



Exeter City Council

Third Interim Sustainability Appraisal:

**Publication Version
Development Delivery
Development Plan Document**

July 2015

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Abbreviations

CA	Conservation Area
CIL	Community Infrastructure Levy
CLG	(Department for) Communities and Local Government
CO ₂	Carbon dioxide (emissions)
CP..	Core Strategy policy
DCC	Devon County Council
DD..	DD DPD policy
DD DPD	Development Delivery DPD
DM..	Policy in “Have your say” document
DPD	Development Plan Document
ECC	Exeter City Council
HMO	House in Multiple Occupation
LDF	Local Development Framework
LEN	Local Energy Network
LSA	Landscape Setting Area
NICE	National Institute for Health and Care Excellence
NPPF	National Planning Policy Framework
PAS	Planning Advisory Service
RSPB	Royal Society for the Protection of Birds
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SHLAA	Strategic Housing Land Availability Assessment
SI	Statutory Instrument
SPD	Supplementary Planning Document
SUDS	Sustainable Urban Drainage Systems

1 Introduction

1.1 The Development Delivery DPD

- 1.1.1 Exeter City Council is preparing its Local Development Framework (LDF), which will replace the Exeter Local Plan First Review. The LDF will include the 'Local Plan' which will comprise two Development Plan Documents (DPDs), namely the adopted Core Strategy and the emerging Development Delivery DPD.
- 1.1.2 The Development Delivery DPD will allocate land for new development and will establish boundaries for other land use designations such as the County Wildlife Sites and the Landscape Setting Areas. It will also provide a comprehensive set of generic development management policies to replace those currently saved from the Exeter Local Plan First Review, which will act as the basis for determining planning applications. This DPD is the subject of this Sustainability Appraisal and is referred to in this document as "the DD DPD" or, where the context permits, simply as "the DPD".
- 1.1.3 To enable a first round of public consultation on the DD DPD, the Council produced a document entitled "Have Your Say". The proposed policy text was arrived at through internal consultation, the input of the statutory Consultation Bodies and consideration of the contribution that each policy made to meeting Exeter's sustainability objectives¹. "Have Your Say" set out the proposed policies and the issues they were designed to address, and sought consultees' views. It was publicised to a wide range of statutory bodies, stakeholders and the general public during a consultation exercise between July and September 2012.
- 1.1.4 Comments received as a result of the initial "Have Your Say" consultation led to changes that were incorporated in to the "Draft" DD DPD. The policy text in the "Draft" DD DPD was also arrived at through a review of the way in which each policy contributed to the Core Strategy Objectives and consideration of the contribution each policy made to meeting Exeter's sustainability objectives. The "Draft" DD DPD was the subject of a further 10 week stage of consultation, between December 2013 and February 2014.
- 1.1.5 Again the comments received as a result of consultation on the "Draft" DD DPD have been carefully considered and changes made where appropriate. The "Publication Version" of the DD DPD, incorporates these proposed changes.

1.2 Exeter's sustainability objectives

- 1.2.1 The sustainability objectives adopted by the Council, and used throughout the LDF sustainability appraisal process to date, are as follows:-
 - 1. *To ensure everybody has the opportunity of a decent home.*
 - 2. *To ensure that all groups of the population have access to the services that they require, in terms of the number of facilities and being able to reach them.*
 - 3. *To provide for education, skills and lifelong learning to: meet the needs of the local population, and meet local employment needs.*
 - 4. *To improve the population's health.*

¹ See paragraph 1.2.1 of this document.

5. *To reduce crime and fear of crime.*
6. *To reduce noise levels.*
7. *To maintain and improve cultural, social and leisure provision.*
8. *To maintain and enhance built and historic assets.*
9. *To promote the conservation and wise use of land and protect and enhance the landscape character of the City.*
10. *To maintain the local amenity, quality and character of the local environment.*
11. *To conserve and enhance the biodiversity of the City.*
12. *To reduce the level in growth of car usage.*
13. *To maintain a high quality environment in terms of air, soil and water quality.*
14. *To contribute towards a reduction in local emissions of greenhouse gases.*
15. *To ensure that there is no increase in the risk of flooding.*
16. *To ensure energy consumption is as efficient as possible.*
17. *To promote wise use of waste resources whilst reducing waste production and disposal.*
18. *To maintain sustainable growth of employment for the City, to match levels of jobs with the economically active workforce.*
19. *To maintain and enhance the vitality and viability of the City Centre.*
20. *To encourage and accommodate both indigenous and inward investment.*

1.2.2 Objectives 1 to 7 are of a social nature, 8 to 17 are environmental, and 18 to 20 are economic objectives. These correspond to the three roles to be performed by the planning system, as set out in the NPPF².

1.3 Legislative requirement for Sustainability Appraisal

1.3.1 Under the Planning and Compulsory Purchase Act 2004³ (as amended), DPDs must undergo a Sustainability Appraisal (SA). This involves the identification and evaluation of a DPD's impacts on the three elements of sustainable development (the economic, social and environmental impacts). The SA process for the UK incorporates the requirements of the European Strategic Environmental Assessment Directive in relation to the environmental assessment of plans, applied in the UK by the Environmental Assessment of Plans and Programmes Regulations 2004⁴.

1.3.2 The National Planning Policy Framework at paragraph 152 requires local planning authorities to seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, mitigation measures should be considered, and where this is not possible, compensatory measures may be appropriate.

² NPPF paragraph 7

³ Section 19(5)

⁴ SI 2004 No. 1633

- 1.3.3 The second Interim SA was prepared with regard to CLG's Guidance on the Strategic Environmental Assessment Directive and the Sustainability Appraisal section of the CLG Plan Making Manual produced by PAS.
- 1.3.4 The National Planning Practice Guidance has since been published (on 6 March 2014), and advises plan-makers to assess the policies in a draft plan, and the reasonable alternatives, to identify the likely significant effects of the available options. This assessment of alternatives should inform the local planning authority in choosing its preferred approach. The authority should also consider ways of mitigating any adverse impacts, maximising beneficial effects, and ways of monitoring likely significant effects. The SA should outline the reason the alternatives were selected, plus the reasons for rejecting certain options in favour of the preferred approach.
- 1.4 The SA process in relation to the Local Development Framework (LDF) including the Development Delivery DPD.**
- 1.4.1 A Scoping Report was first undertaken for the LDF in 2005, which identified the sustainability objectives set out in paragraph 1.2.1. An updated Scoping Report has been produced to support the SA of DD DPD and to ensure new issues that have arisen since 2005 are adequately considered and addressed.
- 1.4.2 The objectives for the LDF were set out in the Core Strategy, and were tested against the above sustainability objectives at the Issues and Options stage, again at the Preferred Options stage, and finally at the Submission stage. The compatibility matrix between the LDF objectives and Exeter's sustainability objectives is included as Appendix 1.
- 1.4.3 The first Interim Sustainability Appraisal (SA) of the DD DPD was published in July 2012 alongside the publication of the "Have Your Say" document. Arising from the consultation responses to both documents, the policies were revised for inclusion in the "Draft" DD DPD.
- 1.4.4 A second Interim SA was then carried out on the revised policies, in accordance with the updated Scoping Report. It was published alongside the "Draft" DD DPD, and a 10 week consultation on both documents ended on 21 February 2014.
- 1.4.5 Numerous comments were received on the Draft DD DPD, and a few on the SA. These have now been analysed, changes made where appropriate and the "Publication Version" of the DD DPD has been prepared, together with this third Interim SA.
- 1.4.6 This third Interim SA follows the format of the second, with the detail of the necessary appraisals being set out in matrices (Appendix 2 – Detailed sustainability matrices for the third Interim SA). This adopts a chapter by chapter approach, demonstrating how the proposed policies have been amended, where appropriate, to take account of comments raised and mitigation measures identified throughout the plan preparation process. The appraisal of each individual policy takes into account the mitigation provided by other policies (the symbol "≡" indicates this in the matrix). The analysis of each chapter of the DD DPD shows the relevant part of the matrix together with any changes. A complete revised matrix appears as Appendix 3 - Summary sustainability matrix for the third interim SA.
- 1.4.7 Following the publicity period on the "Publication Version" of the DD DPD, final minor revisions may be carried out to before the document is submitted for examination. At

the same time, a final iteration of this SA will be undertaken which will comprise the complete formal SA of the DPD.

1.5 Conclusions of the First Interim SA

- 1.5.1 The principal findings of the First Interim SA suggested that the overall impact of the preferred policies was positive, particularly in terms of ensuring everyone had the opportunity of a decent home, access to services, reducing car use, reducing CO₂ emissions, the vitality and viability of the City Centre and attracting investment.
- 1.5.2 The objectives that resulted in the least amount of positive assessments were reducing crime and fear of crime and reducing noise levels. In the main this reflected the fact that other legislation and services exist to control these issues (for example noise levels are governed by Environmental Health legislation and crime is largely dealt with by Devon and Cornwall Police) as well as being covered by Supplementary Planning Documents such as the Residential Design SPD⁵. Nevertheless, all policies needed to be reviewed to see if there was any further potential to include measures to contribute positively to these sustainability objectives.
- 1.5.3 Some policies were also identified that, when taken on their own, had the potential to have negative impact. However, when considered in a holistic manner, taking into account protection offered by other policies, these negative impacts should, in the main, not occur. For example proposals for housing could have a negative impact on flood risk (especially if located with a high risk flood area), but with the protection offered by the flood risk policy this negative impact should not occur.
- 1.5.4 There were also situations where a policy specifically drafted to meet one sustainability objective was found to be in clear conflict with another sustainability objective. In this instance these negative impacts need to be balanced against the positive impacts that the policy has against other sustainability objectives. To repeat the example given above, employment land provision has a negative impact on ensuring everyone has the opportunity to a decent home but it is important that both objectives are met in order to achieve sustainable growth.

1.7 Conclusions of the Second Interim SA

- 1.7.1 The Second Interim SA included detailed assessment of all proposed policies, including the evaluation of likely significant effects of the policies including probability of impacts, duration, frequency, cumulative nature and magnitude in accordance with Annex II of the SEA Directive.
- 1.7.2 The Second Interim SA identified an inherent conflict between growth, which includes the provision of employment and housing development and the protection of the environment. However, the Core Strategy objectives, as a whole, aim to ensure that growth is secured in the most sustainable manner and that any negative sustainability impacts, such as pollution, noise or flood risk are minimised. This is consistent with the component roles of sustainable development as set out in the NPPF, namely the economic role, the social role and the environmental role.
- 1.7.3 The Second Interim SA suggested that the growth of Exeter is in itself a positive sustainable outcome that, compared with dispersal into rural areas, overrides the negative local impact. It is likely that the current policies represent the best mix that

⁵ But see paragraph 2.1.3.

can be achieved in terms of promoting the three competing roles of sustainable development.

2 The emerging DPD policies

2.1 Developing the policies

- 2.1.1 The “Have Your Say” document proposed 39 policies, DM1 to DM39. Around 1000 individuals and organisations were consulted, and about 350 responses were received. About 300 were single-issue responses, while the other 50 raised multiple issues.
- 2.1.2 All policy areas were the subject of some comments. There was a tendency for individuals to make site-specific comments, for example objections to the proposed allocation of an employment area at Eastern Fields, Pinhoe (policy DD2⁶), and the strategic allocation at Alphington (not actually in this DPD, but allocated through the Core Strategy). Land owners and consultants most commonly objected to designations (eg. Monkerton Ridge Park, policy DD29), or that their site should be allocated for development, or that viability issues had not been properly considered.
- 2.1.3 These comments were taken into account in producing the Draft DPD for public consultation. In addition, the draft policies were compared with the Objectives in the Core Strategy⁷; new policies were included to ensure that each Objective was supported by a policy or policies, whereas policies not linked to the Objectives were deleted. This option selection is referred to where appropriate in the following sections of this SA. As an example, new policy DD26 promotes development that designs out crime, recognising that perception of crime is an element of Core Strategy Objective no. 6.
- 2.1.4 The “Draft” DD DPD included 35 policies, DD1 to DD35. Again around 1000 individuals and organisations were consulted, and about 450 responses were received. About 350 were single-issue responses, while the other 100 raised multiple issues.
- 2.1.5 All policy areas were the subject of some comment. There was again a tendency for individuals to make site-specific comments, for example the proposed housing allocation at Eastern Fields, Pinhoe, (Policy DD7⁸) which attracted over 200 objections, and the land north of the West of England School Foundation which attracted over 120 objections⁹. Land owners and consultants most commonly objected to designations (eg. Monkerton Ridge Park, policy DD29), or that their site should be allocated for development.
- 2.1.6 The “Draft” DD DPD was revised into its current “Publication Version” form, taking into account the representations received, and as a result of internal discussion of options. This option selection is referred to where appropriate in the following sections of this document.

⁶ In this document, policies are identified using their DD.. number from the current Publication Version DPD.

⁷ Note that these are the Objectives to support and deliver the Core Strategy Vision, **not** the Sustainability Objectives.

⁸ Previously allocated for employment in the “Have your say” document.

⁹ The land north of West of England School Foundation is no longer proposed for allocation in the Publication Version DD DPD.

2.2 Third Interim Sustainability Appraisal

- 2.2.1 This Third Interim SA carries forward the approach taken to the Second Interim SA and undertakes a detailed sustainability assessment, including the evaluation of likely significant effects of the policies and probability of impacts, duration, frequency, cumulative nature and magnitude in accordance with Annex II of the SEA Directive.
- 2.2.2 During the consultation on the draft DD DPD, some comments were received in relation to the Second Interim SA. These are outlined and addressed in Appendix 5.
- 2.2.3 For each chapter of the Publication Version DD DPD Appendix 2 sets out the following:-
- The detailed sustainability matrix for each policy (together with relevant lines from the Second Interim SA where different from the Third Interim SA)
 - An appraisal of each DPD policy, including any alternatives considered.

