commentary	All of the sites (bar the employment promoted site of Otry_20) will accommodate housing but less than 100 dwellings and so in each case they have been attributed a minor positive effect. 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	+	
Health and well-being commentary	All of the sites assessed fall within areas at or below the 40% least deprived in the country so less potential to alleviate deprivation. 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 the train travels through the village and noise could adversely affect smaller parts of Feni_01, Feni_05, Feni_09 and GH/ED/83, but not enough to impact on the overall neutral scoring. The loss of sports pitches mean that Feni_06 has a negative effect. Otry_20 has a positive effect on well-being in general through the provision of jobs; noise from being adjacent to railway line, but employment is a less sensitive use than residential.													

Sites: Feniton														
Site / SA Objective	**Feni_01**	**Feni_13**	**Feni_14**	**Feni_05**	**Feni_06**	**Feni_07**	**Feni_08**	**Feni_09**	**Feni_11**	**GH/ED/38**	**Feni_10**	**Feni_15**	**Otry_20**	
10. Access to services	+	+	+	+	+	+	+	+	+	+	+	+	+	
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 Ottry_20 which is promoted for employment uses and is given a major 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, so some uncertainty is noted.													
12. Town centres	-	-	-	-	-	-	-	-	-	-	-	-	-	

Sites: Feniton														
Site / SA Objective	**Feni_01**	**Feni_13**	**Feni_14**	**Feni_05**	**Feni_06**	**Feni_07**	**Feni_08**	**Feni_09**	**Feni_11**	**GH/ED/38**	**Feni_10**	**Feni_15**	**Otry_20**	
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.													
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 – the A30 is around 1.4km to the south, accessed along an unlit lane, albeit cars can pass each other along most its length. Superfast broadband exists in local post codes.													

Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects:

- In general, sites in Feniton perform reasonably well and as such mitigation for possible adverse impacts in respect of 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_14 and GH/ED/38.
- Feni_08 should include sensitive design and boundary treatment on its eastern edge to soften the impact upon the countryside beyond.
- A concern in Feniton, relevant to all sites, is the comparative lack of employment opportunities at the village and services and facilities. Securing mixed use and/or employment sites would be desirable in terms of mitigation for impacts and, for example, not adding to existing patterns of out-commuting.
- Significant capacity upgrades are required to Feniton Wastewater Treatment Works – Strategic Policy AR02 requires infrastructure improvements to overcome water quality issues before development is approved.

Sites: Feniton														
Site / SA Objective	Feni_01	Feni_13	Feni_14	Feni_05	Feni_06	Feni_07	Feni_08	Feni_09	Feni_11	GH/ED/38	Feni_10	Feni_15	Otry_20	
These site-specific mitigation measures have been incorporated for the sites that are allocated in Local Plan Strategic Policy SD18.														

Preferred alternatives: Feni_05 for 42 dwellings; Feni_08 for 60 dwellings; Otry_20 for 4.64 ha of employment land.

Reasons for preferred alternatives:

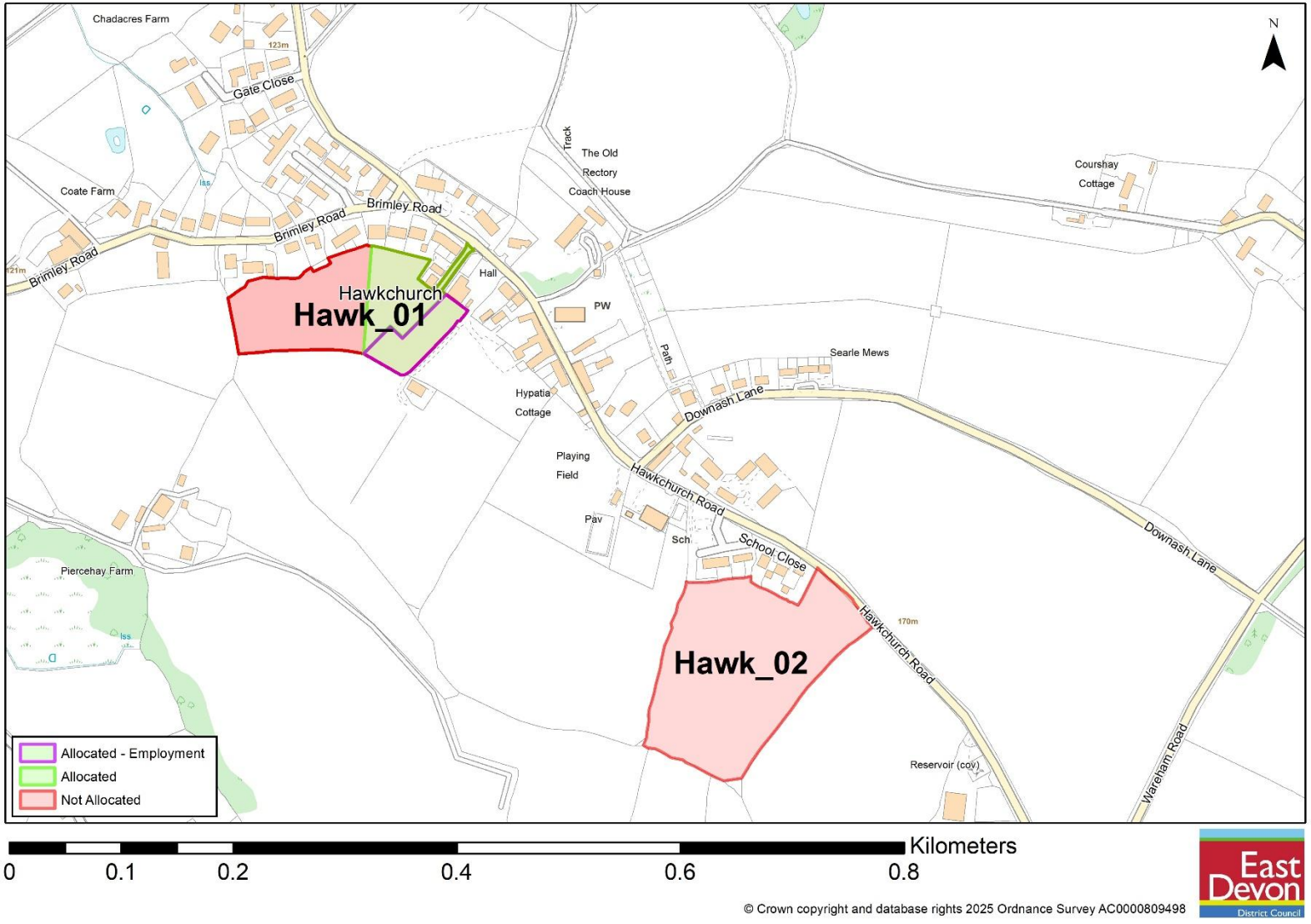
- Feni_05 – Land and buildings at Burland Mead is preferred as it is consistent with the spatial strategy, has good access to facilities in the village, and limited landscape impact being surrounded by existing development on three sites on the site of a former plant nursery containing structures and buildings that are in a poor state of repair.
- Feni_08 – Land Southeast of Beechwood, Station Road is preferred as it is consistent with the spatial strategy, has good access to facilities in the village, no major adverse landscape, biodiversity or historic environment impacts.
- Otry_20 – Land to the south-east of Bridge Cottages (employment site) is preferred as it is consistent with the spatial strategy, and helps meet employment land needs with no significant adverse sustainability effects.

Reasons for rejected sites:

- Feni_01 – Land at Feniton forming part of Sherwood Farm is rejected as there are other, more preferable, sites at Feniton and this site in addition would not be consistent with the spatial strategy; adverse landscape impact of development extending prominently westward of Feniton into the countryside; and loss of best and most versatile agricultural land (Grade 2).
- Feni_06 – FPFA Club, Station Road is rejected as an existing community facility would be lost (assuming it was not replaced) should development go ahead; there are other, more preferable, sites at Feniton and this site in addition would not be consistent with the spatial strategy; and loss of best and most versatile agricultural land (Grade 1).

Sites: Feniton														
Site / SA Objective	Feni_01	Feni_13	Feni_14	Feni_05	Feni_06	Feni_07	Feni_08	Feni_09	Feni_11	GH/ED/38	Feni_10	Feni_15	Otry_20	
• Feni_07 – Lyndale is rejected as there are other, more preferable, sites at Feniton and this site in addition would not be consistent with the spatial strategy; flood alleviation measures are being implemented on part of the site; and loss of best and most versatile agricultural land (Grade 1). • Feni_09 – Land at Sherwood Cross is rejected as there are other, more preferable, sites at Feniton and this site in addition would not be consistent with the spatial strategy; and loss of best and most versatile agricultural land (Grade 2). • Feni_10 – Westlades is rejected as there are other, more preferable, sites at Feniton and this site in addition would not be consistent with the spatial strategy; and loss of best and most versatile agricultural land (Grade 1). • Feni_11 – Land at Sherwood Cross is rejected as there are other, more preferable, sites at Feniton and this site in addition would not be consistent with the spatial strategy; and loss of best and most versatile agricultural land (Grade 1). • Feni_13 – Land at Long Park Farm is rejected as there are other, more preferable, sites at Feniton and this site in addition would not be consistent with the spatial strategy; and loss of best and most versatile agricultural land (Grade 2). • Feni_14 – Land off Ottery Road is rejected due to adverse effect on the listed building to the south and adverse landscape impact; there are other, more preferable, sites at Feniton and this site in addition would not be consistent with the spatial strategy; and loss of best and most versatile agricultural land (Grade 2). • Feni_15 – Long Park Farm is rejected as there are other, more preferable, sites at Feniton and this site in addition would not be consistent with the spatial strategy; and loss of best and most versatile agricultural land (Grade 2). • GH/ED/38 - Land at Sherwood Cross is rejected due to adverse landscape impact as northern parts of the site are open and quite exposed whilst western edges have a sense of remoteness from existing Feniton development; adverse effect on listed buildings within the site; there are other, more preferable, sites at Feniton and this site in addition would not be consistent with the spatial strategy; and loss of best and most versatile agricultural land (mix of Grade 1 and 2).													

Settlement: Hawkchurch



Reasonable alternatives

- Hawk_01 – Norton Store
- Hawk_02 – Field south-east of Hawkchurch School

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, they are located within or adjacent to Hawkchurch (and therefore consistent with the spatial strategy), are not already allocated in a 'made' Neighbourhood Plan, and do not currently have planning permission.

Sites: Hawkchurch			
Site / **SA Objective**	**Hawk_01**	**Hawk_02**	
1. Biodiversity	**+ / - -**	**+ / - -**	
Biodiversity commentary	Both sites are within River Axe SAC Nutrient catchment area – at the time of writing, mitigation is likely to be difficult, so a major negative effect. The sites are also within 25m of the draft Nature Recovery Network. These negative effects are mixed with a long-term minor positive effect from the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.		

Sites: Hawkchurch			
Site / **SA Objective**	**Hawk_01**	**Hawk_02**	
2. Landscape	**-**	**-**	
Landscape commentary	Hawk_01 is an agricultural field with active employment use behind existing housing. Mature trees and hedgerow to south, west, east borders, mature tree in field, but set in context of residential and industrial development. Hawk_02 is a field in agricultural use to south of Hawkchurch, adjoins an exception site, but extends into the open countryside. Mature hedgerow to surround with occasional mature tree.		
3. Hist. built env	**0**	**0**	
Hist. built env. commentary	Several listed buildings within 100-200m of Hawk_01 but there is intervening development which means none would be affected. Same findings for Hawk_02 which is over 200m from nearest listed buildings.		
4. Climate change carbon emissions	**-**	**-**	
Climate change carbon emissions commentary	Although there are bus stops close to both sites, there is only one bus service a week, so limited sustainable travel provision. There is a primary school and shop within the village, but overall limited opportunities for sustainable travel, so a minor negative effect as the car will be needed to access a further range of facilities and jobs than is found in the village.		

Sites: Hawkchurch			
Site / **SA Objective**	**Hawk_01**	**Hawk_02**	
5. Climate change adaptation	**+**	**+**	
Climate change adaptation commentary	Neither site is 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	Hawk_01 is partly within an area of contamination/hazardous waste. Both sites are Grade 3 agricultural land, which could be Grade 3a best and most versatile, so an uncertain negative effect.		
7. Water resources	**-**	**- ?**	
Water resources commentary	The sites are within the River Axe SAC phosphates catchment and could cause major negative effects on water quality. No sites are located within a groundwater source protection zone. South West Water forecast there will be adequate water supply; and Hawkchurch Wastewater Treatment Works has sufficient capacity and environmental permit limits for the proposed development sites (Hawk_01) at Hawkchurch (Water Cycle Study, November 2025), but uncertainty for the other sites.		
8. Homes	**+**	**+**	

Sites: Hawkchurch			
Site / **SA Objective**	**Hawk_01**	**Hawk_02**	
Homes commentary	Both sites can accommodate around 30-40 dwellings. 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	Both sites have nearby access to open space and children's play area, with limited pollution issues. This positive is mixed with a negative effect for Hawk_01, due to the provision of employment on-site.		
10. Access to services	**+**	**+**	
Access to services commentary	Both are sites are close (within 400m) to the primary school, shop, pub, and village hall. The pedestrian route is along narrow country lanes, that lack footpaths, albeit the road is lightly trafficked.		
11. Jobs and employment	**+**	**-**	
Jobs/employment commentary	Neither site is within 1,600m of an employment site, however Hawk_01 offers the opportunity to use existing on-site barns for employment use.		

Sites: Hawkchurch			
Site / **SA Objective**	**Hawk_01**	**Hawk_02**	
12. Town centres	**-**	**-**	
Town centres commentary	Beyond 1,600 metres of a town centre.		
13. Connectivity and transport	**-**	**-**	
Connectivity and transport commentary	The sites are located beyond 1,600m of a train station, hourly bus service, 'A' road, and recognised cycle route. However, the village has 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. A minor negative effect overall.		
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: • River Axe SAC Nutrient catchment area mitigation to be considered through the Habitats Regulations Assessment. • Both sites should include landscaping to minimise adverse impacts upon the landscape. • Contamination assessment required for a planning application at Hawk_01, and any mitigation measures should be incorporated into the development. • 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 – Hawk_01 should retain the existing employment space plus a permanent location for the village shop. These site-specific mitigation measures have been incorporated for the site that is allocated in Local Plan Strategic Policy SD19.			

Sites: Hawkchurch			
Site / **SA Objective**	**Hawk_01**	**Hawk_02**	

Preferred alternative: Hawk_01 (eastern part) for 12 dwellings.

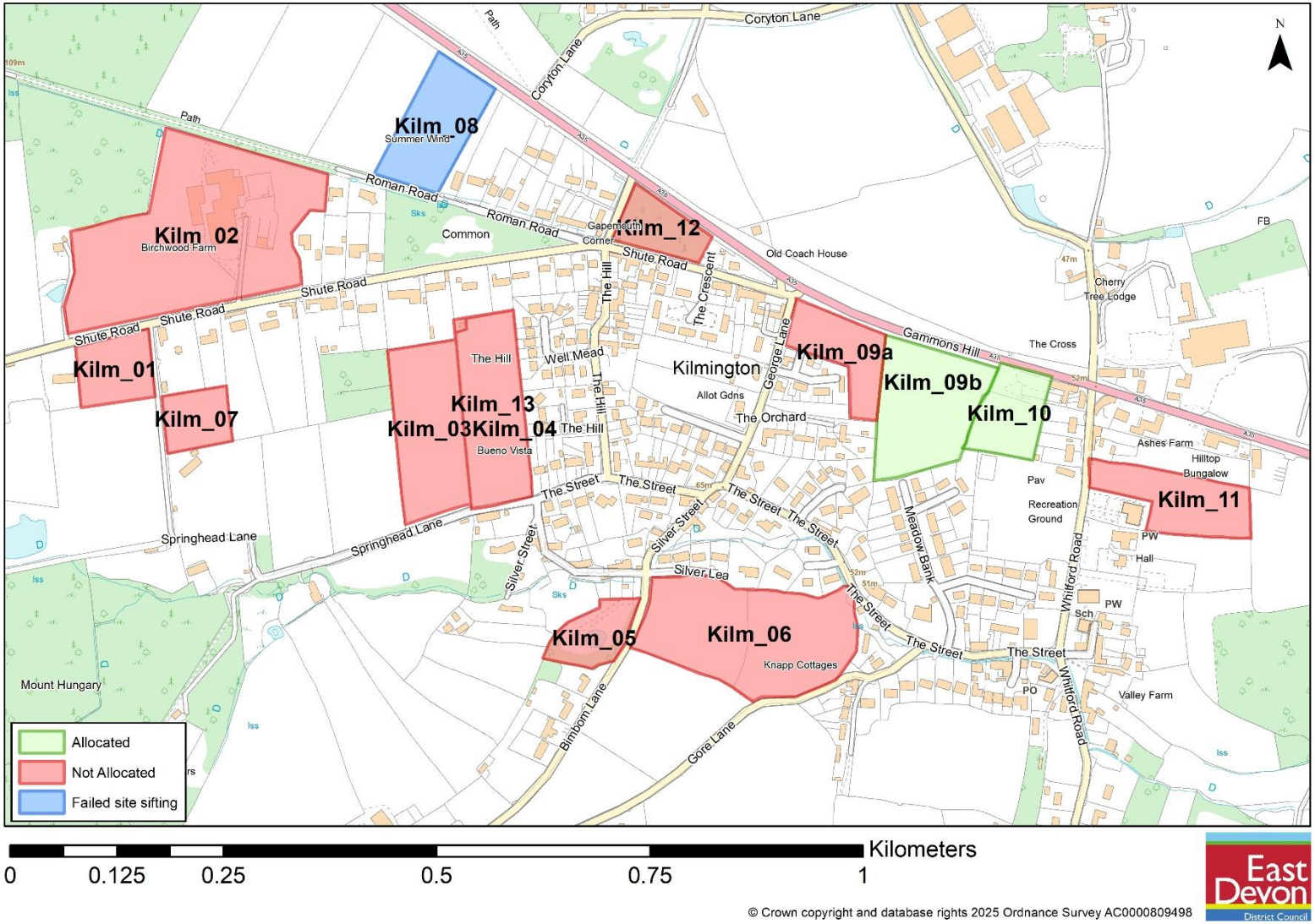
Reasons for preferred alternative:

- Hawk_01 (eastern part) – Norton Store is preferred as it is consistent with the spatial strategy, with limited adverse impacts upon the landscape and historic environment.

