

Exeter City Council

Exeter Local Development Framework

Core Strategy Sustainability Appraisal

Non Technical Summary

February 2012

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1. Introduction

- 1.1 Exeter City Council is producing a Local Development Framework (LDF). This framework will contain a series of documents which will set out policies for spatial planning in Exeter over the next 16 years and deliver sustainable development.
- 1.2 Government guidance requires that the documents that make up the LDF are subject to a process called Sustainability Appraisal (SA). The purpose of the SA is to promote sustainable development through the integration of sustainability considerations into the preparation and adoption of plans.
- 1.3 This non-technical summary sets out how the SA has been prepared and explains how it has informed the preparation of the first and most important LDF document to be produced, the Core Strategy. A full version of the Sustainability Appraisal and supporting appendices is available on the Exeter City Council website at www.exeter.gov.uk/sustainabilityappraisal.

2. Content of the SA

- 2.1 The SA must incorporate the requirements of the European Strategic Environmental Assessment (SEA) directive. SEA is concerned mainly with the effects of plans on the environment but SA widens this assessment to include social and economic as well as environmental issues.
- 2.2 A Sustainability Appraisal (SA) is a method of assessment by which policy documents are appraised for their likely impacts on the environment, society and the economy both now and in the future. It is important as it forces policy makers to think about the possible positive and negative impacts of each individual policy on sustainability issues, such as climate change, energy use and the production of waste, and to consider the need for amendments to policy and/or requirements for mitigation.

3. Core Strategy

- 3.1 The Core Strategy sets out the vision, objectives and strategy for the spatial development of the City up to 2026. It identifies opportunities for Exeter to grow within its environmental limits by maximising the use of previously developed land and bringing forward sustainable urban extensions to the east and south west of the City. The Core Strategy provides a detailed framework to achieve sustainable growth that protects the high quality environment of the City and takes the implications for climate change fully into account.
- 3.2 All other documents in the LDF must be in conformity with the Core Strategy.
- 3.3 In view of the importance of the Core Strategy, it is essential that the sustainability implications of the policies and proposals are fully taken into account. Accordingly, the SA is integral to the preparation of the Core Strategy as a means of assessing the potential social, environmental and economic effects.

4. How was the information compiled?

- 4.1 Initial work involved a scoping process designed to ensure that the SA covers the key sustainability issues relevant to the future planning of the City. In particular this established a framework to enable the sustainability of the Core Strategy to be monitored and appraised. The SA Scoping Report, setting out the work undertaken, was published for consultation in May 2005.
- 4.2 The SA Framework, amended in the light of consultation responses, was then used to test the Core Strategy objectives and policy options emerging through the Issues and Options, November 2005 and Preferred Options October 2006. The SA Report, summarising all of the work to date, was published with the Preferred Options for consultation.
- 4.3 Taking into account the responses to the Preferred Options and the SA, the objectives and policies for inclusion in the Submission Core Strategy were further revised. Sustainability appraisal of the objectives and policies continued on an iterative basis throughout the preparation of the Core Strategy as new issues arose and policies were refined.
- 4.4 The published documents that explain the sustainability appraisal in detail are:
- Core Strategy Sustainability Appraisal Scoping Report, May 2005
 - Core Strategy Sustainability Appraisal Report, October 2006
 - Core Strategy Sustainability Appraisal Report: Appendices, October 2006
 - Core Strategy Sustainability Appraisal Adopted, February 2012
- 4.5 The process is summarised below:

First stage (Scoping Report):

- Review the sustainability objectives that are contained in relevant national, regional and local policy documents and strategies;
- Collect and summarise baseline information on the City;
- Identify the key sustainability issues that must be addressed;
- Establish a framework of sustainability objectives and indicators that enable the sustainability of the plan to be monitored and appraised: and
- Consult statutory environmental bodies and other social and economic interests.

Second stage:

- Develop and appraise the Core Strategy objectives, options and preferred options/policies against the sustainability framework taking into account the evidence base; and
- Propose mitigation measures and monitoring indicators.

Third stage:

- Prepare a sustainability appraisal report summarising the appraisal process and findings; and
- Consult on the Core Strategy and the SA.

Fourth stage:

- Review the Core Strategy and appraise any policy amendments that impact upon sustainability (an iterative process).

