

Mid Devon District Council

Sustainability Appraisal

Local Plan Part 3
(Development management
policies)

Proposed Submission

September 2012

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1 Non technical summary

- 1.1.1. The following non-technical summary has been produced to inform consultees and the general public about the sustainability appraisal process, avoiding the use of technical language.
- 1.1.2. Mid Devon District Council is preparing an additional development plan for the district, which will form part of the district's 'Local Plan'. The latest addition to the Local Plan will be part 3 (referred to as LP3). This document contains development management policies which provide guidance on managing individual development proposals in a way that meets local needs, both economic and social, while protecting the environment. The policies in this document will replace those that remain in the district's existing Adopted Local Plan (2006).

Purpose of the Sustainability Appraisal

- 1.1.3. EU law requires public authorities to assess the impact on the environment when producing a plan or policies. UK regulations require that in addition to assessing the impact on the environment, local planning authorities should also consider the social and economic impact of a plan. Considering these three key elements together is central to assessing the sustainability of a plan.
- 1.1.4. A Sustainability Appraisal is not an exact science. It involves a balance of value judgments about how we manage our impact on the environment. Different groups in society will have different values when thinking about our impact on local surroundings; some may place a high value on the quality of the natural environment, whilst others may seek a stronger economy or facilities for local communities. It is the Council's role to find a balance between these sometimes conflicting goals.
- 1.1.5. This non-technical summary describes the findings of the Sustainability Appraisal of the LP3.

Scoping

- 1.1.6. Before the Council began producing the LP3, it was necessary to carry out a 'scoping stage' in order to gain an understanding of the sustainability challenges the district faces, and the context in which the plan would be written. Section 3 contains an analysis of the plans and programmes that operate at European, national, regional and local level that set the context that the LP3 works within.
- 1.1.7. A profile of Mid Devon was also provided at this stage. It discusses in detail location, physical characteristics, biodiversity, heritage, population, housing, economy, resources and safety and health. Section 3 concludes with identifying the key sustainability challenges to Mid Devon, which need to be considered during the development of policies. These challenges have been highlighted as:
- The need for housing, particularly affordable housing
 - Potential loss of local employment, with increased out-commuting to Exeter and Taunton
 - Small pockets of relative deprivation
 - Traffic congestion and air quality issues in Cullompton and Crediton
 - Measures to adapt to climate change, particularly flooding and building cooling
 - The level of services and employment in smaller rural communities
 - Low use of public transport, walking and cycling and increasing car use
 - Low current biodiversity, and likely future reductions

- Pressure for renewable energy installations
- Future energy supply security and diversity
- Protection of natural resources
- A lack of community engagement
- Building design and construction
- The capacity of essential infrastructure
- Conservation of the area's historic environment
- The reduction, re-use and recycling of waste
- Provision of recreational facilities

Methodology

1.1.8. In order to assess the sustainability impacts of each of the policies of the LP3, Mid Devon has developed a 'framework of indicators', against which each proposal is scored. Within the framework are many objectives against which the impact of each policy is measured. The objectives include:

- Wildlife
- Landscape
- Cultural heritage
- Water
- Land and soils
- Air quality
- Traffic and transport
- Waste
- Climatic factors
- Healthy and safe living environment
- Health care, community services and facilities
- Housing
- Consultation and social deprivation
- Economic growth
- Rural diversification
- Employment
- Retail
- Tourism
- Equalities

1.1.9. The impact of each policy is scored against each objective, giving a positive, neutral, mixed or negative impact. Other impacts, such as the time period within which the impact will be felt, or how the policy interacts with other policies are also discussed. Each policy is given an overall sustainability rating. Commentary is then provided on how the policy was developed, the alternative options considered, the justification for having the policy and mitigation for negative impacts.

The appraisal

1.1.10. The analysis of each policy highlighted the following results:

| | | | | | | |
|--|----------|---------------------------|---------|----------------|---------------------------|----------|
| | Positive | Probability of a positive | Neutral | Some positive, | Probability of a negative | Negative |
|--|----------|---------------------------|---------|----------------|---------------------------|----------|

| | impact (+) | impact (+?) | impact (0) | some negative impacts (+/-) | impact (-?) | impact (-) |
|-----------------------------|------------|-------------|------------|-----------------------------|-------------|------------|
| Policies DM/1 – DM/32 | 21 | 0 | 0 | 9 | 0 | 2 |
| Retained policies BA1 & WI1 | 1 | 0 | 0 | 1 | 0 | 0 |
| Policies Map Changes | 0 | 6 | 13 | 4 | 0 | 0 |

1.1.11. Only two policies were noted as having an outright negative sustainability impact when scored against the framework of indicators. Another 14 policies/changes were noted as having some positive and negative impacts, but taking everything into account the effects of these were felt to balance each other out.

1.1.12. The two policies that were noted as having a negative impact are:

- DM/16 (dwelling sizes)
- DM/21 (employment development outside settlement limits)

1.1.13. Policy DM/16 scored an overall negative result because of the implications it has on the number of dwellings to be built per hectare, and for potential increases that could arise as a result in carbon emissions. However these concerns are offset by the desire to build market houses that are the same size as affordable homes, providing more space for family life, and providing more opportunities for solar gain through larger windows and consideration of orientation. These outcomes have overall benefits for society that outweigh potential negative sustainability concerns.

1.1.14. Policy DM/21 (employment development outside settlement limits) scored negatively against the framework of indicators because it was likely to result in a reduction in the number of people walking or cycling to work, as well as locating new development away from housing, potentially on greenfield sites. However national policy sets the framework which guides proposals for economic growth in the countryside. The policy has to work within this framework, but provides further detail to mitigate further adverse impacts.

1.1.15. On balance the appraisal notes that the LP3 policies will have a positive effect on development across the district. They will work in tandem with the existing Core Strategy and AIDPD policies, which have already been subject to sustainability appraisal, and will work to support the delivery of the strategic policies and allocations set out in those documents.

Monitoring

- 1.1.16. In order to ensure that the policies are delivering their aims effectively, it is necessary to monitor their implementation on an ongoing basis. Mid Devon already produces an Annual Monitoring Report which contains monitoring information that reports on the implementation of the policies of the existing Adopted Local Plan (2006), the Core Strategy, and the Allocations and Infrastructure Development Plan Document. These indicators already cover many of the policy areas of the LP3. Many of the existing indicators will therefore continue to be used in order to monitor the implementation of this new plan, however they will be supported by some new targets. Details of these can be found in Section 7.

2 Background

2.1 The Local Plan

- 2.1.1. Mid Devon District Council is required by law to produce a development plan for the district. Government guidance has stated this document should be referred to as the 'Local Plan'. The Mid Devon Local Plan will be made up of three parts, the first two of which are adopted and in operation:
- Part 1: Core Strategy (adopted 2007)
 - Part 2: Allocations and Infrastructure Development Plan Document (AIDPD, adopted 2010)
- 2.1.2. The Core Strategy includes strategic policies such as targets for housing, employment and retail development. The AIDPD allocates land for development and sets strategic policy on affordable housing and infrastructure provision.
- 2.1.3. The document that is subject to this Sustainability Appraisal forms part three of the Local Plan and provides detailed policies to manage individual development proposals in a way that meets local needs, both economic and social, while protecting the environment. It does not allocate land for development. The policies in this document will replace those that remain in the district's existing Adopted Local Plan (2006).
- 2.1.4. The full title of this element will be 'Local Plan Part 3 (Development management policies)', but for the purpose of the remainder of this document it will simply be referred to as the LP3. For information purposes it should be noted that when the Scoping Report was written LP3 at that time was referred to as the Development Management Development Plan Document (DMDPD). This name has now been superseded.

2.2 Purpose of the Sustainability Appraisal / Strategic Environmental Assessment Report

- 2.2.1. In accordance with the Planning and Compulsory Purchase Act 2004, Development Plan Documents (DPDs) must be subject to Sustainability Appraisal (SA). The SA process incorporates the Strategic Environmental Assessment (SEA) regulations in accordance with European legislation. This involves extending the focus of an SEA, which is concerned with environmental factors, to additionally cover social and economic aspects in accordance with accepted definitions of sustainability.
- 2.2.2. SA assists in promoting sustainable development through integrating sustainability considerations into plan making. It is an iterative, ongoing process and integral to plan making. It considers the effects of the plan on the environment, people and the economy, predicts the effects of reasonable alternatives, proposes measures to mitigate harmful effects, and sets monitoring measures.
- 2.2.3. It should be noted that the SA cannot ensure that development will be absolutely sustainable in all its aspects. It can only show how sustainable the effects of a policy are likely to be and where there are harmful impacts how far they can be mitigated. In some cases, less sustainable development may still have to take place, such as using land to dispose of waste. Also, a policy may have negative environmental impacts but they can be outweighed by positive social and economic aspects that allow it to be regarded as sustainable.

2.2.4. This SA builds on the initial findings set out in the Sustainability Appraisal Scoping Report, which was the first stage in the preparation of an SA for the LP3. It built on previous SA processes used for the Core Strategy and the AIDPD. As set out in Government guidance on applying SA the scoping report involved setting the context and objectives, establishing the baseline and deciding on the scope as follows:

- Identifying other relevant policies, plans and programmes, and sustainability objectives
- Collecting baseline information
- Identifying sustainability issues and problems
- Developing the SA framework
- Consulting on the scope of the SA

2.2.5. The next stage of preparing the sustainability appraisal involves the developing and refining of options and assessing their effects. Government guidance on undertaking a sustainability appraisal defines this stage as including the following aspects:

- Testing the development plan document (DPD) objectives against the sustainability appraisal
- Developing the DPD options
- Predicting the effects of the DPD
- Evaluating the effects of the DPD
- Considering ways of mitigating adverse effects and maximising beneficial effects

2.2.6. The results of applying each stage are set out in detail later in this document. Section 3 'Sustainability Context', sets out the findings of the Scoping Report stage, whilst Section 4 'Sustainability Appraisal Methodology' and Section 5 'Sustainability Appraisal of Local Plan Part 3' set out the process and results of testing the policies and potential options that arose.

2.2.7. This report will accompany the LP3 when it is submitted to the Planning Inspectorate for examination. If any representations are received regarding any significant effects, these may then need to be incorporated into an updated version of the document during which a reappraisal of any changes to the proposed policies will be undertaken. Significant effects of the policies will be monitored in the Annual Monitoring Report. Section 7 details how this will be undertaken.

2.3 Compliance with the Strategic Environmental Assessment Directive and Regulations

2.3.1. The SEA (Strategic Environmental Assessment) Regulations set out certain requirements for reporting the SEA process. The regulations specify that if an integrated appraisal is undertaken (i.e. that the SEA is subsumed within the SA process, as is the case for the LP3) then the sections of the SA report that meet the requirements set out for reporting the SEA process must be clearly signposted. The table below sets out the SEA requirements, and the relevant sections within the SA that demonstrate how they have been carried out.

| The SEA Directive requirements | Section within this SA that meets the requirement |
|---|--|
| Preparation of an environmental report in which likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. | The SA as a whole |
| a) An outline of the contents and main objectives of the plan and the relationship with other relevant plans | Sections 2 and 3 |
| b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme | Section 3 |
| c) The environmental characteristics of areas likely to be significantly affected | Section 3 |
| d) Any existing environmental problems which are relevant to the plan including in particular those relating to any areas of particular environmental importance | Section 3 |
| e) The environmental projection objectives, established at international, community, or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation | Section 3 |
| f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects. | Sections 5 and 6 |
| g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme | Section 5 |
| h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information | Sections 4 and 5 |
| i) A description of the measures envisaged concerning monitoring | Section 7 |
| j) A non-technical summary of the information provided under the above headings | Section 1 |

2.4 Equality Impact Assessment, Habitats Regulations Assessment and rural proofing

- 2.4.1. In addition to this SA, an Equality Impact Assessment (EqIA) and Habitat Regulations Assessment (HRA) have been undertaken. These documents accompany the LP3 during submission to the Planning Inspectorate for examination.
- 2.4.2. The Equality Impact Assessment examined the implications of applying the policies on the protected characteristics as set out by the Equality Act 2010. The Act stipulates that local authorities have a duty to eliminate discrimination and promote equality within service delivery and employment. The equality strands that are protected under the act are referred to as 'protected characteristics' and include:
- Age
 - Disability – including physical disability, mental health
 - Gender reassignment
 - Marriage and civil partnership
 - Pregnancy and maternity
 - Race
 - Religion or belief
 - Sex and sexual orientation
- 2.4.3. Analysis of each of the policies and the changes to the policies map highlighted that 14 of these were likely to have a positive impact on the protected characteristics. 19 were regarded as having only a neutral impact. Two policies, DM/18 (development outside town centres) and DM/32 (planning enforcement) were noted as having a mixed impact on the protected characteristics. These impacts are related to the means of access for people with disabilities for town centre and out of centre employment or retail destinations; and for how the enforcement service will implement the policy giving particular consideration to vulnerable groups. A Local Enforcement Plan will set out how the service will be delivered in greater detail. Further information on the impact of these policies can be found by accessing the Equality Impact Assessment on the Mid Devon District Council website.
- 2.4.4. The habitat regulations require local authorities to undertake an assessment to determine whether proposed policies will have likely significant effects on sites of high environmental importance. Sites to be considered are within the 'Natura 2000' designation, a European classification that includes Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites (e.g. designated wetland areas).
- 2.4.5. There are no Natura 2000 sites within Mid Devon, but there are six SACs within 5km of the district's boundary. These have been subject to screening in accordance with the regulations. No significant effects have been highlighted, and therefore an Appropriate Assessment is not required. Please see the HRA for full details of the findings.
- 2.4.6. Guidance from the Planning Advisory Service states that planning authorities may also consider the impact on rural areas when developing a plan. This is called 'rural proofing', and is considered particularly important in areas where urban issues can dominate, or where the rural population represents only a small proportion of the total. Mid Devon is a very rural district, where over half of the population live within the rural hinterland, rather than in the four principal towns. The development proposals within the plan are as much focused on the impact on rural communities, as to those affecting the larger settlements. Given this

fact, this SA already examines the rural implications of the plan, and a separate 'rural proofing' exercise has not been undertaken.

3 Sustainability context – findings from the Scoping Report

3.1 Review of relevant plans and programmes

- 3.1.1. The first part of the scoping report consisted of an examination of other relevant plans and programmes so that relevant sustainability objectives could be brought into the sustainability appraisal framework. This ensured that the appraisal took those objectives into account when assessing the sustainability of policies and proposals in the LP3.
- 3.1.2. The following tables list the plans or programmes that were identified as being relevant to the Mid Devon area. This included international, European, national, county and local plans and strategies. The title of each plan or programme is set out and is accompanied by a statement detailing the implications for the LP3 (or DMDPD as it was referred to when the Scoping Report was written).
- 3.1.3. There have been a number of significant changes to national planning policy since the Scoping Report was written that impact on the sustainability implications highlighted above. In March 2012 the government introduced the National Planning Policy Framework (NPPF). This framework replaced almost all existing Planning Policy Statements (PPSs) and Planning Policy Guidance Notes (PPGs), reducing these into one fifty page document (though some supporting practice guides remain in place). Where these documents have been superseded, or other circumstances have changed, additional commentary has been added to the original table stating any new or additional sustainability considerations that have been taken into account.

| INTERNATIONAL PLANS AND PROGRAMMES | IMPLICATIONS FOR THE MANAGING DEVELOPMENT PLAN DOCUMENT(DMDPD) |
|---|--|
| World summit on Sustainable Development Johannesburg 2002 | The DMDPD should support the sustainability aims of Agenda 21 at the local level by reducing impacts on the environment and increasing the use of renewable energy sources. |
| European Sustainable Development Strategy May 2001 | The DMDPD should support the EU Sixth Environmental Action Programme by promoting clean energy, addressing public health, reducing exclusion, responding to issues of aging, promoting responsible use of resources and promoting accessibility. |
| European Spatial Development Perspective (ESDP) May 1999 | The DMDPD will need to recognise the need to achieve social and economic cohesion and the need to foster the conservation and management of historical assets and the natural environment. |
| Bern Convention on the Conservation of European Wildlife and Natural Habitats 1979 | The DMDPD must have regard for the conservation of endangered and vulnerable species in the district. It should ensure that its policies are not in conflict with the protection and conservation of these species and their habitats. |

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| Ramsar Convention on Wetlands of International Importance, especially as Wildfowl Habitat 1971 | The DMDPD must account for areas within Mid Devon that are designated wetland sites. Wetlands must be included in land use planning and their wise use promoted. |
| European Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora (The Habitats Directive) 1992 | The DMDPD will need to maintain or restore designated natural habitat types, and habitats of designated species; avoid degrading or destroying SACs and preserve linear structures (rivers/ streams/ hedgerows/ field boundaries etc) that enable movement and migration of species. |
| European Directive on Conservation of Wild Birds 1979 | The DMDPD will need to take measures to preserve, maintain or re-establish a sufficient diversity and area of habitat for wild birds. |
| European Biodiversity Strategy (EBS) 1998 | The DMDPD will need to address the <i>in situ</i> (i.e. within the natural environment) conservation of species and ecosystems. |
| European Water Framework Directive 2000 | The Directive highlights the need to protect ground and surface water from incidental, as well as accidental pollution. |
| European Directive on Ambient Air Quality Assessment and Management 1996 | Recognition of need to be aware that the location of development can have a direct effect on improving air quality. |
| Kyoto Climate Change Protocol 1997 | Protocol provides a clear recognition of the importance of minimising greenhouse gas emissions and the need for emission considerations to feature in policy making. |
| European Convention on the Protection of the Archaeological Heritage (Revised), Valetta, 1992 | The DMDPD will need to recognise the need to protect archaeological sites and areas under the Valetta Convention |
| Convention concerning the Protection of the World Cultural and Natural Heritage 1972 (UNESCO) | The DMDPD will need to recognise the effect of the convention in relation to the protection of Mid Devon's cultural and natural heritage. This is reflected in national planning guidance. |

| NATIONAL PLANS AND PROGRAMMES | IMPLICATIONS FOR THE MANAGING DEVELOPMENT PLAN DOCUMENT(DMDPD) |
|--|---|
| UK Government Sustainable Development Strategy: Securing the Future March 2005 | The DMDPD will need to address the five principles via its policies but it must be recognised that a policy which meets some of the principles may conflict with others. The two most relevant principles relate to the environment and the economy. |
| The UK Climate Change Programme (DEFRA 2006) | The DMDPD will have to take account of the implications for the production of greenhouses gases as a result of development management decisions |
| Environment Agency (2010) Water Resources for the Future – A Strategy for England and Wales | The DMDPD will have to address the impact of its policies on the water environment and the efficient use of a scarce resource. |
| DEFRA (2009) Safeguarding Our Soils A Strategy for England | The DMDPD will have to ensure that the impact on soils arising from the application of its policies is addressed so as to reduce the impact of development on the soil resource. |
| Planning Policy Statement 1: Delivering Sustainable Development | <p>Through the implementation of its policies the DMDPD will need to assist in the delivery of sustainable development and address climate change through an integrated approach to deliver high quality environments that meet people's needs.</p> <p>NOTE: Superseded by the NPPF. Delivering sustainable development remains the core purpose of the planning system. The new framework includes a 'presumption in favour' of sustainable development requiring local authorities to positively meet objectively assessed needs of their areas, unless other policies or material considerations indicate otherwise.</p> |
| Planning and Climate Change Supplement to Planning Policy Statement 1 | <p>The policy framework established by the DMDPD will need to ensure the delivery of energy efficient development which is resilient to climate change and minimises negative impacts on biodiversity that is supported by a sustainable transport network.</p> <p>NOTE: Superseded by the NPPF. A core planning principle of the new framework is to support the transition to a low carbon future in a changing climate, reuse existing resources and encourage the use of renewable energy resources.</p> |
| Planning Policy Statement 3: Housing | The DMDPD will need to assist meeting the social need for housing in the area in ways that will create sustainable communities. This will need incorporate high quality design and deliver the right types of housing in the right locations. |