Reasons for rejected site:

- Hawk_02 – Field south-east of Hawkchurch school is rejected as it is located beyond the main village, extending development into open countryside that has a pastoral, rural character.

Settlement: Kilmington



Reasonable alternatives

- Kilm_01 – Land off Shute Road
- Kilm_02 – Birchwood Farm, Shute Road
- Kilm_03 – Land off Springhead Lane
- Kilm_05 – Land At Pit Orchard, Bim Bom Lane
- Kilm_06 – Land at Gore Lane
- Kilm_07 – Land adjoining Breach
- Kilm_09b – Land east of George Lane
- Kilm_10 – Land to the west and south west of the Old Inn
- Kilm_12 – Land on the north side of Shute Road (Gapemouth Corner)
- Kilm_13 – Land to north of Springhead 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). In addition, they are located within or adjacent to Kilmington (and therefore consistent with the spatial strategy), are not already allocated in a 'made' Neighbourhood Plan, and do not currently have planning permission.

For the reasons given, the following sites are not considered to be reasonable alternatives:

- Kilm_04 overlaps with Kilm_13.
- Kilm_08 is unachievable in the HELAA due to poor access.
- Kilm_09a is already allocated in the Kilmington Neighbourhood Plan.
- Kilm_11 is already allocated in the Kilmington Neighbourhood Plan.

Sites: Kilmington											
Site / SA Objective	**Kilm_01**	**Kilm_02**	**Kilm_03**	**Kilm_13**	**Kilm_05**	**Kilm_06**	**Kilm_07**	**Kilm_09**	**Kilm_10**	**Kilm_12**	
1. Biodiversity	**+ / - -**	**+ / -**	**+ / -**	**+ / -**	**+ / -**	**+ / -**	**+ / -**	**+ / -**	**+ / - -**	**+ / - -**	
Biodiversity commentary	All sites are within River Axe SAC Nutrient catchment area – at the time of writing, mitigation is likely to be difficult, so a major negative effect. In addition, Kilmington is within the sustenance zone for bats associated with Beer Quarry & Caves SAC. Kilm_01, 03, 06, 09 and 13 covered by improved grassland, trees and vegetation on the edge of the site boundary. No ecological designations within 100m of the site. 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 Habitat and County Wildlife Site (CWS) 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 abd Section 41 (S41) Habitat and County Wildlife Site (CWS) within 100m of Kilm_12. 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. Kilm_09 and 10 potential for recreation impact on the River Axe SAC as there is byway nearby that provides direct access to the SAC. These negative effects are mixed with a long-term minor positive effect from the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.										
2. Landscape	**- -**	**- -**	**- -**	**- -**	**- -**	**- -**	**- -**	**- -**	**- -**	**- -**	
Landscape commentary	All sites are within the National Landscape, so are likely to have a major negative effect.										

Sites: Kilmington											
Site / **SA Objective**	**Kilm_01**	**Kilm_02**	**Kilm_03**	**Kilm_13**	**Kilm_05**	**Kilm_06**	**Kilm_07**	**Kilm_09**	**Kilm_10**	**Kilm_12**	
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 assets within 100m that would be affected by developing the site. Substantial existing development in between Kilm_13 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. At 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. 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). 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_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.										
4. Climate change carbon emissions	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	
Climate change carbon emissions commentary	All the sites in Kilmington have 7 out of 12 facilities within 1,600m, there is a two hourly bus service on the A35. Therefore, emissions from travel are reduced, but likely increase in car travel. So a neutral effect for all.										

Sites: Kilmington											
Site / **SA Objective**	**Kilm_01**	**Kilm_02**	**Kilm_03**	**Kilm_13**	**Kilm_05**	**Kilm_06**	**Kilm_07**	**Kilm_09**	**Kilm_10**	**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. Kilm_05 is partially affected by surface water flood risk. Surface water flood risk affects Kilm_10, to the extent that it was included in the Strategic Flood Risk Assessment Level 2, which sets out further detail on key points and constraints to be considered through a site-specific Flood Risk Assessment. All other sites are outside areas of flood risk, leading to a positive effect.										
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. Kilm_10 is partly previously developed land (pub car park), so this is mixed with a positive 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. No sites are located within a groundwater source protection zone. South West Water forecast there will be adequate water supply; and Kilmington Wastewater Treatment Works has sufficient capacity and environmental permit limits for the proposed development sites (Kilm_09, 10) at Kilmington (Water Cycle Study, November 2025), but uncertainty for the other sites. Overall, a minor negative effect is likely for these sites, with uncertainty for the others.										

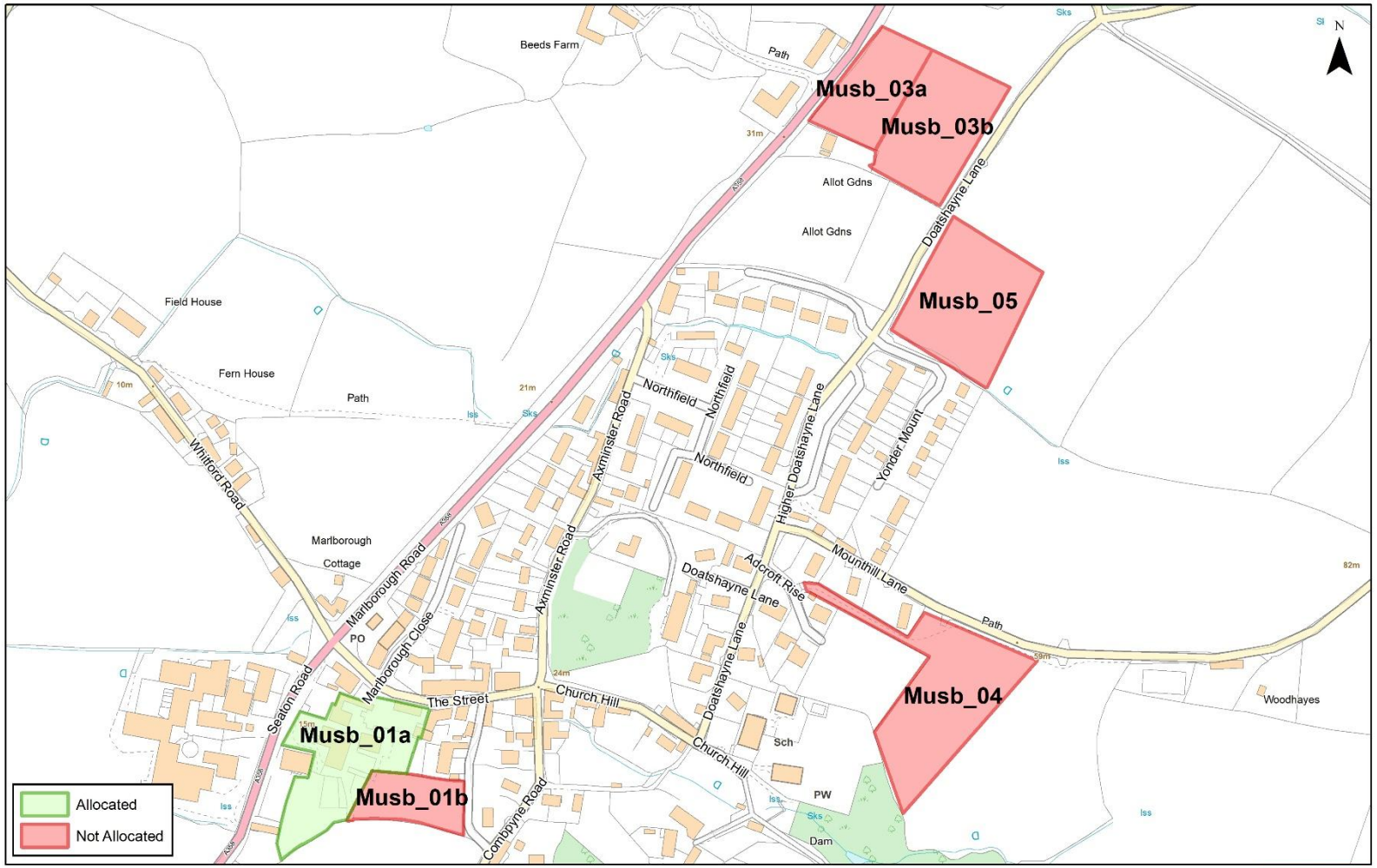
Sites: Kilmington											
Site / SA Objective	**Kilm_01**	**Kilm_02**	**Kilm_03**	**Kilm_13**	**Kilm_05**	**Kilm_06**	**Kilm_07**	**Kilm_09**	**Kilm_10**	**Kilm_12**	
8. Homes	**+**	**+**	**+**	**+**	**+**	**+**	**+**	**+**	**+**	**+**	
Homes commentary	All the sites have potential to deliver less than 100 dwellings, so will have a positive effect. An appropriate mix of tenures and sizes including affordable housing is assumed for all sites.										
9. Health and well-being	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**-**	**-**	**-**	
Health and well-being commentary	All of the sites 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, and Kilm_12 adjacent to A35 road, so negative impact from noise and air quality.										
10. Access to services	**+**	**+**	**+**	**+**	**+**	**+**	**+**	**+**	**+ / - ?**	**+**	
Access to services commentary	All the sites in Kilmington are within 1,600m of a primary school, shop, community hall, pub and post office, with a two hourly bus service on the A35. The pedestrian route to facilities would be along narrow country lanes, that lack footpaths, albeit the roads are lightly trafficked. Kilm_10 incorporates a pub car park, so uncertainty as to whether the loss of parking space could compromise the viability of the pub, so a mixed negative uncertain effect.										
11. Jobs and employment	**+**	**+**	**+**	**+**	**+**	**+**	**+**	**+**	**+**	**+**	

Sites: Kilmington											
Site / **SA Objective**	**Kilm_01**	**Kilm_02**	**Kilm_03**	**Kilm_13**	**Kilm_05**	**Kilm_06**	**Kilm_07**	**Kilm_09**	**Kilm_10**	**Kilm_12**	
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.										
12. Town centres	-	-	-	-	-	-	-	-	-	-	
Town centres commentary	All sites are beyond 1,600 metres of a town centre.										
13. Connectivity and transport	+	+	+	+	+	+	+	+	+	+	
Connectivity and transport commentary	All the sites in Kilmington are located within 800m of an 'A' road, a recognised cycle route, and two hourly bus service. Superfast broadband is available in local post codes.										
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: • All the sites either fall within National Landscape or have a visual connection with the National Landscape (Kilm_11), so 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. • Development should enhance sustainable travel links e.g. Kilm_09b should include footpath links to adjoining roads and paths, to north and south.											

Sites: Kilmington										
Site / SA Objective	Kilm_01	Kilm_02	Kilm_03	Kilm_13	Kilm_05	Kilm_06	Kilm_07	Kilm_09	Kilm_10	Kilm_12
• 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. • 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 would be subject to further assessments. • Part of Kilm_10 is at risk of flooding, and the results of the level 2 SFRA should be incorporated into development proposals. • Development should ensure that the pub adjacent to Kilm_10 is not compromised by a loss of car parking, for example through the retention of parking spaces. These site-specific mitigation measures have been incorporated for the sites that are allocated in Local Plan Strategic Policy SD20.										
Preferred alternatives: Kilm_09b for 23 dwellings; Kilm_10 for 5 dwellings. **Reasons for preferred alternatives:** • Kilm_09b – Land east of George Lane preferred as consistent with the spatial strategy, good access to facilities and employment, and limited harm to biodiversity. • Kilm_10 – Land to the west and south west of the Old Inn preferred as consistent with the spatial strategy, good access to facilities and employment, and partly previously developed land. **Reasons for rejected sites:** • 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.										

Sites: Kilmington										
Site / SA Objective	Kilm_01	Kilm_02	Kilm_03	Kilm_13	Kilm_05	Kilm_06	Kilm_07	Kilm_09	Kilm_10	Kilm_12
• Kilm_05 – Land At Pit Orchard, Bim Bom Lane rejected due to significant adverse landscape effect and adverse biodiversity impact from the presence of vegetation on-site. • Kilm_06 – Land at Gore Lane rejected due to significant adverse landscape effect and adverse historic environment impact from adjoining the Conservation Area and close to listed buildings. • Kilm_07 – Land adjoining Breach rejected due to significant adverse landscape effect. • Kilm_12 – Land on the north side of Shute Road (Gapemouth Corner) rejected due to significant adverse landscape effect and adverse biodiversity impact due to existing trees and vegetation on site. • Kilm_13 – Land to north of Springhead Lane is rejected due to significant adverse landscape effect.										

Settlement: Musbury



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Reasonable alternatives

- Musb_01 – Baxter's Farm
- Musb_03 – Churchpath Field
- Musb_04 – Adcroft, adjacent to Westbank, Mounthill Lane
- Musb_05 – Doatshayne 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). In addition, they are located within or adjacent to Musbury (and therefore consistent with the spatial strategy), are not already allocated in a 'made' Neighbourhood Plan, and do not currently have planning permission. Musb_02 is not within or adjacent, or otherwise well-related, to Musbury, so is not a reasonable alternative.

Sites: Musbury					
Site / **SA Objective**	**Musb_01**	**Musb_03**	**Musb_04**	**Musb_05**	
1. Biodiversity	**+ / - -**	**+ / - -**	**+ / - -**	**+ / - -**	
Biodiversity commentary	All sites are within River Axe SAC Nutrient catchment area – at the time of writing, mitigation is likely to be difficult, so a major negative effect. All sites are also in 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 and 05 is adjacent to draft nature recovery network and a core nature area.				

Sites: Musbury					
Site / **SA Objective**	**Musb_01**	**Musb_03**	**Musb_04**	**Musb_05**	
	These negative effects are mixed with a long-term minor positive effect from the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.				
2. Landscape	**- -**	**- -**	**- -**	**- -**	
Landscape commentary	All sites are in the East Devon National Landscape and parts of them are highly sensitive to landscape change with extensive views across the Axe Valley.				
3. Hist. built env	**-**	**0**	**-**	**0**	
Hist. built env. commentary	Musbury Conservation Area contains several listed buildings, including Grade I listed church. Musb_01 and 04 are particularly close to these assets, and development has the potential to affect their setting.				
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 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.				