For consistency and to enable easy comparison with the Publication Version DPD, all references in this SA are to current policy and paragraph numbers.

Appendix 3 presents the complete sustainability matrix for the Third Interim SA.

2.3 Conclusions of the Third Interim SA

- 2.3.1 As was the case with the Second Interim SA, the individual sections of Appendix 2 and the matrix in Appendix 3 identify an inherent conflict between growth, which includes the provision of employment and housing development, and the protection of the environment. This is demonstrated by remaining negative impacts from policies DD2, DD6, DD8 and DD9 on environmental SA Objectives 8, 9, and 10, as shown in the following table:-

	Objective 8 Historic assets	Objective 9 Land conservation & landscape character	Objective 10 Local environment
DD2 Employment land provision		-	-
DD6 Telecommunications	-	-	-
DD7 Allocated housing sites		-	-
DD8 Housing on unallocated sites		-	-

- Policy conflicts with objective

- 2.3.2 However, the Core Strategy objectives, as a whole, aim to ensure that growth is secured in the most sustainable manner and that any negative sustainability impacts, such as pollution, noise or flood risk, are minimised. This is consistent with the component roles of sustainable development as set out in the NPPF, namely the economic role, the social role, and the environmental role.
- 2.3.3 It is also the case that the growth of Exeter is in itself a positive sustainable outcome that, compared with dispersal into rural areas, overrides the negative local impact. It is likely that the current policies represent the best mix that can be achieved in terms of promoting the three competing roles of sustainable development.

Appendix 1 – Compatibility matrix between the LDF objectives and Exeter's sustainability objectives

Compatibility Matrix between Core Strategy Objectives and SA Objectives

Core Strategy Objectives (Written in short - for the full written objectives see the Core Strategy)	SA Objectives													
	Social		Environmental										Economic	
	1	2, 3, 4, 7	5	8	9	10, 6, 13, 14	11	12	15	16	17	18	19	20
1: Make the fullest contribution possible to the mitigation of, and adaptation to, climate change and the transition to a low carbon economy by, reducing the use of fossil fuels by promoting high quality public transport...	✓	✓		✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
2: Develop the potential of the City for further economic and commercial investment by diversifying the Exeter economy with particular focus on knowledge-based activities and low and zero carbon technology...	✓	✓		?	×	?	×	×	?	✓	?	✓	✓	✓
3: Aim to provide everyone in the community with the opportunity of living in a decent warm home of a suitable type, size and tenure for their needs, supported by the local community facilities they require...	✓	✓	✓	?	×	?	×	×	?	✓	?	✓		✓
4: Provide and enhance retail, cultural and tourist facilities in the City Centre that reflect and enhance Exeter's regional and sub-regional status and sphere of influence, that add to economic growth, that build social cohesion...	✓	✓		?		?		✓		✓	?	✓	✓	✓
5: Minimise the need to travel and reduce the dependence on the car, in accordance with the Local Transport Plan and the Green Infrastructure Strategy, through: enhancement of transport infrastructure and services...	✓	✓				✓		✓		✓				✓
6: Meet local needs for community, cultural, social, retail, health, education, religious, and recreational facilities, particularly within the urban extensions, regeneration areas and in areas of deprivation...	✓	✓	✓		✓	✓		✓		✓	?	✓		✓
7: Promote development that contributes to a healthy population – by implementing the Green Infrastructure Strategy and ensuring that environmental quality and air quality is protected and enhanced.	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓	✓		✓
8: Protect and enhance the City's unique historic character and townscape, its archaeological heritage, its natural setting that is provided by the valley parks and the hills to the north and west, and its biodiversity and geological assets.				✓	✓	✓	✓	✓	✓	?			✓	✓
9: Create and reinforce local distinctiveness and raise the quality of urban living through excellence in design.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓
10: Ensure that infrastructure is in place, when required, that will enable the proposals for development within the urban area, and the Monkerton and Hill Barton, Newcourt and Alphington urban extensions, to be delivered successfully.	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓		✓	✓
✓ Broadly compatible × Potential conflict ? Uncertainty (blank) The objectives have no relation														
SA Objectives 1. To ensure everybody has the opportunity of a decent home. 2. To ensure that all groups of the population have access to the services that they require, in terms of the number of facilities and being able to reach them. 3. To provide for education, skills and lifelong learning to: meet the needs of the local population, and meet local employment needs. 4. To improve the population's health. 5. To reduce crime and fear of crime. 6. To reduce noise levels. 7. To maintain and improve cultural, social and leisure provision. 8. To maintain and enhance built and historic assets. 9. To promote the conservation and wise use of land and protect and enhance the landscape character of the City.						10. To maintain the local amenity, quality and character of the local environment. 11. To conserve and enhance the biodiversity of the City. 12. To reduce the level in growth of car usage. 13. To maintain a high quality environment in terms of air, soil and water quality. 14. To contribute towards a reduction in local emissions of greenhouse gases. 15. To ensure that there is no increase in the risk of flooding. 16. To ensure energy consumption is as efficient as possible. 17. To promote wise use of waste resources whilst reducing waste production and disposal. 18. To maintain sustainable growth of employment for the City, to match levels of jobs with the economically active workforce. 19. To maintain and enhance the vitality and viability of the City Centre. 20. To encourage and accommodate both indigenous and inward investment.								

Appendix 2 – Detailed sustainability matrices for the third Interim SA

Chapter 1 of the DPD – Exeter’s Local Vision for Sustainable Development

In this and the following tables, the SA Objective numbers include a clickable link to the text of the Objective; hovering over the link will give a shorthand summary.

Policies		SA Objectives																			
		Social							Environmental										Economic		
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
DD1	Exeter’s local vision for sustainable development	++	++	++	++	+	+	++	++	++	++	++	++	++	++	++	++	++	++	++	++

++ Policy provides significant support to objective + Policy supports objective - Policy conflicts with objective

• No relationship = Impact balanced by another policy

Positive impacts: This is an all-embracing policy that supports development consistent with the principles of sustainable development. This policy is found either to support or strongly support all of the SA Objectives. This is not surprising given the nature of the policy; however what this assessment does not reflect is the more subtle way in which some of the SA Objectives are mutually inconsistent; therefore a policy which supports one of the Objectives inherently has a negative impact on another. Rather than trying to reflect all these conflicts in one line of the matrix, this exercise has been left to the appraisal of the other policies in the DPD, set out in the following chapters.

In relation to representations received to the Draft DD DPD:-

- Numerous respondents supported the policy or individual elements of it.
- One respondent welcomed the changes made to the explanatory text to clarify how it is to be demonstrated that development is consistent with the principles of sustainable development.

Negative impacts: The NPPF definition of sustainable development includes an economic, social and environmental role. The SA as a whole analyses the balance between the competing roles that define sustainable development.

In relation to representations received to the Draft DD DPD:-

- a. There was again explicit and implied criticism that the considerable growth proposed for Exeter compromised sustainability principles. This SA as a whole analyses the balance between the competing roles that define sustainable development.
- b. One respondent felt it would be appropriate to make express reference to meeting the city's affordable housing needs; however it is considered that criteria f, which refers to housing need, clearly includes affordable housing need and it is not possible to refer to every aspect in one overarching policy.
- c. One respondent considered the explanatory text should also refer to the spatial approach set out in the Core Strategy. However the DD DPD should not repeat the Core Strategy whose spatial approach has already been assessed by the SA for that document.
- d. One respondent suggested that it was not clear that the 'presumption in favour of sustainable development' as set out in the NPPF will be applied in Exeter and suggested the use of the Planning Inspectorate's model policy. However, the explanatory text clearly refers to the 'presumption in favour of sustainable development' and policy DD1 responds to the local opportunities for achieving sustainable development and takes a more locally distinctive approach, in accordance with the NPPF.
- e. The Highways Agency (now Highways England) restated their request for an explicit requirement (in this and other policies) that there should be no adverse impact on the Strategic Road Network. Rather than qualifying a number of policies in this way, the approach adopted is to rely on DD20 and to make it explicit (in the introductory notes) that a proposal must satisfy all relevant policies. DD1(d) already requires proposals to have regard to suitability of location in terms of transport infrastructure.

Option selection and changes to policies:

Only one minor change has been made to this policy since the "Draft" document (to replace 'cultural heritage' with 'historic environment' in DD1(g)) and this does not affect this Sustainability Appraisal.

Evidence base:

Nothing specific to this chapter; see subject-specific chapters below.

Chapter 2 of the DPD – Realising Exeter’s Economic Potential

Policies		SA Objectives																			
		Social							Environmental										Economic		
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
DD2	Employment land provision	=	•	+	•	•	+	•	•	-	-	-	++	=	+	=	+	•	++	++	++
												=									
DD3	Retention of employment land or premises	=	•	+	•	•	+	•	•	•	•	•	++	•	•	•	+	•	++	++	++
DD4	Provision of local services in employment areas	•	++	•	+	•	•	•	•	•	•	•	++	•	+	•	•	•	+	++	++
DD5	Access to jobs	•	•	++	•	•	•	•	•	•	•	•	+	•	+	•	•	•	++	+	•
DD6	Telecommunications	•	++	++	•	•	•	+	-	-	-	•	+	•	+	•	•	•	+	+	+

++ Policy provides significant support to objective + Policy supports objective - Policy conflicts with objective

• No relationship = Impact balanced by another policy

First row: Impact identified in the second Interim SA Second row: Impact identified now (if different)

Positive impacts: These policies are designed to secure land for B1, B2 and B8 Use Classes, together with promoting access to jobs and appropriate telecommunications development. The support from these policies for the Economic SA Objectives, is therefore not surprising. Certain policies within this chapter were also considered to support Objectives 2 (access to services), 3 (education and employment needs), 4 (health), 6 (Noise), 7 (cultural, social and leisure), 12 (reduce growth in car usage), 14 (reduction in emissions) and 16 (energy efficient consumption).

Additional commentary is provided below where the positive impact is not self explanatory:-

- DD4 is considered to support objective 4 (health) as it enables the provision of medical facilities in convenient locations for the working population.

- DD2 and 3 are considered to support Objective 16 (efficient energy consumption), since concentration of employment uses together will make it easier to develop local energy networks (see also DD32).
- DD5 is considered to support Objective 19 (city centre vitality and viability); locating business in the city centre makes them easier to access by employees without cars, many of whom will be the people that DD5 is designed to help.
- Telecommunications and therefore policy DD6 are considered to support Objective 7 (culture, social and leisure), as well as contributing to Objective 12 (reduction in car use) and therefore 14 (reduction in emissions). The contribution of this policy to Objective 3 (education and employment needs) is considered to be significant, on account of the increasing role of the internet and therefore broadband infrastructure in education.
- DD2 and DD3 were found to support Objective 6 (noise reduction) as they assist in concentrating employment uses away from residential areas, and DD3(c) specifically protects residential amenity.

In relation to representations received various respondents have expressed support for the policies, which is welcomed.

Negative impacts: Some negative impacts were identified in relation to policies DD2 and DD6. Additional commentary is provided below:-

- DD2 and DD6 were found to have various negative impacts on the environmental SA Objectives. To a certain extent these are balanced by other policies; for example, DD2 and DD6 conflict with Objective 9 (landscape character), whereas DD25 and DD29 provide support. However, the effect of DD2 will be a net increase in developed land and a loss of greenfield sites; therefore there is considered to be a net negative impact on SA Objectives 9 (landscape character) and 10 (local environment). DD6 is likely to result in a net increase in telecommunications antennae and, despite the provisos in the policy, a net negative impact on Objectives 8 (historic assets) as well as objectives 9 and 10..

In relation to the representations received to the Draft DD DPD:-

- a. A single, strongly worded, objection was received suggesting the definition of employment was too narrow and inconsistent with the NPPF and Core Strategy, and also objecting strongly to the proposed allocation of employment land adjacent to Honiton Road and Fitzroy Road in policy DD2. Whilst the definition is considered appropriate and in accordance with the NPPF, additional text will be inserted and the Core Strategy definition of 'employment land' will be repeated in the Glossary. The land adjacent of Honiton Road and Fitzroy Road is considered an appropriate and sustainable allocation that meets the demand for employment land.
- b. One respondent sought the allocation of additional employment land adjacent to Oaklands Riding Stables; However, this land is outside the strategic areas for growth and is not consistent with Exeter's strategy for sustainable growth.

- c. The change made at draft stage to policy DD3 to reduce the viability test period from 18 to 12 was welcomed by some. However, again, one respondent still considered a 12 month period to be excessive to market a vacant property. The same respondent also considered policy DD3 was unnecessary since sufficient protection is provided by the Core Strategy. It is considered that the policy accords with paragraph 22 of the NPPF and provides useful additional policy to deliver the Core Strategy.
- d. Devon County Council suggests the inclusion of additional text to policy DD3 that accepts the loss of employment land to deliver strategic infrastructure; however, it could be argued that this is already covered by criteria a and in any instance the delivery of strategic infrastructure would be a material consideration.
- e. One respondent argues that each new area of employment land should not be approved until demand has been proven and existing employment land is in full use. Another argues that the employment land allocation is excessive. However, the NPPF requires plans to identify strategic sites to meet anticipated needs over the plan period and the Exeter Employment Study found that there was a need to allocate additional employment land in Exeter to meet demand. The new allocations are all on good transport routes. Sustainability of existing and potential locations was taken into account in the Employment Land Review.
- f. Despite the changes made at draft stage one respondent still considers that the 'Provision of local services in Employment Areas' is too restrictive, particularly in relation to retail development. In response, and following further research, it is proposed to increase the floorspace limit to 280 sqm; a figure that corresponds to the Competition Commission's definition of a small convenience store.
- g. Despite DD5 having been rewritten in a positive form, one respondent still felt the policy was unreasonable and onerous. Another respondent wanted local employers to be given precedence over international firms; however, the objective of the policy is to give jobs to local people and in any instance the Council is not able to differentiate on the basis of whether a firm is local, national or international.
- h. One respondent refers to possible health risks from telecommunications masts; however, the policy needs to remain consistent with the NPPF, paragraph 46.