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| | <p>NOTE: Superseded by the NPPF. This states that good design is a key aspect of sustainable development and is indivisible from good planning.</p> |
| <p>Policy Planning Statement 4: Planning for Sustainable Economic Growth</p> | <p>The DMDPD will need to have regard to the requirement to deliver economic development in a sustainable form, the need to protect the viability and vitality of town centres and the need to promote thriving rural communities. These social and economic priorities will need to be balanced against any environmental impacts.</p> <p>NOTE: Superseded by the NPPF. The planning system should operate to encourage sustainable economic growth, and the local plan should proactively meet the development needs of business.</p> |
| <p>Planning Policy Statement 5: Planning for the Historic Environment</p> | <p>The DMDPD will need to recognise the importance of conserving and recording heritage assets as well as ensuring their continued viability through appropriate uses. This has sustainability benefits through the re-use of existing resources and preservation of social context.</p> <p>NOTE: Superseded by the NPPF. Local authorities should set out a positive strategy for the conservation and enjoyment of the historic environment. Putting heritage assets to viable uses consistent with their conservation remains a priority.</p> |
| <p>Planning Policy Statement 7: Sustainable Development in Rural Areas (2004)</p> | <p>The DMDPD will need to recognise the need to maintain viable rural communities and associated activities whilst protecting environmental resources and ensuring that the impacts of necessary development, including renewable energy generation, on the rural environment are minimised.</p> <p>NOTE: Superseded by the NPPF. Supporting a prosperous rural economy is a priority, including the sustainable growth and expansion of all types of businesses and enterprise in rural areas, and the retention and development of local services and community facilities in villages.</p> |
| <p>Policy Planning Guidance Note 8: Telecommunications</p> | <p>The DMDPD will need to have regard to the protection of landscapes particularly those within the AONB, and nature conservation sites as well as the social benefits of the provision of mobile phone services, particularly for rural communities.</p> <p>NOTE: Superseded by the NPPF. Advanced, high quality communications infrastructure is essential for sustainable economic growth. Communications development within AONBs should only be permitted where it can be demonstrated that it is in the public interest, giving consideration to the need for the development, the cost of developing elsewhere and the detrimental effect on the environment and landscape.</p> |

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| <p>Planning Policy Statement 9: Biodiversity and Geological Conservation (2005)</p> | <p>The DMDPD will need to have regard to the requirement to conserve, enhance and restore the diversity of England's wildlife and geology in relation to new development. This relates to both specific sites and wider biodiversity. Of particular note is the guidance relating to the mitigation of impact of development on the natural environment.</p> <p>NOTE: Superseded by the NPPF. The planning system should contribute and enhance the natural and local environment. The LP3 will need to protect and enhance valued landscapes, recognise the benefits of ecosystem services and minimise impacts on biodiversity, providing net gains where possible.</p> |
| <p>Planning Policy Statement 10: Planning for Sustainable Waste Management.</p> | <p>The DMDPD will need to address the requirement for sustainable waste management. In particular it will have to help ensure that facilities to allow the collection and treatment of waste are in place whilst ensuring that essential facilities are located appropriately and any environmental impacts are minimised.</p> <p>NOTE: To be superseded by the NPPF, but remains in force until the future publication of the National Waste Management Plan.</p> |
| <p>Planning Policy Statement 12: Local Spatial Planning</p> | <p>The council will need to ensure the full involvement of communities in the preparation of the DMDPD so as to create a framework for investment and that promotes economic, environmental and social well being for the area, creates a positive framework for action on climate change and contributes to the achievement of sustainable development.</p> <p>NOTE: Superseded by the NPPF. The NPPF requires early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses. Strategic policies should deliver homes, commercial development, community infrastructure and climate change mitigation. Local authorities have a 'duty to cooperate' on planning issues that cross administrative boundaries.</p> |
| <p>Policy Planning Guidance Note 13: Transport</p> | <p>Policies in the DMDPD will need assist in the reduction of the need to travel, particularly by car, and promote the utilisation of more sustainable forms of transport. This will entail managing the form of settlement growth including the siting of facilities in highly accessible locations particularly in rural areas. This will entail the managing of parking provision. Development should generally be accessible by a range of transport options but this will be less achievable in rural areas.</p> <p>NOTE: Superseded by the NPPF. Transport policies should play a role in facilitating sustainable development and also contribute to wider sustainability and health objectives. Smarter use of technologies can reduce the need to travel. Transport system should be balanced in favour of sustainable modes of transport, but recognise that solutions will vary from urban to rural areas.</p> |

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| Planning Policy Guidance Note 17: Planning for Open Space, Sport and Recreation | <p>The DMDPD will need to assist in the delivery of an accessible network of public open spaces and built facilities to meet the recreation needs of Mid Devon's communities.</p> <p>NOTE: Superseded by the NPPF. Planning should ensure access to high quality open spaces and opportunities for sport and recreation.</p> |
| Planning Policy Statement 22: Renewable Energy | <p>The DMDPD will need to promote the development of all types of alternative energy resources in appropriate locations and formats. Although sustainable in their own right the potential environmental consequences of some forms of renewable energy will need to be considered.</p> <p>NOTE: Superseded by the NPPF. Local authorities are required to have a positive strategy to promote energy from renewable and low carbon sources; design policies to maximise renewable and low carbon development while ensuring adverse impacts are addressed.</p> |
| Planning Policy Statement 23: Planning and Pollution Control | <p>The DMDPD should take account of the risks posed by potentially polluting land uses and the risks of development on contaminated land. Potential impacts on all parts of the environment will need to be considered from pollution sources.</p> <p>NOTE: Superseded by the NPPF. The planning system should prevent new and existing development from contributing to or being put at unacceptable risk from pollution.</p> |
| Planning Policy Guidance 24: Planning and Noise | <p>The DMDPD will need to take account of the potential impact of noise on social, economic and environmental issues. The impact of noise can be considerable in very rural areas like Mid Devon.</p> <p>NOTE: Superseded by the NPPF. The planning system should prevent new and existing development from contributing to or being put at unacceptable risk from pollution (which includes noise pollution).</p> |
| Planning Policy Statement 25: Development and Flood Risk | <p>Flooding is addressed by a policy in the adopted core strategy so will not be a matter for the DMDPD.</p> <p>NOTE1: Superseded by the NPPF. As previously, flooding is already addressed in a policy in the adopted core strategy. The practice guide that accompanies PPS25 is also still currently in place, whilst the NPPF was accompanied by a 'Technical Guidance to the National Planning Policy Framework' document that set out the sequential and exception test as an interim measure until the practice guides could be reviewed.</p> <p>NOTE2: The Environment Agency advised that whilst 'flood risk' is currently addressed by existing policies within the Core Strategy, surface water flooding is also problematic and should be added to the list of sustainability issues for the district.</p> |

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| Heritage Protection Bill | <p>The protection of heritage is dealt with under a policy in the Core Strategy. In considering policies for the DMDPD the protection of the historic environment will need to be considered.</p> <p>NOTE: The bill was dropped from the legislative programme in 2009. English Heritage state that many of the reform principles were included in PPS5 and have since been transferred to the NPPF. This particularly includes taking a unified approach to protecting heritage assets.</p> |
| English Heritage Strategy 2005-2010 | <p>The protection of heritage is dealt with under a policy in the Core Strategy. In considering policies for the DMDPD the protection and enhancement of the historic environment will need to be considered.</p> <p>NOTE: English Heritage has produced an updated strategy for 2011-15 outlining how they will work to protect and champion England's heritage, including continuing a reform programme of heritage legislation.</p> |
| Working with the grain of nature: a biodiversity strategy for England 2002 (DEFRA) | <p>The protection of biodiversity is dealt with under a policy in the Core Strategy. In considering policies for the DMDPD the protection and enhancement of the natural environment will need to be considered.</p> <p>NOTE: A new Biodiversity Strategy for England 2020 has been produced, building on proposals set out in the Natural Environment White Paper. These set out requirements to have Local Nature Partnerships and include provisions for biodiversity offsetting.</p> |
| Natural Environment and Rural Communities Act (NERC) 2006 | <p>The protection of biodiversity is dealt with under a policy in the Core Strategy. In considering policies for the DMDPD the protection and enhancement of the natural environment will need to be considered.</p> |
| Lifetime Homes, Lifetime Neighbourhoods | <p>The DMDPD will need to take account of the social pressures arising from an aging society.</p> |
| Countryside and Rights of Way Act 2000 | <p>The act imposes a duty on public bodies to take reasonable steps to further the conservation and enhancement of special features of SSSIs. The impact of the proposed policies of the DMDPD will need to be assessed.</p> |
| Conservation of Habitats and Species Regulations 2010 | <p>The DMDPD will need to have regard to European protected sites, assessing the impact of plans and projects on them prior to any grant of planning permission.</p> |

| REGIONAL PLANS AND PROGRAMMES | IMPLICATIONS FOR THE MANAGING DEVELOPMENT PLAN DOCUMENT(DMDPD) |
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| South West River Basin Management Plan | This plan focuses on the protection, improvement and sustainable use of the water environment, and sets in place the means of implementing the requirements of the Water Framework Directive. The LP3 needs to take account of the priorities in the RBMP when drafting policy proposals that have an impact on water resources. |

| DEVON PLANS AND PROGRAMMES | IMPLICATIONS FOR THE MANAGING DEVELOPMENT PLAN DOCUMENT(DMDPD) |
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| Devon Structure Plan to 2016 (2004) | <p>The strategic framework and vision for Mid Devon are now supplied by the adopted Core Strategy. The content of policies related to matters covered by the DMDPD will need to be addressed. In particular the seven high level policy aims will need to be taken into account.</p> <p>NOTE: This document remains in place, though following the introduction of the NPPF, it now contains little weight.</p> |
| Devon County Minerals Local Plan (2004) | The DMDPD will not contain policies or proposals related to these matters. |
| Devon County Waste Local Plan (2006) | Allocations and development associated with waste are not a matter for the DMDPD except in so far as individual development proposals will deal with their own waste. Policies will therefore need to be considered in the light of any implications for waste. |
| Devon County Council Emerging Waste Development Plan Document | <p>Take into account the Waste Development Documents' aims and objectives when they emerge.</p> <p>NOTE: A draft of this document was available for consultation between June-August 2012. It sets the county-wide strategy for waste management and draft site options for different types of future waste development. This document is now referred to as the Devon Waste Plan.</p> |
| Devon County Council's Emerging Minerals Core Strategy | <p>Allocations and development associated with minerals are not a matter for the DMDPD except in so far as individual development proposals will utilise particular materials or be able to use recycled material.</p> <p>NOTE: An Options Consultation Paper was released in 2011, and is currently working on the next stage of producing what is</p> |

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| | now to be known as the Devon Minerals Plan 2011-2031. |
| The Nature of Devon – A Biodiversity and Geodiversity Action Plan, revised 2005. | The DMDPD should aim to protect BAP habitat and species by advocating that new infrastructure be sensitively sited and biodiversity enhancements be promoted. The SEA should seek for the DMDPD to primarily avoid, and secondarily minimise and compensate for, any significant negative effects upon biodiversity. |
| A Warm Response – Our Climate Change Response (Devon County Council's Climate Change programme). | The DMDPD must take climate change into account. Therefore its policies must have regard to their carbon implications and any implications for weather hazards. Flooding is already dealt with under a policy in the Core Strategy. |
| Devon Community Strategy | Policies in the DMDPD will need to recognise the rurality of Devon, the need to protect service centres and the need to accommodate growth whilst conserving local distinctiveness. |
| Blackdown Hills AONB Management Plan | Protecting the special qualities of the AONB landscape is dealt with under a policy in the Core Strategy, but any policies with implications for the AONB will need to address any effects on its special landscape. |

| MID DEVON PLANS AND PROGRAMMES | IMPLICATIONS FOR THE MANAGING DEVELOPMENT PLAN DOCUMENT(DMDPD) |
|--|---|
| Mid Devon Corporate Plan 2012-2015 | The focus of the plan is on improving services, prioritising spending and setting out the actions and targets that must be achieved to deliver strategic objectives. Key objectives that relate to planning and which the Local Plan will have an input on achieving include 'thriving economy', 'better homes' and 'caring for the environment'. |
| Mid Devon Local Plan First Alteration (adopted 2006) | As the Local Plan is now largely superseded it will not have any significant implications for the DMDPD |
| Mid Devon Core Strategy adopted 2007 | The SA should seek for the DMDPD to primarily avoid, and secondarily minimise and compensate for, any significant negative effects on the community, in social and economic terms, or the environment. |
| Allocations and Infrastructure Development Plan Document (adopted | Due to the compartmentalised nature of the Local Development Framework the overall vision and objectives are contained in the Core Strategy which sets a context for the DMDPD. The AIDPD sets site allocations, rather than setting specific |

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| 2010) | objectives that need to be taken into account. |
| A Sustainable Community Strategy for Mid Devon 2010 – 2015 (2006) | The core strategy and the AIDPD address most of the issues identified by the community strategy. The DMDPD will need to ensure that its policies address the relevant key area of protecting the environment. |
| A Community Housing Strategy for Mid Devon 2005-2010 | The core strategy and the AIDPD address the need to provide affordable homes. The DMDPD will need to ensure that its policies address the need to ensure homes are sustainable and energy efficient. NOTE: A refreshed version of the document taking in the period 2010-15 has now been produced. |
| Mid Devon Open Space and Play Area Strategy (2007) | The DMDPD will be including policies on public open space so it will be essential that it has regard to this strategy. In particular it will need to ensure that the local people's need for open space is met in ways that ensure good access, provide a diverse range of facilities and enhance people's lives. |
| Draft Green Infrastructure Plan (GIP) | The final version of this document will be published later in 2012. It sets out how green infrastructure has multiple benefits for biodiversity, climate change, sustainable development, low carbon society, and health and wellbeing. The document maps green infrastructure across the district. The LP3 will need to take account of the priorities within the GIP. |

3.2 Description of the area's baseline characteristics and future changes

- 3.2.1. The next part of the scoping report collated baseline information about Mid Devon. This provided the baseline for assessing any effects of a policy or proposal on the district. The baseline assessment contains comparisons to other areas so that issues or problems can be identified. The baseline assessment also contains predictions of how the various factors will progress into the future based on current expected development. The effects of any policies or proposals on these expectations can then be assessed as part of the SA. Where more up-to-date data has been made available since the scoping report was produced, particularly as a result of the 2011 census, the text has been amended to incorporate this. It is worth noting that so far the only information that has been released by the 2011 census relates to population. The remaining information is being released later in 2012 and in 2013.

Location

- 3.2.2. Mid Devon is an inland area in the South West of England, lying roughly equidistant between the Bristol and English Channel coasts. The significant urban areas of Exeter (population 113,000) and Taunton (61,000) are just beyond the southern and eastern boundaries of the District respectively. Major east – west lines of communication run through the district, including the M5, A361, A30 and the Great Western Mainline Railway.

Physical Characteristics

- 3.2.3. The district covers 913 square kilometres. Its landscape is characterised by green rounded hills of pasture and woodland cut through by steep sided river valleys with a maze of high hedged lanes giving rise to occasional panoramic views. The red, fertile soils of much of the area provide a distinctive backdrop. The majority of Mid Devon's settlements are nestled within the folds of this landscape, with many small historic settlements containing thatched cottages and ancient churches. The mild, damp climate is typical of an inland area within the south west.
- 3.2.4. Most of the district drains southwards, with the Culm, Lowman, Exe, Creedy and Yeo rivers flowing in steep sided valleys with occasionally wide floodplains both agricultural and urban in nature, converging and flowing through Exeter to the English Channel. The river Taw, in contrast, flows north west out of the District, reaching the Bristol Channel at Barnstaple. These valleys provide beautiful, often dramatic features within the landscape, and usually important corridors of movement. With generally good or excellent water quality, they are often important wildlife habitats. However, the flat valley floors are subject to periodic flooding events, which can have costly implications for residents and the local economy and are likely to increase with the effects of climate change. This has implications for the market towns of the district which have typically evolved as riverside settlements.

Biodiversity

- 3.2.5. Devon's great variation in geology and landform encourages considerable biodiversity. Of 34 species only found in the UK, 16 can be found in Devon. Three of these are believed to be found nowhere else. Within Mid Devon there are 12 Sites of Special Scientific Interest (SSSI), more than 200 county wildlife sites and 12 different priority habitats including grassland, heathland, woodland and marsh.
- 3.2.6. Changes in wildlife populations and habitat have occurred throughout the last century and show a general trend of decline. The main threats to biodiversity include environmental pollution, land use change, fragmentation and invasive species introduction. These pressures are likely to continue and biodiversity may also be affected by climate change.

Heritage

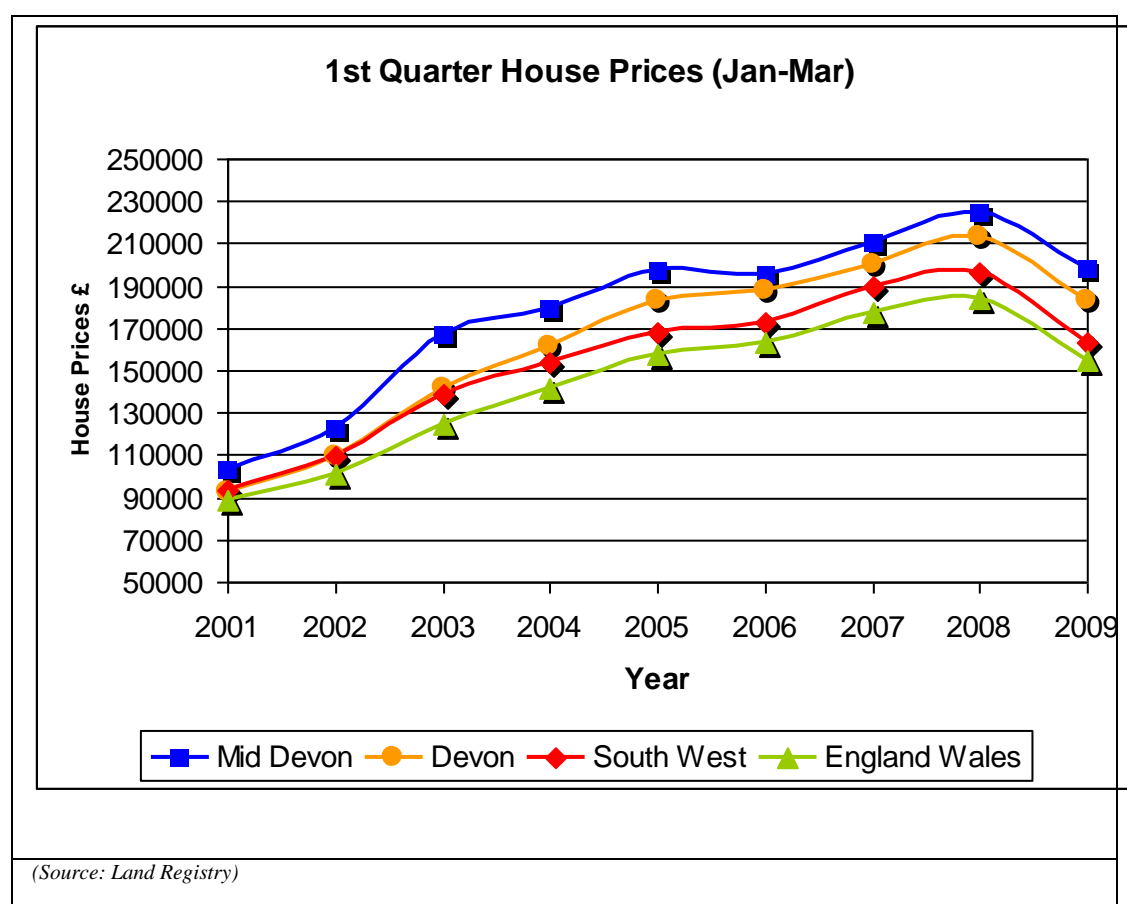
- 3.2.7. This environmental richness is enhanced by the historic and built environment, with approximately 2500 listed buildings, 50 Conservation Areas and 49 Scheduled Monuments within its area. In addition, there is a wide range of archaeological remains which are not scheduled.