Sites: Musbury					
Site / **SA Objective**	**Musb_01**	**Musb_03**	**Musb_04**	**Musb_05**	
5. Climate change adaptation	**-**	**+**	**+**	**+**	
Climate change adaptation commentary	Surface water flood risk and a small corner of fluvial flood risk affects Musb_01, to the extent that it was included in the Strategic Flood Risk Assessment Level 2, which sets out further detail on key points and constraints to be considered through a site-specific Flood Risk Assessment. No other sites are affected by flood risk, so a minor positive effect.				
6. Land resources	**+ / - ?**	**- ?**	**- ?**	**- ?**	
Land resources commentary	All sites are Grade 3 agricultural land, so uncertain negative effect. This is mixed with a positive effect for Musb_01 which is partly previously developed land.				
7. Water resources	**-**	**- ?**	**- ?**	**- ?**	
Water resources commentary	All of the sites are within the River Axe SAC phosphates catchment and could cause major negative effects on water quality. No sites are located within a groundwater source protection zone. South West Water forecast there will be adequate water supply; and Whitford & Musbury Wastewater Treatment Works has sufficient capacity and environmental permit limits for the proposed development sites (Musb_01) at Musbury (Water Cycle Study, November 2025), but uncertainty for the other sites. Overall, a minor negative effect is likely for Musb_01, with uncertainty for the others.				
8. Homes	**+**	**+**	**+**	**+**	

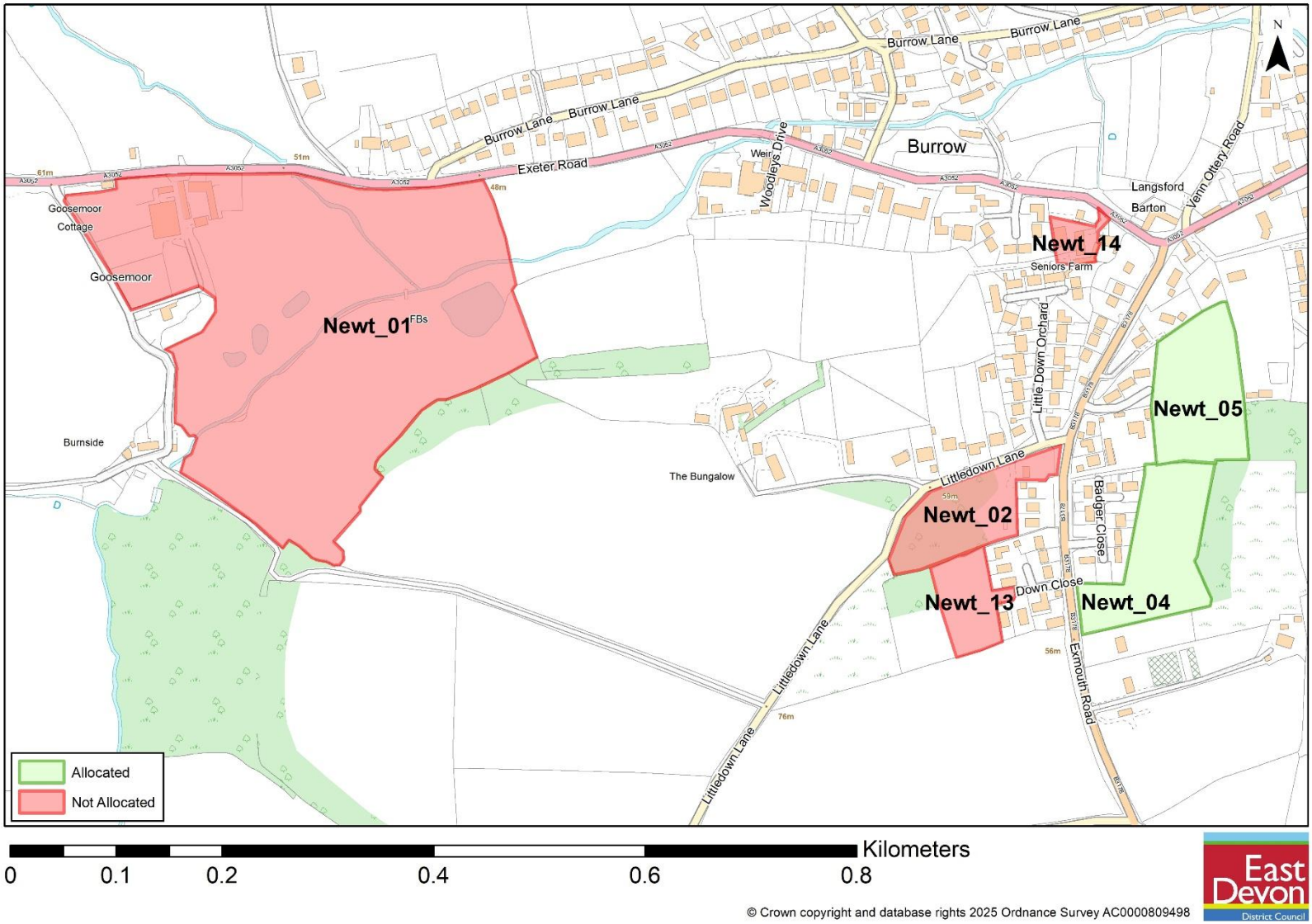
Sites: Musbury					
Site / **SA Objective**	**Musb_01**	**Musb_03**	**Musb_04**	**Musb_05**	
Homes commentary	All the sites have potential to deliver less than 100 dwellings, so will have a positive effect. An appropriate mix of tenures and sizes including affordable housing is assumed for all sites.				
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 and 04 are 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 primary school, shop, village hall and pub, although in the village centre this is along lanes with no separate footway.				
11. Jobs and employment	**+**	**-**	**-**	**-**	

Sites: Musbury					
Site / **SA Objective**	**Musb_01**	**Musb_03**	**Musb_04**	**Musb_05**	
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, 04 or 05. 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	**-**	**-**	**-**	**-**	
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 the A358 road with an hourly bus service, but beyond 1,600m of a recognised cycle route. Broadband speeds in local post codes are 30-80 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 and Caves SAC (bats) to be considered in the Habitats Regulations Assessment, but policy can refer to avoidance/mitigation to reduce adverse effects.					

Sites: Musbury					
Site / SA Objective	Musb_01	Musb_03	Musb_04	Musb_05	
• The landscape impacts of Musb_01 and 03 can reduced by developing only the lower parts of the site – this results in site Musb_01a, which will have a minor negative effect, rather than major. • Further detailed assessment should accompany a planning application to maximise opportunities to conserve and enhance the National Landscape, including reflecting the existing development pattern of Musbury. • At Musb_01, the impact on heritage assets can be lessened by conserving and enhancing the conservation area, listed buildings and their setting, retaining some of the existing buildings as set out in the Baxter's Farm Development Brief. • Noise from the A358 on Musb_01 and 03 can be reduced through site design and possibly landscaping. • Part of Musb_01a is at risk of flooding, and the results of the level 2 SFRA should be incorporated into development proposals. These site-specific mitigation measures have been incorporated for the site that is allocated in Local Plan Strategic Policy SD21.					
Preferred alternative: Musb_01a for 15 dwellings and 0.06 hectares of employment land. **Reasons for preferred alternative:** • Musb_01a – Baxter's Farm is preferred as it is consistent with the spatial strategy with good access to services/facilities and makes good use of existing building and former farmyard. **Reasons for rejected sites:** • Musb_01b – Baxter's Farm is rejected as it is located on higher slopes (compared to Musb_01a) and would have an adverse landscape impact, and adverse historic environment impact given its proximity to the Conservation Area and listed buildings. • Musb_03 – Churchpath Field is rejected due to adverse landscape impact.					

Sites: Musbury					
Site / **SA Objective**	**Musb_01**	**Musb_03**	**Musb_04**	**Musb_05**	
• Musb_04 – Adcroft, adjacent to Westbank, Mounthill Lane is rejected due to adverse landscape impact and adverse impact upon the historic environment, particularly the Grade I listed church. • Musb_05 – Doatshayne Lane is rejected due to adverse landscape impact.					

Settlement: Newton Poppleford



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). In addition, they are located within or adjacent to Newton Poppleford (and therefore consistent with the spatial strategy), are not already allocated in a 'made' Neighbourhood Plan, and do not currently have planning permission.

For the reasons given, the following sites are not considered to be reasonable alternatives:

- Newt_03 was withdrawn no longer available.
- Newt_07 is probably unachievable in the HELAA due to poor access.
- Newt_09 is probably unachievable in the HELAA due to poor access.
- Newt_10 is probably unachievable in the HELAA due to poor access.
- Newt_11 not suitable in HELAA as within Flood Zone 3.
- Newt_12 not suitable in HELAA as too small and within Flood Zone 3.
- Newt_15 is probably unachievable in the HELAA as no access.
- Newt_16 not suitable in HELAA as within Flood Zone 3.
- Newt_17 is probably unachievable in the HELAA due to poor access.

- Newt_18 not suitable in HELAA as within Flood Zone 3.
- Newt_19 overlaps Newt_13.

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 the draft 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 only in the Pebblebed Heaths mitigation zone. Newt_04 and 05 are also next to a draft nature recovery network. In addition, the HRA notes potential air quality impacts at East Devon Heaths SAC/SPA from increased traffic from sites at Newton Poppleford. These negative effects are mixed with a long-term minor positive effect from the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.						
2. Landscape	**- -**	**- -**	**- -**	**- -**	**- -**	**- / +**	
Landscape commentary	All sites are within the East Devon National Landscape and are sensitive to landscape change, although Newt_14 is an existing farmyard surrounded by buildings so has a mixed positive and negative impact. Newt_01 is particularly sensitive to change that would be difficult to mitigate.						

Sites: Newton Poppleford							
Site / **SA Objective**	**Newt_01**	**Newt_02**	**Newt_04**	**Newt_05**	**Newt_13**	**Newt_14**	
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	**-**	**-**	**-**	**-**	**-**	**-**	
Climate change carbon emissions commentary	An accessibility assessment undertaken for the Site Selection work identified a total of 12 services, facilities and employment sites – 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 the busy A3052 road has no pavement or room for large vehicles to pass near the junction with the B3178. 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, so likely to increase emissions from travel.						
5. Climate change adaptation	**0**	**+**	**+**	**+**	**+**	**0**	

Sites: Newton Poppleford							
Site / **SA Objective**	**Newt_01**	**Newt_02**	**Newt_04**	**Newt_05**	**Newt_13**	**Newt_14**	
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	**-**	**- -**	**- -**	**- -**	**0**	**+**	
Land resources commentary	Newt_02 is 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. Newt_13 is classified as mostly Grade 1 and part Grade 2, but a recent appeal decision (22/2779/PIP) concluded the site is Grade 3b, so not best and most versatile. Newt_14 is Grade 3 and currently used as a farmyard in an urban area, so a brownfield site. 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 source protection zone. South West Water forecast there will be adequate water supply; and Otterton Wastewater Treatment Works has sufficient capacity and environmental permit limits for the proposed development sites (Newt_04, 05) at Newton Poppleford (Water Cycle Study, November 2025), but uncertainty for the other sites. Therefore, a minor negative effect is likely for these sites, with uncertainty for the others.						

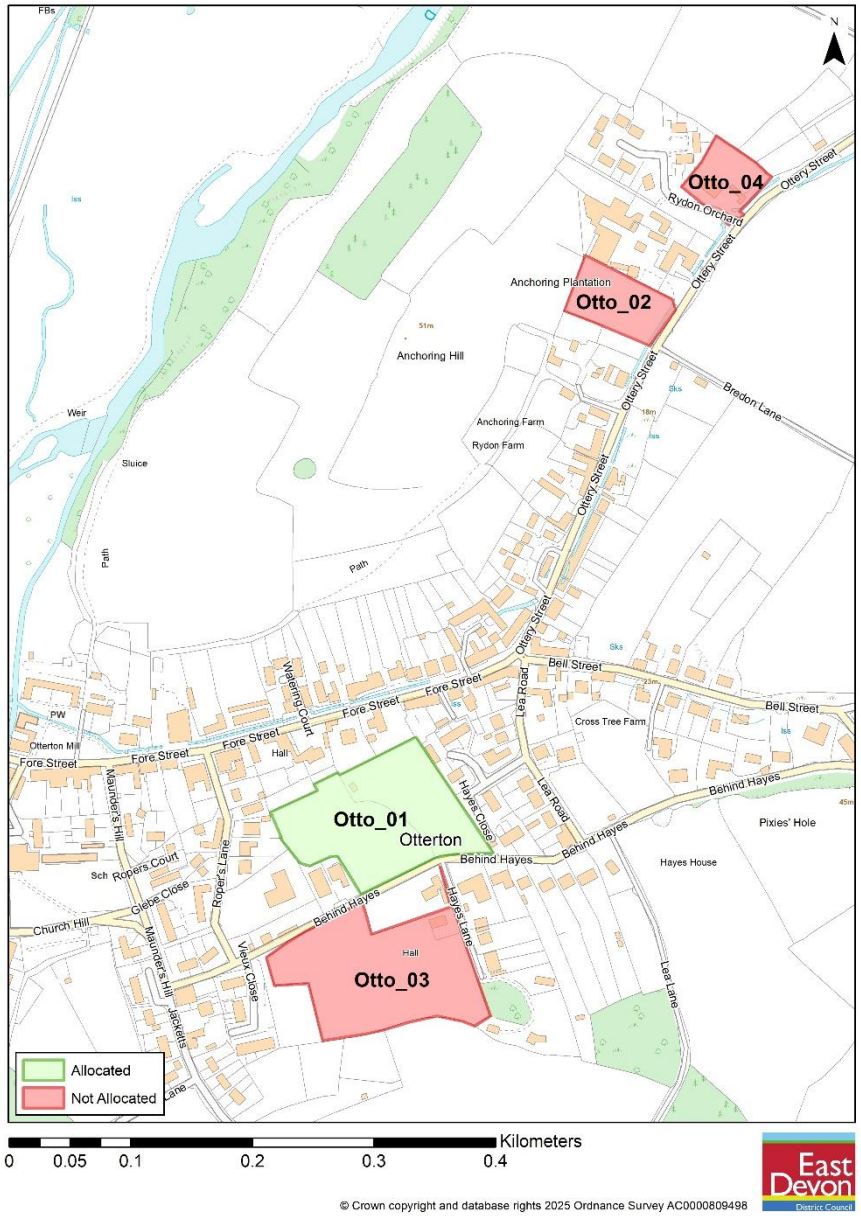
Sites: Newton Poppleford							
Site / SA Objective	**Newt_01**	**Newt_02**	**Newt_04**	**Newt_05**	**Newt_13**	**Newt_14**	
8. Homes	**+ +**	**+**	**+**	**+**	**+**	**+**	
Homes commentary	Newt_01 has a maximum capacity of over 100 dwellings, whilst the other sites could deliver between 5 and 28 dwellings.						
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.						
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 due to a ‘pinch point’ formed where the busy A3052 road has no pavement or room for large vehicles to pass near the junction with the B3178.						
11. Jobs and employment	**-**	**-**	**-**	**-**	**-**	**-**	

Sites: Newton Poppleford							
Site / **SA Objective**	**Newt_01**	**Newt_02**	**Newt_04**	**Newt_05**	**Newt_13**	**Newt_14**	
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 likely be unacceptable due to landscape impact.						
12. Town centres	**-**	**-**	**-**	**-**	**-**	**-**	
Town centres commentary	All sites are more than 1,600 metres from a town centre.						
13. Connectivity and transport	**+ + ?**	**+ + ?**	**+ + ?**	**+ + ?**	**+ + ?**	**+ + ?**	
Connectivity and transport commentary	All sites are within 1600 metres of an hourly bus service, an A road, a recognised cycle route and local post codes have 60-80 mbps broadband. Uncertainty relating to the positive effects for all sites due to the absence of a footpath on the busy section of the A3052 close to the junction with the B3178.						
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.							

Sites: Newton Poppleford							
Site / **SA Objective**	**Newt_01**	**Newt_02**	**Newt_04**	**Newt_05**	**Newt_13**	**Newt_14**	
• Further detailed assessment should accompany a planning application to maximise opportunities to conserve and enhance the National Landscape. • The elevated, eastern parts of Newt_04 and 05 are particularly sensitive and will require careful design and layout. • Noise buffer to A3052 for Newt_01 and 14. • Measures required to protect ground water on sites in source protection zone. • Provide a pedestrian/cycle link from Newt 04 and 05 to Newton Poppleford and Harpford Footpath 1 to the north, which then links to facilities in the village centre, avoiding the busy A3052. • 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. These site-specific mitigation measures have been incorporated for the sites that are allocated in Local Plan Strategic Policy SD22, including a reduction in yield of Newt_04 from 28 to 20 dwellings, and Newt_05 from 27 to 20 dwellings to lessen the impact upon the National Landscape.							
Preferred alternatives: Newt_04 for 20 dwellings; Newt_05 for 20 dwellings. **Reasons for preferred alternatives:** • Newt_04 – Land west of Badger Close is preferred as it consistent with the spatial strategy and, with the mitigation measure of constructing a link to the footpath to the north, provides a route for pedestrians to access facilities in the village centre. • Newt_05 – Land east of Exmouth Road is preferred as it consistent with the spatial strategy and, with the mitigation measure of constructing a link to the footpath to the north, provides a route for pedestrians to access facilities in the village centre.							