Balanced Impacts:

The impacts of some policies are considered to be balanced by the positive impact of other policies. Additional commentary is provided below:

- In so far as dwellings and employment uses are in competition for land allocation, DD2 and DD3 were found to conflict with Objective 1 (decent homes). However it is considered that the impact of these policies is balanced by the strategic housing allocations in the Core Strategy, as well as the policies in Chapter 3 aimed at delivering housing; the matrix indicates this balance
- The impact of DD2 on Objectives 11 (biodiversity), 13 (air, soil and water quality) and 15 (no increase in flood risk) is considered to be entirely compensated for by policies DD31 (which has been amended in the publication version to 'ensure a net biodiversity gain for the Exeter Area' – see chapter 8), DD34 and DD33 respectively; these impacts are therefore shown in the matrix as being balanced by those other policies.

Option selection and changes to policies:

Various changes, outlined above, have been made since the 'Draft DD DPD' (including the inclusion in policy DD4 of the new employment area at Newcourt) but none are considered to affect this Sustainability Appraisal.

Evidence base:

[Exeter Employment Land Review](#) (Exeter City Council, 2009)

[Labour market statistics](#) (Office of National Statistics, updated constantly)

[UK Mobile Services Map](#) (Ofcom, 2012)

Chapter 3 of the DPD – Delivering Homes and Communities

Policies		SA Objectives																			
		Social							Environmental										Economic		
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
ex DD7	Regeneration areas	Policy Deleted																			
DD7(ex DD8)	Allocated sites	++	+	•	+	•	•	•	•	-	-	-	+	=	=	•	•	•	=	+	+
												=									
DD8(ex DD9)	Housing on unallocated sites	++	•	•	+	•	•	•	•	-	-	-	•	=	=	=	•	•	=	+	+
			+									=									
DD9(ex DD10)	Accessible, adaptable and wheelchair user dwellings	++	+	•	+	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
DD10 (ex DD11)	Loss of residential accommodation	++	•	•	+	•	•	•	•	•	•	•	•	•	•	•	•	•	=	•	•
DD11 (ex DD12)	Residential conversions and houses in multiple occupation	++	•	+	•	•	•	•	+	+	•	•	•	•	•	•	•	•	•	+	•
DD12 (ex DD13)	Purpose built student accommodation	++	+	+	•	•	•	•	•	•	•	•	+	•	+	•	•	•	•	+	+
DD13 (ex DD14)	Residential amenity	++	•	•	+	•	+	•	•	•	++	•	•	•	•	•	•	•	•	•	•

++ Policy provides significant support to objective + Policy supports objective - Policy conflicts with objective • No relationship

= Impact balanced by another policy

First row: Impact identified in the second Interim SA Second row: Impact identified now (if different)

Positive impacts: These policies are designed to secure land for residential use, in order to deliver at least 12,000 new homes by 2026 and to ensure the delivery of decent homes to meet the needs of the community. The support from these policies for SA Objectives 1 (decent homes) is therefore not surprising. However, additional commentary is provided below where the positive impact is not self explanatory:

- a. Policies DD7 and DD8 are considered to support Objectives 2 (access to services), 4 (health), 12 (reduce growth in car usage) and 20 (investment). They also support Objective 19 (city centre vitality and viability), as they allow the development of sites in or near the city centre.
- b. DD11 and DD12, are identified as having a positive impact on Objective 3 (education needs), DD11 as having a positive impact on Objective 8 (historic assets) because division into flats may enable the productive re-use of historic buildings, and DD12 as having a positive impact on Objective 20 (investment) because of the attractiveness of student accommodation to investors, at least in some market conditions.

In relation to representations received a number of respondents supported the policies in this chapter.

Negative impacts: Some negative impacts were identified. Additional commentary is provided below:-

- a. The positive impact of policies DD7 and DD8 on environmental SA objectives is lacking. The sites allocated in DD7, and housing on unallocated sites (DD8) is not limited to previously developed land. This will inevitably mean that some greenfield land is developed, with a negative impact on Objectives 9 and 10 which is not fully compensated for by other policies.

In relation to the representations received to the Draft DD DPD:-

- b. The draft document included a number of new sites assessed as suitable to deliver residential development by the Revised 2013 SHLAA. The inclusion of these sites raised a significant number of new objections from the public; a common theme being that green space in and around Exeter should not be lost by allocating them for development. In particular Eastern Fields attracted over 200 objections (a similar number of objections to those received in response to the previous employment allocation) and land north of the West of England School Foundation attracted about 130 objections (including those from organisations such as Natural England and RSPB). It is considered that part of Eastern Fields should remain allocated for residential development as it is suitable for development and can contribute to delivering the strategic housing requirement. However, the Land north of the West of England School Foundation, is no longer allocated in the publication version of the document (see policy changes below).

- c. A number of other sites also attracted objections: land to the east of M5, Topsham Road; land at Exeter Cricket Club; land west of Newport Park. However all these sites now have planning permission and are therefore do not need to be considered by this document.
- d. A number of objections were received in relation to the strategic requirement for at least 12000 dwellings. Objectors considered this number too high and suggested that the number is based on out of date information that does not take into account findings of the 2011 census. However, the latest Strategic Housing Market Assessment (SHMA), that establishes Exeter's objectively assessed housing need (and follows the new Planning Practice Guidance) suggests the 12,000 Core Strategy housing figure continues to be a suitable quantum to guide the growth and development of the city up to 2026
- e. The RSPB were concerned that there was no reference in this chapter to the cumulative risk to European Sites (Exe Estuary SPA etc). New explanatory text is inserted into the Publication Version.
- f. Policy DD8 was criticised for inappropriately referencing the SHLAA which is an evidence base document that does not establish whether a sites should be allocated. This policy has now been amended to delete reference to the SHLAA.
- g. DD9 was criticised both for not going far enough and for being too prescriptive and costly. The policy has been amended to refer to the national optional Building Regulations (category 2 and 3).

Balanced Impacts:

The impacts of some policies are considered to be balanced by the positive impacts of other policies. Additional commentary is provided below:

- h. In so far as dwellings and employment uses are in competition for land allocation, DD7 and DD8 conflict with Objective 18 (employment growth); however the fact that this conflict is balanced by policies in Chapter 2 is recognised.
- i. Policies DD7 and DD8 impact negatively on Objectives 13 (air, soil and water quality) and 15 (no increase in flood risk), but these impacts are considered to be balanced by policies DD34 and 33 respectively. Policies DD7 and DD8 could also impact negatively on Objective 11 (biodiversity), but these impacts are now considered to be balanced by the revised Biodiversity policy (DD32) which requires all development to ensure a net biodiversity gain for the Exeter area.
- j. DD10 has a negative impact on Objective 18 (employment growth) by virtue of restricting the change of use of dwellings to employment use, although this is balanced by DD2 and 3 which retain and allocate employment land.

Option selection and changes to policies:

Various changes have been made:-

- a. The former Regeneration Area policy has been deleted as it did not add anything significant to the Core Strategy. The Regeneration Areas will continue to be identified on the Proposals Map.

- b. The new DD7, has been updated to delete those sites that have already come forward for development and to insert new sites that the 2015 SHLAA has concluded are suitable to deliver residential development. However all the new sites are on brownfield land and therefore should result in no additional negative impact on objectives 9 and 10.
- c. The 2015 SHLAA concludes that the Land north of the West of England School is not suitable for development as it is outside the strategic locations for growth and is no longer needed to meet the requirement to provide at least 12,000 dwellings by 2026.
- d. The reference to the SHLAA in policy DD8 has been deleted. However proposals will still need to accord with other policies in the Development Plan. Accordingly this change is not thought to affect the sustainability appraisal.
- e. DD9 has been amended to refer to the national optional Building Regulations (category 2 and 3).
- f. Policies DD11, DD12 and DD13 have been amended in minor respects that do not affect this Sustainability Appraisal.

Evidence base:

[Strategic Housing Land Availability Assessment](#) ("SHLAA"; Exeter City Council 2013)

[Houses in Multiple Occupation – Amenity and Space Standards](#) (Exeter City Council)

[Bus and Coach Station Development Principles](#) (ECC 2012)

Chapter 4 of the DPD – Retail, Tourism and Culture

Policies		SA Objectives																			
		Social							Environmental										Economic		
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
DD14 (ex DD15)	Bus and coach station area	•	+	•	•	•	•	++	•	•	•	•	•	•	•	•	•	•	+	++	+
DD15 (ex DD16)	Change of use within retail centres	•	+	•	•	•	•	+	•	•	•	•	•	•	•	•	•	•	•	++	•
																			+		+
DD16 (Ex DD17)	Tourist & cultural facilities	•	++	+	•	•	•	++	+	•	•	•	+	•	•	•	•	•	+	++	+
DD17 (ex DD18)	Hotels	•	•	•	•	•	•	+	•	•	+	•	+	•	•	•	•	•	+	++	+

++ Policy provides significant support to objective + Policy supports objective - Policy conflicts with objective • No relationship

= impact balance by another policy

First row: Impact identified in the second Interim SA Second row: Impact identified now (if different)

Positive impacts: These policies were found to have numerous positive impacts, most of which are self-explanatory. However, additional commentary is provided below where the positive impact is not self explanatory: -

- Leisure is a principal use of the proposed bus station redevelopment (DD14) and therefore this policy gives significant support to Objective 7 (cultural, social and leisure).
- DD15 has been amended to allow restaurants, cafes and leisure uses within the secondary shopping frontages (see below) and therefore is now considered to support objective 18 (employment) and 20 (investment).

- c. DD16 and DD17 are felt to support Objectives 18 and 20, by allowing tourism and cultural development, as well as hotels, in appropriate locations.
- d. DD16 includes promotion of cultural development and therefore supports Objective 3 (education).
- e. DD16 supports Objective 12 (reduce car use) by requiring tourism and cultural development to be located where it is easily accessible to users by public transport, walking and cycling. DD17 also supports this Objective by virtue allowing a hotel within walking distance of Sandy Park.

In relation to representations received there have been a few expressions of support, in particular for the new 'Protection and enhancement of tourist and cultural facilities' policy..

Negative impacts: None were identified.

In relation to the representations received:-

- a. A number of respondents suggested that insufficient land is allocated for retail use and considered the document fails to meet the scale and type of retail needed in town centres. Respondents suggested new sites should be allocated for retail. However, work undertaken in support of the Core Strategy suggests that our existing city centre-focused retail strategy is appropriate and sustainable.
- b. Some are concerned about the redevelopment of the bus station and in particular the location, design and access to the new bus station (DD14); however the policy, supporting text and development principles for this site (see Evidence base below) indicate that the redevelopment would provide an 'enhanced bus station' that is accessible, safe and provides a good arrival experience.
- c. There was a request that text be inserted requiring 'small local shops'. Whilst this was not considered reasonable, supporting text has been inserted that refers to the development including a 'range of unit sizes'.
- d. A suggestion has been made that there should be a presumption in favour of year-round tourist attractions. Whilst it is not considered reasonable to insert a presumption the policy already allows proposals to be assessed on their merits.
- e. Concern was expressed with regard to how the word 'viable' would be interpreted in regard to tourist and cultural uses; additional explanatory text has been added to ensure it is clear what evidence would need to be provided.
- f. One respondent did not consider that the quayside an appropriate location for hotels. However, this is a sustainable location for a hotel and other policies would ensure the historic environment is protected.

Option selection and changes to policies:

Various changes have been made:-

- a. DD15 has been amended to accord more closely to the NPPF and to allow a wider range of cafes, restaurants and leisure uses within the secondary shopping frontages. This has resulted in a more positive policy that supports objectives 18 (employment) and 20 (investment).

- b. The wording of policy DD14 has been amended slightly to emphasise that an enhanced bus station is part of the comprehensive mixed use development.
- c. DD16 has been amended to require a proposal for a change of use to demonstrate that there is no viable alternative tourism or cultural use.
- d. DD17 has been updated to remove text referring to the 'commencement of works to substantially increase the capacity of conferencing facilities at Sandy Park' as development has now commenced.