Fifth stage:

- Publish the Core Strategy for pre submission representations and the final sustainability appraisal.

Final stage:

- Monitor the implementation of the Core Strategy (including its sustainability effects).

4.6 The content of each stage is summarised further in the following sections.

5. First stage: Prepare Scoping Report and publish for consultation

Plans, policies and programmes relevant to the Core Strategy (see 2006 Report, Section 3 and Appendix 1)

5.1 The Core Strategy may be influenced in various ways by other plans or programmes at national, regional and local levels. The SA contains a full review of the sustainability objectives of these documents and considers potential conflicts between them and how they interact with the Core Strategy.

Social, environmental and economic characteristics, baseline information and key issues for Exeter (see 2006 Report, Sections 4 and 5 and Appendix 2)

5.2 Exeter is an historic City located strategically in the centre of the south west with excellent road, rail and air connections to all parts of the region. The baseline information states that Exeter has an estimated 2006 population of 117,600¹, a travel to work area with a population of over 280,000, a shopping catchment of over 550,000, a student population of around 12,000, and over two million day-visitors a year.

5.3 The economy of the City supports some 86,000 jobs and 4,500 businesses. Exeter University and Exeter College are centres of educational excellence and both are expanding. Exeter Airport has major plans for growth. The Met Office has, in recent years, relocated to the City. The Exeter area is designated as a Growth point and is identified in the RSS as one of 21 Strategically Significant Cities and Towns (SSCT).

¹ (increased to 118,800 in mid-2009)

5.4 The key issues raised were:

- population growth and therefore the need to provide houses², jobs and shops to meet regional and local needs
- affordability of housing
- areas with high levels of deprivation associated with unemployment, poor skills, low incomes, limited access to appropriate housing, high crime levels, poor health, family breakdown and poor access to services.
- low 'staying on' rate after 16 years old, low GCSE pass rates and workplace training currently not meeting the needs of the labour force
- pollution from traffic and industry that affects human health and air, soil and water quality
- increasing traffic congestion and associated danger and air pollution
- high levels of inward commuting by car
- impact of growing population on environmental assets:
 - wildlife habitats / species
 - valley parks
 - hills and ridgelines
 - architectural / historic character / archaeology
- provision, enhancement of and accessibility to transport, social and community infrastructure to meet the needs of existing and new development.
- climate change and the need to adapt to the consequences and reduce the greenhouse gas emissions that contribute
- increased likelihood of flooding affected by climate change and more impermeable urban surfaces
- continuing rise in the use of water and energy and in the production of waste.

5.5 The assessment of issues highlighted the central concern about the implications of growth on climate change, and the conflict between a sustainable policy that focuses growth at the urban area, rather than dispersal, at the cost of undesirable sustainability consequences for that urban area.

Sustainability Framework (see 2006 Report, Section 6 and Appendix 3)

5.6 The purpose of setting up a framework is to provide a means by which the sustainability of the Core Strategy can be appraised. The framework consists of sustainability objectives that are measurable using identified indicators. The following objectives were identified by considering the objectives in the plans and programmes and the key sustainability issues outlined above.

² (with a mix of size, type and tenure)

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:
 - a) meet the needs of the local population, and
 - b) 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.

Consultation (see 2006 Report, Section 7 and Appendices 4 and 5)

- 5.7 The Scoping Report was published for consultation with stakeholders in May 2005 and subsequently incorporated in the 2006 Sustainability Appraisal report. The main issues raised were concerned with the need to adopt a positive response to climate change. A number of changes, particularly to the baseline information and to the sustainability indicators, were suggested and the report amended.

6. Second Stage; Appraise Objectives/Options/Policies and advise on mitigation

Appraisal of Core Strategy objectives against the sustainability objectives (see 2006 Report, Section 9 and Appendices 6 and 7)

- 6.1 The emerging policy objectives, brought forward at Issues and Options stage, November 2005, were tested against the sustainability objectives through the use of a matrix. This drew attention again to the social and environmental consequences of growth that must be mitigated as far as possible. As a result, the policy objectives were amended for inclusion in the Preferred Options report to add reference, in particular, to the need for social cohesion, promotion of sustainable transport modes and protection and enhancement of environmental quality.