Sites: Newton Poppleford							
Site / **SA Objective**	**Newt_01**	**Newt_02**	**Newt_04**	**Newt_05**	**Newt_13**	**Newt_14**	
Reasons for rejected sites: • Newt_01 – Goosemoor Farm, Exeter Road is rejected because it 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 National Landscape. • Newt_02 – Littledown Farm is rejected as no safe and convenient pedestrian or cycling access to the services and facilities in the village centre; and significant detrimental landscape impacts on East Devon National Landscape, highway, ecological, and tree preservation order constraints. • Newt_13 – Land off Down Close is rejected as no safe and convenient pedestrian or cycling access to the services and facilities in the village centre (whilst the mitigation measure for Newt_04, 05 will provide a footpath link, Newt_13 does meet the planning obligations tests to contribute to this footpath); adverse landscape impact being located in East Devon National Landscape; and ecological constraints. • Newt_14 – Seniors Farmyard is rejected as no safe and convenient pedestrian or cycling access to the services and facilities in the village centre; site access is through flood zone 2; and potential impact on the historic environment.							

Settlement: Otterton



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

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, they are located within or adjacent to Otterton (and therefore consistent with the spatial strategy), are not already allocated in a 'made' Neighbourhood Plan, and do not currently have planning permission.

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. In addition, the HRA notes potential air quality impacts at East Devon Heaths SAC/SPA from increased traffic from sites at Otterton. Otto_03 is adjacent to a draft nature recovery network. These negative effects are mixed with a long-term minor positive effect from the legal requirement for biodiversity net				

Sites: Otterton					
Site / **SA Objective**	**Otto_01**	**Otto_02**	**Otto_03**	**Otto_04**	
	gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.				
2. Landscape	**- -**	**- -**	**- -**	**- -**	
Landscape commentary	All sites are within the East Devon National Landscape and are sensitive to change.				
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 is partly within the Conservation Area; 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	**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 – Otterton has six of these and all sites are located within 800 metres of them. The neutral effect reflects that whilst a basic range				

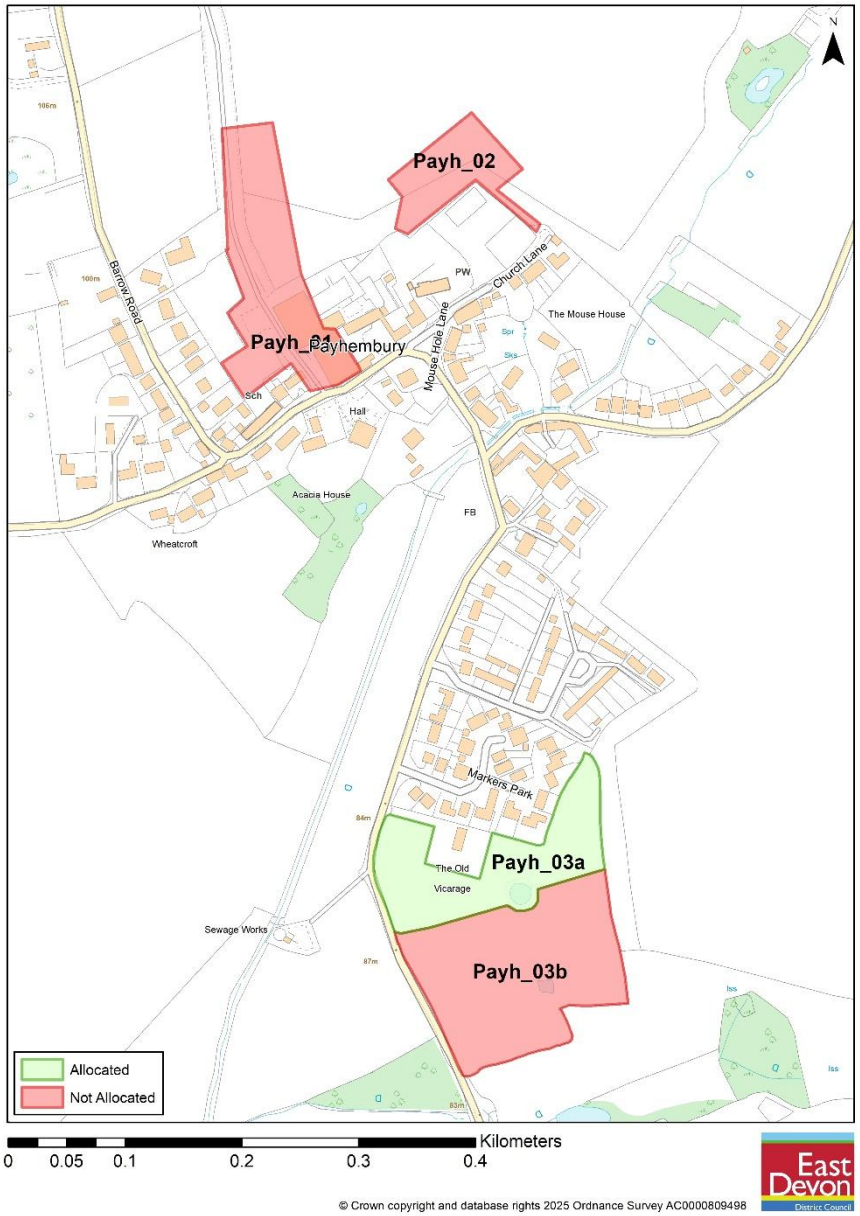
Sites: Otterton					
Site / **SA Objective**	**Otto_01**	**Otto_02**	**Otto_03**	**Otto_04**	
	of facilities is available to reduce carbon emissions from travel, development is likely to require car travel elsewhere to access a fuller range of jobs and services.				
5. Climate change adaptation	**+**	**-**	**+**	**-**	
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 heat, drought and extreme storms through appropriate design and incorporation of sustainable drainage, for example. Around half of Otto_02 and 04 is at risk of flooding, including the site access, so a minor negative effect.				
6. Land resources	**- ?**	**-**	**- ?**	**-**	
Land resources commentary	Otto_01 and 03 are Grade 3 agricultural land, with uncertainty as to whether this constitutes best and most versatile (Grade 3a). 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. South West Water forecast there will be adequate water supply; and Otterton Wastewater Treatment Works has sufficient capacity and environmental permit limits for the proposed development sites				

Sites: Otterton					
Site / **SA Objective**	**Otto_01**	**Otto_02**	**Otto_03**	**Otto_04**	
	(Otto_01) at Otterton (Water Cycle Study, November 2025), but uncertainty for the other sites. Therefore, a minor negative effect is likely for these sites, with uncertainty for the others.				
8. Homes	+	+	+	+	
Homes commentary	The sites have capacity for 5 – 32 dwellings, so a minor positive effect.				
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, 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, shop, pub and community hall.				

Sites: Otterton					
Site / **SA Objective**	**Otto_01**	**Otto_02**	**Otto_03**	**Otto_04**	
11. Jobs and employment	**-**	**-**	**-**	**- -**	
Jobs/employment commentary	None of the sites are within 1,600 metres of a mapped employment site, although there is an engineering plant at North Star. Otto_04 has planning permission for employment uses, so its loss to housing means a major negative effect.				
12. Town centres	**-**	**-**	**-**	**-**	
Town centres commentary	None of the sites is within 1,600 metres of a town centre.				
13. Connectivity and transport	**+**	**+**	**+**	**+**	
Connectivity and transport commentary	There are average broadband speeds in excess of 40-50 mbps in local post codes. All sites are within 1,600 metres of an hourly bus service that runs through the village.				
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.					

Sites: Otterton					
Site / SA Objective	Otto_01	Otto_02	Otto_03	Otto_04	
• Appropriate landscaping may minimise the impact of development on the National Landscape, but negative impacts still anticipated and further detailed assessment should accompany a planning application to maximise opportunities to conserve and enhance the National Landscape. • The adverse landscape and historic environment effects north western part of Otto_02 mean that built development should be avoided in this part of the site. • 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 located in source protection zone. These site-specific mitigation measures have been incorporated for the site that is allocated in Local Plan Strategic Policy SD23.					
Preferred alternative: Otto_01 for 10 dwellings. **Reasons for preferred alternative:** • Otto_01 – land east of Hayes Close is preferred as consistent with spatial strategy with good access to facilities in village centre. **Reasons for rejected sites:** • Otto_02 – land adjacent to North Star is rejected because the western half of the site has high flood risk (flood zone 3), and adverse landscape impact arising from location within the East Devon National Landscape. • Otto_03 – Land at Hayes Lane is rejected due to adverse landscape impact from location within the East Devon National Landscape, and negative impact upon the historic environment. • Otto_04 – Land north of Rydon Close is rejected because the western half of the site has high flood risk (flood zone 3) and adverse landscape impact from location within the East Devon National Landscape.					

Settlement: Payhembury



Reasonable alternatives

- Payh_01 – Slade Barton
- Payh_02 – Behind Playing fields
- Payh_03 – Markers 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). In addition, they are located within or adjacent to Payhembury (and therefore consistent with the spatial strategy), are not already allocated in a 'made' Neighbourhood Plan, and do not currently have planning permission. Note that the southern part of Payh_01 has planning permission for nine dwellings and relocated workshop.

Sites: Payhembury				
Site / **SA Objective**	**Payh_01**	**Payh_02**	**Payh_03**	
1. Biodiversity	**+ / -**	**+ / -**	**+ / -**	
Biodiversity commentary	All sites are within the East Devon Pebblebed Heaths SAC HRA mitigation zone, and are also within close proximity (11m or less) of areas in the draft Nature Recovery Network. In addition, the HRA notes potential air quality impacts at East Devon Heaths SAC/SPA from increased traffic from sites at Payhembury. Payh_03 has a pond in its centre which is also of potential biodiversity interest.			

Sites: Payhembury				
Site / SA Objective	Payh_01	Payh_02	Payh_03	
	These negative effects are mixed with a long-term minor positive effect from the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.			
2. Landscape	- -	- -	- -	
Landscape commentary	Payh_01 comprises units and agricultural field, the majority of which has a partially implemented consent for mixed use redevelopment. The remaining north of the site is highly exposed and poorly related to the existing village development, and has a high/medium landscape sensitivity to new development. Payh_02 is an agricultural field adjoining the recreation ground that slopes up towards the north and is a highly exposed site on higher ground and adjacent to Grade I listed building and curtilage (St Mary's Church). Payh_03 is a field adjoining the southern extent of the built-up area with high intervisibility from the west and on the southern approach to Payhembury. Site slopes up towards the east. No sites are within or have high intervisibility with protected landscapes.			
3. Hist. built env	-	- -	0	
Hist. built env. commentary	Payh_01 has several designated assets within 100m, including the Grade II listed school adjoining to the south, and the Grade I listed church 75m to the east. Payh_02 also has several listed buildings nearby, and is overlooked by the Grade I listed church, so a major negative effect. No significant effects for Payh_03 as closest asset 115m to south (Grade II Glebe Farm) has intervening buildings and vegetation.			

Sites: Payhembury				
Site / **SA Objective**	**Payh_01**	**Payh_02**	**Payh_03**	
4. Climate change carbon emissions	**0**	**0**	**0**	
Climate change carbon emissions commentary	The primary school and shop reduces carbon emissions from travel, but infrequent bus service means that some car travel outside the village is likely to access jobs and other facilities.			
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 sites comprise Grade 3 agricultural land, which could be best and most versatile (Grade 3a) so uncertain negative effect.			
7. Water resources	**- ?**	**- ?**	**-**	

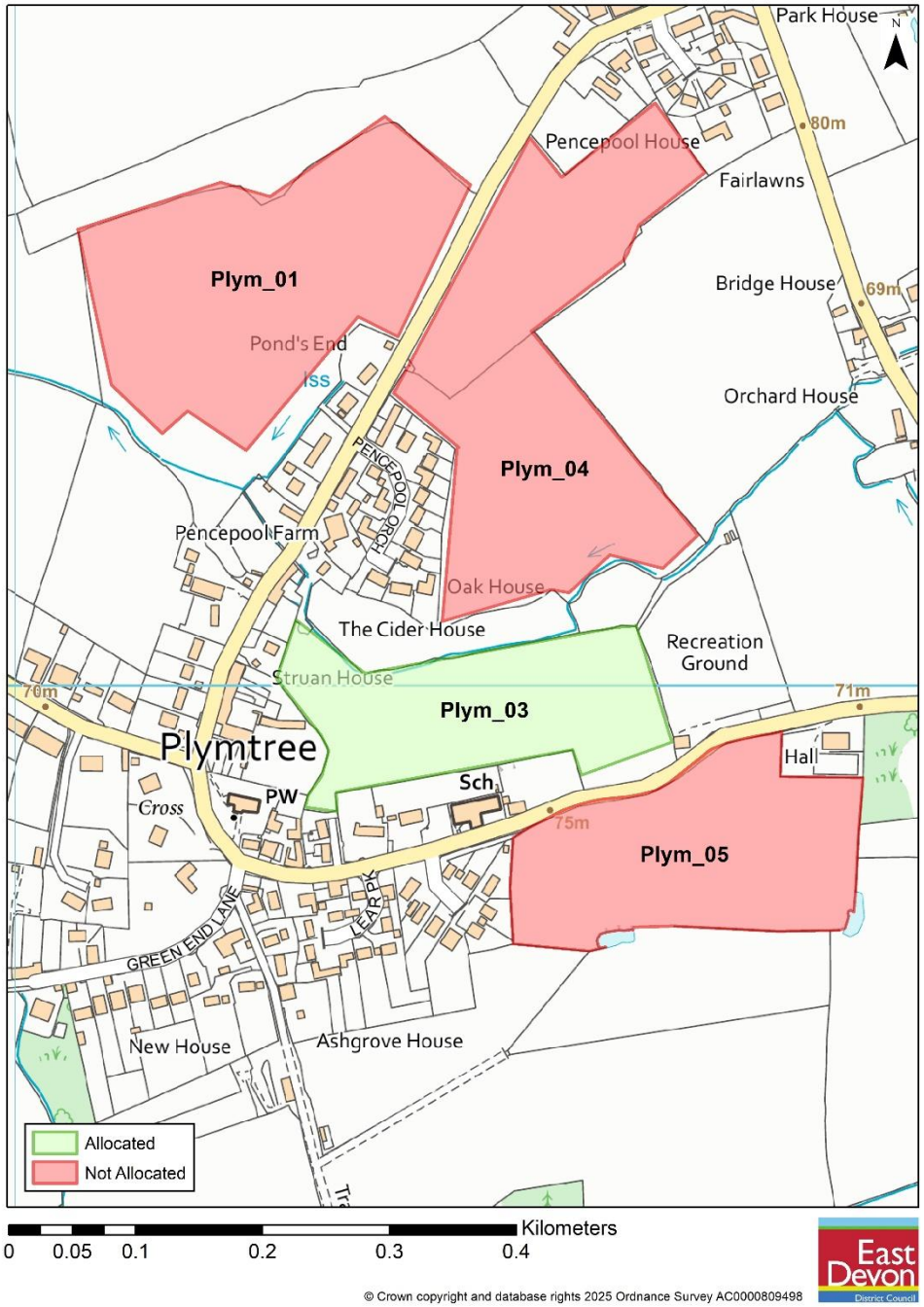
Sites: Payhembury				
Site / **SA Objective**	**Payh_01**	**Payh_02**	**Payh_03**	
Water resources commentary	No sites are located within a groundwater source protection zone. South West Water forecast there will be adequate water supply; but the capacity of Feniton Wastewater Treatment Works is forecast to be exceeded by proposed development (incdlugin at Payh_03), albeit environment permit compliance is sufficient (Water Cycle Study, November 2025). Therefore, a negative effect is likely for proposed allocations, with uncertainty for others.			
8. Homes	**+**	**+**	**+**	
Homes commentary	Payh_01 can deliver around 15 dwellings (9 already with permission and 5-6 in addition), Payh_02 14 dwellings, and Payh_03 around 50 dwellings – therefore, a minor positive effect for all. 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	The sites are within 800m of open space and children's play area, away from sources of air, noise, and light pollution.			
10. Access to services	**+**	**+**	**+ ?**	
Access to services commentary	All are within 800 metres of a limited range of services including a primary school, shop, pub and community hall. However, footways are absent for part of the journey from Payh_03, meaning some uncertainty.			