Evidence base:

[Bus and Coach Station Development Principles](#) (ECC 2012)

[Exeter Retail Study](#) (DTZ for ECC 2008)

[Exeter Hotel Study](#) (The Tourism Company for ECC and East Devon District Council 2007)

Chapter 5 of the DPD – Sustainable Transport

Policies		SA Objectives																			
		Social							Environmental										Economic		
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
DD18 (ex DD19)	Land safeguarded for transport infrastructure	•	++	•	•	•	=	•	•	•	=	=	++	=	+	•	•	•	++	++	++
									=												
DD19 (ex DD20)	Safeguarding railway land & former railway land	•	•	•	•	•	•	•	•	•	•	•	+	•	•	•	•	•	=	•	•
DD20 (ex DD21)	Accessibility and sustainable movement	•	++	•	++	+	•	•	•	•	•	•	++	++	+	•	•	•	++	++	++
															++						
DD21 (ex DD22)	Parking	•	++	•	•	+	•	•	•	•	•	•	+	•	+	•	•	•	+	+	+

++ Policy provides significant support to objective + Policy supports objective - Policy conflicts with objective • No relationship

= Impact balanced by another policy

First row: Impact identified in the second Interim SA Second row: Impact identified now (if different)

Positive impacts: The declared aims of this suite of policies include contributing to sustainability and health objectives, and reducing dependence on the car while giving people a choice about how they travel; therefore the various positive impacts are not surprising. However, additional commentary is provided below where the positive impact is not self explanatory:

- Mobility is essential for people to access work, and for businesses to access markets; therefore the strong link with the economic SA objectives (18-20) is to be expected. DD18's support for objective 18 (employment growth) is significant as the infrastructure in question is essential in this regard (eg. rail stations will provide more commuting options).

- b. Sustainable transport is also vital in enabling people to access services (objective 2), especially the 27.1% of Exeter's households shown by the 2011 census to have no car, almost unchanged since 2001 (27.6%).
- c. The significant support of DD20 in reducing growth in car use (objective 12) and reducing emissions (objective 14) is self-evident; and the change to DD20 (see below) to contribute to the development of primary cycle routes and pedestrian links supports these objectives still further. DD18 and 21 also support these objectives in so far as they encourage low emission and non-car travel modes.
- d. The BMA report "Healthy transport – Healthy lives" indicates that the link between sustainable transport, particularly walking and cycling but also public transport; the support provided by DD20 for objective 4 (health of the population) is therefore significant. Public health guidance note PH41 "Walking and cycling" from NICE is also relevant.
- e. The Council's Air Quality Strategy identifies a need to tackle emissions of nitrogen dioxide generated by motor vehicles along the busiest roads into the city, which has resulted in the designation of an Air Quality Management Area, and production of an Air Quality Action Plan. This identifies the Council's role, as part of its forward planning function, in ensuring that future development does not significantly adversely affect the air quality within the city. Therefore DD20 provides significant support for objective 13 (which includes air quality). DD18 also supports this in so far as it safeguards infrastructure for non-car travel; however see below for potential negative local impact from Hill Barton rail station.
- f. DD20 and 21 contribute to reducing crime and the fear of crime (objective 5), through design of car and parking cycle areas and walking and cycling routes.

In relation to representations received a number of respondents supported the policies in this chapter.

Negative impacts: The following potential impacts have been identified in representations received.

- a. One respondent suggested that the Council should adopt policies for (i) integrated transport which prioritises public transport (ii) a 'walking city' to prioritise pedestrians with retention and enlargement of pedestrian zone (iii) a workplace parking levy for larger businesses. However DD20 does prioritise pedestrians, cyclists and users of public transport. The Development Delivery DPD should also be read in conjunction with policy CP9 of the Core Strategy, and the Sustainable Transport SPD.
- b. Potential site-specific negative impacts have been identified in relation to certain safeguarding proposals in DD18:
 - Ide/Alphington park and ride has been opposed on landscape and Conservation Area grounds (relevant SA objectives are 8 – historic assets, 10 – environment and 11 – biodiversity).
 - Hill Barton rail station has previously been opposed by one respondent as conflicting with residential amenity, and causing noise, light and air pollution (objective 6 – noise and 13 – air quality).

Both facilities were both identified as key infrastructure in the Core Strategy (policy CP9). The choice of sites for both is constrained; the park and ride needs to be readily accessible from the A30, and the station needs to be on the rail line, located so as to serve a different catchment from existing stations. In both cases there are feasibility constraints which have led to the sites in question being proposed.

The significant impacts which would result from development of this infrastructure would have to be considered in the context of other policies which exist to protect the SA objectives in question; the site at Alphington is subject to DD29 (although this policy has been amended to allow infrastructure delivery where there is no suitable alternative site with less harmful impacts and it minimises harm to the Landscape Setting Area – see chapter 8) while historic assets are conserved by DD28 and residential amenity is protected by DD13. In assessing any planning application the local planning authority would need to balance the following factors:

- The need to provide the infrastructure pursuant to CP9, to bring about the significant positive impacts identified.
- The relative impact on historic assets, environmental and amenity interests protected by DD28, DD29 or DD13 (as applicable) in relation to these and any feasible alternative locations.
- The possibility of mitigating that impact by conditions.

In the meantime it is necessary to safeguard these sites, as the need to provide these facilities and a lack of viable alternative sites may be considered to outweigh the negative impact in either or both cases. In the matrix, the relationship between DD18 and objectives 6, 10, 11 and 13 indicates that there will be an impact but that it will be balanced by other policies. The relationship between DD18 and objective 8 is now also recognised in the matrix; although the impact will be balanced by policy DD28.

- c. No objection has been raised to any of the other safeguarding designations.
- d. Other respondents oppose Ide/Alphington park and ride on the basis that it has little or no positive benefit. However, park and ride intercepts and therefore reduces traffic entering the city. Target customers are those living in Exeter's rural hinterland for whom other public transport is not a realistic option, not those already using bus or train. No change is proposed to the matrix in this regard.

Option selection and changes to policies:

A number of minor changes have been made to this chapter but these are not considered to affect the Sustainability Appraisal. The only significant change is the insertion of a new criteria into DD20 to 'contribute to the development or improvement of the primary cycle routes and key local cycle/pedestrian links' (see above).

Evidence base:

[2011 Census](#) (Office of National Statistics, 2012)

[Healthy transport = Healthy lives](#) (British Medical Association, 2012)

[PH41 Walking and cycling](#) (National Institute for Health and Clinical Excellence, 2012)

[Air Quality Strategy](#) (ECC, 2009)

[Air Quality Action Plan](#) (ECC, 2012)

[Devon Metro Appraisal Report](#) (DCC, 2011)

[Exeter Growth Bus Strategy](#) (DCC, 2012)

[Exeter Walking Strategy](#) (DCC, 2012)

[Exeter Cycle Strategy](#) (DCC, 2011)

Chapter 6 of the DPD – Meeting Community Needs

Policies		SA Objectives																			
		Social							Environmental										Economic		
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
DD22 (ex DD23)	Open space, allotments, and sport and recreation provision	•	++	•	+	•	=	++	•	•	+	+	+	+	+	+	•	•	•	•	+
DD23 (ex DD24)	Other community facilities	•	++	+	+	•	=	++	•	•	•	•	+	•	+	•	•	•	•	•	•
DD24 (ex DD25)	Assets of community value	•	++	+	+	•	=	++	•	•	•	•	+	•	+	•	•	•	•	•	•

++ Policy provides significant support to objective + Policy supports objective - Policy conflicts with objective ? Unclear relationship • No relationship
= Impact balanced by another policy

Positive impacts: The declared aim of these policies is to facilitate social interaction and create healthy, inclusive communities through the provision of community facilities in appropriate places; therefore the various positive impacts are not surprising.

- The provision of cultural, social and leisure facilities is the objective of these policies, hence the significant support for SA Objective 7. Providing them in the appropriate place gives significant support to Objective 2 (access to services). A consequence of this is likely to be a reduction in car use and thus in emissions, contributing to Objectives 12 and 14. The contribution made by DD22 to Objective 12 (car use) is also recognised.
- As well as fulfilling a recreational function, green space will often enhance the natural environment, therefore DD22 supports several of the environmental SA Objectives, namely 10 (local environment), 11 (biodiversity), 13 (air, soil and water quality) and 15 (no increase in flood risk). It also supports Objective 20 by enhancing the quality of life in Exeter and thereby encouraging investment.
- Sufficient and convenient provision of community facilities pursuant to DD23 can promote education (Objective 3) through use as a venue for learning.

- d. Both policies support Objective 4 (health) by encouraging social interaction.

In relation to representations received many representations support the policies generally (particularly DD22) or the protection of a specific area of open space.

Negative impacts: :-

Community facilities can potentially cause harm to residential amenity, for example through noise (objective 6), and this is recognised in the matrix. However, any new facility would have to satisfy policy DD13 (protection of residential amenity), which therefore balances out any negative impact from these policies. The policies taken as a whole are therefore not considered to have any negative impact on SA Objectives.

In relation to representations received:

- a. A number of respondents thought that DD23 should give support for new and improved facilities. The policy text has been amended to express support for the enhancement of community facilities and the provision of new community facilities. This enhances still further the significant positive affect on objectives 2 (access to services) and 7 (provision of facilities).
- b. Sport England referred to the need for a strategy, in particular covering playing pitches. A playing pitch strategy is being produced.

Option selection and changes to policies:

Minor changes have been made to policy and supporting text to clarify meaning. These changes are not considered to impact on the Sustainability Appraisal.

Evidence base:

[Accessible Natural Green Space Standards](#) (Natural England, 2008)

[Audit of Outdoor Recreation Facilities](#) (ECC, 2005)

Community Facilities Audit (ECC, in course of preparation)

Chapter 7 of the DPD – Locally Distinctive Places

Policies		SA Objectives																			
		Social							Environmental										Economic		
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
DD25 (ex DD26)	Design principles	=	++	•	+	•	+	+	++	++	++	+	+	+	+	+	+	+	=	+	+
DD26 (ex DD27)	Designing out Crime	+	•	•	+	++	•	•	•	•	•	•	•	•	•	•	•	•	•	+	+
DD27 (ex DD28)	Shop Fronts	•	•	•	•	•	•	•	+	•	+	•	•	•	•	•	•	•	•	•	•
DD28 (ex DD29)	Conserving and managing heritage assets	=	•	•	•	•	•	++	++	++	+	•	•	•	•	•	•	•	=	•	+

++ Policy provides significant support to objective + Policy supports objective - Policy conflicts with objective ? Unclear relationship • No relationship
= Impact balanced by another policy

Positive impacts: These policies safeguard a wide variety of interests, with particular emphasis on the built environment and the city's heritage.

- Policies DD25 and DD28 are identified as providing significant support to SA Objective 8 (historic assets) and 9 (land conservation and landscape character) and objective 20 in helping to preserve the city as a place which attracts inward investment.
- Policy DD25 was found to provide significant support to the following Objectives; the principal subparagraphs (in the policy) are cited below:-
 - Objective 1 (decent homes) through (d);
 - Objective 2 (access to services) through (d);
 - Objective 10 (local environment) through many subparagraphs.

- iv. Objective 11 (biodiversity) which is supported by (m), and (g);
- v. Objective 16 (efficient energy consumption) which is supported by (f).
- c. Policy DD28 was found to provide significant support to Objective 7 (culture).

In relation to representations received:-

- d. There was support for all policies from various respondents.
- e. Devon and Cornwall Police welcome inclusion of a policy (DD26) which seeks to deliver safe and secure schemes through designing out crime.

Negative impacts: There is a potential argument that policies of this type constrain development and thereby conflict with other SA Objectives; specifically, in relation to Objectives 1 (decent homes) and 18 (employment growth), DD25 could restrict the location of housing or employment development, and both DD27 and DD28 could constrain its design or restrict the re-use of an existing building.

This is reflected in a couple of representations:-

- a. One respondent suggested that DD25 was 'draconian' as it implied that all criteria had to be complied with. The policy text has been amended to ensure it is clear that criteria only need to be complied with where relevant.
- b. One respondent requested a review of the boundaries of conservation areas, as Alphington CA in particular was said to be too extensive.

It is inherent that in a Development Plan, some policies will actively promote development and others (like these) will control how it is to be carried out. Inclusion of this suite of policies is consistent with NPPF whose twelve core planning principles (at paragraph 17) include high quality design and a good standard of amenity, and appropriate conservation of heritage assets.

It is considered that any restrictive effect on employment or housing development is balanced by the policies in Chapters 2 and 3 respectively. The matrix indicates this in respect of SA Objectives 1 and 18.

Option selection and changes to policies:

Only minor changes have been made to the policies and supporting text in this chapter and these do not affect the Sustainability Appraisal.

Evidence base:

[Secured by Design](#) (Association of Chief Police Officers)

[Conservation Area Appraisals and Management Plans](#) (Exeter City Council)

[List of Buildings of Local Importance](#) (Exeter City Council, in course of updating)

Chapter 8 of the DPD – Environment

Policies		SA Objectives																			
		Social							Environmental										Economic		
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
DD29 (ex DD30)	Protection of landscape setting areas	=	•	•	+	•	•	+	•	++	++	++	•	+	•	+	•	•	=	•	+
DD30 (ex DD31)	Green infrastructure	•	•	•	+	•	•	+	•	++	++	++	+	+	•	•	•	•	•	•	+
DD31 (ex DD30)	Biodiversity	=	•	•	•	•	•	•	•	+	+	++	•	+	•	•	•	•	=	•	•
DD32 (ex DD33)	Local energy networks	+	•	•	•	•	•	•	•	•	•	•	•	+	++	•	++	+	=	•	+
DD33 (ex DD34)	Flood risk	•	•	•	•	•	•	•	•	+	+	•	•	+	•	++	•	•	•	•	•
DD34 (ex DD35)	Pollution and contaminated land	+	•	•	+	•	++	=	•	+	+	+	•	++	•	•	•	•	=	•	•

++ Policy provides significant support to objective + Policy supports objective - Policy conflicts with objective ? Unclear relationship • No relationship
 = Impact balanced by another policy

Positive impacts: These policies are designed to safeguard a wide variety of aspects of the environment. For each policy, there is at least one obvious SA Objective to which it provides significant support and support (not significant) for other SA Objectives which is also thought to be self-explanatory.