Appraisal of Core Strategy policy options/policies against the sustainability objectives (see 2006 Report, Section 10 and Appendix 8)

- 6.2 The appraisal of policy options, brought forward through the Issues and Options, highlighted the need to:
- promote and improve public transport;
 - focus development on previously developed land and the most sustainable greenfield locations to the east and south west;
 - encourage office and retail development in the City Centre but consider potential harm to the historic core;
 - maintain and enhance district and local centres;
 - assess the impact of the requirements for affordable housing, community infrastructure and renewable energy on the viability of development;
 - take into account the effect of higher housing densities on the quality of housing;
 - support development with green infrastructure and high quality connections to facilities by alternatives to the car; and
 - ensure that the loss of greenfield land is confined to areas of least landscape value.
- 6.3 The Preferred Options included policies to deal with the issues identified. Sustainability appraisal provided continuous input to the preparation of the policies and, in particular, to the assessment of the alternative ways forward. The sustainability concerns identified at the Issues and Options stage were taken on board in the Preferred Options as far as possible but the SA indicated that the potential for development to harm the landscape and biodiversity, impact of development on the historic City Centre, together with the implications of developer contributions for the viability of development, all required further consideration.

7. Third Stage: Prepare SA report and consult on Preferred Options and SA

- 7.1 The Preferred Options Report and accompanying Sustainability Appraisal were published for consultation in October 2006. The SA incorporated the 2005 Scoping Report, as amended, and described the appraisal carried out on the Issues and Options and Preferred Options (as outlined above).

8. Fourth Stage: Review Core Strategy and subject amendments to further SA

Appraisal of Core Strategy objectives (see 2010 Report - Section 1 and Appendix 1)

- 8.1 In the light of the consultation responses to the Preferred Options and to the SA, the Core Strategy objectives were revised for inclusion in the draft submission Core Strategy. As at the Second Stage above, each objective was tested against the sustainability objectives through the use of a matrix. This did not identify a need to change the wording of the Core Strategy objectives but further refinement was subsequently required as a result of new Government guidance and as new issues arose. In each case any significant changes have been subject to further sustainability appraisal.

- 8.2 The revised Core Strategy objectives include new references, or increased emphasis, to mitigation of and adaptation to climate change, support for training and education, improvement of economic inclusion in areas of deprivation, protection of biodiversity and geological assets, and the provision of infrastructure when needed. These changes serve to reinforce the sustainability of the objectives.

1. Make the fullest contribution possible to the mitigation of, and adaptation to, climate change and the transition to a low carbon economy by, in particular:
 - reducing the use of fossil fuels by promoting high quality public transport and encouraging walking and cycling;
 - making the best use of land by maximising the use of previously developed land, promoting conversions and encouraging high density development in the City Centre and in appropriate locations within the urban extensions;
 - in partnership with others, promoting the efficient use of natural resources, the re-use and recycling of resources, and the production and consumption of renewable energy;
 - encouraging and facilitating the development of low and zero carbon energy development which reduces CO₂ emissions and the City's exposure to high fossil fuel prices, and improves the City's energy security; and,
 - linking the provision of low and zero carbon energy infrastructure in new developments to existing buildings to create more viable schemes and expand the benefits of such schemes more widely across the City.
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;
 - providing sufficient land and an appropriate range of accommodation for businesses particularly in the Monkerton/Hill Barton, Newcourt and Matford areas;

- providing opportunities for high quality office development within the City Centre;
 - supporting training and education including a bespoke facility at Monkerton; and,
 - improving, in partnership with others, economic inclusion and productivity, particularly in areas of deprivation such as Newtown/Sidwell Street and Wonford.
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, by making full and efficient use of previously developed land and delivering sustainable urban extensions to the east and south-west.
 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, and that promote vitality and viability; and continue to enhance the Quay and Canal area as a centre for tourism and recreation.
 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:
 - the enhancement of transport infrastructure and services;
 - a step change in the use of sustainable transport; and
 - providing easy access to jobs and community facilities within the urban extensions to the east and south-west.
 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, in order to improve quality of life and reduce social exclusion and the perception of crime.
 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.
- 8.3 There remains, as discussed throughout the appraisal process, an inherent conflict between growth and the protection of the environment. The objectives, as a whole, however, aim to ensure that growth is secured in the most sustainable manner and that, any negative sustainability impacts, such as pollution, noise, and flood risk, are minimised.