Sites: Payhembury				
Site / **SA Objective**	**Payh_01**	**Payh_02**	**Payh_03**	
11. Jobs and employment	**- -**	**-**	**-**	
Jobs/employment commentary	Developing Payh_01 in full for residential would result in a net loss of existing employment uses, so major negative effect. Apart from small-scale uses on Payh_01, no employment sites are within 1,600m of Payh_02 and 03.			
12. Town centres	**-**	**-**	**-**	
Town centres commentary	All sites are beyond 1,600m of an existing town centre.			
13. Connectivity and transport	**-**	**-**	**-**	
Connectivity and transport commentary	Transport connectivity is relatively poor. Although there are bus stops in the village, the service is infrequent, less than once per day. The village is accessed by country lanes, with the nearest A road (A373) being some 2km away, with no nearby recognised cycle routes. Broadband speeds range from 55-78 Mbps median speeds for postcodes in local area, so all sites have access to superfast broadband.			
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: Payhembury				
Site / SA Objective	Payh_01	Payh_02	Payh_03	
• The reduction of Payh_03 to the area immediately adjoining the settlement boundary will reduce landscape impact to a minor adverse effect – this site is Payh_03a, with the remainder Payh_03b. All other effects remain the same for Payh_03a as highlighted for Payh_03. • Payh_03a should include substantial screening along the southern boundary to maintain the rural character of the lane. • The pond should be retained when developing Payh_03a to minimise adverse biodiversity effects. • Significant capacity upgrades are required to Feniton Wastewater Treatment Works – Strategic Policy AR02 requires infrastructure improvements to overcome water quality issues before development is approved. • 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. These site-specific mitigation measures have been incorporated for the site that is allocated in Local Plan Strategic Policy SD24.				
Preferred alternative: Payh_03a for 15 dwellings. **Reasons for preferred alternatives:** • Payh_03a – Markers Park is preferred as consistent with the spatial strategy with good access to facilities in village centre, and an acceptable landscape impact. **Reasons for rejected sites:** • Payh_01 – Slade Barton is rejected as the more acceptable southern part of the site already has planning permission, and allocating the northern area would have an adverse landscape impact, being poorly related to the existing village and protruding development into the countryside, and would also adversely impact on the historic environment.				

Sites: Payhembury				
Site / **SA Objective**	**Payh_01**	**Payh_02**	**Payh_03**	
• Payh_02 – Behind Playing fields is rejected because of being highly exposed site with major negative landscape impact, and major negative historic environment impact given the close proximity to the Grade I listed church. • Payh_03b – Markers Park is rejected as the scale of development is too high for the village, particularly given poor transport connectivity, and because of major negative landscape effect.				

Settlement: Plymtree



Reasonable alternatives

- Plym_01 – Fordmore Farm
- Plym_03 – Land to west of Plymtree recreation ground
- Plym_04 – Land to north west of Plymtree recreation ground
- Plym_05 – Land West of the Village Hall

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, they are located within or adjacent to Plymtree (and therefore consistent with the spatial strategy), are not already allocated in a 'made' Neighbourhood Plan, and do not currently have planning permission. Plym_02 is not a reasonable alternative as it overlaps Plym_03 and Plym_04.

Sites: Plymtree					
Site / **SA Objective**	**Plym_01**	**Plym_03**	**Plym_04**	**Plym_05**	
1. Biodiversity	**+ / 0**	**+ / -**	**+ / -**	**+ / 0**	
Biodiversity commentary	Plym_01 has no biodiversity features within 250m, and the closest features to Plym_05 are across the road to the north, so a neutral effect for both. Plym_03, 04 have draft Nature Recovery Network and Section 41 Habitat adjacent and within 20m so a likely negative effect.				

Sites: Plymtree					
Site / **SA Objective**	**Plym_01**	**Plym_03**	**Plym_04**	**Plym_05**	
	These neutral and negative effects are mixed with a long-term minor positive effect from the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.				
2. Landscape	**- -**	**-**	**- -**	**-**	
Landscape commentary	Plym_01 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, with a high landscape sensitivity to new development overall. Plym_03 is set within the context of low-density housing to south, west and north west, so a medium-low landscape sensitivity. Plym_04 comprises two agricultural fields between Plymtree village and Norman's Green that gently slope up towards the north and is highly exposed from access routes. Development could erode separation between Plymstock and Norman's Green, so a major negative effect. Plym_05 has existing development along western boundary that provides some context of built form, and mature hedgerow/trees reduce visibility over parts of site. Nevertheless, the site has a close relationship with the surrounding countryside, so medium landscape sensitivity.				
3. Hist. built env	**-**	**- - ?**	**-**	**- ?**	
Hist. built env. commentary	Plym_01 has three designated heritage assets within 100m, whiolst Plym_04 has four, so a negative effect for these sites. Plym_03 is located near to a series of listed buildings in the village, including the grade I listed church, so a major negative effect with uncertainty subject to lower-level surveys. Plym_05 has several Grade II listed buildings, along with Grade I listed church, to west, but intervening buildings mean limited adverse impact. Grade II* Plymtree Manor and associated Grade II stables approximately 75m to east, leading to negative effect with uncertainty subject to lower-level surveys.				

Sites: Plymtree					
Site / **SA Objective**	**Plym_01**	**Plym_03**	**Plym_04**	**Plym_05**	
4. Climate change carbon emissions	**0**	**0**	**0**	**0**	
Climate change carbon emissions commentary	The primary school and shop reduces carbon emissions from travel, but infrequent bus service means that some car travel outside the village is likely to access jobs and other facilities.				
5. Climate change adaptation	**0**	**0**	**0**	**+**	
Climate change adaptation commentary	Plym_01, 03 and 04 have a neutral effect as partially located in an area of flood risk, but development can avoid this area. Plym_05 is not within an area of flood risk, or critical drainage area, so a positive effect for the site.				
6. Land resources	**- ?**	**- ?**	**- ?**	**- ?**	
Land resources commentary	A greenfield site on Grade 3 agricultural land, which could be 3a (best and most versatile) so uncertain negative effect.				
7. Water resources	**- ?**	**-**	**- ?**	**- ?**	

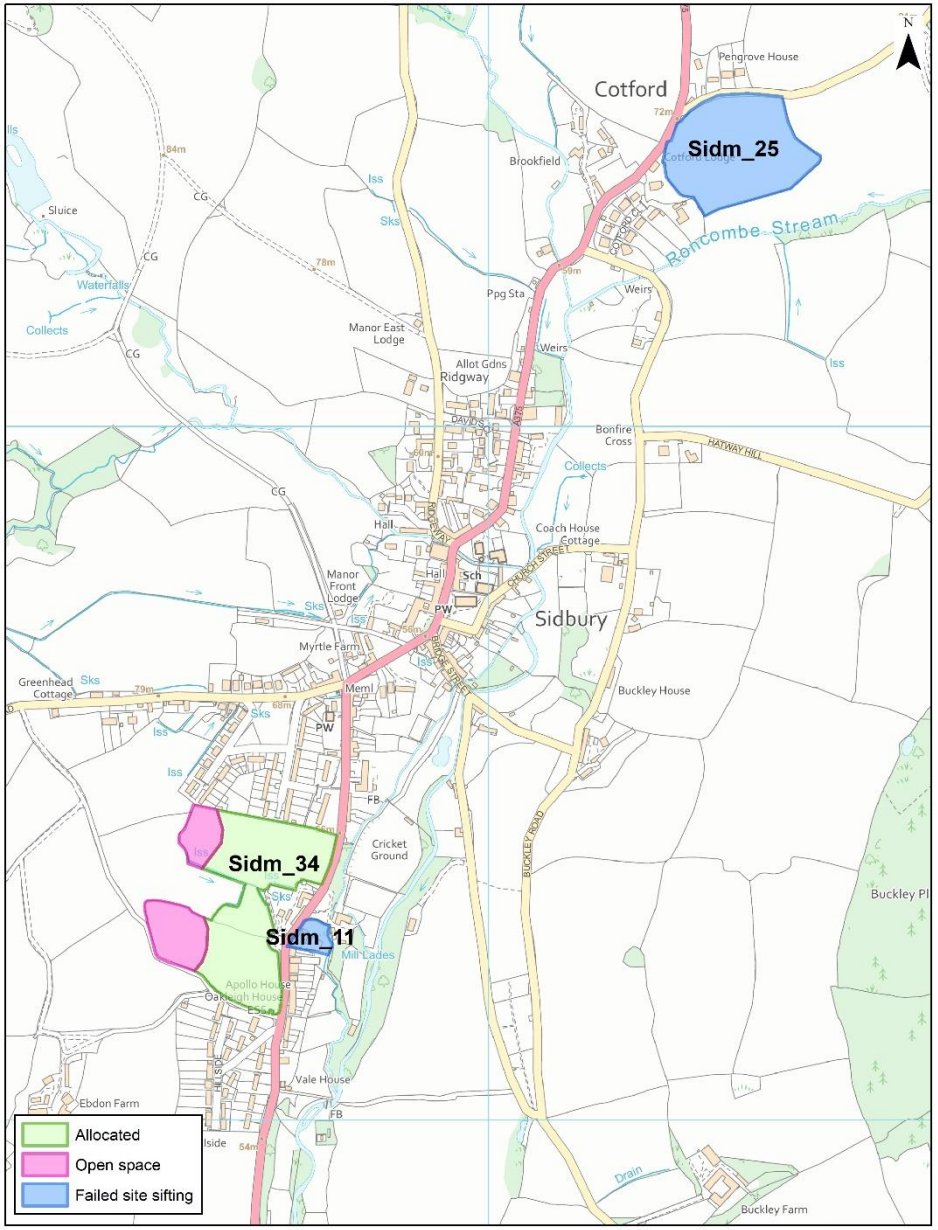
Sites: Plymtree					
Site / **SA Objective**	**Plym_01**	**Plym_03**	**Plym_04**	**Plym_05**	
Water resources commentary	No sites are located within a groundwater source protection zone. South West Water forecast there will be adequate water supply; but the capacity of Feniton Wastewater Treatment Works is forecast to be exceeded by proposed development (including at Plym_03), albeit environment permit compliance is sufficient (Water Cycle Study, November 2025). Therefore, a negative effect is likely for proposed allocation, with uncertainty for others.				
8. Homes	**+**	**+**	**+**	**+**	
Homes commentary	Plym_01 can deliver 50 dwellings, Plym_03: 30 dwellings, Plym_04: 70 dwellings and Plym_05: 43 dwellings, so a minor positive for all sites. 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 within 800m of open space and children's play area, in a rural location away from noise, air and light pollution. Relatively low deprivation as amongst 40% least deprived neighbourhoods.				
10. Access to services	**+**	**+**	**+**	**+**	

Sites: Plymtree					
Site / **SA Objective**	**Plym_01**	**Plym_03**	**Plym_04**	**Plym_05**	
Access to services commentary	All are within 800 metres of a limited range of services including a primary school, shop, pub and community hall.				
11. Jobs and employment	**-**	**-**	**-**	**-**	
Jobs/employment commentary	No significant employment sites in close proximity, limited opportunity for employment provision due to context of sites.				
12. Town centres	**-**	**-**	**-**	**-**	
Town centres commentary	All sites are beyond 1,600 metres of a town centre.				
13. Connectivity and transport	**-**	**-**	**-**	**-**	
Connectivity and transport commentary	Transport connectivity is relatively poor. Although there are bus stops in the village, the service is infrequent, less than once per day. The village is accessed by country lanes, with the nearest A road (A373) being some 3.5km away, with no nearby recognised cycle routes. Broadband speeds range from 20-80 Mbps median speeds for postcodes in local area, all sites have access to superfast broadband. Negative effect overall.				

Sites: Plymtree					
Site / **SA Objective**	**Plym_01**	**Plym_03**	**Plym_04**	**Plym_05**	
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. • The scale of development at Plym_03 can be reduced from 43 to 30 dwellings to reduce density and mitigate the impact upon the Grade I listed church. Careful design of this site will also be required, including conserving views of the church and retain open space to link with its wider rural setting. • Significant capacity upgrades are required to Feniton Wastewater Treatment Works – Strategic Policy AR02 requires infrastructure improvements to overcome water quality issues before development is approved. • All sites have relatively good access to facilities, but these beneficial effects can be maximised by enhancing sustainable travel links e.g. providing a footpath link to local facilities. These site-specific mitigation measures have been incorporated for the site that is allocated in Local Plan Strategic Policy SD25.					
Preferred alternative: Plym_03 for 30 dwellings. **Reasons for preferred alternatives:** • Plym_03 – Land to west of Plymtree recreation ground is preferred as consistent with the spatial strategy, well-located in the centre of village meaning acceptable landscape impact and good access to facilities. **Reasons for rejected sites:**					

Sites: Plymtree					
Site / **SA Objective**	**Plym_01**	**Plym_03**	**Plym_04**	**Plym_05**	
• Plym_01 – Fordmore Farm is rejected due to adverse landscape impact as the site extends into open countryside and does not relate well to the village. • Plym_04 – Land to north west of Plymtree recreation ground is rejected due to major adverse landscape impact that would join Plymtree to Norman's Green, affecting the separate character of both settlements; and the scale of development, in addition to the preferred alternative, would not be consistent with the spatial strategy. • Plym_05 – Land west of Village Hall rejected as it is a significant greenfield site which contributes to setting of the adjacent Grade II* listed Manor House and it's formal gardens. It is located on the periphery of the village (albeit the village hall is located beyond it) and would extend built form into the open countryside.					

Settlement: Sidbury



Reasonable alternatives

- Sidm_34 – Land South of Furzehill

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, they are located within or adjacent to Sidbury (and therefore consistent with the spatial strategy), are not already allocated in a 'made' Neighbourhood Plan, and do not currently have planning permission.

For the reasons given, the following sites are not considered to be reasonable alternatives:

- Sidm_10 – Land South of Furzehill overlaps with Sidm_34.
- Sidm_11 – Burnt Oak (existing garage block) has planning permission for 7 dwellings (17/2904/OUT).
- Sidm_25 – Field bordering junction of Cotford Road and Roncombe Lane is not within or adjacent, or otherwise well-related, to Sidbury.

Sites: Sidbury		
Site / **SA Objective**	**Sidm_34**	
1. Biodiversity	**+ / -**	

Sites: Sidbury		
Site / **SA Objective**	**Sidm_34**	
Biodiversity commentary	Arable fields surrounded and divided by mature hedgerows and trees. Site is 10m from an unconfirmed wildlife site, 31m from a draft nature recovery network area, 35m from Section 41 habitat of principle importance. Site is within both the Beer Quarry and Caves SAC bat consultation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone. In addition, the HRA notes potential air quality impacts at East Devon Heaths SAC/SPA from increased traffic from the site at Sidbury. These negative effects are mixed with a long-term minor positive effect from the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.	
2. Landscape	**- -**	
Landscape commentary	Located entirely within East Devon National Landscape. Short distance views into site from A375 are limited due to topography and mature vegetation, but site is clearly visible from elsewhere in the National Landscape, for example from Buckley Road across the valley to east.	
3. Hist. built env	**-**	
Hist. built env. commentary	Two designated heritage assets with 10m with Grade II listed Furzehill Farm 9m to south east, open views of site are available from this asset, currently view to agricultural field; and Sidbury Conservation Area 13m to north east has views into southern part	

Sites: Sidbury		
Site / **SA Objective**	**Sidm_34**	
	of the site. Site is visible from Sidbury Castle, an Iron Age hill fort, Scheduled Monument is around 500m to the west Likely negative impact on setting of these two heritage assets.	
4. Climate change carbon emissions	**+**	
Climate change carbon emissions commentary	A bus stop 95m away on hourly or better service, primary school and shop around 415m distant offer the potential to reduce travel and sustainable travel links.	
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	**- ?**	

Sites: Sidbury		
Site / **SA Objective**	**Sidm_34**	
Land resources commentary	The site comprises Grade 3 agricultural land which could be best and most versatile (Grade 3a), so uncertain negative effect.	
7. Water resources	**0**	
Water resources commentary	No sites are located within a groundwater source protection zone. South West Water forecast there will be adequate water supply; and Sidmouth Wastewater Treatment Works has sufficient capacity and environmental permit limits for the proposed development site Sidm_34 (Water Cycle Study, November 2025). Therefore, a neutral effect is likely.	
8. Homes	**+**	
Homes commentary	The site can realistically accommodate around 43 dwellings so a minor 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	Within close proximity (less than 100m) to open space and children's play area. Site adjoins the A375 so potential for noise from traffic along this road, but the site is higher than the road level which reduces the impact.	