Population and Housing

- 3.2.8. Early releases from the 2011 census puts the Mid Devon population at 77,800, which gives an average population density of less than one person per hectare. There are three main market towns: Tiverton (pop. 21,800), Cullompton (pop. 8,800) and Crediton (pop. 7,700), with a lesser role for Bampton (pop. 1,800). Tiverton is roughly central to the district, located about 11km (7 miles) from Junction 27 of the M5 and the Tiverton Parkway mainline railway station at Sampford Peverell. The M5 passes through Cullompton on its eastern side, with Junction 28 providing direct access to the town and the A373 running east towards Honiton. Crediton is the most westerly town in Mid Devon, about 13km (8 miles) from Exeter. However, almost half of residents live outside these three towns, all in

settlements below 3,000 population. There are 21 villages defined as settlements suitable for very limited growth, but many more small villages and hamlets throughout the district.

- 3.2.9. Mid Devon's population has grown considerably since 1981, when it was 58,600. Almost all of this growth has arisen because more people are moving into the District than are moving out (Net In-Migration). There is an expectation of continued demand for new housing in Mid Devon in the longer term.
- 3.2.10. As set out in the table below Mid Devon's house prices are significantly above the English average. Also, studies on behalf of the Council have shown that there is a considerable shortage of affordable housing. South West house prices have risen substantially in the last 22 years from about £33,000 in 1983 to almost £195,500 in 2005 (an increase of 490% in 22 years which is a higher rate of growth than England as a whole). However, local incomes have failed to keep pace with this increase. A key consequence of this has been that the South West has become the least affordable region for house buyers in the UK. It is likely that a mismatch between the overall supply and demand for housing is the root cause, but other issues, such as easy mortgage availability, contributed to steep house price rises. As shown in the table below there is now downward pressure on house prices but reduced mortgage availability means that affordability is still poor in Mid Devon



- 3.2.11. Growth in the rural areas has been considerable, particularly Willand, which has virtually doubled its population in that time, whilst Cullompton has seen a relatively high growth rate for its size. The following table sets out a summary of housing completions and population growth in Mid Devon 1981 – 2001:

| | Housing completions | | Population growth | |
|-------------|---------------------|------------|-------------------|------------|
| Location | Annual Rate | Proportion | Annual rate | Proportion |
| Rural areas | 159 | 43% | 192 | 38% |
| Tiverton | 78 | 21% | 85 | 17% |
| Cullompton | 63 | 17% | 137 | 27% |
| Willand | 34 | 9% | 60 | 12% |
| Crediton | 33 | 9% | 27 | 5% |
| Total | 370 | 100% | 501 | 100% |

Economy

- 3.2.12. The nearby city of Exeter exerts an influence over the Mid Devon economy, with Crediton and Cullompton, the most southern rural wards showing high levels of out-commuting to Exeter. Within Mid Devon, Tiverton and Crediton have their own discernible “catchment areas” covering nearby rural wards. On the other hand, Cullompton’s economic influence is less apparent. All three main towns show a reduction in people living and working in the same town over time (1991 to 2001), but with Tiverton remaining the most self-contained. (Tiverton from 77% to 68%; Crediton 52% to 49% and Cullompton 47% to 43%).
- 3.2.13. A similar pattern of activity and movement can be discerned for retail activity. The 2012 Retail Study shows that Tiverton is the largest and most successful town centre in Mid Devon, with a comparatively wide catchment. Cullompton town centre had had to cope with change since the last retail study was undertaken in 2004, and there has been a significant increase in vacant units. Crediton has also experienced significant change in its retail environment in recent years, but this does not appear to have affected convenience goods stores in the town centre and there have not been dramatic changes in other retail sectors in the centre. Trends have shown that national retailers are seeking to concentrate in larger towns, particularly nearby Exeter and Taunton.
- 3.2.14. Working at home is increasing in the district. In 1981 and 1991 12% worked at home but this significantly increased to 17% by 2001. It is likely that this trend will continue and may accelerate with the expansion of broadband and increased travel costs. The proportion of home workers in the rural wards is highest, with 20%.
- 3.2.15. Manufacturing is particularly important in Mid Devon accounting for 22% of jobs compared to 10% in the Exeter sub-region (2001 figures). In the district there continues to be a large number of employees in agriculture and forestry and with the M5 route through Mid Devon, land transport is a major sector. National trends generally show a continued decline in these sectors, a potential threat to employment in Mid Devon.
- 3.2.16. Following the completion of a number of large food retailing stores in the three main towns of the district, the leakage of main food shopping to other sub-regional centres has been reduced. This has been most prominently felt in Crediton. Cullompton has also seen a greater retention of main food shopping trips; however other convenience stores within the town have since closed.

- 3.2.17. Small and very small businesses are important to the local economy, with large and growing numbers of businesses employing less than 10 people, particularly in rural areas. Mid Devon shows a high rate of self-employment.

Resources

- 3.2.18. The Government's policy is to minimise the development of greenfield land, and to promote "brownfield" (previously developed land) for redevelopment (*NB. This remains government policy as stated in the new NPPF*). Historically, some 25% of Mid Devon's housing development has been on previously developed land. However, this has increased dramatically and stood at 47% in 2008-09. This trend is not likely to continue as previously developed land is principally a finite resource.
- 3.2.19. Energy is a crucial consideration in the functioning of the economy, and one area of concern is the future of non – renewable sources of energy, particularly oil. Oil is the world's key non-renewable resource, which currently provides 40% of the world energy use and in particular over 90% of world transport energy. Since 1981 oil from existing reserves has been used faster than new sources have been found, meaning that known reserves have been falling. The gap between growing consumption and shrinking discovery continues to widen; oil is now being consumed four times faster than it is being discovered.
- 3.2.20. Worldwide demand for oil is increasing with economic growth. At some stage, the level of production will fall below the level of demand for oil, leading to increased prices. This could occur within the period of the Local Development Framework (i.e. before 2026). Travel is the fastest growing energy use sector. Increased prices will make travel increasingly expensive. The implication is that living in more remote areas will become more expensive. Natural gas is another non-renewable energy source which may be increasing in importance. It too is subject to uncertainty of supply.
- 3.2.21. A continued growth in renewable energy production would both help ameliorate these trends, and also may be encouraged by higher energy prices. Renewable energy is forecast to provide an increased proportion of total energy production. Another trend will be increased energy efficiency in building construction with a growing need for retrospective action to increase the efficiency of existing development.
- 3.2.22. Public finance will be necessary for more local investment in such non-profit making infrastructure as transport, affordable housing, education and health, unless these resources can be "levered" from private sources through mechanisms such as planning obligations. Forecasting the availability of public finance is subject to uncertainties arising from economic performance and political changes. The Government has recently undertaken a spending review which proposes significant decreases in public expenditure on a broad range of public services.
- 3.2.23. Private finance will be necessary for the development of new market housing and employment growth. The availability of private finance will depend crucially on economic performance. Against a backdrop of a worsening crisis in the Eurozone the Bank of England has cut the UK growth forecast for 2012 from 1.25%, set in April 2012, and now believes the 'bounce back' in 2013 will be weaker than previously anticipated.

Transport

- 3.2.24. Car use and ownership in the UK has increased considerably in the past 30 years. In Mid Devon there has been a 6% increase in households who own more than one car from 1991

to 2001. Conversely, 17% of households in Mid Devon do not own a car. Research carried out on behalf of the Department of Communities and Local Government in 2007 forecast an increase of approximately 18% in car ownership between 2001 and 2026 for the UK.

- 3.2.25. Mid Devon is rural in nature and has a high dependency on the car. Most residents do not use public transport frequently. Major rural roads in Devon have seen a 49% increase in traffic between 1986 and 1999. This is a very high growth rate compared with the 31% growth in England and Wales, and 19% growth in Exeter and Barnstaple. The centralisation of services and greater willingness to travel to find work are partly responsible. Despite the increase in traffic, the accident record has shown considerable improvement, with a 7% reduction in injurious accidents between 1990 and 2001. Within Mid Devon, the reduction has been a more dramatic 23%.
- 3.2.26. Despite the improving technology in energy efficiency, the fast growth of car use on the road will have an impact on air quality and climate change. Increases in traffic volume will also have an indirect effect on human health as air quality deteriorates. More cars on the road also imply a greater likelihood of traffic congestion. Unless cars move to renewable energy sources, demand for non-renewable energy, particularly oil, will continue to rise.
- 3.2.27. Crediton was declared an Air Quality Management Area (AQMA) in October 2004 as a result of an excess level of Nitrogen Dioxide and Particulates. Cullompton was also declared an AQMA in 2006 due to high levels of Nitrogen Dioxide. These are likely to be caused by traffic volume, congestion and the 'canyon' like effects of buildings causing poor dispersion.

Safety and Health

- 3.2.28. Mid Devon is an area of low crime incidence. Data for 2000 to 2001 indicates that the proportion of the population suffering violent crime, sexual violence, robbery, burglary and motor vehicle thefts are all below the national average. However, there will need to be consideration of policy impacts on crime, disorder and anti-social behaviour.
- 3.2.29. Mid Devon has a healthier population than the national average. 7.7% of the population considered themselves to be in less than good health in 2001 compared with 9.2% in England and Wales. This self-assessment is reflected in other data, where Mid Devon Primary Care Trust (which covers a wider area than Mid Devon District Council) shows lower death rates than the country as a whole (86% of the England figure, after taking account of age differences) and consequently higher life expectancy by about 2 years (77.1 years for men and 82.6 years for women). Death rates from a range of illnesses tend to be lower within Mid Devon.
- 3.2.30. One issue of current concern is the impact of reduced physical activity and higher sugar and fat intakes. 57.9% of adults in England were classified as being overweight, while the equivalent figure for Mid Devon was 61.8%. Indications are that this is an increasing problem. This will have an increasing effect on the overall health of Mid Devon residents.
- 3.2.31. The Office of National Statistics has published updated English Indices of Multiple Deprivation (IMD) 2010. These take into account seven 'domains' of deprivation: income, employment, health and disability, education, skills and training, barriers to housing and services, crime; and living environment.
- 3.2.32. The average IMD ranking for Mid Devon is above the 50% midpoint ranking of 16241, standing at 17141. The IMD are divided into small geographical areas called Lower Layer Super Output Areas (LSOAs) and these show considerable variation across the district,

especially within the towns. Out of 43 LSOAs for Mid Devon, the six most deprived are in Tiverton town.

3.3 Key sustainability issues

3.3.1. The scoping report identified a number of sustainability issues and problems, many of which are already known from work on the Core Strategy and the AIDPD. Others were identified from the baseline information and from relevant plans and programmes. These have been taken into account in the sustainability appraisal objectives when assessing the LP3. The following sustainability issues and problems were identified as being of particular importance to Mid Devon:

- The need for housing, particularly affordable housing, in the most sustainable locations
- Potential loss of local employment, with increased out-commuting to Exeter and Taunton
- Small pockets of relative deprivation
- Traffic congestion and air quality issues in Cullompton and Crediton
- Measures to mitigate and adapt to climate change, particularly flooding and building cooling (in particular to take account of all sources of flooding including that from surface water runoff)
- The level of services and employment in smaller rural communities
- Low use of public transport, walking and cycling and increasing car use
- Low current biodiversity, and likely future reductions
- Pressure for renewable energy installations
- Future energy supply security and diversity

3.3.2. Following the review of relevant plans and programmes it is considered that the following are also sustainability issues and problems that should also be taken into account:

- The protection of natural resources
- A lack of community engagement
- Building design and construction
- The capacity of essential infrastructure
- Conservation of the area's historic environment
- The reduction, re-use and recycling of waste
- Provision of recreation facilities

3.3.3. The Sustainable Community Strategy (2010-2015) also highlighted a number of key issues for the district. The five key priorities are:

- Meeting housing needs
- Building the local economy
- Supporting stronger, healthier and safer communities
- Improving access to local services
- Protecting the environment

3.3.4. These issues reflect a number of the key sustainability issues highlighted above. The policies of the LP3 reflect these priorities, putting in place measures to address the concerns, and provide long-lasting solutions to local sustainability challenges.

3.4 Scoping Report consultation

- 3.4.1. The Sustainability Appraisal Scoping Report was made available for consultation in December 2010. Three national organisations are statutory consultees - the Environment Agency, English Heritage and Natural England. All three were invited to comment on the scope of the report.
- 3.4.2. The Environment Agency responded with a number of recommendations that have been factored into the methodology for this Sustainability Appraisal. These include:
- Taking into account all sources of flooding including that from surface water runoff (this has been included within the list of district-wide sustainability issues set out above in Section 3.3)
 - Referencing the UK law interpretation of EU Directive on the Conservation of Habitats *et al* as the 'Conservation of Habitats and Species Regulations 2010' within National Plans and Programmes in Section 3.1
 - An assessment of the effect of the proposed policies on Water Framework Directive ecological status, which collectively covers pollution and physical modification. This assessment has been included within Annex II of this document
 - Reference to the Countryside and Rights of Way Act 2000 in the context of Sites of Specific Scientific Interest (SSSI). This has been set out in Section 3.1
 - Specific consideration should be given to Green Infrastructure. A proposed policy, DM/29 (integrating green infrastructure in major development) has been included within the LP3
- 3.4.3. No responses were received at the Scoping Stage consultation from English Heritage or Natural England.

4 Sustainability appraisal methodology

4.1 Developing the plan and options

- 4.1.1. The process for writing the LP3 was amended during the time of its development. Initially, it had been proposed to produce an Issues and Options stage, a Preferred Options, and then produce the submission version. Mid Devon's Statement of Community Involvement was revised during 2012 and now sets out two stages of consultation, an initial options stage, and a submission stage.
- 4.1.2. An Issues and Options Report was developed and consulted on in 2011, and the responses received in that document have been used to inform the submission version, which is accompanied by this Sustainability Appraisal.
- 4.1.3. To ensure sustainability considerations were taken into account during the development of policy options, the SA was undertaken whilst the policies were being written. The policy development process involved a number of stages during which a proposal was subject to scrutiny. This included critical appraisal meetings with Development Management staff, and later scrutiny from a Planning Policy Advisory Group, a panel of Elected Members that considered proposals before a draft document was submitted to Cabinet. SA findings were fed into these stages at any point, creating a feedback loop that allowed policies to be amended in line with sustainability considerations, and then again be subjected to internal discussions with officers and Elected Members.
- 4.1.4. In addition, proposed versions of the policies were also submitted to a number of consultation bodies for comment. These bodies would have been consulted at Preferred Options stage, however instead their feedback was sought throughout policy development as part of the district's 'Duty to cooperate', whereby cross-boundary strategic matters are discussed. The NPPF identifies strategic priorities as including, for example:
- The homes and jobs needed in the area
 - The provision of retail, leisure and other commercial development
 - The provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy
 - The provision of health, security, community and cultural infrastructure and other local facilities
 - Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape
- 4.1.5. The adopted Core Strategy and AIDPD set out strategic priorities for planning in the district, and those documents were adopted before the Duty to Cooperate existed, (however at that time the Regional Development Agency was responsible for coordinating strategic matters through the development of the South West Regional Spatial Strategy). The LP3 contains development management policies, many of which do not have cross-boundary of 'large than local' significance. However, the following draft policies were considered to be strategic in nature:
- DM/3 (sustainable design) – relating to climate change
 - DM/4 (waste management)
 - DM/5 (renewable energy) – relating to climate change and landscape impact

- DM/6 (transport and air quality) – which includes reference to European designated sites
- DM/28 (development affecting heritage assets)
- DM/29 (integrating green infrastructure in major development)
- DM/30 (protected landscapes)
- DM/31 (protected sites) – includes Special Areas of Conservation

4.1.6. Where comments were received policies were amended as appropriate. The bodies consulted included:

- All neighbouring district council's including East Devon, Exeter, North Devon, Taunton Deane, Teignbridge, Torridge, West Devon and West Somerset
- Devon County Council (in particular its functions covering waste, transport, landscape, ecology, historic environment and strategic planning)
- Somerset County Council
- Exmoor and Dartmoor National Parks
- Natural England
- English Heritage
- Environment Agency
- Sport England
- Heart of the South West Local Enterprise Partnership
- North Devon Biosphere
- Blackdown Hill Area of Outstanding Natural Beauty
- The Woodland Trust
- Devon Wildlife Trust
- Devon Biodiversity Record Centre
- Sustrans

4.1.7. Against each policy appraised in Section 5, is a table which charts the policy development process. This describes how the policy was written, taking account of the comments from consultees, internal discussions and input from the SA as described above. The table highlights alternative options that were considered, and the need and/or justification for having the policy.

4.2 Sustainability appraisal framework of indicators

4.2.1. The scoping report set out the indicators to be used in the sustainability appraisal framework. These were developed from identifying sustainability issues and were based on those used for appraisal of previous plans including the Core Strategy and AIDPD. These objectives have been used to score the various policy and proposal options in the LP3 so that the most sustainable options are chosen. It also allows for potential unsustainable impacts to be removed or mitigated.

4.2.2. The sustainability objectives used have been set out below. Each of the objectives has one or more indicators, and a description of a negative, positive and neutral impact arising from development. Changes have been made to some of the impacts for each indicator compared with those proposed within the Scoping Report. For example, the Scoping Report proposed objective G1 'Access to public transport', against which the positive impact was '7 services each Monday-Saturday within 400m', with related effects for the neutral and negative impacts. This has been amended to 'Increase access' for positive, 'No change' for

neutral, and 'Decrease access' for negative. The original impacts proposed in the Scoping Report are stated in *italics*.