Additional commentary is provided below where the positive impact is no self explanatory:-

- a. Objective 1 (decent homes) is supported by DD32 in that connection to a local energy network can help to ensure warmth without energy poverty; also by DD34 which aims to protect residents from noise pollution.
- b. Objective 4 (health) was found to be supported by DD29, DD30 (because green infrastructure in many cases enables outdoor recreation) and DD34. By providing green corridors for walking and cycling, DD30 is also considered to support Objective 12 (reduction in car use).
- c. DD34 explicitly advocates the reduction of noise pollution, and therefore provides significant support to Objective 6. It is also considered to support Objectives 10 (local environment) and 11 (biodiversity).
- d. Objective 15 (no increase in flood risk) is considered to be supported by DD29 by its restriction on development in the Valley Parks.
- e. Objective 20 (investment) has been identified as being supported by DD33. It is considered that inward investment could also be encouraged by green infrastructure and the existence of local energy networks; therefore this Objective is also supported by DD30 and DD32.

In relation to representations received:-

- f. Various respondents have expressed support for the policies, which is welcomed.
- g. Natural England and the RSPB have both suggested various changes to the wording of DD31, which has been strengthened to accord more closely with the NPPF
- h. The Environment Agency made a couple of suggestions for changes to DD34, which has been amended to incorporate their suggestions.
- i. A couple of respondents has commented on DD33 that no development should be permitted in Flood Zone 3 unless it contributes to reducing flood risk; however, some forms of development are considered water compatible or less vulnerable to flooding.

Negative impacts: As with Chapter 7, there is a potential argument that some of these policies of this type constrain development and thereby conflict with other SA Objectives, particularly in relation to Objectives 1 (decent homes) and 18 (employment growth).

- a. DD29 and DD31 could restrict the location of housing or employment development.
- b. DD32 could be argued to constrain the design and thereby increase the cost of housing or employment development; however, in the case of housing it is considered that this is outweighed by the benefit in tackling fuel poverty. On balance, therefore, DD32 has been recognised as supporting Objective 1 (decent homes).
- c. DD34 could restrict the location of polluting employment uses.

- d. DD34 could also restrict the location of noisy leisure uses (Objective 7); however this is felt to be adequately balanced by policies DD22 and DD23, designed to secure the provision of indoor and outdoor facilities respectively.

These impacts, particularly those identified in (a) and (b) above, are reflected in several of the representations received:-

- c. A number of respondents objects to the retention of Landscape Setting Areas (LSAs), saying this is contrary to the NPPF. However, the NPPF (at paragraph 109) does require the planning system to protect and enhance valued landscapes, and where it has been determined that development is appropriate and sustainable, the designation has been removed.
- d. One respondent objects to the inclusion of her home in a LSA, however DD29 does allow extensions to dwellings and replacement dwellings, so individual householders are not disadvantaged by the policy.
- e. One respondent criticises DD32 as being a burden affecting viability. However, local energy networks will only be brought forward where they are practical, viable and deliverable. Where a network is brought forward, it will be important that development links in to it to maximise the benefits from it. In response to criticisms that the policy is anti-competitive, we have pointed out that competitiveness can be ensured through the structuring of energy contracts. A Viability Study has been completed to support the DPD.

It is inherent that in a Development Plan, some policies will actively promote development and others (like these) will control how it is to be carried out. Inclusion of this suite of policies is consistent with NPPF whose twelve core planning principles (at paragraph 17) include recognising and protecting the character of different areas, supporting the transition to a low carbon future, taking full account of flood risk, and conserving and enhancing the natural environment.

It is considered that any restrictive effect on employment or housing development is balanced by the policies in Chapters 2 and 3 respectively. The matrix indicates this; policies DD29, 31, 32, and 34 are now shown as having a “balanced” impact on Objective 18 (employment), and DD29 and 31 are shown as having a “balanced” impact on Objective 1 (decent homes). However, the positive impact of DD32 (LENs) and DD34 (pollution) on Objective 1 (decent homes) identified above, combined with the positive impact of the policies in Chapter 3, are considered not just to balance but to outweigh any negative impact; therefore these policies are shown as supporting Objective 1.

Option selection and changes to policies:

Various changes have been made to the policies in this chapter.

- a. Policy DD29 has been amended in response to representations to allow for development that delivers strategically important infrastructure where it can be demonstrated that there is no suitable alternative site with less harmful impacts. However, with the safeguards in the policy it is still considered to significantly support objectives 9, 10 and 11.
- b. In response to comments received from RSPB and Natural England several changes have been made to ensure clarity and consistency with the NPPF. The amended policy makes it clear that development that has an adverse impact on the integrity of International Sites will not be permitted and ensures that all development ensures a net biodiversity gain for the Exeter area (in accordance with the mitigation hierarchy). These changes strengthen still further the significant support this policy gives to objective 11.

- c. Policies DD30, DD33 and DD34 have been amended in minor respects that do not affect this Sustainability Appraisal.

Evidence base:

[Green Infrastructure Study and Strategy](#) (LDA Design for East Devon District Council, Exeter City Council, Teignbridge District Council and Natural England, 2009)

[Exeter Fringes Landscape Sensitivity and Capacity Study](#) (Diacono Associates and White Consultants for Exeter City Council, 2007)

[Exeter Core Strategy Habitats Regulations Assessment](#) (WSP for Exeter City Council, 2010)

[Exe Estuary SPA & Dawlish Warren SAC Interim Report](#) (D Liley and R Hoskin, 2011) and associated documents

[South West Nature Map \(Devon\)](#) (Biodiversity South West, 2007)

[Exeter Biodiversity Reference Map](#) (DBRC, 2011)

Exeter Energy Strategy (ECC, to be prepared)

[Air Quality Strategy](#) (ECC, 2009)

[Air Quality Action Plan](#) (ECC, 2012)

[Contaminated Land Strategy](#) (ECC, 2001)

Appendix 3 - Summary sustainability matrix for the third interim SA

Policies		SA Objectives																			
		Social							Environmental										Economic		
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
DD1	Local vision for sustainable development	++	++	++	++	+	+	++	++	++	++	++	++	++	++	++	++	++	++	++	++
DD2	Employment land provision	=	•	+	•	•	+	•	•	-	-	=	++	=	+	=	+	•	++	++	++
DD3	Retention of employment land or premises	=	•	+	•	•	+	•	•	•	•	•	++	•	•	•	+	•	++	++	++
DD4	Provision of local services in employment areas	•	++	•	+	•	•	•	•	•	•	•	++	•	+	•	•	•	+	++	++
DD5	Access to jobs	•	•	++	•	•	•	•	•	•	•	•	+	•	+	•	•	•	++	+	•
DD6	Telecommunications	•	++	++	•	•	•	+	-	-	-	•	+	•	+	•	•	•	+	+	+
DD7	Allocated sites	++	+	•	+	•	•	•	•	-	-	=	+	=	=	•	•	•	=	+	+
DD8	Housing on unallocated sites	++	+	•	+	•	•	•	•	-	-	=	•	=	=	=	•	•	=	+	+
DD9	Accessible, adaptable and wheelchair user dwellings	++	+	•	+	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
DD10	Loss of residential accommodation	++	•	•	+	•	•	•	•	•	•	•	•	•	•	•	•	•	=	•	•

Policies		SA Objectives																			
		Social							Environmental										Economic		
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
DD11	Residential conversions and houses in multiple occupation	++	•	+	•	•	•	•	+	+	•	•	•	•	•	•	•	•	•	+	•
DD12	Purpose built student accommodation	++	+	+	•	•	•	•	•	•	•	•	+	•	+	•	•	•	•	+	+
DD13	Residential amenity	++	•	•	+	•	+	•	•	•	++	•	•	•	•	•	•	•	•	•	•
DD14	Bus and coach station area	•	+	•	•	•	•	++	•	•	•	•	•	•	•	•	•	•	+	++	+
DD15	Change of use within retail centres	•	+	•	•	•	•	+	•	•	•	•	•	•	•	•	•	•	+	++	+
DD16	Tourist & cultural facilities	•	++	+	•	•	•	++	+	•	•	•	+	•	•	•	•	•	+	++	+
DD17	Hotels	•	•	•	•	•	•	+	•	•	+	•	+	•	•	•	•	•	+	++	+
DD18	Land safeguarded for transport infrastructure	•	++	•	•	•	=	•	=	•	=	=	++	=	+	•	•	•	++	++	++
DD19	Safeguarding railway land & former railway land	•	•	•	•	•	•	•	•	•	•	•	+	•	•	•	•	•	=	•	•
DD20	Accessibility and sustainable movement	•	++	•	++	+	•	•	•	•	•	•	++	++	+	•	•	•	++	++	++

Policies		SA Objectives																			
		Social							Environmental										Economic		
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
DD21	Parking	•	++	•	•	+	•	•	•	•	•	•	+	•	+	•	•	•	+	+	+
DD22	Open space etc	•	++	•	+	•	=	++	•	•	+	+	+	+	+	+	•	•	•	•	+
DD23	Other community facilities	•	++	+	+	•	=	++	•	•	•	•	+	•	+	•	•	•	•	•	•
DD24	Assets of community value	•	++	+	+	•	=	++	•	•	•	•	+	•	+	•	•	•	•	•	•
DD25	Design principles	=	++	•	+	•	+	+	++	++	++	+	+	+	+	+	+	+	=	+	+
DD26	Designing out crime	+	•	•	+	++	•	•	•	•	•	•	•	•	•	•	•	•	•	+	+
DD27	Shop fronts	•	•	•	•	•	•	•	+	•	+	•	•	•	•	•	•	•	•	•	•
DD28	Conserving and managing historic assets	=	•	•	•	•	•	++	++	++	+	•	•	•	•	•	•	•	=	•	+
DD29	Protection of landscape setting areas	=	•	•	+	•	•	+	•	++	++	++	•	+	•	+	•	•	=	•	+
DD30	Green infrastructure	•	•	•	+	•	•	+	•	++	++	++	+	+	•	•	•	•	•	•	+
DD31	Biodiversity	=	•	•	•	•	•	•	•	+	+	++	•	+	•	•	•	•	=	•	•
DD32	Local energy networks	+	•	•	•	•	•	•	•	•	•	•	•	+	++	•	++	+	=	•	+

Policies		SA Objectives																			
		Social							Environmental										Economic		
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
DD33	Flood risk	•	•	•	•	•	•	•	•	+	+	•	•	+	•	++	•	•	•	•	•
DD34	Pollution and contaminated land	+	•	•	+	•	++	=	•	+	+	+	•	++	•	•	•	•	=	•	•

Appendix 4 – Current ‘Publication Version’ Policies and comparison with ‘Draft’ Policies

Yellow highlighting indicates changes.

	Draft DD DPD		Publication Version
DD1	<p><i>Development will be permitted where it is demonstrated that the proposal is consistent with the principles of sustainable development, as appropriate to its location, scale and form. Proposals should have regard to:</i></p> <ul style="list-style-type: none"> <i>(a) the impacts of climate change and the need to achieve a transition to a low carbon economy;</i> <i>(b) contribution to the city’s economy</i> <i>(c) meeting community needs and delivering neighbourhood plans;</i> <i>(d) suitability of location in terms of transport infrastructure and access to facilities;</i> <i>(e) impact on the natural and built environment;</i> <i>(f) contribution to meeting housing need and creating strong, vibrant and healthy communities; and,</i> <i>(g) conservation and enhancement of the city’s cultural heritage.</i> 	DD1	<p><i>Development will be permitted where it is demonstrated that the proposal is consistent with the principles of sustainable development, as appropriate to its location, scale and form. Proposals should have regard to:</i></p> <ul style="list-style-type: none"> <i>(a) the impacts of climate change and the need to achieve a transition to a low carbon economy;</i> <i>(b) contribution to the city’s economy</i> <i>(c) meeting community needs and delivering neighbourhood plans;</i> <i>(d) suitability of location in terms of transport infrastructure and access to facilities;</i> <i>(e) impact on the natural and built environment;</i> <i>(f) contribution to meeting housing need and creating strong, vibrant and healthy communities; and,</i> <i>(g) conservation and enhancement of the city’s historic environment.</i>
DM2	<p><i>The following sites are allocated for employment development and associated infrastructure and will be retained for this purpose:</i></p> <p style="padding-left: 40px;"><i>Exeter Business Park (4 hectares)</i></p> <p style="padding-left: 40px;"><i>Newcourt (16 hectares)</i></p>	DD2	No change.