Sites: Sidbury		
Site / **SA Objective**	**Sidm_34**	
10. Access to services	**+**	
Access to services commentary	Within 500m of school, shop, pub and village hall in village centre. Assume pedestrian link via Furzehill to the north to avoid walking along a narrow section of the A375 that lacks pavement.	
11. Jobs and employment	**+ ?**	
Jobs/employment commentary	Adopted Local Plan 2013-31 employment allocation at Sidford 800m to south, but this positive is mixed with uncertainty as the site has planning permission but is not yet developed. Sidm_34 is not considered appropriate for significant economic provision, given its sensitive location.	
12. Town centres	**-**	
Town centres commentary	Beyond 1,600 metres of a town centre.	
13. Connectivity and transport	**+**	

Sites: Sidbury		
Site / **SA Objective**	**Sidm_34**	
Connectivity and transport commentary	Site adjoins the A375, with a bus stop 95m to east with an hourly or better service. Broadband speeds range from 42-80 Mbps for postcodes in local area, so all sites are assumed 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 and high quality design would be required due to major negative effects upon the landscape and local heritage, particularly given its location in East Devon National Landscape. The higher, westerly parts are most sensitive and should be open space rather than built development. Further detailed assessment should be undertaken to inform a planning application. • Design should conserve and enhance designated assets comprising the listed buildings to the north and east, Sidbury Conservation Area, and Sidbury Castle Scheduled Monument. • Noise attenuation near to the A375 will lessen the negative effect on health and well-being from traffic noise. These site-specific mitigation measures have mostly been incorporated for the site that is allocated in Strategic Policy SD26. Noise attenuation measures are not included in the allocation policy, but this effect can be addressed by other Local Plan policies.		
Preferred alternative: Sidm_34 for 43 dwellings. **Reasons for preferred alternative:** • Sidm_34 – Land South of Furzehill is preferred as it is consistent with spatial strategy, adjoining the existing urban area where adverse effects can be mitigated, and it provides the only opportunity for development at Sidbury.		

Settlement: Stoke Canon

Reasonable alternatives

- None – see explanation below.

Outline of reasons for selecting the alternatives

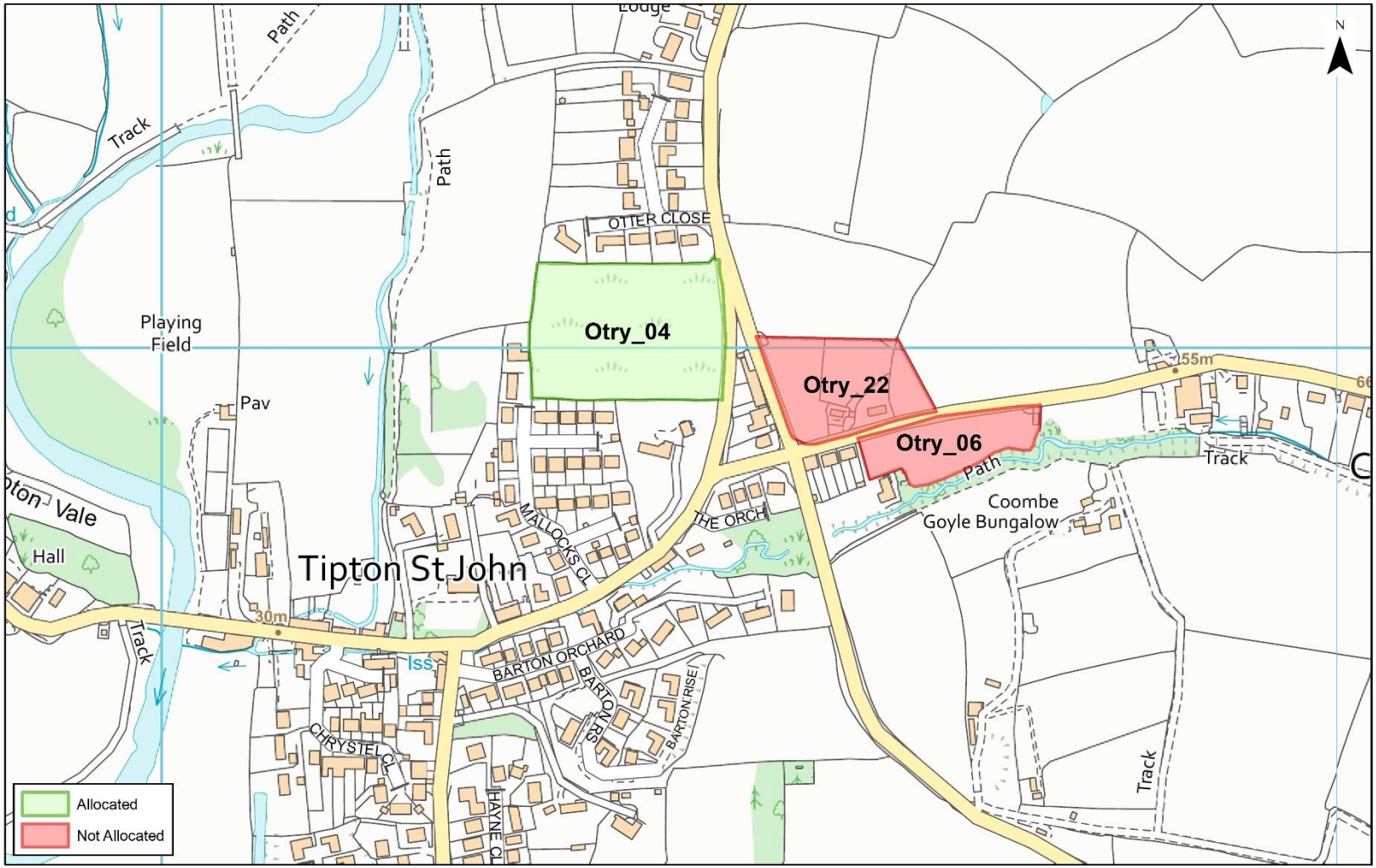
A number of sites[106] at Stoke Canon were considered but, for the reasons given, none are reasonable alternatives:

- Stok_01 – Land lying to the West of Chestnut Crescent is not suitable in the HELAA as entirely located within Flood Zone 3.
- Stok_02 – Oakhay Barton is not suitable in the HELAA as entirely located within Flood Zone 3.
- Stok_05 – Field 7414, Stoke Road is not adjacent or well-related to the settlement.
- Stok_07 – Oakhay Barton is not suitable in the HELAA as entirely located within Flood Zone 3.
- Stok_08 – Land and buildings known as Stoke Cottage is unachievable in the HELAA due to flood risk
- Stok_10 – Field 6700 & 6907, Stoke Road, Stoke Canon, EX5 4EG. Site not adjacent or well-related to the settlement.
- Stok_11 – Land and buildings known as Stoke Cottage overlaps Stok_08 and is unachievable in the HELAA due to flood risk.

As there are no reasonable alternatives for sites at Stoke Canon, a Sustainability Appraisal matrix has not been completed.

[106] Maps of these sites can be seen in the Housing and Employment Land Availability Assessment Evidence and Examination Library - Housing (HOU) - East Devon

Settlement: Tipton St John



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Reasonable alternatives

- Otry_04 – Land South of Otter Close
- Otry_06 – Land next to 6 Coombe Vale
- Otry_22 – Combe Bank

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, they are located within or adjacent to Tipton St John (and therefore consistent with the spatial strategy), are not already allocated in a 'made' Neighbourhood Plan, and do not currently have planning permission.

Sites: Tipton St John				
Site / **SA Objective**	**Otry_04**	**Otry_06**	**Otry_22**	
1. Biodiversity	**+ / -**	**+ / -**	**+ / -**	
Biodiversity commentary	All sites are within Pebblebed Heaths mitigation zone, leading to a minor negative effect. In addition, the HRA notes potential air quality impacts at East Devon Heaths SAC/SPA from increased traffic from sites at Tipton. The sites are improved grassland of limited habitat value, although there are some mature trees within the hedgerows. Otry_06 has a band of trees to the south of the site which are of ecological importance, warranting a negative score. Otry_22 has no biodiversity designations or draft nature recovery network areas within 50m of site.			

Sites: Tipton St John				
Site / **SA Objective**	**Otry_04**	**Otry_06**	**Otry_22**	
	These negative effects are mixed with a long-term minor positive effect from the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.			
2. Landscape	**-**	**- -**	**- -**	
Landscape commentary	Otry_06 lies within the National Landscape so any development is considered to have a significant adverse effect. Otry_04 lies outside, but adjacent, to the National Landscape, with existing houses around the site, so the impact is less significant but still harmful. The local topography around Otry_22 means the site is higher than the adjoining road and development is therefore likely to be more visible, including from the National Landscape across the road to the south – hedgerow removal required to access site will make the site even more visible.			
3. Hist. built env	**0**	**0**	**0**	
Hist. built env. commentary	No particular heritage impacts have been identified.			
4. Climate change carbon emissions	**0**	**0**	**0**	

Sites: Tipton St John				
Site / **SA Objective**	**Otry_04**	**Otry_06**	**Otry_22**	
Climate change carbon emissions commentary	All sites adjoin the village, so have reasonable access to the school, pub, shop and village hall. A two hourly bus service along adjoining road. These facilities/services reduce carbon emissions from travel, but some car travel outside the village is likely to access jobs and other facilities.			
5. Climate change adaptation	**-**	**-**	**-**	
Climate change adaptation commentary	Otry_06 has a band of Flood zone 2 and 3 running across the southern section, which would limit the developable area. Otry_22 has no flood risk from rivers or surface water on site, and not located in a critical drainage area, but surface water flood risk is present along the lane to south, and the centre of the village 300m down the hill to the west has suffered from serious flooding in the recent past – given this, a minor negative effect.			
6. Land resources	**- ?**	**- ?**	**- ?**	
Land resources commentary	All sites are greenfield and are Grade 3 agricultural land, which could be 3a (best and most versatile) so uncertain negative effect.			
7. Water resources	**-**	**- ?**	**- ?**	

Sites: Tipton St John				
Site / **SA Objective**	**Otry_04**	**Otry_06**	**Otry_22**	
Water resources commentary	All sites are within a groundwater source protection zone. South West Water forecast there will be adequate water supply; but the capacity of Fluxton Wastewater Treatment Works is forecast to be exceeded by proposed development in the area (including Otry_04), albeit environment permit compliance is sufficient (Water Cycle Study, November 2025). Therefore, a negative effect is likely for proposed site Otry_04, with uncertainty for others.			
8. Homes	**+ ?**	**+**	**+**	
Homes commentary	Otry_04 has a capacity for 45 dwellings, or a primary school and five dwellings. Otry_06 could deliver 12 dwellings, and Otry_22 29 dwellings. 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 6 dwellings may not be met on site Otry_04 and therefore affordable housing may not be required, so a positive uncertain effect.			
9. Health and well-being	**+**	**+**	**+**	
Health and well-being commentary	Around 500m from children's play area and sports pitches which are located near to the centre of the village. Rural location, away from noise, air and light pollution. Amongst the 20% least deprived areas, so development will not help an area of higher deprivation, but a positive effect overall.			
10. Access to services	**+ / - ?**	**+ / - ?**	**+ / - ?**	

Sites: Tipton St John				
Site / **SA Objective**	**Otry_04**	**Otry_06**	**Otry_22**	
Access to services commentary	Tipton St John is a small village so, although it has a limited range of services, all sites are within 400m of the shop, primary school and village hall. A short section of the journey from Otry_04 and 06 is along narrow lanes that lack a pavement. A positive effect is mixed with uncertain negative because there are some uncertainty as to whether the primary school will remain in the village – in the past, there were proposals to relocate the primary school (currently located within the floodplain) to Ottery St Mary, but more recently it is seen as preferable to retain the school in the village.			
11. Jobs and employment	**?**	**-**	**-**	
Jobs/employment commentary	None of the sites are within 1,600m 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	**-**	**-**	**-**	
Town centres commentary	None of the sites are within 1,600m of a town centre.			
13. Connectivity and transport	**+**	**+**	**+**	

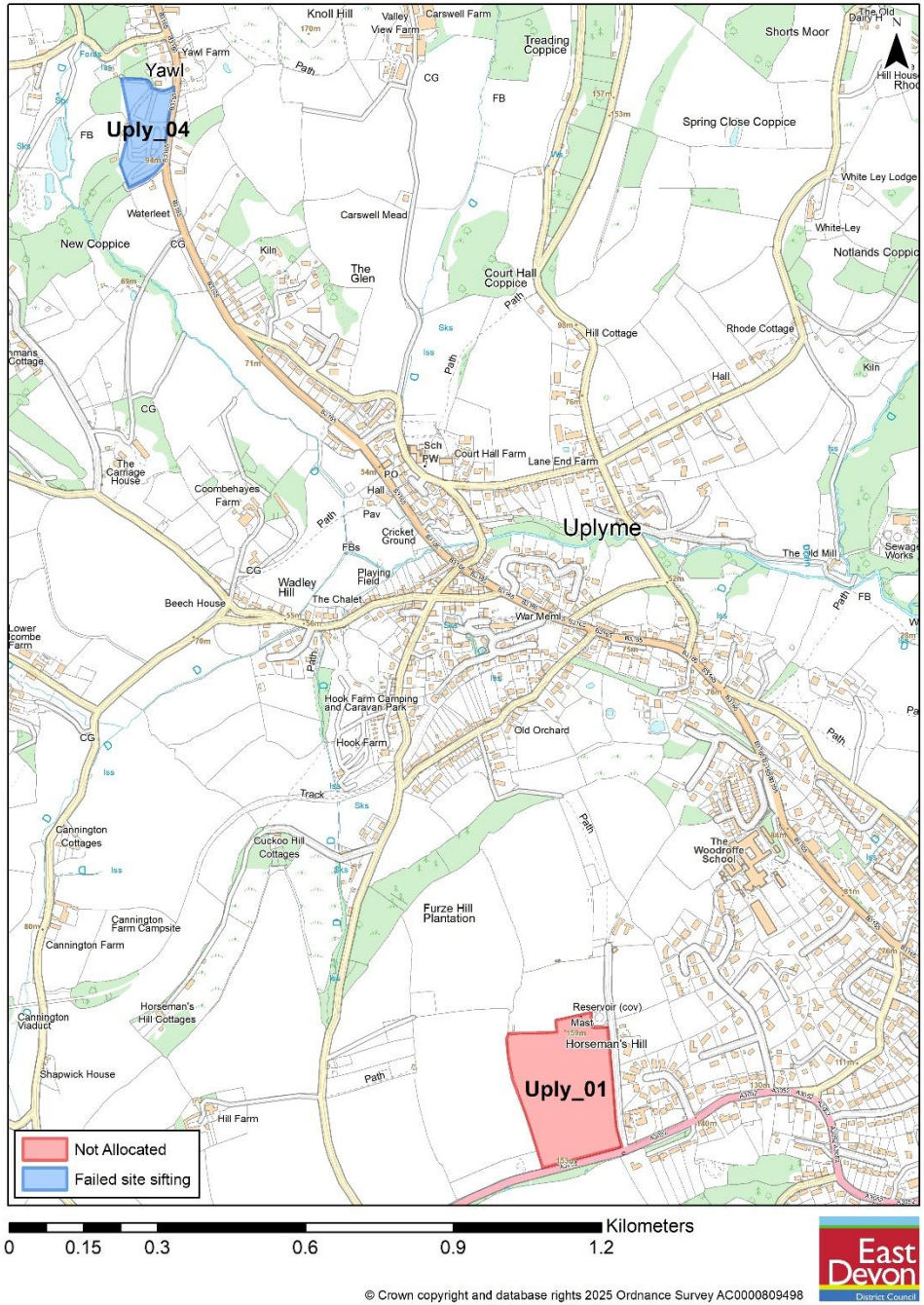
Sites: Tipton St John				
Site / **SA Objective**	**Otry_04**	**Otry_06**	**Otry_22**	
Connectivity and transport commentary	Broadband speeds of 70-160 mbps in local post codes means superfast broadband is available. The sites are around 500m from National Cycle Network 248, but this is currently an isolated route that does not link up with others. Tipton is around 2.5km north of the nearest 'A' road (A3052), and the village bus service is every two hours. On balance, a minor positive effect.			

Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects:

- Adverse ecology impacts 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 for both sites could be reduced by careful design to conserve and enhance the natural beauty of the sites and their wider setting, including a reduction in density and long-term landscaping/screening; however negative effects will likely remain due to the sensitivity of the National Landscape.
- Ensure sustainable drainage systems to reduce flood risk off-site, particularly in the village centre – this would change the effect on objective 5 from minor negative to minor positive.
- High quality design can reduce negative effects and maximise beneficial effects on the built environment.
- Significant capacity upgrades are required to Fluxton Wastewater Treatment Works – Strategic Policy AR02 requires infrastructure improvements to overcome water quality issues before development is approved.
- Access to facilities can be maximised by enhancing sustainable travel links e.g. create bus stops near to the site, pedestrian/cycle links.
- The negative uncertainty relating to access to services (objective 10) can be improved by including a primary school on one of the sites.

Sites: Tipton St John				
Site / **SA Objective**	**Otry_04**	**Otry_06**	**Otry_22**	
Some of these site-specific mitigation measures have been incorporated for the site that is allocated in Local Plan Strategic Policy SD27. For those that have not, the effects can be addressed by other Local Plan policies.				
Preferred alternative: Otry_04 for five dwellings and a new primary school. **Reasons for preferred alternative:** • Otry_04 – Land South of Otter Close is preferred as consistent with the spatial strategy and provides an opportunity to retain the primary school in the village, through its relocation from its current location in the floodplain, with acceptable landscape, biodiversity and historic environment impact. **Reasons for rejected sites:** • Otry_06 – Land next to 6 Coombe Vale is rejected due to significant adverse landscape impact. • Otry_22 – Combe Bank is rejected due to major adverse landscape impact, breaching the road along the east of Tipton St John and visible from considerable distance, including the National Landscape across the road to the south.				