- 4.2.3. These changes have been made to ensure the impacts are appropriate to policy proposals, which are the focus of the LP3, against which more generalised effects would be felt, rather than for site specific allocations, against which more detailed criteria would have been appropriate. It is anticipated that the more specific impacts will return when site allocations are subject to sustainability appraisal as part of a future review of the Core Strategy and strategic allocations. Two allocations from the existing Adopted Local Plan (2006) are to be retained in this current plan, and they have been subject to SA using the original set of indicators.

| Sustainability Appraisal Framework of Indicators | | | | |
|--|---|--|----------------|---|
| Objective | Impact Indicator | Positive impact | Neutral impact | Negative impact |
| (A) Wildlife | (A1) Priority habitat area, CWS or SSSI | Increase quality or area. | No change. | Reduce quality or area. |
| | (A2) Protected or priority species. | Increase numbers or range. | No change. | Reduce numbers or range. |
| | (A3) Wildlife networks | Improve network connections. | No change. | Fragment network. |
| (B) Landscape | (B1) Landscape quality and character. | Enhance. | No change. | Harm. |
| (C) Cultural heritage | (C1) Archaeological sites. | Enhance setting of a site. | No change. | Damage to or loss of site or harm to setting of a site. |
| | (C2) Archaeological understanding. | Improve understanding or interpretation. | No change. | Not applicable. |
| | (C3) Listed buildings. | Improve repair or enhances setting. | No change. | Damage to character or setting. |
| | (C4) Historic parks and gardens | Enhance character or setting | No change | Harm character or setting |

| Sustainability Appraisal Framework of Indicators | | | | |
|--|---|--|--|--|
| Objective | Impact Indicator | Positive impact | Neutral impact | Negative impact |
| | (C5) Character of conservation areas. | Enhance | Preserve | Damage |
| | (C6) Conservation area appraisals and management plans. | Help to implement. | No change. | Hinder implementation. |
| (D) Water | (D1) River quality. | Reduce pollution of rivers. | No change. | Increase pollution of rivers. |
| (E) Land and soils | (E1) Area of contaminated land. | Reduce | Maintain | Increase |
| | (E2) Proportion of site which is previously developed. | Increase <i>Originally 'Over 30%</i> | No change. <i>Originally '30%'</i> | Decrease. <i>Originally 'Under 30%'</i> |
| | (E3) Square metres floorspace per hectare. | Increase <i>Originally 'Over 3500'</i> | No change. <i>Originally '3500'</i> | Decrease. <i>Originally 'Under 3500'</i> |
| | (E4) Dwellings per hectare. | Increase <i>Originally 'Over 50'</i> | No change. <i>Originally '30-50'</i> | Decrease <i>Originally 'Under 30'</i> |
| (F) Air quality | (F1) Air quality. | Improve within AQMA. | No change. | Worsen within AQMA or where it could lead to an AQMA being required. |
| (G) Traffic and transport | (G1) Access to public transport, including any improvements proposed. | Increase access <i>Originally '7 services each Monday – Saturday within 400m'</i> | No change <i>Originally 'Daily service within 400m'</i> | Decrease access <i>Originally 'Less than a daily service within 400m'</i> |

| Sustainability Appraisal Framework of Indicators | | | | |
|--|--|--|---|---|
| Objective | Impact Indicator | Positive impact | Neutral impact | Negative impact |
| | (G2) Proportion of people that are forecast to use public transport, walk or cycle to work | Increase <i>Originally 'Over 20%'</i> | No change <i>Originally '15-20%'</i> | Decrease <i>Originally 'Less than 15%'</i> |
| | (G3) Road vehicle access. | Improve road safety. | No change to road safety. | Harm road safety. |
| | (G4) Impact on public rights of way. | Create additional, improve ease of use or improve setting. | No change. | Loss, reduce ease of use or harm setting. |
| (H) Waste | (H1) Reduces waste <i>Originally left blank.</i> | Reduces overall. <i>Originally left blank.</i> | No change. <i>Originally left blank.</i> | Increases overall. <i>Originally left blank.</i> |
| (I) Climatic factors | (I1) Reduce carbon dioxide emission. | Reduces overall. | No change overall. | Increases overall. |
| | (I2) Land on floodplain. | Decrease flood risk <i>Originally 'Outside flood zone 2 and 3 and reduces flood impact'</i> | No change <i>Originally 'Outside flood zone 3 and no change to flood impact'</i> | Increase flood risk <i>Originally 'Within flood zone 3 or increases flood impact'</i> |
| | (I3) Renewable energy capacity. | Increase | No change | Reduce. |
| (J) Healthy and safe living environments | (J1) Public open space. | Increase provision <i>Originally 'Within 400m of public open space and leads to a net increase of public open space over and above current standards (60 sqm per dwelling)'</i> | No change <i>Originally 'Within 400m of public open space and leads to a net increase of public open space at current standards (60 sqm per dwelling)'</i> | Decrease provision <i>Originally 'More than 400m from public open space or leads to a net reduction in public open space, or a net increase below current standards (60 sqm per dwelling)'</i> |

| Sustainability Appraisal Framework of Indicators | | | | |
|---|---|--|--|--|
| Objective | Impact Indicator | Positive impact | Neutral impact | Negative impact |
| | (J2) Road vehicle access. | Improve road safety. | No change to road safety. | Harm road safety. |
| | (J3) Number of affordable houses lost and proposed. | Increase provision <i>Originally 'Affordable housing provision in excess of standard proportion'</i> | No change <i>Originally 'Affordable housing provision at standard proportion'</i> | Decrease provision <i>Originally 'Affordable housing provision below standard proportion'</i> |
| | (J4) Number of jobs lost and created. | Net increase in employment. | No change. | Net reduction in employment. |
| | (J5) Avoidance of noise and pollution | Improve air quality or noise levels for susceptible uses. | No change. | Worse air quality or noise levels for susceptible uses. |
| | (J6) Walking and cycling provision | Increase <i>Originally 'Over 15% walking and cycling to work forecast'</i> | No change <i>Originally '15% walking and cycling to work forecast'</i> | Decrease <i>Originally 'Under 15% walking and cycling to work forecast'</i> |
| (K) Health care, community services and facilities. | (K1) Access to public transport, including any improvements proposed. | Increase access <i>Originally '7 services each Monday – Saturday within 400m'</i> | No change <i>Originally 'Daily service within 400m'</i> | Decrease access <i>Originally 'Less than a daily service within 400m'</i> |
| | (K2) Access to health and other services | Increase access <i>Originally 'Less than 30 minutes public transport or walking time to a hospital, or leads to an improvement in health services.'</i> | No change <i>Originally '30 minutes public transport or walking time to a hospital and no improvement to health services'</i> | Decrease access <i>Originally 'Over 30 minutes public transport or walking time to a hospital or leads to a reduction in health services'</i> |

| Sustainability Appraisal Framework of Indicators | | | | |
|--|---|---|---|--|
| Objective | Impact Indicator | Positive impact | Neutral impact | Negative impact |
| | (K3) Access to community facilities and services. | Increase access <i>Originally 'Within the same settlement as a shop, hall, school and public house, and increases provision of those services'</i> | No change <i>Originally 'Within the same settlement as a shop, hall, school and public house, but does not increase provision of those services'</i> | Decrease access <i>Originally 'Not within the same settlement as a shop, hall, school and public house, or leads to a reduction in the provision of those services'</i> |
| (L) Housing | (L1) Number of affordable houses lost and proposed. | Increase provision <i>Originally 'Affordable housing provision in excess of standard proportion'</i> | No change <i>Originally 'Affordable housing provision at standard proportion'</i> | Decrease provision <i>Originally 'Affordable housing provision below standard proportion'</i> |
| | (L2) Number of houses lost and proposed. | Increase housing provision. | No change. | Reduce housing provision. |
| | (L3) Timing of housing provision. | Housing available immediately. | Housing available later than five years. | Housing unavailable. |
| (M) Consultation and social deprivation | (M1) Community involvement. | Support. | No clear view. | Opposition. |
| | (M2) Access to education and training. | Improved facilities. | No change. | Reduced facilities. |
| | (M3) Employment floorspace. | Net increase. | No net change. | Net reduction. |
| | (M4) Use of local goods or services. | Increase. | No change. | Reduce. |
| | (M5) Number of affordable houses lost and proposed. | Increase provision <i>Originally 'Affordable housing provision in excess of standard proportion'</i> | No change <i>Originally 'Affordable housing provision at standard proportion'</i> | Decrease provision <i>Originally 'Affordable housing provision below standard proportion'</i> |

| Sustainability Appraisal Framework of Indicators | | | | |
|--|--|--|--|---|
| Objective | Impact Indicator | Positive impact | Neutral impact | Negative impact |
| (N) Economic growth | (N1) Employment, retail and other business floorspace. | Increase. | No change. | Reduce. |
| (O) Rural diversification. | (O1) Employment floorspace in rural areas. | Increase. | No change. | Reduce. |
| (P) Employment | (P1) Number of jobs lost and created. | Net | No change. | Reduce. |
| | (P2) Key workers housing | Increase. | No change. | Reduce. |
| (Q) Retail | (Q1) Proximity of new housing to retail. | Increase. <i>Originally 'Within a market town'</i> | No change <i>Originally 'Within a settlement containing a shop and within 30 minutes public transport journey of a town centre'</i> | Decrease <i>Originally 'Not within a settlement containing a shop, or not within 30 minutes public transport journey of a town centre'</i> |
| | (Q2) Location of new retail floorspace. | Increase town centre provision <i>Originally 'Within a defined town centre'</i> | No change <i>Originally 'Outside a defined town centre, and accords with the sequential test'</i> | Decrease town centre provision <i>Originally 'Does not accord with the sequential test'</i> |
| | (Q3) Retail floorspace within villages. | Increase. | No change. | Reduce. |
| | (Q4) Impact on vitality and viability of town centres. | Improve. | No change. | Harm. |

| Sustainability Appraisal Framework of Indicators | | | | |
|--|--|---|---|--|
| Objective | Impact Indicator | Positive impact | Neutral impact | Negative impact |
| (R) Tourism | (R1) Number of tourists visiting and spending nights in Mid Devon. | Will increase numbers. | No change. | Will reduce numbers. |
| | (R2) Tourist bedspaces provided. | Increase | No change | Reduction |
| (S) Equalities | (S1) Provision of lifetime homes. | Increase provision <i>Originally 'Over 4% of dwellings meet the lifetime homes standard'</i> | No change <i>Originally '4% of dwellings meet the lifetime homes standard'</i> | Decrease provision <i>Originally 'Less than 4% of dwellings meet the lifetime homes standard'</i> |

4.3 The challenge of implementing the 'no plan' scenario

- 4.3.1. The SEA Regulations require that this report set out the impact on the environment without implementation of the plan. This is undertaken by having a 'no plan' scenario, the baseline against which the impact of the LP3 is assessed. The 'no plan' scenario is taken as examining the outcome if the proposed LP3 policies were not in place, and therefore any development proposal would be considered solely against the policies of the Adopted Mid Devon Local Plan, Core Strategy, AIDPD and national policy set out in the NPPF.
- 4.3.2. Having a 'no plan' scenario is more challenging for a document that contains only development management policies. When considering a variety of site allocations the scenario can be applied in a more straightforward manner in order to compare and assess the most appropriate option. Analysing the effect of the 'no plan' scenario in the case of the LP3, is less clear. Applying the approach will not necessarily be relevant to all policies, but in the cases where it is, the effect has been stated as part of the commentary, in order to highlight where the 'no plan' scenario can be applied.
- 4.3.3. The implication is that the detailed development management policies of the existing Adopted Local Plan will become increasingly outdated and out of step with national policy over time. Already, the policies only have weight according to their degree of compliance with the NPPF, whereas the new policies in the LP3 can build on national policy, augmenting it with local evidence. With the analysis of each policy is a justification of the need for each policy. The justification is ultimately derived from the potential harmful effects of not having a policy under the 'no plan' scenario.

- 4.3.4. Where revisions to policies maps are proposed, the existing boundaries in their current form are the 'no plan' baseline. Each map is subject to analysis against the sustainability framework, and then commentary is proposed for the revisions as a whole.

4.4 Understanding the sustainability appraisal

- 4.4.1. Each of the proposed policies and amendments to the proposals map within the LP3 has been appraised against the sustainability framework as set out above in section 4.2. The results of the appraisal are presented in a matrix, an example of which is provided below. Each indicator has a reference number and the impact upon that indicator is denoted by a symbol. Colour coding is used to highlight positive (green) or negative (red) impacts. An overall rating for the policy is provided on the right of the matrix, having given consideration to the scores against all indicators. Commentary is provided below each matrix on the sustainability impacts of the policy, considering any 'no plan' effects, and where any negative impacts are noted, mitigation measures, if possible, are also discussed.
- 4.4.2. A matrix for each policy can be found within Section 5. Annex II has another version of the same matrices but also contains the full title of the SA objectives, indicators and impacts as an alternative point of reference.

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|---------|
| DM/2 | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall |
| | 0 | 0 | 0 | + | + | 0 | + | + | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | + | 0 | + | 0 | 0 | + |
| | 0 | 0 | 0 | + | + | 0 | + | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | + | + | 0 | 0 | + | 0 | 0 | + | 0 | 0 | + | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | |

- 4.4.3. The symbols denoting impact have the following meaning:

| Symbol | Meaning |
|--------|--|
| + | Positive impact |
| + | Likely to have a positive impact but impossible to state with absolute certainty |
| 0 | No impact / indeterminate impact |
| +/- | Some positive/some negative impacts, in broadly equal measure |
| -? | Likely to have a negative impact but impossible to state with absolute certainty |
| - | Negative impact |

- 4.4.4. When appraising draft policies the SEA Directive also requires policy makers to consider various 'impact dimensions' of policy implementation. This SA provides a commentary on the secondary, cumulative, synergistic, short, medium, long-term, temporary and permanent effects of the policies. This is set out per policy and can be found below each sustainability appraisal matrix throughout Section 5.

5 Sustainability appraisal of Local Plan Part 3

5.1 DM/1 Presumption in favour of sustainable development

Policy text:

When considering development proposals the Council will take a positive approach in favour of sustainable development. It will work proactively to find solutions which allow proposals to be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in the Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without unnecessary delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

- a) Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against national policy taken as a whole; or*
- b) Specific national policies indicate that development should be restricted.*

Policy development process:

This policy was developed using the Planning Inspectorate's 'presumption in favour' model policy as the template. Minor alterations to the wording were included to make the policy 'future proof', e.g. replacing 'NPPF', with 'national policy', and stating that applications in accordance with the Local Plan would be approved without 'unnecessary delay'.

Alternative option(s):

Two possible alternative options were considered, firstly to not include a policy; secondly to include the exact wording set out in the Planning Inspectorate's 'model policy'.

Need/justification:

To be in conformity with NPPF which states that the presumption in favour should be the 'golden thread' that runs through all plan making and decision taking. Inclusion of such a policy was also recommended by a consultee at the Issues and Options stage. Including this policy is recommended by the Planning Inspectorate.

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|---------|--|
| DM/1 | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall | |
| | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | |
| | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | | |
| Timescale: Immediate to long term. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Secondary/cumulative/synergistic effects: Once the LP3 is adopted, all Mid Devon's policies will be in accordance with the NPPF. There should therefore be no indirect effects, such as the granting of permissions where local policy and national policy were not in accordance. Synergistically this policy supports all others in the LP3, as well as the Core Strategy and AIDPD, ensuring the delivery of sustainable development. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Temporary/permanent effects: The policy should result in the permanent delivery of proposals that meet the definition of 'sustainable development' as set out in the NPPF (though noting that some development proposals are only granted temporary planning permission). | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

- 5.1.1. The National Planning Policy Framework requires local authorities to operate a 'presumption in favour of sustainable development' throughout Local Plan policies. Delivering sustainable development is a core principle of the planning system, against which all applications for planning permission are assessed. The 'presumption in favour' sets out a requirement that development proposals that accord with the development plan should be approved without delay, unless material considerations indicate otherwise. Furthermore, where policies are absent or out of date, permission will be granted unless material considerations indicate otherwise, unless the adverse impacts significantly and demonstrably outweigh the benefits when assessed against national policy as a whole, or where national policy states that development should be restricted.
- 5.1.2. When assessing planning applications, the impact of the policy means that where development is in accord with the local plan, and is therefore sustainable, should be approved. When scored against the sustainability framework the policy has a positive impact, ensuring the approval of sustainable development, with no negative effects.

5.2 DM/2 High quality design

Policy text:

Designs of new development must be of high quality, based upon and demonstrating the following principles:

- a) Clear understanding of the characteristics of the site, its wider context and the surrounding area*
- b) Efficient and effective use of the site, having regard to criterion (a)*
- c) Positive contribution to local character including any heritage assets*
- d) Creation of safe and accessible places that also encourage sustainable modes of travel*
- e) Visually attractive places that are well integrated with surrounding buildings, streets and landscapes, and do not have an unacceptably adverse effect on the privacy and amenity of neighbouring properties and uses, taking account of:*
 - i) Architecture*
 - ii) Siting, layout, scale and massing*
 - iii) Orientation and fenestration*

- iv) *Materials, landscaping and green infrastructure*
- f) *Appropriate drainage including sustainable drainage systems (SUDS) and connection of foul drainage to a mains sewer where available.*

Major residential development proposals will be required to achieve a score of 75% against relevant criteria in the Building for Life standard.

Policy development process:

The 2010 informal scoping consultation received responses stating that new development should be locally distinctive and respect its surroundings. Criterion (e) was changed from 'preserve the privacy' to 'do not have an unacceptably adversely effect on the privacy' to allow flexibility in the application of the policy. Criterion (d) was expanded to add 'such as walking and cycling' to ensure clarity over sustainability objectives. Criterion (f) was added stating 'appropriate drainage including SUDS and connection of foul drainage to a mains sewer where available' to build upon Core Strategy Policy COR11, enable environmentally sustainable development and to take account of the LPA's duties under Circular 03/99.

Alternative option(s):

One alternative was to rely solely on national policy for design guidance, which from March 2012 would be NPPF paragraphs 56-68. A second alternative was to build the design criteria of DM/2 into individual topic-based policies, such as those relating to replacement dwellings or employment development outside settlements.

Need/justification:

Including a specific local policy has the benefit of being applicable to a wide range of other Local Plan policies, without criteria needing to be repeated throughout the plan. While the NPPF provides some design guidance, the Development Plan remains the starting point for decision-making and should reflect the importance of good design in delivering sustainable development.

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|---------|
| DM/2 | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall |
| | 0 | 0 | 0 | 0 | + | + | + | + | + | + | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | + | 0 | + | 0 | + | 0 | 0 | + |
| | 0 | 0 | 0 | + | + | 0 | + | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | + | 0 | 0 | 0 | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | |
| Timescale: Immediate to long term. | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Secondary/cumulative/synergistic effects: This policy will complement a number of other policies within the plan. Particularly DM/3 (sustainable design) through the incorporation of Sustainable Urban Drainage Systems (SUDS) where appropriate; DM/6 (transport and air quality) through prioritising sustainable modes of transport in developments, particularly walking and cycling; and DM/15 (design of housing) through complementary approaches to high quality local places, daylight, orientation, materials etc; and DM/28 (heritage assets) as the policy requires developmen to make a positive contribution to local character. | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Temporary/permanent effects: Permanent, as this policy will apply to all new development that takes place in the district over the lifetime of the plan. | | | | | | | | | | | | | | | | | | | | | | | | | | | |

- 5.2.1. This policy recognises the importance of good design as a key aspect of sustainable development, setting out key principles to be adhered to. For example, it requires development to have a clear understanding of character, context and surrounding area. New development is required through the policy to make a positive contribution to local character, create safe places, encourage sustainable transport and take account of architecture, layout, siting, scale, massing, orientation, fenestration, materials, landscaping and green infrastructure. There is also a requirement for major residential developments to achieve a 75% score against the Building for Life standard.
- 5.2.2. The policy scores positively against a number of the sustainability objectives. The policy requires development to make a positive contribution to character including heritage assets, and therefore scores positively for the effect it should have on listed buildings, historic parks and gardens and the character of conservation areas. The policy's focus on architecture, scale, and materials ensure that the details that contribute towards historical character are positively emphasised.
- 5.2.3. The policy requires major developments to meet 75% of the criteria within the Building for Life standard. These standards cover a range of issues, but particularly include:
- Access to public transport
 - Proximity to community facilities, including shops and schools
 - Reduction of environmental impact
 - Internal spaces capable of adaptation
 - Development to be in advance of building regulations
- 5.2.4. Against all the above criteria, of which there are twenty objectives in total, it is anticipated that the policy will have a positive impact on the quality of design of major developments.

5.3 DM/3 Sustainable design

Policy text:

Proposals for new housing and major commercial development (excluding agricultural and equestrian buildings) must demonstrate how sustainable design and construction methods will be incorporated to achieve energy and water efficiency and resilience to climate change. Designs must use landform, layout, building orientation, massing and landscaping to minimise energy consumption.

New dwellings will be required to meet Level 4 of the Code for Sustainable Homes from 2013, rising to Level 5 from 2016.

Commercial development including use classes C1, C2 and C2a will be required to achieve BREEAM 'Very Good' standard from 2013 and 'Excellent' from 2016.

If evidence demonstrates that meeting the minimum standard under the Code for Sustainable Homes or BREEAM would render the development unachievable, the Council will balance the overall benefits of the development against the objectives of this policy.

Policy development process:

Broad support from consultees at the Issues and Options stage for a policy on sustainable design. Paragraph 3 changed 'Non-residential buildings' to 'Commercial development' to clarify scope of policy following discussions with Development Management.

Alternative option(s):

There is a 'no policy' option, relying instead on the Building Regulations and other policies within the LP3 that refer to Lifetime Homes and Building for Life standards. Another alternative would be a revised form of this policy, with different minimum standards according to evidence of development viability.

Need/justification:

Consultation representations were in favour of a policy. The policy is considered justified in principle as a means of delivering development that minimises its environmental impact and achieves a higher standard of living/working for the people who occupy the buildings. The presumption in favour of sustainable development is also reflected in the policy's flexible and balanced approach in respect of viability issues.