DM3	<p><i>Proposals involving the loss of employment land, site or premises will not be permitted unless the alternative use is sustainable in the location proposed and:</i></p> <ul style="list-style-type: none"> <i>(a) it is demonstrated that development for an alternative use represents an opportunity that would create significant economic benefits for the city and its travel to work area; or</i> <i>(b) the site or premises is not viable for employment use, cannot reasonably be made viable for such use and has been actively marketed at a reasonable price or rent for at least 12 months prior to the planning application being submitted; or</i> <i>(c) the proposal would remove a use which creates residential amenity problems such as those arising from noise or odours.</i> 	DD3	<p><i>Proposals involving the loss of employment allocations, land, or floorspace, will not be permitted unless the alternative use is sustainable in the location proposed and:</i></p> <ul style="list-style-type: none"> <i>(a) it is demonstrated that development for an alternative use represents an opportunity that would create significant economic benefits for the city and its travel to work area; or</i> <i>(b) the site or premises is not viable for employment use, cannot reasonably be made viable for such use and has been actively marketed at a reasonable price or rent for at least 12 months prior to the planning application being submitted; or</i> <i>(c) the proposal would remove a use which creates residential amenity problems such as those arising from noise or odours.</i>
DM4	<p><i>Development involving the provision of local services at Matford, Marsh Barton, Pinhoe, Sowton, Exeter Business Park, Pynes Hill and Peninsula Park will be permitted provided that:</i></p> <ul style="list-style-type: none"> <i>(a) the service is designed to serve local workforce needs only;</i> <i>(b) there is sufficient demand for the service amongst the local workforce, over and above that currently met by any existing service in the area;</i> <i>(c) it would be located within reasonable walking distance of the local workforce, taking into account new or enhanced routes provided or funded by the developer;</i> <i>(d) it would provide clear benefits to the environment and</i> 	DD4	<p><i>Development involving the provision of local services at Matford, Marsh Barton, Pinhoe, Sowton, Exeter Business Park, Newcourt, Pynes Hill and Peninsula Park will be permitted provided that:</i></p> <ul style="list-style-type: none"> <i>(a) the service is designed to serve local workforce needs only;</i> <i>(b) there is not sufficient provision to meet local workforce needs through existing services in the area;</i> <i>(c) it would be located within reasonable walking distance of the local workforce, taking into account new or enhanced routes provided or funded by the developer;</i> <i>(d) it would provide clear benefits to the environment and</i>

	<p><i>the road network by reducing the need for workers to travel during the working day; and,</i></p> <p><i>(e) it would not harm the primary function of the area as a business park or industrial estate.</i></p>		<p><i>the road network by reducing the need for workers to travel outside of the employment area during the working day; and,</i></p> <p><i>(e) it would not harm the primary function of the area as a business park or industrial estate.</i></p>
DM5	<p><i>Development will be supported if it promotes and facilitates access to the jobs it creates amongst those residents of the city and its travel to work area including those who can have difficulty entering or returning to the labour market, young people and the unemployed</i></p>	DD5	<p><i>Development will be supported if it promotes and facilitates access to the jobs it creates amongst residents of the city and its travel to work area including those who can have difficulty entering or returning to the labour market, young people and the unemployed.</i></p>
DM6	<p><i>Telecommunications development will be permitted provided that:</i></p> <p><i>(a) the siting and design of the equipment will minimise visual impact and their impact on amenity;</i></p> <p><i>(b) the development does not have any unacceptable adverse impact on any area or site of historic, conservation, archaeological, landscape or biodiversity importance; and,</i></p> <p><i>(c) the operator has investigated the availability, benefits and impacts of alternative sites and developments, including mast or site sharing, and has demonstrated that there are no practicable alternatives.</i></p>	DD6	<p><i>No Change.</i></p>
DM7	<p><i>The following areas are allocated as Regeneration Areas:</i></p> <p><i>Grecian Quarter</i></p> <p><i>Water Lane Area</i></p> <p><i>Within these areas proposals for redevelopment will be permitted in accordance with site specific planning guidance.</i></p>		<p><i>No equivalent policy.</i></p>

DM8	<p><i>The following sites (for 10 or more dwellings) are allocated for residential and associated infrastructure development: [site areas, indicative capacity and footnotes shown in policy, omitted here for clarity]</i></p> <p><i>Exmouth Junction, Prince Charles Road</i></p> <p><i>Exwick Middle School, Higher Exwick Hill</i></p> <p><i>Land adj Exeter St Davids Station</i></p> <p><i>ERADE, Topsham Road</i></p> <p><i>Land north of WESC Foundation, Topsham Road</i></p> <p><i>Land east of M5, Exeter Road</i></p> <p><i>Land off Liffey Rise</i></p> <p><i>Land at Exeter Cricket Ground, Prince of Wales Road</i></p> <p><i>Middlemoor Headquarters</i></p> <p><i>Land west of Newport Park, Topsham Road</i></p> <p><i>Land south of Apple Lane</i></p> <p><i>Mary Arches Car Park</i></p> <p><i>Land south of Woodwater Park</i></p> <p><i>Eastern Fields</i></p> <p><i>Land opposite 7-10 Glenthorne Road</i></p> <p><i>23-26 Mary Arches Street</i></p> <p><i>Eagle Yard, Tudor Street</i></p> <p><i>Foxhayes First School, Gloucester Road</i></p>	DD7	<p><i>The following sites (for 10 or more dwellings) are allocated for residential and associated infrastructure development: [site areas, indicative capacity and footnotes shown in policy, omitted here for clarity]</i></p> <p><i>Exmouth Junction, Prince Charles Road</i></p> <p><i>Exwick Middle School, Higher Exwick Hill</i></p> <p><i>Land adj Exeter St Davids Station</i></p> <p><i>Land off Liffey Rise</i></p> <p><i>Land south of Apple Lane</i></p> <p><i>Mary Arches Car Park</i></p> <p><i>Land south of Woodwater Park</i></p> <p><i>Eastern Fields</i></p> <p><i>Land opposite 7-10 Glenthorne Road</i></p> <p><i>Foxhayes First School, Gloucester Road</i></p> <p><i>Land adjacent Exeter Arms Hotel, Rydon Lane</i></p> <p><i>DOA & Exeter Mobility Centre, Wonford Road</i></p> <p><i>Former Nursery to rear of 2-20 Locarno Road</i></p> <p><i>Frickers Yard, Willeys Avenue</i></p> <p><i>Bendene Hotel, 15-16 Richmond Road</i></p> <p><i>Land at Exeter City Football Club (rear Big Bank)</i></p> <p><i>Pyramids Leisure Centre, Heavitree Road</i></p> <p><i>Royal Devon & Exeter Hospital (Heavitree Campus)</i></p> <p><i>79 Heavitree Road</i></p>
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DM9	<i>Housing development will be permitted on sites assessed as deliverable by the Strategic Housing Land Availability Assessment and on other unallocated sites within the urban area, provided that other policies within the Development Plan are complied with.</i>	DD8	<i>Housing development will be permitted on unallocated sites within the urban area, provided that all other relevant policies within the Development Plan are complied with.</i>
DM10	<i>Proposals for major residential development of 20 or more dwellings or on sites of 0.5ha or more will be required to provide 5% of housing that is designed so as to be accessible by people confined to wheelchairs in accordance with the Council's Wheelchair Accessible Housing Design Standards. The type of provision, in regard to dwelling size, will be informed by need.</i>	DD9	<i>All housing development should be designed to be accessible and adaptable in accordance with category 2 of the optional Building Regulations. 5% of affordable housing must be designed so as to be accessible by people confined to wheelchairs in accordance with category 3 of the optional Building Regulations (the type of provision, in regard to dwelling size, will be informed by need).</i>
DM11	<i>Proposals involving a net loss of residential units will not be permitted.</i>	DD10	<i>No change.</i>
DM12	<p><i>Development involving the conversion of a building to flats, bedsits, or a house in multiple occupation, will be permitted provided the proposal:</i></p> <ul style="list-style-type: none"> <i>(a) respects the character and appearance of the building and surrounding area;</i> <i>(b) does not result in unacceptable harm to the amenity of neighbouring residents;</i> <i>(c) provides sufficient internal and external amenity space for future occupiers</i> <i>(d) makes appropriate provision for refuse storage and car and bicycle parking;</i> <i>(d) would not cause unacceptable transport impacts; and,</i> 	DD11	<p><i>Development involving the conversion of a building to flats, bedsits, or a house in multiple occupation, will be permitted provided the proposal:</i></p> <ul style="list-style-type: none"> <i>(a) respects the character and appearance of the building and surrounding area;</i> <i>(b) does not result in unacceptable harm to the amenity of neighbouring residents;</i> <i>(c) provides sufficient internal and external space for future occupiers;</i> <i>(d) makes appropriate provision for refuse storage and car and cycle parking;</i> <i>(e) would not cause unacceptable transport impacts; and,</i> <i>(f) would not result in an over concentration of HMOs in any one area of the city, to the extent that it would</i>

	<p>(e) would not result in an over concentration of HMOs in any one area of the city, to the extent that it would change the character of the area or undermine the maintenance of a balanced and mixed local community.</p>		<p>change the character of the area or undermine the maintenance of a balanced and mixed local community.</p>
DM13	<p>Purpose built student accommodation will be permitted provided that:</p> <p>(a) it responds well to the local context and reinforces local distinctiveness;</p> <p>(b) appropriate provision is made for refuse storage, parking for disabled persons and cycle parking;</p> <p>(c) sufficient internal and external amenity space is provided such that students feel at ease and comfortable and accommodation is designed so as to allow easy conversion to other forms of residential use;</p> <p>(d) it does not harm the amenity of neighbouring residents; and,</p> <p>(e) a suitable Management Plan is submitted to demonstrate how the property will be managed in the long term to ensure acceptable amenity levels for occupiers and neighbouring residents.</p>	DD12	<p>Purpose built student accommodation will be permitted provided the proposal:</p> <p>(a) respects, and contributes positively towards, the character and appearance of the area;</p> <p>(b) does not result in unacceptable harm to the amenity of neighbouring residents;</p> <p>(c) provides sufficient internal and external space for future occupiers;</p> <p>(d) makes appropriate provision for refuse storage, operational and disabled persons parking, servicing and cycle parking;</p> <p>(e) reduces the need to travel and would not cause unacceptable transport impacts;</p> <p>(f) is accompanied by a suitable Management Plan secured by planning obligation to demonstrate how the property will be managed in the long term.</p>

DM14	<p>Development will be permitted provided that it does not have an unacceptable impact on the amenity of existing local residents and, where residential development is proposed, provides good living conditions and standards of amenity for future occupiers of the development. The following factors will be taken into account:-</p> <ul style="list-style-type: none"> • privacy and overlooking • the availability of natural light and outlook <p>whether the proposal is over-bearing</p> <ul style="list-style-type: none"> • light or air pollution • noise and disturbance • odour, fumes or vibration • security <p>In respect of development involving new residential units, the following will also be taken into account:-</p> <ul style="list-style-type: none"> • whether sufficient internal and external space is provided for future occupiers; and • appropriate provision of storage space for household items, cycles, rubbish and recycling 	DD13	<p>Development will be permitted provided that it does not result in unacceptable harm to the amenity of neighbouring residents and, where residential development is proposed, provides good living conditions and standards of amenity for future occupiers of the development. The following factors will be taken into account:-</p> <ul style="list-style-type: none"> • privacy and overlooking • the availability of natural light and outlook • whether the proposal is over-bearing • light or air pollution • noise and disturbance • odour, fumes or vibration • security • the ability to feel at ease in home or garden <p>In respect of development involving new residential units, the following will also be taken into account:-</p> <ul style="list-style-type: none"> • whether sufficient internal and external space is provided for future occupiers; and • appropriate provision of storage space for household items, cycles, rubbish and recycling
DM15	<p>Retail and leisure development is proposed at the Bus and Coach Station as part of a comprehensive mixed use development including an enhanced Bus Station. The amount of retail floorspace will be determined in accordance with the Core Strategy and the most up to date assessment of retail capacity. Such retail development must not harm the viability and vitality of the City Centre as a whole. In addition offices, leisure, hotels and housing will be acceptable uses.</p>	DD14	<p>Retail and leisure development and an enhanced bus station is proposed as part of a comprehensive mixed use development. The amount of retail floorspace will be determined in accordance with the Core Strategy and the most up to date assessment of retail capacity. Such retail development must not harm the viability and vitality of the City Centre as a whole. In addition offices, leisure, hotels and housing will be acceptable uses.</p>

DM16	<p><i>Development involving the change of use of ground floor Class A premises will not be permitted if it would harm the vitality and viability of the secondary shopping areas of the city centre or any district or local centre.</i></p>	DD15	<p><i>Development involving the change of use of ground floor Class A premises in the primary shopping area of the city centre or any district or local centre will be permitted unless it would harm the vitality and viability of these areas.</i></p>
DM17	<p><i>Tourism and Cultural development proposals will be supported that:</i></p> <ul style="list-style-type: none"> <i>enhance the profile of Exeter as a tourist destination and cultural centre</i> <i>address deficiencies in the city's tourism and cultural offer</i> <i>contribute to the achievement of regeneration</i> <i>is of a form and scale that that does not harm the quality of the natural and built environment</i> <i>is easily accessible, to the community served, by public transport, walking and cycling</i> <p><i>Attractions and facilities that serve the city and wider sub-region should be located within, or adjacent to, the City Centre.</i></p> <p><i>Permission will not be granted for the change of use of a tourist or cultural attraction to another use, unless the proposed use will maintain or enhance the tourism and cultural offer, or the existing tourism or cultural use is not viable.</i></p>	DD16	<p><i>Tourism and Cultural development proposals will be supported that:</i></p> <ul style="list-style-type: none"> <i>enhance the profile of Exeter as a tourist destination and cultural centre</i> <i>address deficiencies in the city's tourism and cultural offer</i> <i>contribute to the achievement of regeneration</i> <i>is of a form and scale that that does not harm the quality of the natural and built environment</i> <i>is easily accessible, to the community served, by public transport, walking and cycling</i> <p><i>Attractions and facilities that serve the city and wider sub-region should be located within, or adjacent to, the City Centre.</i></p> <p><i>Permission will not be granted for the change of use of a tourist or cultural attraction to another use, unless the proposal will maintain or enhance the tourism and cultural offer, or there is no reasonable prospect of the use continuing on a viable basis, nor securing a satisfactory viable alternative tourism or cultural use.</i></p>
DM18	<p><i>Planning permission for Hotel development will be granted</i></p>	DD17	<p><i>Planning permission for Hotel development (Class C1) will</i></p>