- 8.4 It also remains the case that the growth of Exeter, in response to regional development needs, is itself a positive sustainable outcome that compared to dispersal into rural areas, overrides the negative local impact.

Appraisal of Core Strategy policies (see 2010 Report, Section 2 and Appendices 2 and 3)

- 8.5 The revisions to the Core Strategy objectives are reflected in the amendments to the policies. The predicted impact of each policy on each of the sustainability objectives was again assessed, including the significance, likelihood and geographical scale where relevant,
- 8.6 A particularly important amendment is the introduction of measures to mitigate climate change by minimising incremental carbon emissions, managing and adapting to the environmental consequences of past emissions, and reducing existing emissions. Specifically the Core Strategy:
- sets out spatial planning policies which concentrate development in locations expected to be resilient to climate change;
 - seeks to avoid and manage flood risk;
 - seeks to ensure design, layout and building types will prevent summer overheating and minimise carbon emissions;
 - aims to promote and preserve biodiversity and green infrastructure across the City;
 - provides policy guidance on transport, flood risk, low and zero carbon development (including renewable energy) and sustainable construction;
 - links low carbon infrastructure from new development to existing buildings; and
 - identifies measures to reduce non-domestic and transport emissions City wide.
- 8.7 The sustainability of the Core Strategy is further strengthened by the addition of references to the environmental limits of the City, guiding development to the most sustainable locations, focus on the urban area particularly the City centre, and ensuring that infrastructure is in place when needed. The provision of guidance on residential density, housing mix, viability of development, soil and noise, and renewable energy add to the sustainability of the plan.
- 8.8 The Sustainability Appraisal Report shows that the majority of the nineteen Core Strategy policies in the submission draft are likely to have a beneficial effect on the sustainable development of Exeter City.
- 8.9 Positive benefits include: increase in the availability of housing, particularly affordable housing, better connectivity within and between areas, especially with better access to community facilities, enhancement of the economy with increased investment, and measures to minimise air pollution and the adverse effects of climate change.
- 8.10 Potential negative cumulative effects primarily result from the increase in population and consequent increased demand for resources, use of infrastructure and generation of impacts on air, water and soil quality and waste. However, policy guidance on issues such as sustainable transport, pollution and sustainable construction pay particular attention to mitigation to address these matters.

8.11 The process of appraisal has identified some elements of the plan, which could benefit from further consideration:

- noise pollution, water and soil contamination issues from further development
- lack of emphasis on the reduction of carbon emitting vehicles
- 'Designing out crime' at the Quay and Canal Basin Area.

9. Fifth Stage: Publish the Core Strategy for pre submission representations and the Final SA

9.1 The draft submission Core Strategy was published for pre submission representations for eight weeks on 29 July 2010. This was accompanied by the Proposed Final Sustainability Appraisal. Representations were requested by 24 September 2010. Natural England made representations about the SA, and the issues raised were dealt with through amendments to the Core Strategy.

9.2 The Core Strategy and SA were examined during summer 2011. The Inspector found the Core Strategy, with a limited number of changes, to be sound. In relation to the legal requirements, the Inspector stated that Sustainability Appraisal had been carried out and is adequate. In her report the Inspector states, "None of these materially alters the substance of the plan and its policies, nor undermines the sustainability appraisal and participatory processes undertaken"³

10. Final Stage: Monitoring the Implementation of the Core Strategy

10.1 A monitoring framework is set out in the Sustainability Report (Part 1: Appendix 3) to help record how the plan is performing in terms of its sustainability impacts.

10.2 Monitoring will be undertaken for the Local Development Framework. The findings of this monitoring will measure how well the plan contributes to sustainable development, and inform future reviews of the plans and policies.

11. Further information

The supporting documents can be sourced from Forward Planning, Phase 2 - Room 4.30 and/or on the Council's web site:

www.exeter.gov.uk/sustainabilityappraisal

For more information or copies of documents please contact Forward Planning, Exeter City Council, Civic Centre, Paris Street, EXETER, EX1 1NN. Tel: 01392 265250. E-mail: ldf@exeter.gov.uk.

³ <http://www.exeter.gov.uk/index.aspx?articleid=13455> accessed March 2012.