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|----|----|-----|-----|-----|----|-----|-----|-----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|---------|--|
| DM/3 | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall | |
| | 0 | + | + | +/- | +/- | 0 | +/- | +/- | +/- | 0 | + | + | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | + | + | 0 | + | 0 | 0 | + | |
| | 0 | 0 | +/- | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | | |
| Timescale: Short to long term, though the policy will set a higher standard from 2016, so there will be changes in the short term. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Secondary/cumulative/synergistic effects: Indirect effects may include the need for more assessors who can complete BREEAM or Code for Sustainable Homes assessments and sign-off post-construction certificates. Synergistic effects include how the policy complements others which include other building standards. For example, builders of a major housing development will need to comply with Code for Sustainable Homes requirement (from Policy DM/3), Building for Life (from Policy DM/2) and Lifetime homes (from Policy DM/15). However these requirements can be collectively undertaken as part of the Code for Sustainable Homes design stage; in particular Lifetime homes is already one of the credits under the Code's 'Health & Well-being' category. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Temporary/permanent effects: Permanent, as the policy is a mechanism to reduce carbon emissions that arise as a result of the 'lifetime' of a building. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

- 5.3.1. This policy incorporates sustainable design features into proposals for new housing and major commercial development, thereby reducing negative environmental and social impacts. The policy required applicants to demonstrate that developments are energy and water efficient and resilient to climate change. The Code for Sustainable Homes and BREEAM are used to determine compliance with the policy, with the level of achievement required to meet the policy rising over time.
- 5.3.2. The appraisal demonstrates that the policy is positive in its impact with no outright negative impacts. The policy's most positive impact will be on reducing carbon dioxide emissions and increasing renewable energy capacity. The Code for Sustainable Homes has an objective to reduce NOx emissions, and therefore implementation of the policy could result in a positive

impact on air quality. In addition, the code requires developments to tackle waste, and at present this is only a requirement in the AIDPD for larger allocations, and is only generally described in the existing Adopted Local Plan (2006) that developments should ‘minimise the creation of waste’. The new policy’s alignment with the Code for Sustainable Homes and BREEAM means that there will be improved positive impacts, over and above those that would have been achieved under the existing ‘no plan’ scenario.

- 5.3.3. It is possible that there could be some negative impacts arising from the requirement to cut carbon emissions, particularly by using more visual forms of renewable energy technologies. For example, developments that include photovoltaic panels could have a negative effect on the character of conservation areas or on valued landscapes. However such proposals for development will also have to be judged against Policies DM/28 (heritage assets) and DM/30 (protected landscapes) that ensure a level of control.
- 5.3.4. The Code for Sustainable Homes covers a range of criteria from which developers are able to pick and choose the elements that they wish to deliver in order to obtain the required number of credits. Therefore it is difficult to be absolutely certain of each positive impact against the sustainability framework, but overall the impacts on carbon emissions are likely to be the most certain.

5.4 DM/4 Waste management in major development

Policy text:

Major development proposals must demonstrate that the construction and operation of the development will accord with sustainable waste management principles. A waste audit statement will be required to set out how waste will be managed according to the following hierarchy:

- a) Reduction of waste generated on site*
- b) Re-use of waste that is produced*
- c) Recycling and composting*
- d) Recovery of value from waste*
- e) Landfill or landraise*

Policy development process:

Support was received at the Issues and Options stage for a waste minimisation policy. A consultation response from Devon County Council requested inclusion of a policy that operated in accordance with the national waste management hierarchy.

Alternative option(s):

Rather than setting a local policy, the LPA could rely on the Devon Waste Plan (emerging Policy WDMP 13). Alternatively, in broad terms, waste management is applicable under Policy DM/2 (Building for Life criteria), DM/3 and DM/15 criterion c.

Need/justification:

The emerging Devon Waste Plan has statutory control over waste management development, but Devon County Council is not the local planning authority responsible for determining the majority of

non-waste development proposals within Mid Devon. It is doubtful whether emerging Devon Waste Plan policy WDMP 13 could be enforced without a corroborating policy in the district Local Plan. Other proposed LP3 policies (DM/2, DM/3 and DM/15) do not fulfil the role of Policy DM/4, as they have a wider focus and flexibility that allow for optional waste management criteria or do not go as far as the waste hierarchy in their requirements.

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|---------|--|
| DM/4 | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | + | 0 | 0 | 0 | 0 | + | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | | |
| Timescale: Short to long term. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Secondary/cumulative/synergistic effects: Secondary indirect effects are likely to include a reduction in land use for landfill, and the negative environmental impacts associated with landfill. Synergistically the policy complements DM/3 (sustainable design) which includes waste as one of the options that development could choose to select in order to meet the criteria of the Code for Sustainable Homes; this policy ensure that waste considerations must be tackled on major developments (under policy DM/3 a developer would not necessarily have to select waste as one of its credits to achieve the overall Code requirement). The policy also complements DM/15 (design of housing) which has a requirement for homes to be designed with provision for recycling and waste storage. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Temporary/permanent effects: Temporary in that waste during construction of major developments is subject to this policy; permanent in that sustainable development principles have to be incorporated into the design of the development for the lifetime of its operation. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

- 5.4.1. This policy sets out requirements for major development proposals to give consideration to the management of waste during construction and operation. In particular it includes a 'waste hierarchy', based on national waste policy that seeks to reduce the amount of waste that goes to landfill. While there is some overlap with Policy DM/3, this policy goes further in setting out a hierarchy. Also not all homes developed in accordance with the Code for Sustainable Homes will choose the waste credits in order to meet their overall total.
- 5.4.2. Against the 'no plan' scenario, the previous policy focused solely on minimising waste and recycling. The use of this new policy clearly sets out at local level a hierarchy to guide major development. Planning cannot change people's behaviour once a development is in operation, however it can influence the choices people make by providing opportunities for reducing waste/recycling/composting etc. This policy therefore is highlighted as having a positive sustainable impact through the reduction of waste and of carbon dioxide emissions that would otherwise have been expended in processing of waste and production of new products.

5.5 DM/5 Renewable and low carbon energy

Policy text:

The benefits of renewable and low carbon energy development will be weighed against its impact. Proposals for wind turbines, solar power installations and other forms of renewable or low carbon energy will be permitted where they do not have significant adverse impacts on the character,

amenity and visual quality of the area, including cumulative impacts of similar developments within the parish or adjoining parishes. Development must consider:

- a) Landscape character and heritage assets;
- b) Environmental amenity of nearby properties in accordance with Policy DM/7;
- c) Quality and productivity of the best and most versatile agricultural land (grades 1, 2 and 3a);
- d) Biodiversity (avoiding habitat fragmentation).

Policy development process:

Consultation at the informal scoping stage highlighted both support and opposition to renewable energy production including wind turbines. In general there was support for a policy but only allowing development at an appropriate scale that took account of local character. Policy text requires development to consider 'quality and productivity of best and most versatile agricultural land' following representations received at the Issues and Options stage, whilst also considering 'landscape character and heritage assets'.

Alternative option(s):

It is not possible to rely solely on the NPPF in this case, given the requirements of NPPF paragraph 97. Alternatives to the policy would be in the detail of its emphasis or criteria.

Need/justification:

The NPPF requires local planning authorities to have a positive strategy to promote energy from renewable and low carbon sources, and design policies to maximise such development while ensuring that adverse impacts are addressed satisfactorily. Policy DM/5 does not provide for everything set out in NPPF paragraph 97, but builds upon strategic policies for renewable and low carbon energy set out in the Core Strategy and AIDPD.

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|----|----|-----|-----|-----|----|-----|-----|-----|----|-----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|---------|--|
| DM/5 | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall | |
| | 0 | 0 | 0 | +/- | +/- | + | +/- | +/- | +/- | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | + | 0 | 0 | + | |
| | 0 | 0 | +/- | 0 | 0 | 0 | 0 | 0 | 0 | 0 | +/- | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | | |
| <p>Timescale: Immediate to long term as an increasing number of applications have been received in recent years, which is likely to increase as time progresses given the pressures to reduce carbon emissions as a result of climate change.</p> <p>Secondary/cumulative/synergistic effects: Wind turbines can have cumulative impacts on a landscape, particularly where isolated small scale developments are granted, eventually dotting the landscape. The policy requires development not to have significant adverse impacts, including cumulative impacts in relation to other similar developments. The policy also works in tandem with DM/6 (transport and air quality) to consider the environmental amenity of nearby properties, and with DM/30 (protected landscapes) and DM/31 (other protected sites) to provide protection against habitat fragmentation.</p> <p>Temporary/permanent effects: The scoping stage of installing renewable energy technology to investigate feasibility, such as the installation of anemometer masts to assess wind speeds, will have a temporary effect on the landscape, as temporary permissions are often granted for the masts. Large renewable projects, such as solar farms are often granted long-term permissions, for example 25 years, so that once the Feed In Tariff expires, the facility is required to be removed, in order to protect the landscape and best agricultural land.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

- 5.5.1. The policy requires proposals for renewable or low carbon energy to be weighed against their impact. The policy recognises the importance of delivering low carbon or renewable technology, but understands that there are other considerations that need to be taken account of in order for such developments to be acceptable in planning terms.
- 5.5.2. Overall, the appraisal highlights that the policy has no outright negative impacts, and has some positive benefits. The policy requires development proposals to take account of landscape character and heritage assets, which could be detrimentally affected by renewable technology development, for example where solar panels are proposed on listed buildings or buildings in a conservation area. In order to mitigate against such issues the policy requires the benefits of proposals to be weighed against their impact, and does not permit such development where it would have a significant effect on 'character, amenity and visual quality of the area'. Such proposals would also have to be assessed against other policies within the LP3, which provide protection for heritage assets and landscapes.
- 5.5.3. The analysis highlights that there are positive and negative impacts in terms of public support. Individual proposals for renewable energy developments are often contentious, however support was expressed in representations at the Issues and Options stage for a policy on renewable energy which would set criteria under which development could be acceptable. The policy also requires development to recognise the quality and productivity of agricultural land, to reduce the likelihood of habitat fragmentation and to consider the environmental amenity of nearby properties. The policy therefore contains a number of factors to mitigate against a number of possible negative aspects of renewable and low carbon development.

5.6 DM/6 Transport and air quality

Policy text:

Development proposals that would give rise to significant levels of movement must be accompanied by an integrated Transport Assessment, Travel Plan, Environmental Statement and Low Emission Assessment. The Environmental Statement must include an assessment of the impact of traffic nitrates on environmental assets, including protected sites listed in Policy DM/31, and propose mitigation measures where appropriate. The Low Emission Assessment shall include the following:

- a) Assessment of the impact on existing Air Quality Management Areas, or an impact likely to result in the declaration of an additional Air Quality Management Area, in cases where a demonstrable negative impact on ambient concentrations of air pollutants is considered likely;*
- b) Modelling of local residual road transport emissions from the development without mitigation measures; and*
- c) Onsite mitigation measures to reduce negative impacts on local air quality.*

Policy development process:

Low emissions assessment guidance removed from main body of text and attached as an annex to make the policy more user friendly. The policy was amended to require provision of environmental statement detailing impact of traffic nitrates on environmental assets and protected sites following consultation with Natural England. Further amendments to criterion (a) were also undertaken following advice from technical consultants.

Alternative option(s):

Policy DM/6 requires an integrated assessment that combines various areas of interest under one report. An alternative would be to split these up, by means of separate policies requiring transport assessments, travel plans, low emissions and environmental assessments.

Need/justification:

The assessments required by Policy DM/6 are justified by NPPF paragraphs 30, 32, 34-36, 120 and 124. Reducing transport emissions and protecting the environment are supported throughout the NPPF. An integrated assessment procedure is considered to reduce repetition and complexity in the planning application process, allowing the single assessment to be tailored and weighted according to the circumstances of a particular development.

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|---------|
| DM/6 | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall |
| | + | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | + | + | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | + |
| | 0 | 0 | + | + | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | |
| Timescale: Short to long term. | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Secondary/cumulative/synergistic effects: Emissions can have significant indirect negative impacts on biodiversity and in particular on protected species. The policy links to Policy DM/31 (other protected sites) in order to provide protection for sites that may be vulnerable due to their proximity to major roads (such as the Rackenford Special Area of Conservation near to the A361). | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Temporary/permanent effects: Temporary effects will arise during construction phase, for which the provision of Travel Plans are designed to allow developments to set out alternative sustainable modes of transport as a means of accessing the development site. Permanent effects are highlighted the environmental impacts (in the Environmental Statement) and Low Emission Assessment, and mitigation required. | | | | | | | | | | | | | | | | | | | | | | | | | | | |

- 5.6.1. The policy aims to manage the impact of additional transport on air quality arising from development proposals. The policy requires major development that significantly increases levels of movement to be accompanied by an integrated Transport Assessment, Travel Plan, Environmental Statement and Low Emission Assessment. Where Low Emission Assessments are required the policy requires them to specify their impact on existing Air Quality Management Areas, to set out modelling of transport emissions and onsite mitigation measures to off-set negative impacts on air quality. The impacts of transport emissions on environmental assets must also be assessed and mitigated where necessary.
- 5.6.2. The sustainability appraisal has highlighted that there are no negative impacts of the proposal, whilst there are some positive impacts. It is acknowledged that new development can result in an increase in transport and associated emissions. Without this policy in place, the transport policy in the Core Strategy (COR9) and site specific measures on the largest allocations from the AIDPD will apply. These provide a level of protection, however the new policy has a specific requirement for major development to provide low emission assessments and associated on site mitigation measures. This provides a mechanism for addressing negative air quality impacts, whilst also encouraging the introduction of low emission technologies, such as electric charging points, thereby creating the infrastructure for longer term climate change mitigation.

- 5.6.3. The impact on town centres could also be a positive factor. Cullompton and Crediton are both Air Quality Management Areas, with Tiverton at risk of being classified in addition. It is noted that the poor air quality, caused by the significant amount of road traffic through Cullompton and Crediton, has a link to the viability and vitality of the town centre. This policy may have a positive effect on the town centres through the requirement for development in those areas to provide on-site mitigation to reduce negative impacts on air quality.

5.7 DM/7 Pollution

Policy text:

Applications for development that risks negatively impacting on the quality of the environment through noise, odour, light, air, water, land and other forms of pollution must be accompanied by an impact assessment and mitigation scheme where necessary. Development will be permitted where the direct, indirect and cumulative effects of pollution will not have an unacceptable negative impact on health, the natural environment and general amenity.

Policy development process:

The emphasis of the policy was shifted to permitting development that 'will not have an unacceptable negative impact'.

Alternative option(s):

Failure to have a policy on this subject would be contrary to NPPF paragraphs 110 and 120, so a 'no policy' approach is not considered to be a realistic alternative. The policy could have been merged with DM/6 (Transport and Air Quality), DM/2 (High Quality Design) or DM/3 (Sustainable Design).

Need/justification:

Amalgamating this policy with others in the LP3 would have likely reduced the detail of the policy and risked diluting its importance among other criteria. Prevention and mitigation of pollution through local policy is justified and encouraged by the NPPF.

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|----|----|----|----|----|----|----|----|----|----|-----|-----|----|----|----|-----|----|----|----|----|----|-----|----|----|----|----|---------|---|--|
| DM/7 | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall | | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | +/- | +/- | 0 | 0 | 0 | +/- | 0 | 0 | 0 | 0 | 0 | +/- | 0 | 0 | 0 | 0 | +/- | | |
| | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | ? | 0 | 0 | | 0 | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | | | |
| Timescale: Short to long term. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Secondary/cumulative/synergistic effects: Traffic pollution from individual vehicles can have a low level impact, but indirectly and cumulatively there can be more significant impacts on amenity, biodiversity and the environment. The policy seeks to minimise such unacceptable negative impacts. Synergistically the policy also complements DM/3 (sustainable design) which has the option for development to tackle NOx Emissions as a credit towards meeting the Code for Sustainable Homes criteria; having this policy work in tandem with DM/3 ensures that the effects of pollution are considered and where necessary mitigated on all development, not just on those where it is selected as a credit towards achieving the Code level. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Temporary/permanent effects: Temporary, in that some pollution may result during construction; however it is the lifetime of a development where pollution will continue to have an effect. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

- 5.7.1. This policy aims to protect individuals, the natural environment and general amenity from the harmful effects of noise, odour, light, air, water, land and other forms of pollution. The policy requires development to provide an impact assessment of the effects of pollution from development and details of mitigation where necessary.
- 5.7.2. The policy acknowledges that development may have a negative impact on the quality of the environment through the direct, indirect and cumulative effects of pollution. However, the policy only permits development where these effects do not have an unacceptable negative impact. The results against the sustainability framework indicate that there are no outright negative impacts of applying the policy, but acknowledges that in some circumstances development may cause pollution. Whilst this is a general policy, it is anticipated that with it in place, there is an additional level of protection against developments that would pollute the local environment.
- 5.7.3. Similarly as with Policy DM/6 the impact on town centres could be a positive factor. Cullompton and Crediton are already Air Quality Management Areas, with Tiverton at risk of being classed in addition. The various forms of pollution can have a damaging impact on the vitality of a town centre. This policy may result in mitigation schemes being put in place within town centres to address potential negative impacts.

5.8 DM/8 Parking

Policy text:

Development must provide an appropriate level of parking, taking into account:

- The accessibility of the site, including the availability of public transport;*
- The type, mix and use of development;*
- Local levels of car ownership.*

Design must enable and encourage the maximum use of sustainable modes of transport, including provision for cyclists and low-emission vehicles. Infrastructure for electric vehicles should be built

into the development according to the following minimum standards:

| Development type | | Electric vehicle infrastructure |
|---|---|---|
| <i>Residential</i> Use classes: C3, C4 | <i>House with off-road parking</i> | <i>Single phase</i> <i>1 charging point per unit</i> |
| | <i>House with on-road parking</i> | <i>Single phase</i> <i>1 charging point per 10 units</i> |
| | <i>Flats/ apartments</i> | <i>Single phase</i> <i>2 charging points per 10 parking spaces (or per 10 units)</i> |
| <i>Commercial</i> Use classes: A1-A5, B1, B2, C1-C2a, D1-D2 | <i>Leisure/ retail</i> | <i>Single/3 phase/accelerated</i> <i>2 charging points per 200m² gross floorspace</i> |
| | <i>Business, general industry, higher education and hospitals</i> | <i>Single/3 phase/accelerated</i> <i>2 charging points per 200m² gross floorspace</i> |
| | <i>Hotels & residential institutions</i> | <i>Single/3 phase/accelerated</i> <i>2 charging points per 30 rooms or per 10 parking spaces</i> |
| <i>Industrial</i> Use class: B8 | <i>Storage and distribution</i> | <i>Single/3 phase/accelerated</i> <i>2 charging points per 10 parking spaces (employees/visitors)</i> <i>Commercial vehicle recharging provision as required.</i> |

Policy development process:

Many respondents wrote in at the 2010 informal scoping consultation to express dissatisfaction about inadequate parking provision on previous housing developments. The policy seeks to address this issue in broad terms, with further detail to follow in an SPD. The supporting text was updated to include forecasts into levels of car ownership.

Alternative option(s):

The 'no policy' option would not significantly change the previous position under the Local Plan adopted in 2006, as this did not set a minimum parking standard for residential development. The NPPF does not set national standards, so in the absence of a local policy, there would be no maximum or minimum for parking provision with any kind of development. The policy could reflect the position of the NPPF (as it does) but another alternative would be to omit the table from the policy that sets specific standards on infrastructure provision for electric vehicles.

Need/justification:

Inclusion of a policy was recommended by a consultee at the Issues and Options stage in order to provide certainty for developers, and at the scoping stage the issue of parking received the most public interest of any policy topic. The NPPF does not require local planning authorities to set parking standards, but provides criteria for when they do. A policy reflecting the NPPF's position provides some clarity to developers and supports the LP3's presumption in favour of sustainable development by taking account of parking provision among all other factors. By requiring electric vehicle infrastructure the policy exploits an opportunity for the use of sustainable transport modes in accordance with NPPF paragraph 35, based on detailed guidance produced by the Low Emission Strategies Partnership. The policy does not set precise standards for car parking spaces because evidence of local car ownership is currently limited, but the Council intends to prepare an SPD in 2013 which will make use of data from the Census 2011 and focus on a variety of parking issues.