	<i>in the city centre and at the quayside. Subject to commencement of works to substantially increase the capacity of conferencing facilities at Sandy Park, planning permission will be granted for a hotel comprising up to 120 bedrooms located within reasonable walking distance of this development. Elsewhere the sequential test will be applied.</i>		<i>be granted in the city centre and at the quayside. Planning permission will be granted for a hotel comprising up to 120 bedrooms located within reasonable walking distance of Sandy Park to complement the conference facilities. Elsewhere the sequential test will be applied.</i>
DM19	<p><i>The following sites and routes are safeguarded for transport infrastructure:</i></p> <ul style="list-style-type: none"> <i>Land for new stations at Hill Barton and Newcourt on the Exeter to Exmouth line and at Marsh Barton on the Exeter to Plymouth line</i> <i>Land for a park and ride site at Ide/Alphington interchange on the A30</i> <i>Land at Monkerton to provide a new road link and an Enhanced Public Transport Route</i> <i>Land at Eastern Fields for the Exhibition Way road link</i> <i>Land at Marsh Barton/Haven Banks for the Water Lane road link</i> <i>Land south west of Cheeke Street within the Grecian Quarter to provide an enhanced Bus Station</i> 	DD18	<p><i>The following sites and routes are safeguarded for transport infrastructure:</i></p> <ul style="list-style-type: none"> <i>Land for new stations at Hill Barton and Newcourt on the Exeter to Exmouth line and at Marsh Barton on the Exeter to Plymouth line</i> <i>Land for a park and ride site at Ide/Alphington interchange on the A30</i> <i>Land at Monkerton to provide a new road link and an Enhanced Public Transport Route</i> <i>Land at Eastern Fields for the Exhibition Way road link</i> <i>Land at Marsh Barton/Haven Banks for the Water Lane road link</i> <p><i>Development will not be permitted where it would preclude or impact upon the provision of infrastructure identified in the Infrastructure Delivery Plan (IDP) for Exeter or equivalent document for an adjoining area.</i></p>
DM20	<i>Development will not be permitted on that part of the former railway land at Exmouth Junction not allocated for housing, or at Marsh Barton siding, which may prejudice the re-use of the land for other transport uses.</i>	DD19	<i>Development will not be permitted on safeguarded railway land and former railway land, which may prejudice the re-use of the land for transport related uses, unless there is no foreseeable demand for such uses..</i>
DM21	<i>Development, as appropriate to its location, scale and</i>	DD20	<i>Development, as appropriate to its location, scale and</i>

	<p><i>form, should:</i></p> <ul style="list-style-type: none"> (a) <i>give priority to the needs of pedestrians, cyclists and users of public transport over private motorised vehicles;</i> (b) <i>provide safe, sufficient and convenient means of access to existing and proposed transport networks, without conflicting with the existing function or safety of those networks;</i> (c) <i>be phased so that early development is as close as possible to existing public transport services, walking and cycle routes, then progress in such a way that bus, walking and cycle routes can be extended into the development as it becomes practical and viable to do so; and,</i> (d) <i>be supported by a travel plan that encourages the use of sustainable forms of movement.</i> 		<p><i>form, should:</i></p> <ul style="list-style-type: none"> (a) <i>give priority to the needs of pedestrians, cyclists and users of public transport over private motorised vehicles;</i> (b) <i>avoid prejudicing the delivery of, and where appropriate contribute to development and improvement of, the primary cycle routes and key local cycle/pedestrian links;</i> (c) <i>provide safe, sufficient and convenient means of access to existing and proposed transport networks, without conflicting with the existing function or safety of those networks;</i> (d) <i>be phased so that early development is as close as possible to existing public transport services, walking and cycle routes, then progress in such a way that bus, walking and cycle routes can be extended into the development as it becomes practical and viable to do so; and,</i> (e) <i>be supported by a travel plan that encourages the use of sustainable forms of movement.</i>
DM22	<p><i>Development should:</i></p> <ul style="list-style-type: none"> (a) <i>provide an amount of car parking appropriate to the proposal and its location, and make appropriate provision for the parking of motorcycles and for the charging of electric vehicles;</i> (b) <i>integrate parking provision into the overall design of the development and ensure an appropriate ratio of allocated to unallocated parking, so as to avoid the creation of a car dominated environment;</i> 	DD21	<p><i>Development should:</i></p> <ul style="list-style-type: none"> (a) <i>provide an amount of car parking appropriate to the proposal and its location, and make appropriate provision for the parking of motorcycles and for the charging of electric vehicles;</i> (b) <i>integrate parking provision into the overall design of the development and ensure an appropriate ratio of allocated to unallocated parking, so as to avoid the creation of a car dominated environment which is unsafe for pedestrians and cyclists;</i>

	<p>(c) provide safe and secure parking facilities that are subject to natural surveillance, with safe and convenient pedestrian links to their surroundings; and,</p> <p>(d) make safe, secure, sufficient and convenient provision for cycle parking and storage in all development and providing showers, lockers and drying space where more than 20 people are employed.</p>		<p>(c) provide safe and secure parking facilities that are subject to natural surveillance, with safe and convenient pedestrian links to their surroundings; and,</p> <p>(d) make safe, secure, sufficient and convenient provision for cycle parking and storage in all development and providing showers, lockers and drying space where possible, and in any event where more than 20 people are employed;</p>
DM23	<p>All open space, local green space, allotment and sport and recreation facilities will be protected and enhancements to these areas will be supported. Any loss of these facilities will only be permitted where:</p> <p>(a) there is a proven excess of the facility in the area; or</p> <p>(b) the community will gain equivalent benefit from the provision of suitable replacement open space, allotment, sport or recreation facilities nearby.</p> <p>Any replacement provision must take into account the needs of the area and current standards open space, sport and recreation provision, but should be equivalent to, or an improvement upon, the existing resource.</p> <p>Proposals for new residential development will be required to provide new open space, allotments, sport and recreation facilities in accordance with standards set out in the Open Space, Sport and Recreation SPD. Facilities should be provided on-site as an integral part of the scheme. Where on-site provision is not appropriate, off-site provision or a financial contribution towards it will be sought. The financial contribution will be commensurate with the facilities required to serve the development.</p> <p>Developers will make provision for the on-going</p>	DD22	<p>All open space, local green space, allotment and sport and recreation facilities will be protected. Any loss of these facilities will only be permitted where:</p> <p>(a) there is a proven excess of the facility in the area; or</p> <p>(b) the community will gain from the provision of replacement facilities of equivalent or better quantity and quality in a suitable location; or,</p> <p>(c) the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.</p> <p>Proposals for new open space, allotments or sport and recreational facilities and enhancements to existing facilities will be supported where they meet all other relevant policies in the Development Plan.</p> <p>Proposals for new residential development will be required to provide new open space, allotments, sport and recreation facilities in accordance with standards set out in the Open Space, Sport and Recreation SPD. Facilities should be provided on-site as an integral part of the scheme. Where on-site provision is not appropriate, off-site provision or a financial contribution towards it will be sought. The financial contribution will be commensurate</p>

	management and maintenance of their open space, allotments, sport and recreation facilities, to standards that have been agreed with the City Council, unless arrangements area made for the transfer of these facilities to the City Council.		with the facilities required to serve the development. Developers will make provision for the on-going management and maintenance of their open space, allotments, sport and recreation facilities, to standards that have been agreed with the City Council.
DM24	<p>Proposals involving the loss of land or buildings in community use will only be permitted where:</p> <p>(a) there is no reasonable prospect of the existing use continuing on a viable basis, nor or securing a satisfactory viable alternative community use; or,</p> <p>(b) a satisfactory replacement facility is provided in a suitably convenient location for the community served, to a timescale that avoids any significant break in use.</p> <p>Proposals for major new residential development will be required to provide community facilities commensurate with the scale of development. Account will be taken of the level of existing provision and an assessment made of new facilities required as a result of the proposed development.</p>	DD23	<p>All land or buildings in community use, or allocated for community use, will be protected. Any loss of land or buildings in community use will only be permitted where:</p> <p>(a)there is no reasonable prospect of the existing use continuing on a viable basis, nor securing a satisfactory viable alternative community use; or,</p> <p>(b) there are adequate facilities in the area to meet demand; or,</p> <p>(c) the community will benefit from the provision of replacement facilities of equivalent or better quantity and quality in a suitable location, to a timescale that avoids any significant break in use.</p> <p>Proposals for new community facilities and enhancements to existing facilities will be supported where they meet all other relevant policies in the Development Plan.</p> <p>Proposals for major new residential development will be required to provide community facilities commensurate with the scale of development. An assessment will be made of new facilities required as a result of the proposed development, taking account of the level of existing provision.</p>
DD25	Development involving the loss of an asset of community value will not be permitted unless the benefits of the	DD24	Development involving the loss of an asset of community value listed under the Localism Act will not be permitted

	<i>proposal clearly outweigh the harm that would result from the loss of the asset.</i>		<i>unless there is no reasonable prospect of the existing use continuing on a viable basis, nor of securing a satisfactory viable alternative community use, or the benefits of the proposal clearly outweigh the harm that would result from the loss of the asset.</i>
DM26	<p><i>Planning permission will be granted for development that:</i></p> <ul style="list-style-type: none"> <i>a) creates high quality distinctive places;</i> <i>b) ensures the location, layout and built form integrate well into the surroundings;</i> <i>c) includes a robust and long lasting landscape framework which takes advantage of existing landscape features;</i> <i>d) contributes to the provision of a compatible mix of uses which work well together to create vital and viable places;</i> <i>e) retains and refurbishes existing buildings of good townscape value;</i> <i>f) integrates measures to address climate change in ways which contribute to the character and appearance of the scheme;</i> <i>g) contributes to the delivery of the Exeter Green Infrastructure Strategy;</i> <i>h) creates or maintains a high quality public realm and makes provision, where appropriate, for public art as an integral part of the design;</i> <i>i) ensures that the scale, massing and height of buildings, extensions, and other structures relate well to the site, the surroundings and to human scale;</i> <i>j) is visually attractive as a result of good architectural detailing and landscaping;</i> 	DD25	<p><i>Planning permission will be granted for development that addresses, where relevant, the following factors:</i></p> <ul style="list-style-type: none"> <i>a) creates high quality distinctive places;</i> <i>b) ensures the location, layout and built form complement the surroundings;</i> <i>c) includes a robust and long lasting landscape framework which takes advantage of existing landscape features;</i> <i>d) contributes to the provision of a compatible mix of uses which work well together to create vital and viable places;</i> <i>e) retains and refurbishes existing buildings of good townscape value;</i> <i>f) integrates measures to address climate change in ways which contribute to the character and appearance of the scheme;</i> <i>g) contributes to the delivery of the Exeter Green Infrastructure Strategy;</i> <i>h) creates or maintains a high quality public realm and makes provision, where appropriate, for public art as an integral part of the design;</i> <i>i) ensures that the scale, massing and height of buildings, extensions, and other structures relate well to the site, the surroundings and to human scale;</i> <i>j) adopts contemporary and innovative design solutions</i>

	<p>k) uses high quality materials which weather well and which relate well to materials in the locality;</p> <p>l) retains and protects existing trees of good arboricultural and amenity value and supports the planting of native trees in appropriate locations; and,</p> <p>m) integrates all service, utility, extraction systems and refuse facilities so that they complement the scheme and preserve landscape features including trees.</p>		<p>where this results in distinctive places that integrate well into the surroundings;</p> <p>k) is visually attractive as a result of good architectural detailing and landscaping;</p> <p>l) uses high quality materials which relate well to materials in the locality;</p> <p>m) retains and protects existing trees of good arboricultural and amenity value and supports the planting of native trees in appropriate locations; and,</p> <p>n) integrates all service, utility, extraction systems and refuse facilities so that they complement the scheme.</p>
DD27	<p>Planning permission will be granted for development that creates a safe and secure environment by:</p> <p>(a) taking an integrated approach that ensures potential conflicts between security and other objectives are resolved;</p> <p>(b) creating environmental quality and a sense of ownership;</p> <p>(c) providing natural surveillance;</p> <p>(d) achieving safe vehicular and pedestrian access routes;</p> <p>(e) providing suitable and managed open space that minimises crime and antisocial behaviour; and</p> <p>(f) providing effective lighting that reduces crime and fear of crime</p>	DD26	No change.
DD28	<p>Planning permission will be granted for development that delivers shop fronts, and associated awnings and signs, that are in keeping with the character of the building and of</p>	DD27	No change.