Settlement: Uplyme



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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 they have potential to be delivered (subject to further consideration through the planning process). Although not located adjacent to Uplyme, it is adjacent to an existing settlement (Lyme Regis), albeit not in East Devon. Uply_04 is not a reasonable alternative as it is not adjacent or 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. A mixed long-term minor positive effect from the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.	
2. Landscape	**- -**	

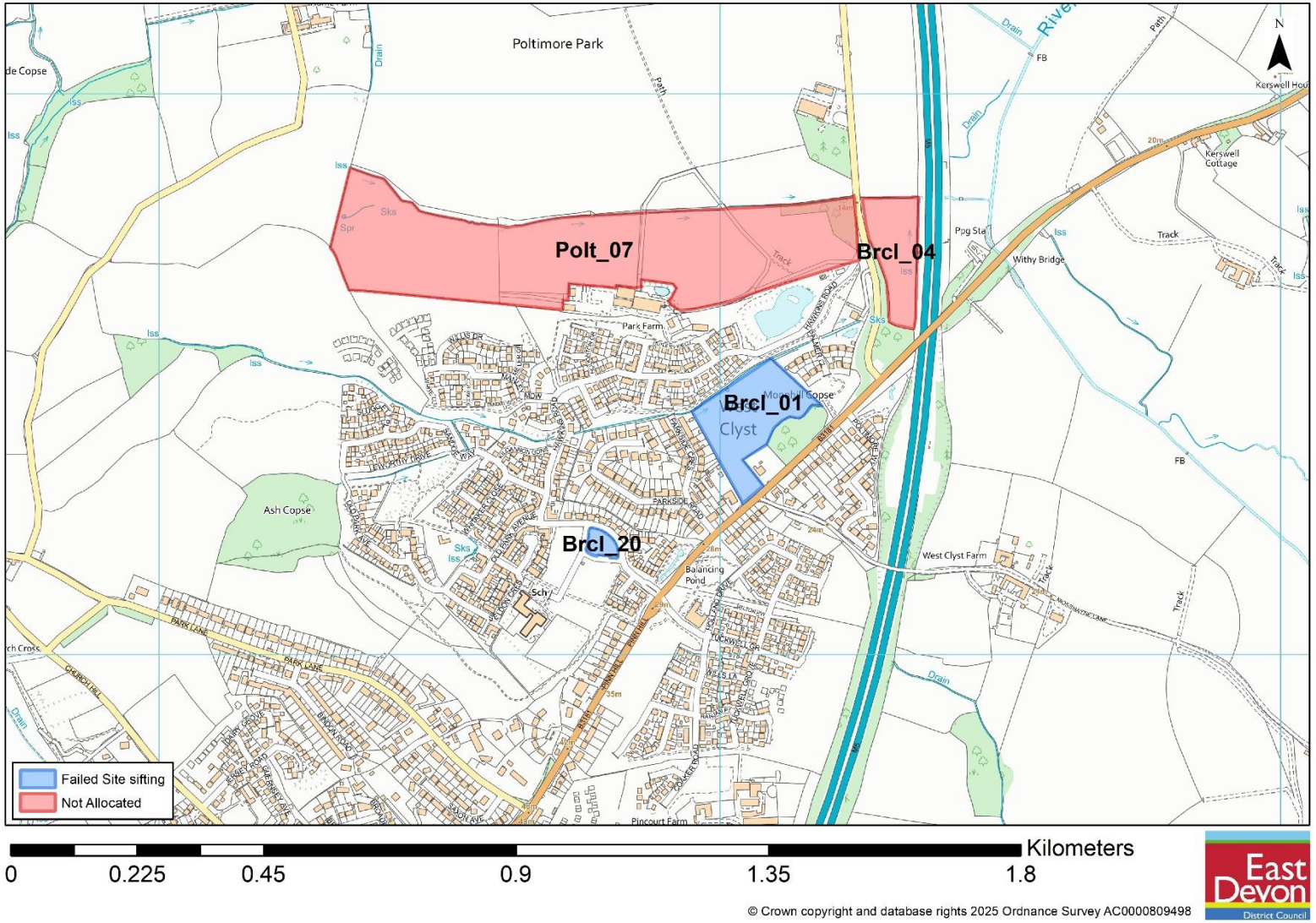
Sites: Uplyme		
Site / **SA Objective**	**Uply_01**	
Landscape commentary	Site is located on the open coastal plateaux in the East Devon National Landscape, is highly sensitive to change and mitigation would be difficult.	
3. Hist. built env	**0**	
Hist. built env. commentary	No issues identified.	
4. Climate change carbon emissions	**- -**	
Climate change carbon emissions commentary	The site is within 1,600 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 limited sustainable travel options (four buses a day).	
5. Climate change adaptation	**+**	

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 1,600 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 1,600 metres of employment sites.	
12. Town centres	**+**	

Sites: Uplyme		
Site / **SA Objective**	**Uply_01**	
Town centres commentary	Site is within 1,600 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 -– Land at Sidmouth Road, Lyme Regis is rejected due to significant adverse landscape impact and difficulty of walking or cycling to services and facilities in either Uplyme or Lyme Regis.		

Settlement: Westclyst



Reasonable alternatives

- Brcl_04 – Land adjacent Poltimore Park
- Polt_07 – Land at Westclyst Poltimore

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, they are located within or adjacent to Westclyst (and therefore consistent with the spatial strategy), are not already allocated in a 'made' Neighbourhood Plan, and do not currently have planning permission. Polt_07 is a reasonable alternative despite being unachievable in the HELAA, as an identical site (Polt_03) that was previously included in the HELAA states the site is achievable.

For the reasons given, the following sites are not considered to be reasonable alternatives:

- Brcl_01 – already has planning permission.
- Brcl_20 – already has planning permission.
- Polt_03 – overlap with Polt_07.

Sites: Westclyst			
Site / **SA Objective**	**Brcl_04**	**Polt_07**	
1. Biodiversity	**+ / - -**	**+ / - -**	

Sites: Westclyst			
Site / **SA Objective**	**Brcl_04**	**Polt_07**	
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 and Pebbled Heaths buffer zone, and Section 41 Habitat, County Wildlife Sites and unconfirmed wildlife sites within 100m of the site. So significant negative effect. Polt_07 is existing farmland covered by improved grassland, with trees and vegetation on the edge of the site boundary, with Section 41 Habitat and County Wildlife Site adjoining to the site (North & Northeast). These negative effects are mixed with a long-term minor positive effect from the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.		
2. Landscape	**+**	**-**	
Landscape commentary	Brcl_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_07 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.		
3. Hist. built env	**0**	**- -**	
Hist. built env. commentary	Brcl_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. Polt_07 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, so major negative effect.		

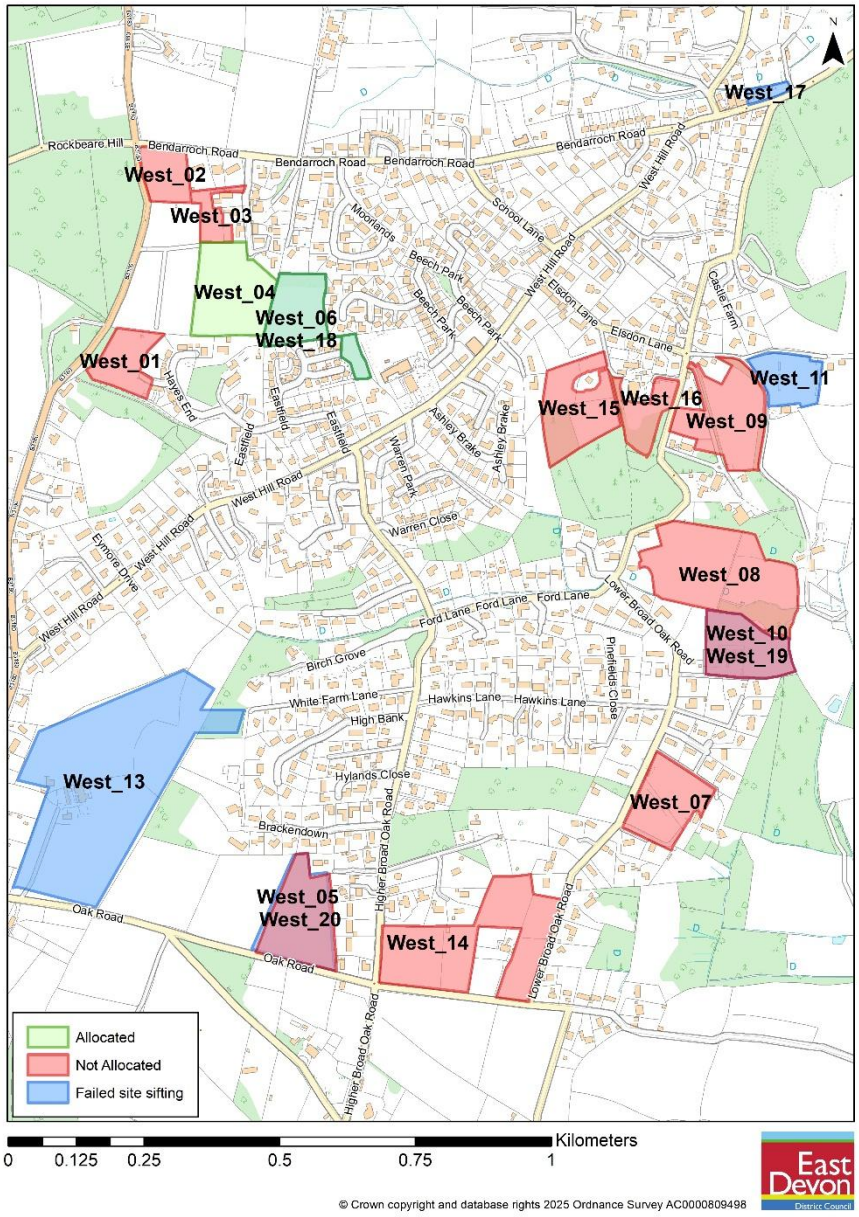
Sites: Westclyst			
Site / **SA Objective**	**Brcl_04**	**Polt_07**	
4. Climate change carbon emissions	**+**	**+**	
Climate change carbon emissions commentary	Brcl_04 has 8 out of 12 facilities within 1,600m of the site, and within 1600m to Pinhoe rail station and the main road. Hourly or better bus service available. Overall positive effect. Polt_07 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.		
5. Climate change adaptation	**0**	**- -**	
Climate change adaptation commentary	Polt_07 has medium/high flood risk (zones 2 & 3) covering minor part of the site and development could avoid that area. Brcl_04 falls in zone 2 & 3 flood zones, and development of the site would find it difficult to avoid these constraints.		
6. Land resources	**- ?**	**-**	
Land resources commentary	Brcl_04 is greenfield site on Grade 3 agricultural land, which could be 3a (best and most versatile) so uncertain negative effect. Polt_07 is greenfield has Grade 1 agricultural land in the middle of the site and the rest is site on Grade 3 agricultural land, so negative effect.		
7. Water resources	**0**	**0**	

Sites: Westclyst			
Site / **SA Objective**	**Brcl_04**	**Polt_07**	
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	Brcl_04 has potential to deliver less than 100 dwellings, so will have a positive effect; whilst Polt_07 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 sites are within 1,600m of open space/allotment and a children's play area but also adjacent to M5 road and its associated noise and air pollution, so negative effect.		
10. Access to services	**+**	**+**	
Access to services commentary	Both sites are within 1,600m from a primary school, secondary school, pub, shop, community hall and post office, Polt_07 also within 1600m from GP, and Brcl_04 just over 1700m from GP, therefore a minor positive effect.		
11. Jobs and employment	**+**	**+**	

Sites: Westclyst			
Site / **SA Objective**	**Brcl_04**	**Polt_07**	
Jobs/employment commentary	Both sites are within 1,600m to jobs in Pinhoe, with large scale of Polt_07 offering potential to deliver on-site employment, 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).		
13. Connectivity and transport	**+ +**	**+ +**	
Connectivity and transport commentary	Both sites are located within 1,600m of a train station, an hourly or better bus service, and M5. Local post codes have download speeds of 160 mbps, so superfast broadband is available.		
Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects: • Considerable landscaping at Polt_07 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:**			

Sites: Westclyst			
Site / SA Objective	Brcl_04	Polt_07	
• Brcl_04 rejected due to large proportion of the site fall inside flood zone 3. • Polt_07 rejected due to significant adverse biodiversity, landscape and historical effects.			

Settlement: West Hill



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_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_14 – Pikes Farm
- West_15 – Flower Cottage, Elsdon Lane
- West_16 – Elsdon House, Elsdon Lane
- West_17 – WI building and adjoining land
- West_18 – Land north and east of Eastfield
- West_19 – Land east of The Pygthle, Lower Broad Oak Road
- West_20 – Land off Oak 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). In addition, they are located within or adjacent to West Hill (and therefore consistent with the spatial strategy), are not already allocated in a 'made' Neighbourhood Plan, and do not currently have planning permission. The exception is West_14 which is a reasonable alternative despite being unachievable in the HELAA, as Devon County Council removed their minerals objection after publication of the HELAA.

For the reasons given, the following sites are not considered to be reasonable alternatives:

- West_05 overlaps with West_20.
- West_06 overlaps with West_18.
- West_10 overlaps with West_19.
- West_11 is probably unachievable in the HELAA due to access constraints.
- West_12 is in an isolated location, not adjacent or well-related to West Hill, so does not reflect the settlement strategy.
- West_13 probably unachievable in HELAA due to mineral constraints, but DCC subsequently removed their objection in stating that Oak Road forms a more logical boundary to the Mineral Safeguarding Area. However, southern part of site is within 400m Pebblebed Heaths exclusion zone, and only north east tip of site is adjacent to existing settlement boundary- this combination of reasons means site does not pass sifting stage.
- West_17 does not pass site sifting as area outside surface water flood risk (approximately 0.05 ha) is below site size threshold.
- GH/ED/23 and Rock_15 are in isolated locations, not adjacent or well-related to West Hill (or an existing business park for the potential employment use 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_20**	**West_18**	**West_07**	**West_08**	**West_09**	**West_19**	**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. In addition, the HRA notes potential air quality impacts at East Devon Heaths SAC/SPA from increased traffic from sites at West Hill. West_20 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)														

Sites: West Hill															
Site / SA Objective	West_01	West_02	West_03	West_04	West_20	West_18	West_07	West_08	West_09	West_19	West_14	West_15	West_16	West_17	
	habitats are present on several sites, namely West_01, West_08, West_16; and adjoin West_02, West_05, West_18, West_07, West_09, West_19, West_14, West_15 and West_17. These negative effects are mixed with a long-term minor positive effect from the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.														
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 National Landscape to the east and south of the settlement, 500m to 2km from the sites. West_01 adjoins existing development to the east, but there are TPOs on-site. 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, but the urban context from dwellings to north and south mean a minor negative effect. West_18 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_20 has a remote feel, with little perception of dwellings to north and east. West_07, 08 and 09 are tranquil, rural landscapes, with the entirety of West_08 and West_09 covered by a TPO. West_19 is a prominent, sloping site located at the top of a valley, and development would 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, with limited perception of built context. West_15 and 16 adjoin each other, both have mature woodland, including TPO trees.														