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|-----|----|----|----|----|---------|
| DM/8 | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | + | + | 0 | 0 | 0 | +/- | 0 | 0 | 0 | 0 | + |
| | 0 | 0 | + | + | + | 0 | 0 | - | 0 | 0 | 0 | 0 | 0 | 0 | - | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | |
| Timescale: Immediate to long term. | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Secondary/cumulative/synergistic effects: The impact on the use of electric vehicles is likely to have a cumulative effect, as a 'critical mass' will need to be reached in terms of the availability of infrastructure, and reduced costs of vehicles for their wider use to take place. Synergistically, this policy, and others such as DM/12 (conversion of rural buildings) and DM/21 (employment development outside settlements) is unlikely to lead to a reduction in car use in the countryside; more likely car usage may be increased as a result. | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Temporary/permanent effects: There impact will be permanent in relation to setting the amount of parking available per development, and through permanent installation of electric vehicle charging infrastructure. | | | | | | | | | | | | | | | | | | | | | | | | | | | |

- 5.8.1. The policy takes account of the fact that car ownership is predicted to increase, rather than decrease, over the next 10-15 years, and particularly reflects the importance of car usage in Mid Devon due to its rural nature. Rather than try to limit car usage through applying maximum parking standards, the policy seeks to provide adequate parking, and seeks to deliver low emission vehicle infrastructure to new developments. This recognises that restrictions in parking do not correspond to a reduction in car ownership, which has caused increasing congestions within residential areas. The policy states that car parking standards will be expressed within a supplementary planning document in the near future.
- 5.8.2. The success of the policy will be greatly determined by the introduction of affordable mass-market low emission vehicles. The introduction of low emission infrastructure alone is unlikely to be sufficient to change car ownership preference from petrol/diesel usage to more sustainable alternatives. However, without infrastructure in place to enable residents and businesses to charge/re-fuel low emission vehicles there would be a significantly reduced likelihood of the technologies taking hold in the district. It is likely that residents will continue to make use of traditional diesel/petrol vehicles until mass market low emissions technology becomes common across the country, thereby driving down costs.
- 5.8.3. The policy has some potentially negative effects when scored against the sustainability framework. These are related to the delivery of affordable housing, as the requirement to deliver low emission technologies adds an additional requirement and cost to developers which may impact on viability. However, building EV charging infrastructure into a

development alongside all the other utilities infrastructure is likely to be far cheaper than retro-fitting, and is not considered to impose an excessive burden on development.

- 5.8.4. It is difficult to be absolutely certain about the positive outcomes, given that low emission technologies are relatively new, though there should be beneficial impacts on public transport and opportunities for walking and cycling. The analysis highlights that the policy has potentially a mixed outcome in terms of reducing carbon dioxide emissions. This is because the positive benefits of using electric vehicles is to some extent offset by the fact that their production incurs a high carbon cost, whilst the electricity that powers them may be derived from fossil fuels, which are a finite resource. However the supporting text does encourage the option for other alternative fuel sources to be used in future.

5.9 DM/9 Cross subsidy of affordable housing

Policy text:

The Local Planning Authority will consider the inclusion of some market housing within exception sites where there is evidence of local need for affordable housing. The amount of market housing must be lower than the amount of affordable housing and at the lowest proportion that will ensure the delivery of significant affordable housing.

Policy development process:

The possibility of cross-subsidy on exception sites was introduced by the NPPF, previously Mid Devon had no policy on this subject. Consultation responses from the Issues and Options stage highlighted a desire from some rural communities for a relaxation of the 100% affordable target on exception sites. The policy was amended to consider permitting only 'where there is evidence of local need for affordable housing' following advice from Development Management. Discussions took place with PPAG about setting a ratio split between affordable and market housing, though this was not included within the final policy.

Alternative option(s):

The option to specify a ratio between affordable housing and market housing, e.g. 70:30 was discussed, however it was agreed that there was no evidence to support such a measure. Instead each site will have to be considered on its own merits.

Need/justification:

The NPPF sets out the possibility of permitting cross-subsidy housing schemes on exception sites. This policy develops the NPPF a little further, providing more guidance for developers.

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|-----|----|----|----|----|----|----|-----|----|----|----|----|----|----|-----|----|----|----|----|----|----|----|----|----|----|----|---------|
| DM/9 | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | +/- | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| | +/- | 0 | 0 | 0 | 0 | 0 | 0 | +/- | + | + | + | 0 | 0 | 0 | +/- | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | + | + |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | |
| <p>Timescale: Short to long term. Some developments may come forward relatively quickly as the implementation of this policy may make a site viable, that previously would not have gone ahead.</p> <p>Secondary/cumulative/synergistic effects: Whilst per site, there may be a small reduction in the number of affordable homes delivered, across the district this could lead to under-delivery of needed affordable provision.</p> <p>Temporary/permanent effects: Permanent, as once the split between market/affordable homes on a site is agreed, this is set by a S106 agreement. This could be varied after agreement, but would likely only result in a decrease in the number of affordable homes.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | |

- 5.9.1. This policy allows for a proportion of houses on exception sites (i.e. sites outside of settlement limits) to be market housing to enable the delivery of affordable housing. This reflects recent changes to national policy allowing cross-subsidy housing, which previously would not have been able to take place and all housing would have needed to be affordable.
- 5.9.2. There are some positive benefits to arise from this policy. Developers have previously argued that certain exception sites within the district were not viable as 100% affordable, and therefore would not come forward. Allowing a proportion of market housing, in order to deliver the affordable housing will have a positive effect on the overall number of houses proposed, and the timing at which they can come forward.
- 5.9.3. Less clear is the affect this policy will have on the number of affordable homes delivered. Potentially, this results in a drop in the number of affordable homes that could be built, but contrary to that it could be argued that those sites may never have come forward under the previous national policy. Other possible positive outcomes that may come about as a result are an increase in the number of lifetime homes (as 20% of new housing would have to meet this target).
- 5.9.4. Furthermore, results from the Issues and Options consultation period highlighted a desire from some communities for a relaxation of the 100% affordable housing requirement. This was requested in order to make sites in rural areas viable and therefore help realise the delivery of needed affordable housing. The policy was also worded to reflect concern from Elected Members about too much market housing being allowed in order to make a site viable. The policy is worded such that the amount of market housing is lower than the affordable element, and is the lowest proportion needed for delivery.

5.10 DM/10 Rural workers dwellings

Policy text:

Applications for rural workers dwellings will be permitted where

- a) It can be demonstrated that the nature and demands of an existing rural business are such that a full time worker has an essential need to be permanently resident at or near their place of work so they are available at all times,*
- b) The need cannot be met within a nearby settlement, or by existing housing at or near the site or through the conversion of a suitable redundant or disused rural building at the site,*
- c) The size and scale of rural workers dwellings will be commensurate with the scale of the operation and designed to reflect the location and setting of the proposed site.*

Where a rural business is not established a temporary dwelling may be permitted on the basis of the criteria above and where there is clear evidence of a firm intention to establish a rural enterprise and sound financial planning.

Policy development process:

Mid Devon had no previous policy on rural workers dwellings, however with the introduction of the NPPF, particularly paragraph 55, a policy needed to be developed to augment national guidance. The informal scoping stage consultation received many responses stating that agricultural and forestry worker dwellings were thought to be essential where there is a proven need. Further support was noted at Issues and Options stage for retaining a policy on agricultural workers dwellings. Consultee-suggested criteria written into the policy included setting a test for occupational workers and the size should be appropriate to scale of operation. Amended permitting a temporary dwelling 'where there is clear evidence of a firm intention to establish a rural enterprise and sound financial planning' and additionally supporting text now states that S106 agreement will be used to tie occupation to the building following requests from development management. The term 'functional' need was amended to 'essential' in criterion (a) to bring policy in line with the NPPF. No financial test has been incorporated into the policy, as had previously been the case with Planning Policy Statement 7.

Alternative option(s):

A more detailed policy was discussed, which would have further elaborated on the provisions contained within the NPPF in relation to specifying locations, though it was thought that criterion (b) was as specific as the policy could be.

Need/justification:

The policy has built on the provisions of the NPPF, but has added further detail in regards to essential need. The supporting text states aims to ensure that temporary dwellings may be permitted where there is a viable demonstration of evidence to support the operation of a rural business.

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|---------|--|
| DM/10 | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall | |
| | 0 | 0 | 0 | -? | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | - | - | 0 | 0 | 0 | 0 | +/- | |
| | 0 | + | 0 | 0 | 0 | -? | -? | 0 | + | 0 | + | 0 | 0 | 0 | 0 | + | 0 | + | 0 | - | 0 | 0 | 0 | 0 | 0 | 0 | | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | | |
| Timescale: Short to long term. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Secondary/cumulative/synergistic effects: The policy may result in more homes being built in the countryside which cumulatively could impact on the landscape. Any proposals would be determined with regard to DM/2 (high quality design) and also Mid Devon's Landscape Character Assessment. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Temporary/permanent effects: The policy permits temporary dwellings where a firm intention to establish a rural enterprise is demonstrated, which will result in dwellings appearing for a limited period. Otherwise, the construction of rural workers dwellings is likely to have a permanent impact. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

- 5.10.1. This policy permits the development of housing for rural workers outside of defined settlement limits, providing a criterion based approach when this can take place. It seeks to balance the needs of rural businesses against the harm of developing within the open countryside.
- 5.10.2. Analysis against the sustainability framework highlights a number of positive and negative outcomes as a result of this policy. The policy will deliver a limited number of new housing where there is a rural need. This could also positively help a rural business where the need for a worker to be permanently on site is essential to the success of the enterprise.
- 5.10.3. There are some negative impacts however. The location of the dwelling, outside of a settlement is likely to lead to increased car usage in order to access services that potentially could be some distance away, resulting in increased carbon emissions. In order to minimise such harm, developments will only be permitted where there is no existing housing or conversion of existing buildings is not an option, thereby reducing opportunities where the policy will apply.
- 5.10.4. Negative impacts could also arise from development taking place within the open countryside to the detriment of the surrounding landscape. To minimise the harm, the policy has been worded so that the scale of any building is proportionate to the size of the enterprise, and that it reflects the location and setting of the site, whilst any proposals would also be considered within the scope of DM/2 (high quality design). Overall it is noted that there are sustainability concerns with the policy, which have been accepted on the basis of the boost provided by the policy to rural enterprises with particular need for on-site round the clock labour.

5.11 DM/11 Occupancy conditions

Policy text:

Permissions for rural workers dwellings will be subject to an occupancy condition. Removal of such a condition will only be permitted where there is clear evidence that there is no need for the condition to remain in place.

Policy development process:

There was general support at the Issues and Options consultation stage for a policy on agricultural workers properties with an occupancy condition. A consultee response requested being able to sell within a set period of time. A minimum marketing time of either 12, 18, or 30 months was discussed at Development Management, PPAG and Cabinet stages, and the final figure of 18 was agreed.

Alternative option(s):

There remains the option to have no policy, and instead not make use of occupancy conditions.

Need/justification:

Not implementing occupancy conditions may result in housing intended for rural workers being purchased by anyone on the open market, which in itself would raise the cost of these dwellings. Overall this would result in a reduction in the availability of lower cost dwellings for agricultural/forestry workers.

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|---------|--|
| DM/11 | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | |
| | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | + | 0 | 0 | 0 | 0 | + | + | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | | |
| Timescale: Short to long term. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Secondary/cumulative/synergistic effects: This will have secondary effects on the availability of agricultural/forestry/other important rural labour in the vicinity. The policy should have a positive impact in this regard. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Temporary/permanent effects: The effects will be permanent, though the policy does set criteria whereby an occupancy condition can be removed. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

5.11.1. This policy attaches a planning condition to rural workers dwellings, tying the dwelling to the agricultural or occupancy use. The removal of a tie is restricted to situations where the use is no longer needed, and requires provision of strong evidence as justification.

5.11.2. There are a number of positive effects as a result of this policy. Whilst not classed as affordable housing, this type of housing could be considered low cost. The tie placed on the building by a planning condition effectively keeps the cost of the property to a level that makes it more affordable to rural workers, thereby possibly providing a form of lower cost housing that meets a local need. Whilst this cannot be highlighted on the sustainability appraisal as having a positive effect on 'affordable housing', it does have a local positive impact, and also the reason why it is noted as being supported by consultation results.

5.12 DM/12 Conversion of rural buildings

Policy text:

The conversion of redundant or disused rural buildings of substantial and permanent construction which positively contribute to an area's rural character for residential or employment uses will be

permitted where:

- a) A suitable access to the building is in place or can be created without damaging the surrounding area's rural character and the road network can support the proposed use*
- b) The building can be converted without significant alteration, extension or rebuilding*
- c) The design will retain the original character of the building and its surroundings*
- d) The development will retain any nature conservation interest associated with the site or building*

Policy development process:

The NPPF is the starting point for developing a policy on this topic, as currently Mid Devon has no policy covering conversion of rural buildings for residential use. A variety of responses were received at the Issues and Options stage, though generally it was felt a policy was required. The earlier informal scoping stage consultation also received responses to state that a policy permitting the conversion of rural buildings should be included. Responses suggested the following criteria which are reflected in the policy – provision of suitable access, to take account of local character and design to enhance immediate vicinity. Added criterion (e) 'development will retain any nature conservation interest' following identification that rare species may use abandoned barns as a result of analysis from this sustainability appraisal. Removed criterion 'the building is not in a prominent or isolated location' as other criteria provide sufficient protection.

Alternative option(s):

The alternative option would be to use the NPPF as the sole guidance for determining such applications.

Need/justification:

The policy augments national guidance, developing the NPPF's requirement for such conversions to 'lead to an enhancement to the immediate setting', by applying the policy only to 'buildings of substantial and permanent construction' that 'positively contribute to an area's rural character'. The policy also sets criteria about access to such buildings, impacts on the road network and conservation interests, given that unused barns can be used by priority species, e.g. for nesting.

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|----|-----|-----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|-----|----|-----|-----|----|---------|--|
| DM/12 | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall | |
| | 0 | +/- | +/- | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | - | +/- | 0 | 0 | 0 | 0 | +/- | |
| | 0 | 0 | 0 | 0 | 0 | -? | -? | 0 | + | + | + | 0 | 0 | 0 | 0 | + | + | +? | 0 | - | 0 | 0 | 0 | +/- | +/- | 0 | | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | | |
| Timescale: Immediate to long term. Proposals for conversion of rural buildings could be submitted immediately given the provisions of the NPPF. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Secondary/cumulative/synergistic effects: The conversion of rural buildings to residential use will increase the number of people living in the countryside, this has effects in terms of carbon emissions and services reaching those dwellings. Synergistically, when assessed alongside Policy DM/21 (employment development outside settlements) which sets criteria by which new employment development can take place in the countryside, both policies will be adding to the number of people not living and working in the main settlements. However there is a limited stock of available buildings for conversion, so it is anticipated that these effects will not be too significant. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Temporary/permanent effects: Once converted, those buildings cannot be used again for their original purpose. However the policy stipulates that any conversion must result in an enhancement of the setting, thereby having a positive permanent effect on the landscape. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

- 5.12.1. This policy permits the conversion of redundant or disused rural buildings to a residential or employment use. The policy recognises the importance of rural buildings to the landscape and character of Mid Devon and permits their conversion where proposals meet a number of criteria regarding access, design, amenity and compatibility with rural character.
- 5.12.2. Against the sustainability framework the policy has some positive outcomes, but also a number that are negative. A number of factors are scored negatively when first referenced against the matrix and as such the policy and supporting text has been amended to reflect this in order to reduce these effects. In particular this affected the indicators for impact on protected/priority species and wildlife networks. Rural buildings such as barns can provide habitats for creatures such as barn owls and bats, particularly if the buildings have been redundant for some time. The original policy wording made no reference to the priority species or any surveying work. The policy was redrafted after initial scoring as part of the sustainability appraisal and the wording was updated to include a need to retain any nature conservation interest, and the supporting text requires provision of a habitat survey and makes reference to other legislation that exists to provide protection for priority species.
- 5.12.3. Other effects include the impact on the rural landscape of the district. Rural buildings contribute positively towards the character and appeal of the district. Inappropriate conversion of such buildings to a residential or employment use could therefore have a negative impact. The policy seeks to improve the landscape by retaining buildings of character – others will eventually be knocked down. Tourism could also be affected as the rural nature is central to the attraction of the district. To mitigate against such impacts the policy requires a conversion to be undertaken without significant alteration to existing building, to retain the original character of the building and surrounding landscape, and to result in an overall enhancement to the immediate vicinity as required by the NPPF.
- 5.12.4. The policy could also have an effect on carbon emissions. Locating development away from existing settlements is likely to lead to increased car usage, given the low levels of public transport in the more rural parts of the district. Further negative impacts will be felt in terms of waste, as the creation of isolated homes in the countryside requires services, such as waste collection to come to them. This has implications for carbon in increasing the length of collection rounds, as well as increasing the cost of services. To some degree there

will be a positive impact on carbon emissions as a converting an existing building will use less energy than constructing a brand new dwelling. There are also positive impacts on the level of houses created, as well as provision of employment floorspace in rural areas.

5.13 DM/13 Replacement dwellings

Policy text:

The construction of replacement dwellings will be permitted where the replacement dwelling's floorspace will be no greater in size than the existing dwelling, taking into account any unspent permitted development rights.

Policy development process:

General support expressed at the Issues and Options stage for a policy. Suggested criteria to use included only permitting replacements on a like-for-like basis, not permitting larger properties, otherwise property prices would rise. These concerns were also raised during the earlier informal scoping stage consultation. Removed criterion (b) to permit replacement dwellings where 'the form and character of the new dwelling will complement its situation and the appearance of nearby buildings' as this is covered by Policy DM/2 (high quality design) and added inclusion of 'unspent permitted development rights' to criterion (a) on the advice of Development Management.

Alternative option(s):

Have a policy based on replacement to have same footprint.

Need/justification:

Having a policy based on building footprint takes no account of the height of the replacement. Larger replacements, e.g. a two storey executive home replacing a bungalow with a reasonable footprint could result in a greater sale cost, and reduce the overall pool of lower cost rural housing.

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|---------|---|
| DM/13 | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | +/- | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | 0 |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | | |
| Timescale: Short to long term. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Secondary/cumulative/synergistic effects: Synergistically this policy will be read in conjunction with policies DM/2 (high quality design) and DM/15 (design of housing) thereby ensuring that any replacement dwellings are built to a high standard, improving the quality of the housing stock across the district. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Temporary/permanent effects: Replacement buildings will be permanent additions to the landscape. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

5.13.1. This policy permits the replacement of existing dwellings with new buildings, but limits the floorspace to no greater than that of the original property.

5.13.2. There are no significant impacts as a result of the policy, with the sustainability framework showing a balance between some potential positive and negative effects. In terms of carbon

emissions the construction of a new building will result in the use of large amounts of emissions during the manufacture of the materials and during construction. However a new building will have to adhere to higher standards of energy efficiency as set out by building control and Policy DM/3 (sustainable design) set out in this document, which will act positively against the negative impacts.

- 5.13.3. A new building may also feature renewable energy technologies as part of the design, thereby increasing the capacity of the district. 20% of new buildings will also have to be constructed to Lifetime Homes standards, therefore some replacement buildings will meet this standard. Public support at the Issues and Options consultation was also expressed in favour of having a policy. A general beneficial impact of the policy is that it may allow sub-standard homes to be improved – there is no indicator above to note this impact.

5.14 DM/14 Extensions and ancillary development

Policy text:

Extensions to existing dwellings and other ancillary development will be permitted provided that they:

- a) Respect the character, scale, setting and design of existing dwellings;*
- b) Will not result in over-development of the dwelling curtilage; and*
- c) Will not adversely affect the residential amenity of occupants of nearby properties*

Policy development process:

Broad support expressed at Issues and Options stage for policies to manage extensions and ancillary development, and that national policy alone was not sufficient. Representations suggested including criteria on overlooking, design, loss of character, privacy, and size. The supporting text was amended to include last line regarding design and location of ancillary development following discussions with Development Management.

Alternative option(s):

To rely on a general design policy.

Need/justification:

Broad support at Issues and Options consultation stage for a policy on this subject. Making use of a general design policy doesn't cover the specific impacts that extensions can have on neighbouring properties. Also, the significant number of householder applications received by the district meant that having a specific policy on extensions will be of use for much of the work undertaken by Development Management.