	<i>the surrounding street scene.</i>		
DM29	<p><i>Development should conserve and enhance the historic environment of the city, whether comprising individual heritage assets, their settings, or historic areas.</i></p> <p><i>Development that affects the historic environment will be allowed provided it meets the following criteria, as they apply to the particular asset or area affected:</i></p> <p>(a) <i>A development proposal that affects a designated heritage asset must demonstrate how special regard has been given to conserving its particular significance, in the form of fabric, setting, character or appearance, and any features of special architectural or historic or archaeological interest that it possesses; and,</i></p> <p>(b) <i>For development that affects non-designated heritage assets, including buried remains and those on the List of Locally Important Heritage Assets, the presumption will be that the particularly significant elements of these assets, including physical form and setting, will where possible be conserved and enhanced.</i></p> <p>(c) <i>Where it is not practicable or desirable to retain heritage assets in an unaltered form, whether these are designated or undesignated, provision for appropriate recording, analysis, reporting and archiving will be required in lieu of their retention, to be undertaken by an appropriately qualified person or organisation in accordance with a scheme of works to be agreed in advance.</i></p>	DD28	<p><i>Planning permission and Listed Building Consent will be granted for development that conserves and enhances the city's heritage assets and their setting. Development that affects the historic environment will be allowed provided it meets the following criteria, as they apply to the particular asset affected:</i></p> <p>a) <i>A development proposal that affects a designated heritage asset must conserve its particular significance, in the form of fabric, setting, character or appearance, and any features of special architectural or historic or archaeological interest that it possesses; and,</i></p> <p>b) <i>For development that affects non-designated heritage assets, including buried remains and those on the List of Locally Important Heritage Assets, the presumption will be that the particularly significant elements of these assets, including physical form and setting, will be conserved and enhanced.</i></p> <p><i>Where it is not practicable or desirable to retain heritage assets in an unaltered form, whether these are designated or undesignated, provision for appropriate recording, analysis, reporting and archiving will be required in lieu of their retention, to be undertaken by an appropriately qualified person or organisation in accordance with a scheme of works to be agreed in advance of development commencing on site.</i></p>
DM30	<p><i>Development within the Landscape Setting Areas will only be permitted where:</i></p> <p>(a) <i>there is no harm to the distinctive characteristics and</i></p>	DD29	<p><i>Development within the Landscape Setting Areas will only be permitted where:</i></p> <p>(a) <i>there is no harm to the distinctive characteristics and</i></p>

	<p><i>special qualities of the landscape setting of the City and wider area; and</i></p> <p>(b) <i>it does not contribute towards the urbanisation of these areas; and</i></p> <p>(c) <i>it does not contribute towards settlement coalescence between Exeter and Topsham; and</i></p> <p>(d) <i>it consists of a replacement dwelling or domestic extension or it is reasonably necessary for the purposes of agriculture, forestry, the rural economy, outdoor recreation, landscape, educational or biodiversity enhancement, or the provision of green infrastructure.</i></p>		<p><i>special qualities of the landscape setting of the City and wider area; and</i></p> <p>(b) <i>it does not contribute towards the urbanisation of these areas; and</i></p> <p>(c) <i>it does not contribute towards settlement coalescence between Exeter and Topsham; and</i></p> <p>(d) <i>it consists of a replacement dwelling or domestic extension or it is reasonably necessary for the purposes of agriculture, forestry, the rural economy, outdoor recreation, landscape, educational or biodiversity enhancement, or the provision of green infrastructure; or,</i></p> <p>(e) <i>it delivers strategically important infrastructure identified in the Infrastructure Delivery Plan and it can be demonstrated that there are no reasonable alternative sites and it minimises harm to the Landscape Setting Area.</i></p>
DM31	<p><i>Development, as appropriate to its location, scale and form, must protect and enhance existing green infrastructure and must deliver new green infrastructure in accordance with the Green Infrastructure Strategy.</i></p>	DD30	<p><i>Development, as appropriate to its location, scale and form, must protect or enhance existing green infrastructure and must deliver new green infrastructure in accordance with the Green Infrastructure Strategy.</i></p>
DM32	<p><i>International Sites (Special Protection Area, Special Area of Conservation and RAMSAR sites) benefit from statutory protection. Where development is likely to have a significant effect on an International Site (either alone or in combination with other plans or projects) an Appropriate Assessment will be required in accordance with the Conservation of Habitats and Species Regulations 2010. The integrity of European Sites must be maintained.</i></p> <p><i>Development that is likely to have either a direct or indirect</i></p>	DD31	<p><i>International Sites (Special Protection Area, Special Area of Conservation and Ramsar sites) benefit from statutory protection. Development that has an adverse impact on the integrity of International Sites will not be permitted.</i></p> <p><i>Development that is likely to have either a direct or indirect adverse effect on a Site of Special Scientific Interest (SSSIs) will not be permitted unless the benefits of the development clearly outweigh both the impacts on the features of the site and any broader impacts on the</i></p>

<p>adverse effect on a Site of Special Scientific Interest (SSSIs) will not be permitted unless the benefits of the development clearly outweigh both the impacts on the features of the site and any broader impacts on the national network of SSSIs.</p> <p>Development that is likely to have either a direct or indirect adverse impact on a County Wildlife Site, a Biodiversity Enhancement Area, a Regionally Important Geological/Geomorphological Site or any other area of local importance to biodiversity or geodiversity will only be permitted if:</p> <ul style="list-style-type: none"> (a) the need for the development is sufficient to outweigh nature and/or geological conservation considerations; (b) the extent of any damaging impact is kept to a minimum and appropriate mitigation and compensatory measures are implemented; and (c) it can be demonstrated that there are no reasonable alternative sites. <p>Development will be required to:</p> <ul style="list-style-type: none"> (a) contribute towards measures to avoid or mitigate adverse effects on the Exe Estuary and other International Sites and to implement the Green Infrastructure Strategy; (b) in the case of protected species outside designated sites, favourable conservation status must be maintained; (c) restore, conserve and enhance wildlife habitats, corridors and any other features of ecological interest including those related to protected species; 	<p>national network of SSSIs.</p> <p>Development that is likely to have either a direct or indirect adverse impact on a County Wildlife Site, Ancient Woodland, a Biodiversity Enhancement Area, or a Regionally Important Geological Site will only be permitted if:</p> <ul style="list-style-type: none"> (a) the need for and benefits of the development is sufficient to outweigh biodiversity and/or geological conservation considerations; (b) it can be demonstrated that there is no suitable alternative site with less harmful impacts; and,, (c) damaging impacts are avoided or kept to a minimum and appropriate mitigation and compensatory measures are implemented. <p>All development will, where relevant, be required to:</p> <ul style="list-style-type: none"> (a) avoid, mitigate or compensate for harm to biodiversity ; (b) take steps to avoid affecting protected species and in all cases ensure that disturbance to wildlife is kept to a minimum; (c) preserve, restore and re-create wildlife habitats, corridors and networks and any other features of ecological interest including those related to protected species; (d) contribute towards measures to mitigate against adverse impacts on the Exe Estuary SPA and other European Sites; and, (e) wherever possible provide net gains in biodiversity on site and where necessary provide compensation (through biodiversity off-setting or other payments or payments in kind) to ensure a net biodiversity gain for the
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	<p>(d) ensure that disturbance to wildlife is kept to a minimum during construction;</p> <p>(e) wherever possible result in an improvement to the biodiversity value of the site, incorporating biodiversity features into buildings and landscape; and,</p> <p>(f) where necessary provide mitigation to ensure a net biodiversity gain for the Exeter area.</p>		Exeter area.
DM36	<p>Local energy networks are proposed at the following areas:</p> <p>a) Monkerton and Hill Barton;</p> <p>b) The City Centre, Heavitree Road and Wonford;</p> <p>c) Marsh Barton, Matford, and land South of Alphington; and,</p> <p>d) In other locations across the City where it is shown that it is feasible and viable to bring forward a local energy network.</p> <p>Within these areas, all new development (either new build or conversion) with a floorspace of at least 1,000 square metres, or comprising ten or more dwellings, must be constructed to have heating (water and space) systems compatible with the proposed or existing local energy network and include provision for the necessary pipework from those in-building systems up to the appropriate site boundary to allow connection to the network when available.</p> <p>Throughout the city, from the time when there is a contractual commitment for any element of a local energy network, all new development (either new build or</p>	DD33	<p>Local energy networks are proposed at the following areas:</p> <p>a) Monkerton and Hill Barton;</p> <p>b) The City Centre, Heavitree Road and Wonford;</p> <p>c) Marsh Barton, Matford, and land South of Alphington; and,</p> <p>d) In other locations across the City where it is shown that it is feasible and viable to bring forward a local energy network.</p> <p>Within these areas, all new development (either new build or conversion) with a floorspace of at least 1,000 square metres, or comprising ten or more dwellings, must be constructed to have heating (water and space) systems compatible with the proposed or existing local energy network and include provision for the necessary pipework from those in-building systems up to the appropriate site boundary to allow connection to the network when available.</p> <p>Throughout the city, from the time when there is a contractual commitment for any element of a local energy network to be delivered, all new development (either new</p>

	<p>conversion) with a floorspace of at least 1,000 square metres, or comprising ten or more dwellings, that is within 500 metres of that element of the network, must be constructed to have heating (water and space) systems compatible with the local energy network and include pipework from those in-building systems up to the appropriate site boundary to allow connection to the network when available.</p> <p><i>In any instance, any large-scale residential or non-residential development must demonstrate that consideration has been given as to whether it is viable and feasible for that development to be part of any Local Energy Network.</i></p>		<p>build or conversion) with a floorspace of at least 1,000 square metres, or comprising ten or more dwellings, that is within 500 metres of the contracted parts of the network, must be constructed to have heating (water and space) systems compatible with the local energy network and include pipework from those in-building systems up to the appropriate site boundary to allow connection to the network when available.</p> <p><i>In any instance, any large-scale residential or non-residential development must demonstrate that consideration has been given as to whether it is viable and feasible for that development to be part of any Local Energy Network.</i></p>
DM34	<p><i>In areas at risk of flooding, development will only be permitted where it is demonstrated that the proposal meets the sequential test and, where appropriate, the exception test. In Flood Zone 3 residential development will only be permitted where it meets the sequential test and the exception test and also contributes to reducing the overall flood risk.</i></p>	DD33	<p>No change.</p>
DM35	<p><i>All development proposals should minimise and where possible reduce emissions and other forms of pollution, including light and noise pollution, and ensure no deterioration in air and water quality. Proposals on contaminated land will only be permitted where the land is, or can be made, suitable for the proposed use.</i></p>	DD34	<p><i>All development proposals should minimise and where possible reduce emissions and other forms of pollution, including light and noise pollution, and ensure no unacceptable deterioration in air and water quality and quantity. Proposals on land affected by contamination will only be permitted where the land is, or can be made,</i></p>

	<p>Proposals will only be permitted where, individually or cumulatively, taking account of proposed mitigation, remediation and future monitoring, there are no unacceptable impacts on:</p> <ul style="list-style-type: none"> • the natural environment and general amenity; • public health and safety; • air quality; • ambient and background noise levels; • surface and ground water quality; • land quality and condition; and <p>the need for compliance with statutory environmental quality standards; Proposals that can be adversely affected by existing pollution will only be permitted where :</p> <ul style="list-style-type: none"> • conditions can be imposed that result in an acceptable form of development that avoids the potential for conflict; and • the proposed development does not place unreasonable restrictions on the future development of existing businesses. 		<p>suitable for the proposed use.</p> <p>Proposals will only be permitted where, individually or cumulatively, taking account of proposed mitigation, remediation and future monitoring, there are no unacceptable impacts on:</p> <ul style="list-style-type: none"> • the natural environment and general amenity; • public health and safety; • air quality; • noise levels; • surface and ground water quality and quantity; • land quality and condition; and • the need for compliance with statutory environmental quality standards; <p>Proposals that are potentially subject to existing pollution will only be permitted where:</p> <ul style="list-style-type: none"> • the potential for adverse affects is avoided or mitigated through design, layout, engineering solutions or the use of planning conditions/obligations; and, • the proposed development does not place unreasonable restrictions on the future operation of existing businesses.
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Appendix 5 – Comments received on second Interim SA

Heritage Development SW Ltd	DD7 & 8 of SA	Objective 5 should score +, not •, on the basis that the development of sites in accordance with the prescribed design policies will achieve low crime layouts.	Disagree; crime reduction depends on detailed design, not site location; hence no relationship. DD26 has a significant positive impact on this objective.
		Objective 10 should score +, not -. Design principles will be applied to proposed developments to maintain local amenity, quality and character of the local environment.	Disagree; net impact of this policy is considered negative in that inevitably more greenfield land is developed. DD25 has a significant positive impact on this objective.
		Objective 11 should score +, not -. Development in accordance with prescribed policies will achieve the conservation and enhancement of biodiversity interests.	Disagree; however the Third Interim SA concludes that the negative impacts of this policy will be compensated for by amended policy DD31. DD25 has a positive impact on objective 11 and DD31 has a significant positive impact.
		Objective 13 should score +, not =. Design principles will be applied to proposed developments to achieve a high quality of environment.	Disagree; as above. It is considered that negative impacts will be compensated for by DD 34 and 35.
		Objective 14 should score +, not • (DD9 only), as using suitable land within the city in sustainable locations will reduce local emissions.	Disagree; as the provision of new housing sites will increase local emissions. However, the Third Interim SA concludes that the negative impacts of this policy will be compensated for by other policies.
		Objective 18 should score ?, not =. Overall there will be a positive impact from matching jobs and the economically active across the city; on their own each allocated site will not have a negative impact, but may be uncertain in terms of particular localities.	Disagree; However, again it is considered that negative impacts will be compensated for by policies in chapter 2.
		Overall the scores for both allocated and unallocated sites should be more positive as they	The SA was conducted rigorously, without a presumption that all scores should be positive

		have already been through careful scrutiny and sifting through the SHLAA process and, in the case of allocated sites, the DPD preparation process. When combined with the suite of proposed design principles and policies, these sites will score positively against the SA objectives.	or neutral. However, where negative impacts were identified, including in relation to these policies, this has been placed in context by paragraphs 2.3.2 and 2.3.2 of the SA; ie. Growth of Exeter is preferable to dispersed growth within rural areas.
		Matrix scoring against policies DD8 and DD9 on p36 does not correctly reflect the updated matrix at Chapter 3, p14.	Acknowledged and corrected in this interim SA.