Sites: West Hill															
Site / **SA Objective**	**West_01**	**West_02**	**West_03**	**West_04**	**West_20**	**West_18**	**West_07**	**West_08**	**West_09**	**West_19**	**West_14**	**West_15**	**West_16**	**West_17**	
	West_17 would involve developing on previously developed land with low landscape sensitivity.														
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	Most sites have 6 out of 12 facilities within 1,600m of site, whilst the 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_18, but there are some short gaps in the footpath along West Hill Road. 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, 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 with the steep topography along this road meaning it would not be attractive to pedestrians. 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														

Sites: West Hill															
Site / SA Objective	**West_01**	**West_02**	**West_03**	**West_04**	**West_20**	**West_18**	**West_07**	**West_08**	**West_09**	**West_19**	**West_14**	**West_15**	**West_16**	**West_17**	
	topography. 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, although there are bus stops with hourly or greater service adjacent to the site.														
5. Climate change adaptation	**+**	**+**	**+**	**+**	**+**	**+**	**0**	**-**	**0**	**+**	**+**	**0**	**+**	**- -**	
Climate change adaptation commentary	The only site that is affected by Flood Zone 3 is West_08, which also has surface water flood risk. West_07, 09, 15 are all partially covered by surface water flood risk, but development can avoid these areas. West_17 is almost entirely covered by surface water flood risk. 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, 18, 20 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 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	**- ?**	**- ?**	**- ?**	**-**	**- ?**	**-**	**- ?**	**- ?**	**- ?**	**- ?**	**- ?**	**- ?**	**- ?**	**- ?**	

Sites: West Hill															
Site / **SA Objective**	**West_01**	**West_02**	**West_03**	**West_04**	**West_20**	**West_18**	**West_07**	**West_08**	**West_09**	**West_19**	**West_14**	**West_15**	**West_16**	**West_17**	
Water resources commentary	None are located within a groundwater source protection zone, apart from a small section of West_14. South West Water forecast there will be adequate water supply; but the capacity of Fluxton Wastewater Treatment Works is forecast to be exceeded by proposed development in the area (including West_04, 18), albeit environment permit compliance is sufficient (Water Cycle Study, November 2025). Therefore, a negative effect is likely for proposed sites West_04, 18, with uncertainty for others.														
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_20 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.														
10. Access to services	+	+	+	+	-	+	-	-	+	-	-	+	+	+	

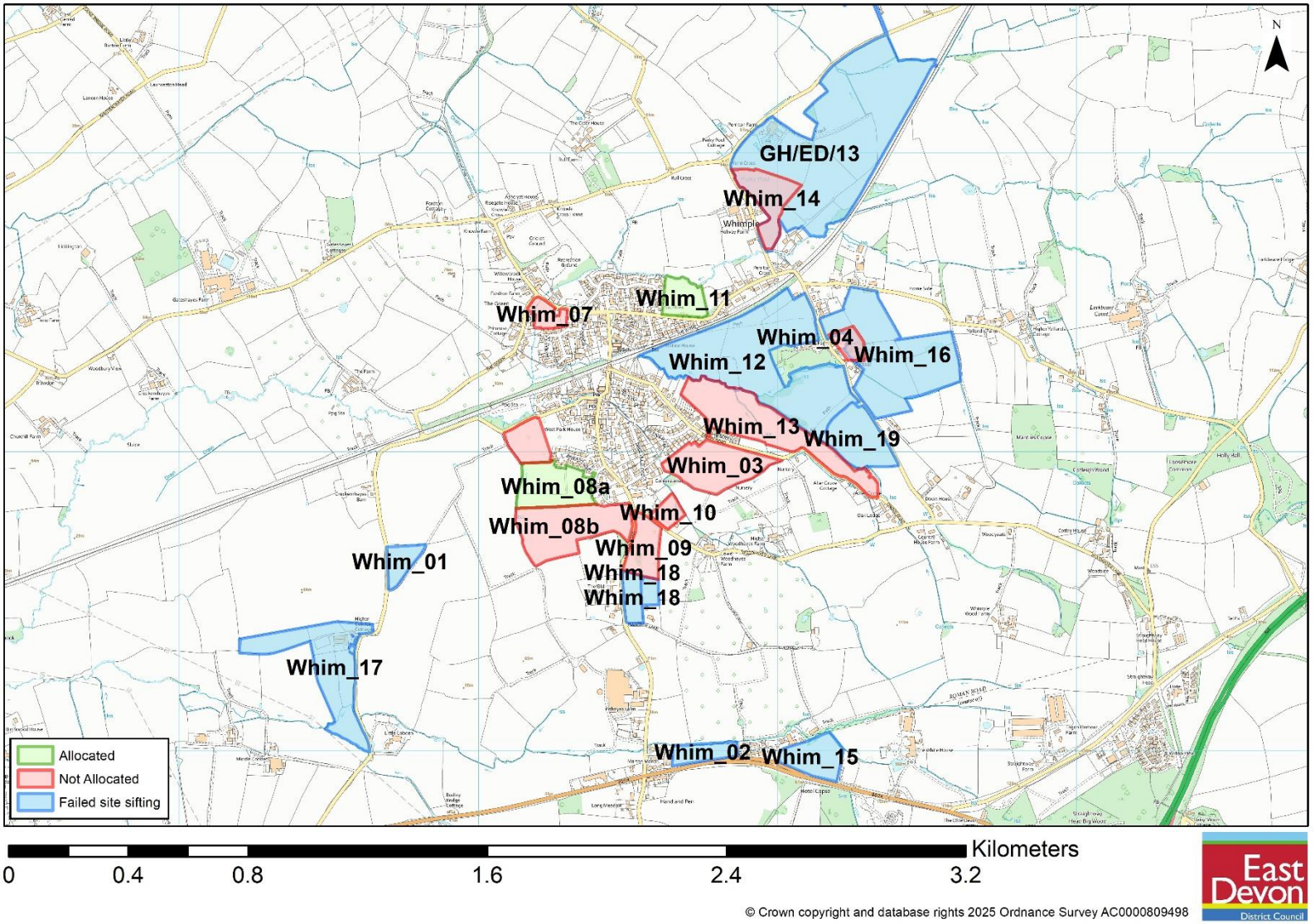
Sites: West Hill															
Site / SA Objective	West_01	West_02	West_03	West_04	West_20	West_18	West_07	West_08	West_09	West_19	West_14	West_15	West_16	West_17	
Access to services commentary	All sites, apart from West_20, 07 and 14, are within 800m of the primary school, shop and community hall. West_01, 02, 03, 04, 18, 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_18 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. West_20, 07 and 14 are just over 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. West_08 and 19 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. 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.														
11. Jobs and employment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

Sites: West Hill															
Site / **SA Objective**	**West_01**	**West_02**	**West_03**	**West_04**	**West_20**	**West_18**	**West_07**	**West_08**	**West_09**	**West_19**	**West_14**	**West_15**	**West_16**	**West_17**	
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.														
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 18 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, 18, 08, 09, 11, 15, 16, 17) within 800m. West_05, 07, 19, 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:															

Sites: West Hill															
Site / SA Objective	West_01	West_02	West_03	West_04	West_20	West_18	West_07	West_08	West_09	West_19	West_14	West_15	West_16	West_17	
• Considerable landscaping would be required to address significant adverse effects on the landscape for West_01, 20, 07, 08, 09, 19, 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. • The woodland in the northern part of West_18 should be retained and enhanced to reduce adverse landscape and biodiversity effects. • Significant capacity upgrades are required to Fluxton Wastewater Treatment Works – Strategic Policy AR02 requires infrastructure improvements to overcome water quality issues before development is approved. • Improve pedestrian links from the sites where possible with the provision of footpaths. • Create a direct pedestrian link through West_04 and 18 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. These site-specific mitigation measures have been incorporated for the sites that are allocated in Local Plan Strategic Policy SD28.														
Preferred alternatives: West_04 for 34 dwellings; West_18 for 30 dwellings. **Reasons for preferred alternatives:** • West_04 – Land adjoining Wind Mill Lane is preferred as consistent with spatial strategy, 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_18 – Land north and east of Eastfield is preferred as consistent with spatial strategy, relatively good pedestrian access to facilities, along with suitable highways access. No change to heritage assets. Adjacent to existing development, so less sensitive landscape. **Reasons for rejected sites:** • West_01 – Land at Westhayes/Hayes End Eastfield is rejected as S.41 habitat "deciduous woodland" covers most of site, with several parts also protected by TPOs, meaning that only a small area in south east of site would be acceptable, but this area is below the site size threshold of 0.15 hectares.														

Sites: West Hill															
Site / SA Objective	West_01	West_02	West_03	West_04	West_20	West_18	West_07	West_08	West_09	West_19	West_14	West_15	West_16	West_17	
• West_02 – Field at junction of B3180 and Bendarroch Road is 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. • West_03 – Rear of Hasta-La-Vista, Windmill Lane is 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_07 – Land at Lower Broad Oak Road is 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 is 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 is rejected as poor pedestrian access to facilities, sensitive landscape including entire site covered by TPO, adverse ecological impact, and surface water flood risk. • West_14 – Pikes Farm is rejected as poor pedestrian access to facilities; and site is currently a sensitive, rural landscape. • West_15 – Flower Cottage, Elsdon Lane is 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 is rejected as sensitive landscape, adverse ecological impact. • West_17 – WI building and adjoining land is rejected as surface water flood risk covers most of site, and there are sequentially preferable sites in West Hill. • West_19 – Land east of The Pygthle, Lower Broad Oak Road is rejected as poor pedestrian access to facilities, and a sensitive landscape that slopes steeply in parts. • West_20 – Land off Oak Road is rejected as poor pedestrian access to facilities; and site is currently a sensitive, rural landscape, including TPO covering entire site boundary.														

Settlement: Whimple



Reasonable alternatives

- Whim_03 – Land south of Grove Road
- Whim_04 – Hits Farmhouse, Lilypond Lane
- Whim_07 – Land fronting Broadclyst Raod
- 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

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, they are located within or adjacent to Whimple (and therefore consistent with the spatial strategy), are not already allocated in a 'made' Neighbourhood Plan, and do not currently have planning permission.

For the reasons given, the following sites are not considered to be reasonable alternatives:

- Whim_01, 02, 15, 17, 18, 19, 20 are not within or adjacent, or otherwise well-related, to Whimple.
- Whim_12 is probably unachievable in the HELAA given access constraints and need to improve the road network and bridge over the railway.
- Whim_16 is probably unachievable in the HELAA due to road network issues and isolated from services/facilities.
- GH/ED/13 overlaps Whim_14.

Sites: Whimple										
Site / **SA Objective**	**Whim_03**	**Whim_04**	**Whim_07**	**Whim_08**	**Whim_09**	**Whim_10**	**Whim_11**	**Whim_13**	**Whim_14**	
1. Biodiversity	**+ / -**	**+ / -**	**+ / -**	**+ / - -**	**+ / - -**	**+ / -**	**+ / -**	**+ / -**	**+ / -**	
Biodiversity commentary	All sites are in the Pebblebed Heaths mitigation zone, meaning a minor negative effect. In addition, the HRA notes potential air quality impacts at East Devon Heaths SAC/SPA from increased traffic from sites at Whimple. Whim_08 is partly covered by an unconfirmed wildlife site, whilst Whim_09 is entirely covered by an unconfirmed wildlife site so major negative effect for these. All other sites are either adjacent to or in close proximity to either an unconfirmed wildlife site and/or core nature areas. These negative effects are mixed with a long-term minor positive effect from the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.									
2. Landscape	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	
Landscape commentary	None of the sites are in the National Landscape, but all contribute to the attractive landscape setting of Whimple.									
3. Hist. built env	**-**	**- -**	**- -**	**-**	**- -**	**- -**	**-**	**-**	**-**	

Sites: Whimple										
Site / **SA Objective**	**Whim_03**	**Whim_04**	**Whim_07**	**Whim_08**	**Whim_09**	**Whim_10**	**Whim_11**	**Whim_13**	**Whim_14**	
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 II* 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, and 14 have the potential to have a negative impact on the setting of designated heritage assets, with an archaeological record also present on Whim_08.									
4. Climate change carbon emissions	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	
Climate change carbon emissions commentary	All sites are within 1,600 metres of the eight out of twelve facilities available, including a train station, offering the opportunity to minimise carbon emissions from travel. However, pavements are not continuous and may deter pedestrian access, so a neutral effect overall.									
5. Climate change adaptation	**- -**	**- -**	**- -**	**-**	**+**	**+**	**- -**	**- -**	**-**	
Climate change adaptation commentary	Whim_04, 07, 11, and 13 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. A small part of Whim_09 together with the land adjacent to Whim_10 are in flood zone 2. Whim_08 is partly affected by flood zone 3, surface water flood risk, and groundwater flooding. Surface water flood risk also affects Whim_11 – both Whim_08 and 11 are in the Strategic Flood Risk Assessment Level 2, which sets out further detail on key points and constraints to be considered through a site-specific Flood Risk Assessment. Whim_14 is within a critical drainage area but not affected by other sources of flood risk.									

Sites: Whimple										
Site / **SA Objective**	**Whim_03**	**Whim_04**	**Whim_07**	**Whim_08**	**Whim_09**	**Whim_10**	**Whim_11**	**Whim_13**	**Whim_14**	
6. Land resources	**- ?**	**- ?**	**- ?**	**- ?**	**- ?**	**- ?**	**- ?**	**- ?**	**- ?**	
Land resources commentary	All the sites are Grade 3 agricultural land where it is not broken into a and b so an uncertain negative effect.									
7. Water resources	**- ?**	**- ?**	**- ?**	**- ?**	**- ?**	**- ?**	**- ?**	**- ?**	**- ?**	
Water resources commentary	None are located within a groundwater source protection zone. South West Water forecast there will be adequate water supply. There is forecast to be marginal capacity exceedances at Countess Wear Wastewater Treatment Works assuming development at Whim_08, 11, although this may not take into account planned investment so there is some uncertainty.									
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 1,600 metres of open space and a children's play area. No sites are adjacent to noise pollution from a railway line or A road.									

Sites: Whimple										
Site / SA Objective	Whim_03	Whim_04	Whim_07	Whim_08	Whim_09	Whim_10	Whim_11	Whim_13	Whim_14	
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 1,600 metres of any site. There may be potential for employment uses on Whim_08 given its relatively large size.									
12. Town centres	-	-	-	-	-	-	-	-	-	
Town centres commentary	No sites are within 1,600 metres of a town centre.									
13. Connectivity and transport	+	+	+	+	+	+	+	+	+	

Sites: Whimple										
Site / **SA Objective**	**Whim_03**	**Whim_04**	**Whim_07**	**Whim_08**	**Whim_09**	**Whim_10**	**Whim_11**	**Whim_13**	**Whim_14**	
Connectivity and transport commentary	Whimple has broadband speeds over 30 mbps. All sites are within 1,600 metres of a train station, but over 2km from the nearest A road, so a minor positive impact overall.									
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. • Given its large size, it is possible to reduce the site area of Whim_08 to reduce major negative biodiversity effects, by avoiding the unconfirmed wildlife site; and limit the site no further south than the existing settlement boundary to lessen the landscape impact. This site – Whim_08a – will have minor negative biodiversity effects, and a minor (rather than major) positive effect on housing given its smaller size than Whim_08. • 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 potential impacts on designated heritage assets of development on Whim_04 and 07 are particularly significant and difficult to mitigate. • Whim_11 should conserve and enhance the setting of Grade II listed Slewton House to ensure its setting is conserved and enhanced. • An archaeological investigation should be undertaken at Whim_08 to understand the nature and extend of the structure noted in the Devon Historic Environment Record. • Potential requirement for capacity upgrades to Countess Wear Wastewater Treatment Works – Strategic Policy AR02 requires infrastructure improvements to overcome water quality issues before development is approved. • All sites in the Whimple critical drainage area should meet the minimum drainage standards and contribute to a scheme to reduce risk of flooding. Parts of Whim_08 and 11 are at risk of flooding and development should reflect the findings of the level 2 SFRA for these sites.									

Sites: Whimple										
Site / SA Objective	Whim_03	Whim_04	Whim_07	Whim_08	Whim_09	Whim_10	Whim_11	Whim_13	Whim_14	
• Whim_11 should enable convenient east to west walking and cycling links along the site frontage, delivering a footway extension from the west. These site-specific mitigation measures have been incorporated for the sites that are allocated in Local Plan Strategic Policy SD29.										
Preferred alternative: Whim_08a for 50 dwellings and a community orchard; Whim_11 for 33 dwellings. **Reasons for preferred alternatives:** • Whim_08a – Land West of Church Road and Bramley Gardens is preferred as it is consistent with the spatial strategy with no major adverse effects. • Whim_11 – Land at Station Road is preferred as consistent with spatial strategy with relatively few constraints. **Reasons for rejected sites:** • Whim_03 – Land south of Grove Road is 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 is rejected due to poor access making pedestrian and cycling routes to facilities in village centre difficult. • Whim_07 – Land fronting Broadclyst Road is rejected due to flooding potential impacts on designated heritage assets. • Whim_08b – Land West of Church Road and Bramley Gardens is rejected as the scale of growth, when combined with the preferred alternatives is not consistent with the spatial strategy; and because of adverse landscape impacts on setting of Whimple, including difficulties of providing satisfactory highway access without detrimental landscape impacts.										

Sites: Whimple										
Site / SA Objective	Whim_03	Whim_04	Whim_07	Whim_08	Whim_09	Whim_10	Whim_11	Whim_13	Whim_14	
• Whim_09 – Land at Church Road and Woodhayes Lane is 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 is rejected due to detrimental impact on setting of designated heritage assets, landscape setting of village and poor pedestrian cycling links to village centre. • Whim_13 – Land North of Grove Road is rejected as strategic level of growth not compatible with strategy and landscape impacts on setting of village. • Whim_14 – Land at Perriton Barton is rejected due to poor relationship and pedestrian links with village, landscape impact and potential impact on ecology and the setting of designated heritage assets.										

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