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|---------|--|
| DM/14 | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | - | - | 0 | 0 | 0 | 0 | +/- | |
| | 0 | + | ? | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | + | 0 | 0 | 0 | + | ? | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | | |
| Timescale: Immediate to long term. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Secondary/cumulative/synergistic effects: The local streetscene can be affected by many properties adding extensions. Extensions may also present opportunities for home working. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Temporary/permanent effects: Once built, extensions and ancillary development are permanent additions. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

- 5.14.1. This policy sets out the conditions under which extensions to existing dwellings and any other ancillary development can take place.
- 5.14.2. Extensions and ancillary development can have an impact on an area, though the scale of the impact is typically determined by the size of the development. Small domestic extensions, where there are few immediate neighbours can have very little impact. Larger extensions, taking up significant parts of a garden, or that affect the amenity of neighbours, or are in a rural location and visually impact on the quality of a landscape can be particularly detrimental to the local environment. There was broad public support at the Issues and Options stage for having a criteria-based policy to cover extensions and ancillary development.
- 5.14.3. There are a number of other potential negative effects of permitting extensions. In rural areas adding an extension to a property can significantly increase the desirability and therefore the price of a dwelling. The reduction of 'lower cost' housing in rural areas contributes towards gentrification and creates less sustainable communities. On the reserve of this however, permitting someone to extend their home may remove their need to move home, either to a bigger property, or to one that is designed to meet their needs, e.g. if they have a disability. In such cases allowing them to extend their own home may mean they do not need to join a waiting list for an adapted local authority or housing association property.
- 5.14.4. In terms of climate change impacts, permitting extensions increases the footprint of a property, and thereby the energy consumption of a property. However, the land an extension is built on is often classed as previously developed land, which is being reused. Furthermore, householder applications make up approximately 30% of the applications received by Mid Devon District Council and these typically request planning permission for extensions. The building work undertaken for this type of development is an important part of the local economy and is typically undertaken by local self-employed building contractors or small firms.

5.15 DM/15 Design of housing

Policy text:

New housing development should be designed to deliver:

a) High quality local places taking into account physical context, local character, density and land use mix;

- b) Adequate levels of daylight, sunlight and privacy to private amenity spaces and principal windows;*
- c) Suitably sized rooms and overall floorspace which allows for adequate storage and movement within the building together with external space for recycling, refuse and cycle storage;*
- d) Adaptable dwellings that can accommodate a range of occupiers and their changing needs over time which will include the provision of a lift in home with more than one storey*
- e) Private amenity space that reflects the size, location, floorspace and orientation of the property;*
- f) Sustainable forms of development that maximise the natural benefits of the site through design, materials, technology and orientation;*
- g) On sites of 10 houses or more the provision of 20% of dwellings built to lifetime homes standard;*
- h) Car parking in accordance with Policy DM/8.*

Policy development process:

The NPPF is the starting point for developing a policy as this sets a requirement to secure a good standard of amenity. Many responses were received at the informal scoping stage consultation requesting proper provision for cycle storage, recycling and waste storage. Criteria reflecting these requirements have been included within the policy. Stair lift requirement was added at request of PPAG, whilst criterion (h) was added to cross-reference with parking policy at the request of Development Management.

Alternative option(s):

A requirement for more than 20% of housing to meet the lifetime homes standard was discussed. Analysis was undertaken to examine the percentage of homes to meet the standard set by other Devon LPAs, however it was concluded that a 20% target was the only level that could be backed up with evidence. A more detailed policy was proposed but instead it was decided to be less prescriptive, and instead set out such provisions in supplementary design guide.

Need/justification:

The policy builds on the guidance set out in the NPPF and augments it with local evidence on disability (in order to set the lifetime homes target) and other issues requested from consultees, such as provision for cycle, waste and recycling storage.

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|---------|--|
| DM/15 | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall | |
| | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | + | |
| | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | | |
| Timescale: Short to long term. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Secondary/cumulative/synergistic effects: Cumulatively the policy will start a process by which more properties across the district are adaptable, though the policy will have no effect on the existing housing stock. The policy is therefore likely to have the indirect effect of allowing elderly or disabled people the opportunity to remain in their homes, should their needs change. The policy complements DM/2 (high quality design) in the delivery of both a high quality urban realm with well-designed housing that meets the needs of local residents. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Temporary/permanent effects: Permanent, as the policy requires a high standard of design which will affect the lifetime of a development. The requirement for adaptable properties will have a changing effect over time on the layout of a house, for example allowing buildings to be altered as circumstances change. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

- 5.15.1. Research by CABE in 2010 highlighted that the UK is building the smallest houses in Europe. It noted the importance of providing flexibility of space within the home to adapt to changing needs, to provide space for family life and opportunities for children to study in private and most importantly that improved health and well-being can result from living in a well-designed home that provides sufficient space to function well and support privacy and social activity.
- 5.15.2. This policy seeks to take account of these points by including criteria to guide the development of new housing within the district. It stipulates requirements to deliver a high quality housing design, including provision of adequate space for storage, private amenity space and a proportion of homes to meet lifetime homes standard.
- 5.15.3. Positive sustainability impacts as a result of this policy include delivery of a proportion of new homes to be built to lifetime homes standard, the inclusion of space for cycle storage and the impact this could have on local cycling activity. Furthermore, consultation and input from Elected Members has highlighted the need for adequate room for storage and movement within a property.
- 5.15.4. Other potential positive effects that are harder to determine include impacts on landscape character and conservation areas. The policy requires the delivery of high quality places that take account of local character, whilst in addition the policy will need to be read in accordance with DM/2 (High quality design) and DM/28 (Heritage assets). Indeterminate effects could include the impact on public open space deriving from the requirement to provide 'private amenity space that reflects the size, location, floorspace and orientation of the property'. This could result in larger private gardens at the expense of public open space. However, consultation responses have highlighted that this would be an acceptable trade-off. A potential negative impact could include a reduction in the number of dwellings per hectare delivered as a result of providing sufficient movement and storage space.

5.16 DM/16 Dwelling sizes

Policy text:

Newly constructed dwellings must exceed the following minimum internal floorspace requirements.

| <i>Bed spaces that can be accommodated in bedrooms</i> | <i>Internal floorspace of property</i> |
|--|--|
| <i>1 bed space</i> | <i>30 to 35 sq m</i> |
| <i>2 bed space</i> | <i>45 to 50 sq m</i> |
| <i>3 bed space</i> | <i>57 to 67 sq m</i> |
| <i>4 bed space</i> | <i>67 to 75 sq m</i> |
| <i>5 bed space – 1 storey</i> | <i>75 to 85 sq m</i> |
| <i>5 bed space – 2 storey</i> | <i>82 to 85 sq m</i> |
| <i>5 bed space – 3 storey</i> | <i>85 to 95 sq m</i> |
| <i>6 bed space – 1 storey</i> | <i>85 to 95 sq m</i> |
| <i>6 bed space – 2 storey</i> | <i>95 to 100 sq m</i> |
| <i>6 bed space – 3 storey</i> | <i>100 to 105 sq m</i> |
| <i>7 bed space – 2+ storey</i> | <i>108 to 115 sq m</i> |
| <i>7+ bed space</i> | <i>Add 10 sq m per bed space</i> |

Policy development process:
This policy was added at PPAG stage following a request to ensure parity between the size of market and affordable houses that were being developed. A more detailed explanation of bedspace was included to add clarity to the policy at the request of Development Management.

Alternative option(s):
The option to have no standards.

Need/justification:
Mid Devon has no alternative evidence base on which to justify standards that are different from those set by the Homes and Communities Agency (HCA). However, there is no reason why market houses should be built to a smaller space standard than affordable homes, and on this basis the HCA standards have been introduced as the minimum for all new homes.

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|---------|--|
| DM/16 | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall | |
| | 0 | 0 | -? | -? | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | - | 0 | 0 | 0 | 0 | 0 | 0 | - | 0 | 0 | 0 | 0 | - | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | | |
| Timescale: Short to long term. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Secondary/cumulative/synergistic effects: Indirect effects may include the impact on land intake, as increasing room sizes may reduce the number of dwellings that can be built on a plot. The policy, working in tandem with DM/15 (design of housing) requiring sufficient private amenity space and Policy DM/29 (integrating green infrastructure in major development) which contains provisions for larger gardens could collectively add to the overall land intake. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Temporary/permanent effects: Permanent, the policy will set the size of rooms in a dwelling, which once built are a permanent feature. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

- 5.16.1. This policy sets minimum floorspace requirements for new housing development. It uses Homes and Communities Agency standards for affordable housing and seeks to apply it to market housing as well.
- 5.16.2. As per the analysis of DM/15 (design of housing) this policy seeks to address the provision of housing with sufficient internal space for the activities of family life. Responses from consultations and Elected Members has highlighted that this is an issue of local significance. Potential additional positive outcomes include the effect this can have on educational achievement. CABE research from 2010 indicated where children had no place for private study in houses this could be linked to poor educational attainment.
- 5.16.3. A potential negative outcome of implementing this policy is the effect it could have on the land intake. Increasing minimum dwelling sizes could reduce the number of dwellings per hectare that can be delivered on a particular site. A concern could be that this policy impacts on the number dwellings that can be delivered, and then the district would need to consider whether it allocating more land for housing is required, which itself has implications for wildlife and landscape. However the proposed minimum standard represents overall a very marginal increase on the average house size being delivered within the district. It is anticipated that this policy can be implemented by incorporating the changes into existing allocated sites.
- 5.16.4. Increasing the size of houses could also lead to increased carbon emissions. Larger and/or more rooms are likely to result in greater use of materials during construction and increased heating/energy costs during the lifetime of the building. Though, providing larger dwellings does provide opportunities to consider orientation in way to increase passive solar gain, particularly through the use of larger windows.
- 5.16.5. Overall, the analysis against the sustainability framework highlights that the policy is less sustainable than others within the LP3. However, given that national research and local consultation has highlighted that dwelling sizes have become too small, the implication of the policy is felt to have overall benefits for society, that outweigh the negative sustainability impacts.

5.17 DM/17: Town centre development

Policy text:

The Council will promote the sustainable growth and regeneration of Tiverton, Cullompton, Crediton and Bampton. Within defined town centres, development proposals for retail, leisure, commercial, office, tourism, cultural, community and residential development will be supported where they:

- a) Retain or enhance the town centre's historic character and appearance, vitality and viability;*
- b) Sustain or enhance diverse town centre uses and customer choice, incorporating residential accommodation above ground floor level where possible; and*
- c) Are readily accessible by public transport, walking and cycling.*

Within defined primary shopping areas the shopping function will be safeguarded and enhanced. Development and change of use of ground floor retail premises to alternative uses will not be permitted where:

- i) The primary retail role and character is undermined, causing unacceptable fragmentation and isolation of the remaining shops;*
- ii) The proposed use would harm the vitality and viability of the primary shopping area;*
- iii) The proportion of A1 retail uses would fall below 65% of all units within the primary shopping frontage; or*
- iv) There would be a detrimental effect on the visual character and amenities of the surrounding area.*

Policy development process:

Support was expressed at the informal scoping stage consultation for town centre housing, particularly flats above shops, though there was opposition to commercial developments being converted to residential. Further support was registered at Issues and Options stage for a policy on town centre housing based upon a refined version of that contained within the existing Adopted Local Plan 2006. Earlier informal scoping stage consultation highlighted strong support for shops in town centres, with some proposing a mix of shops and housing as appropriate with an allowance for leisure, business, tourism and community uses.

A policy specifically on town centre housing was drafted, but was not included in the final plan. This was because the provisions within it are covered by this policy, and Policy DM/15 (design of housing). Suggested criteria to use for a general town centres policy included taking account of historic character and appearance, supporting the growth/promotion of town centres and restricting conversion of other uses to dwellings. The detail of the wording was adjusted over time in consultation with the Council's Retail Study consultants, to ensure adequate protection of town centres and the core retail function of primary shopping areas.

Alternative option(s):

The NPPF requires LPAs to define the extent of town centres and primary shopping areas. The policy does this (see associated Submission Policies Map) and reflects the wording of NPPF paragraph 23. Having no policy is not considered a realistic option, given the requirements of the NPPF. The Council's Retail Study considered a number of options put forward in the Issues and Options consultation, including merging of previous 2006 Local Plan policies as well as reliance on national policy.

Need/justification:

The NPPF provides the need/justification for this policy in principle. The Retail Study considered the options and recommended a local policy. The policy wording was devised through discussion with the Retail Study consultants and takes account of both national policy and previous public consultation responses.

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|---------|--|
| DM/17 | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall | |
| | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | + | 0 | 0 | 0 | + | + | + | -? | + | + | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | + | |
| | + | + | -? | + | + | + | + | + | + | + | 0 | + | +/ | + | + | + | 0 | + | 0 | + | + | 0 | + | + | + | 0 | | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | | |
| Timescale: Medium to long term - change of use is an incremental process, and the concentration of town centre uses within the primary shopping areas and shopping frontages is likely to be more noticeable in the medium to long term. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Secondary/cumulative/synergistic effects: As a direct consequence the policy concentrates town centres uses within town centre boundaries, and therefore indirectly may make residential uses more likely outside of those boundaries. Synergistically this policy along with DM/18 (development outside town centres) directs new employment development towards the town centres, i.e. the most sustainable location. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Temporary/permanent effects: Permanent, but will be incremental in nature, and the option to revise town centre boundaries to permit different uses can be revisited in future should circumstances change. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

- 5.17.1. This policy encourages sustainable growth and regeneration of the district's principal settlements of Tiverton, Cullompton, Crediton and Bampton. The policy focuses on promoting a variety of town centre uses, whilst resisting development that would harm the vitality and viability of defined primary shopping frontages.
- 5.17.2. This policy scores very positively against the sustainability framework, with considerable positive impacts, against few that are negative. The positive impacts include using previously developed land through conversions, and building near to services/retail thereby increasing the likelihood of the use of sustainable means of travel. This policy may also increase the level of housing across the district. It is felt that providing some housing within town centres can positively contribute towards vitality. Mixed use town centres can have a wider economic benefit through developing the evening economy, whereby residents' access facilities such as restaurants/cinemas after traditional retail closing hours. The policy is therefore striking a balanced approach to maintaining vitality and viability, seeking to encourage a range of uses that support economic growth.
- 5.17.3. A possible negative impact could be the loss of employment floorspace to housing and the impact this could have on the vitality and viability of the district's town centres. The policy has been written so that a proposal will be refused where it is deemed to impact on viability/vitality.
- 5.17.4. Other impacts that are noted as having a potentially negative impact include the effects on air quality. The town centres of Crediton and Cullompton are already designated as Air Quality Management Areas, whilst Tiverton is at risk of being given the same status. Whilst town centre living is likely to result in increased use of sustainable modes of transport, evidence suggests that residents will still wish to own a vehicle. More residents living in a town centre could have a negative impact on town centre air quality, but overall the concentration of commercial development in town centres is likely to reduce travel to out of centre retail and business premises and reduce the district's residual transport emissions. To offset negative effects, this policy will need to be read in conjunction with Policies DM/6 (Transport and Air Quality), DM/7 (Pollution) and DM/8 (Parking), which set controls and mitigation measures to minimise negative impacts.

5.18 DM/18 Development outside town centres

Policy text:

Within Tiverton, Cullompton, Crediton and Bampton the Council will apply a sequential approach to planning applications for main town centre uses, according to the following descending order of preference:

- a) Town centre*
- b) Edge of town centre*
- c) Out of town centre*

Edge of centre and other out of centre proposals must be well related to the town centre and accessible by public transport, walking and cycling. Proposals in these locations must also demonstrate that no suitable sites are available in a more sustainable location according to the order of preference given above.

The Council will require an impact assessment to be submitted for any proposals for retail and leisure development outside of town centres, where the proposed gross floorspace would exceed 500 square metres. The impact assessment must include an assessment of:

- i) The impact of the proposal on existing, committed and planned public and private investment in the town or other centres in the catchment area of the proposal; and*
- ii) The impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made, or ten years in the case of major development, taking into account the cumulative impact of recently completed development, planning permissions and development plan allocations.*

Policy development process:

Broad agreement from responses at Issues and Options stage for a local policy to guide development, rather than relying on national policy alone. The earlier informal consultation stage had highlighted that many felt town centres should take precedence over out of town retailing. Many responses preferred some form of restrictive approach to out of town centre development which has been reflected in the sequential approach and impact assessment requirement for larger developments.

Alternative option(s):

The alternative option identified at Issues and Options stage was to rely solely on national policy. Since then the NPPF has been published and requires LPAs to set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres.

Need/justification:

The principle of the policy is considered justified by the NPPF, which sets the framework for considering development against a sequential approach. The NPPF includes a default floor area threshold above which impact assessments for out-of-centre development would be required. The

threshold is very high considering the size of Mid Devon's towns, and the Retail Study recommends a lower threshold which has been included in the policy. The policy reflects both the NPPF and local circumstances.

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|----|----|-----|----|----|----|----|----|----|----|----|----|-----|----|----|----|----|-----|----|-----|----|----|----|----|----|----|---------|
| DM/18 | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | + | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | + |
| | 0 | 0 | +/- | +? | + | + | + | 0 | 0 | 0 | + | 0 | +/- | + | 0 | + | 0 | +/- | 0 | +/- | + | 0 | + | 0 | 0 | 0 | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | |
| Timescale: Short to long term. | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Secondary/cumulative/synergistic effects: The policy directs development towards the town centres as the most sustainable location. Indirect effects of this include the impact on traffic, which would be reduced if not having to access out of centre retail parks, instead making use of accessible sites in town centres with good public transport links. This policy complements Policy DM/8 (parking) in this regard. The policy also works synergistically with DM/20 (rural shopping) to direct larger retail towards town centres, rather than permit any development in the countryside or on the edge of settlements that may jeopardise town or village centre viability. | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Temporary/permanent effects: Permanent, once built these facilities are a permanent fixture of the townscape. | | | | | | | | | | | | | | | | | | | | | | | | | | | |

- 5.18.1. This policy sets out a sequential approach to approving main town centre uses in the four towns of the district. Retail and leisure development over 500 square metres gross floorspace is required to be accompanied by an impact assessment.
- 5.18.2. The policy aims to guide development to the most sustainable locations, e.g. town centres, closer to other shops, services and public transport provision. Analysis against the sustainability framework highlights a mixed outcome for a wide number of indicators. This reflects the variation in impact dependent on whether new development is located within the town centre (and largely has positive benefits), or as it moves to the edge of, or out of centre, those impacts become less pronounced or can have a negative effect.
- 5.18.3. It is noted that the policy does not stop development taking place, and therefore should result in a positive impact on the amount of employment floorspace for the district. However, where edge-of-centre and out-of-centre land is marketed at a lower price than land within the town centre, there could be considerable pressure to be less than rigorous in applying the sequential test. The perceived benefit would be the creation of additional jobs. Whilst new employment development would create new posts, there could be negative effects on the viability of existing retail or other employment, particularly in town centres. The creation of jobs in one location could reduce jobs in another location, having no net effect on jobs, or degrading the town centre to the point that there is an overall reduction in employment. People may choose to work or shop in new developments if they are out of town, and in doing so, visit town centres much less frequently. The policy aims to minimise such opportunities by applying the sequential approach and requiring an undertaking of an impact assessment which considers the effect on town centre vitality and viability. It will be the Council's responsibility to make balanced judgements based on evidence.

5.19 DM/19 Fronts of shops and business premises

Policy text:

Proposals for the alteration, replacement or construction of fronts of shops or business premises must be well proportioned and suited to the character of the building, adjacent buildings and the surrounding street scene. Where security measures such as grilles or shutters are proposed, these should be designed as an integral part of the building's front, maintaining the visibility of the building's interior and minimising visual impact. Independent ground floor access to the upper floors must be retained.

Policy development process:

The 2010 informal scoping stage consultation received responses stating that shop front improvements should be traditional in character, but perhaps there has been too much emphasis on materials. The Issues and Options consultation received responses stating that shop/business fronts should take account of local character and be of a high standard, and that having a policy on the subject was recommended. Mixed responses were received at this stage requesting a policy highlighting the balance between conservation of character and promoting economic growth.

Alternative option(s):

The Issues and Options report considered whether national policy would be sufficient on this subject, or whether a local policy should be amalgamated with a general town centre policy.

Need/justification:

The policy is considered to accord with the presumption in favour of sustainable development by preserving the character and appearance of the built environment while also allowing shops and business premises to adapt to change. With only the general content of the NPPF to apply, and no local policy, it would be difficult to resist inappropriate development. Cumulatively this could have a significant impact on the character of the town centre and how it is perceived by shoppers.

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|----|-----|----|----|----|----|----|----|----|----|-----|----|----|----|----|----|----|-----|----|----|----|----|-----|----|----|----|---------|--|
| DM/19 | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall | |
| | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | + | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | |
| | 0 | +/- | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | +/- | 0 | 0 | 0 | 0 | 0 | 0 | +/- | 0 | 0 | 0 | 0 | +/- | + | 0 | 0 | | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | | |
| Timescale: Short to long term. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Secondary/cumulative/synergistic effects: Synergistically the policy support DM/28 (heritage assets) in that the town centres of the four towns are all conservation areas. The quality of the retail environment in these centres is closely interlinked to their history as market towns and both policies would be applied together in order to perserve the character of the streetscene. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Temporary/permanent effects: Permanent, though the effects can be reversed much more simply (relatively), than making changes to buildings that have been constructed. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

5.19.1. This policy sets a standard for the design of shop fronts and business premises. The four towns of the district are all historic settlements, where the character of the high street is

integral to their sense of place. Most of the town centre area for each of the four towns forms part of a conservation area. Over time the significance of a historic character can be diluted if unsympathetic shop and business fronts are permitted.

5.19.2. The sustainability framework highlights positive impacts of the policy on listed buildings and the character of conservation areas. Furthermore, the historic nature of the district's market towns is an element in their tourist appeal. Ensuring the development of appropriate shop fronts should contribute towards maintaining a tourist attraction whilst also helping to deliver the priorities set out in conservation area appraisals.

5.19.3. Potential negative impacts relate to the effect such a policy could have on the viability of some shops and businesses. Shop fronts in areas of high architectural or historic value may require bespoke designs and construction in order to meet the criteria of the policy. It is possible that in some cases this could be the determining factor between an operation remaining open or being forced to close. However, taking a less stringent approach could result in the dilution of the character of a shopping area, which in itself could have a wider impact on the vitality of the entire centre.

5.20 DM/20 Rural shopping

Policy text:

Retail development will be permitted within defined villages, where it will meet local needs and is accessible by a range of transport modes.

Adjacent to the village or elsewhere in the open countryside, proposals for retail development must demonstrate that:

- a) The location and scale of the development would not harm the vitality and viability of town centre or village shopping facilities; and*
- b) The development would not lead to an unacceptable impact on the local road network; and*
- c) There would not be an unacceptable adverse impact to the character and appearance of the countryside.*

Policy development process:

The Issues and Options consultation provided many suggestions for criteria that should be included within a rural shopping policy. Those suggestions that were within the scope of development management included taking account of reducing traffic impacts, permitting small scale employment adjacent to settlements and consideration of viability and vitality of town/village centres. Minor adjustments were made to policy wording as it developed, such as the removal of a line in the opening paragraph stating that 'scale must be appropriate to the settlement', as this is covered by other criteria later in the policy. The emphasis of the policy was changed so that the criteria based approach is applied not only to countryside development, but also to retail development adjacent to defined villages.

Alternative option(s):

The Issues and Options consultation considered either 'policy or no policy' options. To some extent the subject is already addressed through Policies COR17 and COR18 of the adopted Core Strategy (allowing appropriately scaled retail development in rural areas), and now the NPPF takes a permissive approach to the growth of the rural economy.

Need/justification:

The NPPF (paragraph 25) refers to small scale rural development as an exception to the stringent out-of-town-centre sequential test procedure, and goes on to encourage a pro-growth agenda in rural areas. The Retail Study recommends the inclusion of a Local Plan policy to amplify the strategic direction provided by the Core Strategy. The policy is consistent with the NPPF taken as a whole, in that it promotes sustainable modes of transport, considers impact to the vitality and viability of existing facilities, and recognises the intrinsic character and beauty of the countryside.

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|----|----|----|-----|-----|-----|-----|----|----|----|----|----|-----|----|----|----|-----|-----|----|-----|-----|-----|----|----|----|----|---------|--|
| DM/20 | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall | |
| | 0 | 0 | 0 | -? | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | +/- | 0 | 0 | 0 | +/- | +/- | 0 | 0 | 0 | +/- | 0 | 0 | 0 | 0 | +/- | |
| | 0 | +? | -? | +/- | +/- | +/- | +/- | 0 | 0 | 0 | 0 | 0 | + | + | 0 | + | + | +/- | 0 | +/- | +/- | + | +? | 0 | 0 | 0 | | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | | |
| Timescale: Short to long term. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Secondary/cumulative/synergistic effects: Indirectly the policy may reduce traffic in the open countryside or edge of settlement locations, instead directing uses to more central locations depending on the scale of the proposal. The policy supports DM/18 (development outside town centres) in directing development towards central locations with better public transport links. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Temporary/permanent effects: Permanent, once development has been directed to a location it becomes a fixed feature of the landscape. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

- 5.20.1. This policy sets the criteria by which retail development can take place within villages, adjacent to villages, or elsewhere in the open countryside. The policy aims to direct rural shopping to the centre of villages, setting stricter criteria for proposals on the edge of settlements or in the countryside.
- 5.20.2. The overall effect of the policy on sustainability is largely determined by the eventual location of development. Locating retail development within villages is likely to have a much less harmful impact in terms of encouraging vitality of rural centres, reducing the need for the use of unsustainable modes of transport and promoting walking and cycling. Development at the edge of settlements or in the open countryside is potentially less sustainable, largely being accessed via the private car, and risking a detrimental effect on existing village retail viability.
- 5.20.3. Therefore the policy sets stricter criteria for rural development that is not within villages in order to minimise potential adverse impacts. The policy scores positively for increasing overall employment floorspace, particularly within villages, but this should be tempered against the impact this will have on existing retail offers. The impact on the availability of jobs within rural areas should be positive, given the criterion that the development should not impact on the viability of existing facilities. Landscape impacts could be negative if developing in the countryside, however any proposals will also need to take account of DM/2 (High quality design) and DM/30 (Protected landscapes).

5.21 DM/21 Employment development outside settlement limits

Policy text:

In countryside locations, planning permission will be granted for new-build employment development or expansion of existing businesses, provided that the development is of an appropriate use and scale for its location. Proposals must demonstrate that:

- a) The development would not lead to an unacceptable impact on the local road network;*
- b) There would not be an unacceptable adverse impact to the character and appearance of the countryside; and*
- c) There are insufficient sites or premises in the immediate area to meet the needs of the proposal.*

Policy development process:

Broad support was registered at the Issues and Options consultation stage for policies covering new-build or expansion of employment facilities. Some reservations were expressed at the earlier informal scoping consultation about the loss of rural and agricultural land. However some argued that rural employment conversions should receive support, providing opportunities for farm diversification.

Suggested criteria that have been included in the policy include impact on traffic, landscape and character impacts and demonstration that there are no other suitable sites. Criterion (c) was added in order to prioritise already existing and allocated sites.

Alternative option(s):

The option to have a separate policy on farm diversification (which was decided against as this policy alone would be sufficient). Alternatively there is the option to rely on the guidance of the NPPF and have no policy.

Need/justification:

Support registered at Issues and Options stage for a policy on employment development. The NPPF guidance has been augmented to ensure transport and landscape impacts are considered.

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|-----|----|----|----|---------|
| DM/21 | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall |
| | 0 | 0 | -? | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | - | 0 | 0 | -? | 0 | - | 0 | 0 | 0 | - | 0 | 0 | 0 | 0 | - |
| | 0 | + | 0 | - | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | + | + | + | 0 | - | - | - | +/- | 0 | 0 | 0 | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | |
| Timescale: Short to long term. | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Secondary/cumulative/synergistic effects: Indirectly this policy may lead to a greater number of businesses operating within the countryside. When combined with Policy DM/21 (conversion of rural buildings) together this could result in more people both working and potentially living in the countryside. This has an effect on the delivery of services, e.g. waste collection, that would need to access new employment sites, increasing the size of collection rounds, increasing carbon emissions and potentially increasing costs for service delivery agencies. | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Temporary/permanent effects: Permanent, once development has been directed to a location it becomes a fixed feature of the landscape. | | | | | | | | | | | | | | | | | | | | | | | | | | | |

5.21.1. This policy sets out the criteria by which employment development can take place within the open countryside. The policy permits employment development, but seeks to ensure that it is appropriate in scale for its location and reduces adverse impacts.

5.21.2. Employment development away that is located away from existing settlements can have negative sustainability impacts. Where a business requires a significant volume of vehicular traffic to visit the site, either through customers and/or deliveries this can result in unacceptable increases in emissions through the increased length of journeys required. Rises in pollutants can be a result, which could impact on biodiversity. Furthermore, for the most rural locations, access to these locations via sustainable modes of transport becomes increasingly unlikely. However this policy has in place a number of criteria that set standards by which development would have to be in accordance. Transportation impacts are limited by criterion (a), whilst other impacts on character and appearance of the countryside are restricted by criterion (b). Furthermore, any development proposal would also be assessed in conjunction with Policies DM/6 (Transport and air quality) and DM/7 (Pollution).

5.21.3. Overall the impacts are highlighted as being more negative than positive. However the provisions for permitting employment development outside of settlement limits is established by the NPPF. To ensure the LP3 is found to be sound, it must be in conformity with national policy.

5.22 DM/22 Protection of employment land

Policy text:

The development of allocated employment land for non-employment uses will not be permitted unless it can be demonstrated that there is no reasonable prospect for employment development within five years of allocation or planning permission being granted. The development of existing employment land for non-employment uses will be permitted provided that there are no strong economic reasons why development would be inappropriate.

Policy development process:

The NPPF is the starting point for a policy on this topic, stating that land should only be protected

where there is an economic need. Broad support was expressed by consultees at the informal scoping and Issues and Options stages for a policy that protects employment land, though some consideration of viability should be taken into account. Recommendations from consultees that have been written into the policy include having a time restriction before release and consideration to releasing such land where there not strong economic reasons.

Alternative option(s):

Have no policy and rely on the NPPF. Different time periods for protecting land were also an alternative option; a 10 year protection was discussed.

Need/justification:

There was broad support at Issues and Options consultation stage for a policy protecting allocated/existing employment sites. Mid Devon has written a positive policy, in conformity with the NPPF, that seeks to provide some protection to employment land, given its relative scarcity in the district. A five year period was agreed as being permitted within the remit of the NPPF – any more would have been considered as ‘long term’.

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|-----|-----|----|----|----|----|----|-----|-----|----|----|----|-----|----|-----|-----|-----|----|----|----|----|----|----|----|----|----|---------|
| DM/22 | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | + | 0 | + | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | +/- |
| | +/- | +/- | -? | + | 0 | 0 | 0 | +/- | +/- | 0 | + | 0 | +/- | 0 | +/- | +/- | +/- | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | |
| Timescale: Short to medium term. | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Secondary/cumulative/synergistic effects: The redevelopment of existing employment sites is covered by the policy which states this will be permitted where there are not strong economic reasons. Mid Devon has an undersupply of employment land and such sites may be protected from development for alternative uses in line with this policy. In the short term this may result in certain sites in towns not being redeveloped immediately, and potentially being vacant. Vacant sites can attract vandalism, can deteriorate and affect the feel of an area, thereby there are circumstances where a negative indirect impact could be felt. Though a long-term view on the availability of employment land across the district would be taken. Any proposals to redevelop the site would also be considered in light of Policy DM/2 (high quality design) as it may be inappropriate to redevelop a site in a predominantly industrial area for residential use as this would result in a poor level of amenity for potential residents. | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Temporary/permanent effects: Temporary in that an employment site may be protected for up to 5 years, but after this period it may be considered for other uses. | | | | | | | | | | | | | | | | | | | | | | | | | | | |

- 5.22.1. This policy sets out Mid Devon’s approach to protecting allocated and existing employment sites. The SA Scoping Report highlighted the loss of employment land as being a particularly importance sustainability issue for the district. Out-commuting to larger centres such as Exeter and Taunton is an existing concern, which has negative impacts on transport emissions, pollution and climate change. Employment sites have been allocated in sustainable locations within the AIDPD in 2010, to meet an identified shortfall across the district. Therefore, the protection of these sites, in the immediate term is a priority.
- 5.22.2. Without the policy it is possible that should these sites be given over to other uses, most likely to housing, out-commuting would likely increase. This would have negative impact on the transportation emissions and climate change, and reduce the district’s ability to meet its

own needs. It could also increase pressure to release other sites for employment, which would most likely be on greenfield land.

- 5.22.3. If the allocated sites did not come forward within five years, it is likely that they may never be developed. Housing, which is a priority, would likely come forward on these sites. It could be argued that housing could have a lesser impact on the environment than an employment use (which could be an industrial use), and that this would also therefore increase the number of affordable houses delivered. However this would have to be balanced against the negative impacts discussed above. It should also be noted that the policy does permit some employment sites to be used for alternative purposes, so in some cases, new housing could be permitted where there are economic reasons for losing the employment designation.

5.23 DM/23 Agricultural development

Policy text:

Agricultural development will be permitted where:

- a) The development supports farming activity on that farm enterprise or in the immediate agricultural community; and*
- b) The development is sensitively located to limit any adverse effects on the amenity of local residents and is well-designed, respecting the character and appearance of the area*
- c) The development will not have an unacceptable adverse impact on the environment*

Policy development process:

Wide support was expressed at the Issues and Options stage for a policy on agricultural development. Suggested criteria that have been written into the policy include respecting character and appearance of the area, that development is well-designed and related to that farm enterprise. Removed 'conversion of existing buildings to agricultural use' at the request of Development Management as these are sufficiently covered by the term 'new agricultural development'. Removed requirement for new or converted buildings to be removed if ceased to be used for agricultural use; included requirement that proposals for new livestock buildings need to be accompanied by Waste Management Plan; amended 'the use is related to supporting farming activity' to 'the development supports farming activity' as the term 'use' has other planning connotations – all final three changes made following discussions with Development Management.

Alternative option(s):

Some responses from the Issues and Options stage recommended a stricter approach to assessing applications for large agricultural development. However, the NPPF paragraph 28 requires local plans to promote the development of agricultural businesses. Larger agricultural holdings also have more permissive permitted development rights. Any proposal will also be assessed against Policy DM/2 (high quality design) which gives consideration to landscape and neighbouring amenity.

Need/justification:

Consultation responses expressed wide support for a policy on agricultural development,

particularly given the importance of agriculture to the local economy and warranted a policy to guide proposals.

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|----|----|----|-----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|---------|
| DM/23 | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall |
| | 0 | 0 | 0 | +/- | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | - | 0 | 0 | 0 | 0 | +/- |
| | 0 | + | + | - | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | + | + | + | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | |
| Timescale: Short to long term. | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Secondary/cumulative/synergistic effects: The cumulative development of large modern agricultural buildings can alter a landscape. The policy seeks to limit such cumulative impact by requiring development to respect the character and appearance of an area. Together with Policy DM/12 (conversion of rural buildings) the policy could result in some agricultural buildings being developed that could later be converted to other uses, however they would need to demonstrate that they were of substantial and permanent construction and make a positive contribution to an area's character. | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Temporary/permanent effects: Permanent, once development has been directed to a location it becomes a fixed feature of the landscape. | | | | | | | | | | | | | | | | | | | | | | | | | | | |

- 5.23.1. This policy permits agricultural development where it supports activity on a farming enterprise and is sensitive in its design and location to limit any adverse effects.
- 5.23.2. The analysis against the sustainability appraisal concludes a balanced impact, with a few positive effects, offsetting some negative. Positive outcomes include the benefits to farms, through being allowed to upgrade to more modern buildings and/or expand their farming enterprise, potentially creating more jobs in the process. Public support was noted at the Issues and Options stage for a policy on this subject.
- 5.23.3. Negative impacts include the increased carbon emissions created at all stages of construction of a new building (i.e. at manufacture of materials, transportation, on-site energy usage). Pollution, air quality and transportation impacts on rural roads are also a negative impact, but these have been limited through Policy [insert] on Pollution elsewhere in this document, by which any new development would have to adhere.
- 5.23.4. The impact on landscape is also an issue that a number of responses were received upon as part of the Issues and Options Consultation stage. Concern was raised about the scale of some modern agricultural facilities and their impact on the surrounding landscape. However any proposal would also have to adhere to the criteria set out in Policy DM/2 (high quality design) which covers landscape and visual impact.

5.24 DM/24 Equestrian development

Policy text:

Horse-related facilities and equestrian enterprises in the countryside will be permitted where they are well integrated with their surroundings, being of appropriate location, scale, design and materials so as not to harm the character and landscape of the rural area or the amenity of nearby residents.

Commercial or non-commercial large scale equestrian developments must not result in an unacceptable increase in traffic on the local highway network.

Policy development process:

Wide, though not exclusive support was registered during the Issues and Options consultation for a policy to cover equestrian development. Originally had included a reference to bridleway network, however this was removed following discussions with PPAG. Amended the policy to include requirement for larger/commercial scale developments not to have unacceptable impact on road network following input from this sustainability appraisal.

Alternative option(s):

Omit policy and rely on the NPPF and Policy DM/21 (employment development outside settlements).

Need/justification:

Wide support was expressed at the consultation stage for a policy on this subject, whilst it was also noted that equestrian development plays an important part of our rural economy, and warranted a separate policy to guide proposals.

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|----|----|-----|-----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|---------|
| DM/24 | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall |
| | 0 | 0 | 0 | +/- | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -? | 0 | 0 | - | 0 | 0 | 0 | -? | +/- |
| | 0 | 0 | +/- | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | + | + | + | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | |
| Timescale: Short to long term. | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Secondary/cumulative/synergistic effects: Where there are a number of equestrian developments in an area this could cumulatively change the nature of the landscape, particularly in the case of smaller scale domestic size developments. | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Temporary/permanent effects: Permanent, once development has been directed to a location it becomes a fixed feature of the landscape. | | | | | | | | | | | | | | | | | | | | | | | | | | | |

- 5.24.1. This policy permits equestrian related development within the countryside, providing that it is well integrated with the local landscape, through appropriate location, scale, design and materials. Commercial or large domestic developments are also required to demonstrate that they do not result in an unacceptable increase in traffic.
- 5.24.2. Analysis against the sustainability framework reveals a balanced outcome, with some positive impacts against a limited number of negative. Positive outcomes include the growth in employment related developments, providing opportunities for economic growth and potentially tourism. Consultation feedback has also highlighted public support for having a policy to cover equestrian development.
- 5.24.3. Negative impacts include the carbon dioxide emissions related to construction (from extraction/manufacture of materials, transportation and on-site emissions). Other potential negative impacts include the effects on the landscape from equestrian buildings, which are often located in fields away from other development. The policy has been written so that any development must be well integrated with the surroundings, and to take account of

factors such as location, scale, design and materials, in order to reduce any harmful effects of building within the countryside. Pollution from vehicles accessing the site at construction and during operation use is also a concern. Any proposals for development will have to be measured against Policy DM/7 (pollution) which requires mitigation for schemes that cause pollution. Furthermore there is always the possibility of potential negative impacts on road safety from riders using of local roads, where the bridleway network coverage is poor.

5.25 DM/25 Tourism and leisure facilities

Policy text:

Proposals for new or expanded tourism, visitor or leisure facilities will be supported within or adjacent to defined settlements. Elsewhere, the nature of the proposed development must justify a countryside location, avoiding an unacceptable traffic impact on the local road network.

Development proposals must:

- a) Respect the character and appearance of the location; and*
- b) Where possible, involve conversion or replacement of existing buildings; and*
- c) Demonstrate that the need is not met by existing provision within nearby settlements.*

Policy development process:

There was mixed responses from the public consultation at the informal scoping and Issues and Options stages as to the need for a tourism policy. However many responses recommended including criteria that promoted tourism that respected local character and appearance; that tourism should be promoted within settlement limits and consideration of traffic impacts. Expanded the scope of the policy to additionally include leisure development as well as tourist/visitor following discussions with Development Management. Amended supporting text to require applications for countryside development to be fully justified by the applicant and submit a marketing strategy and business plan in order to deliver high quality tourism, and that the benefits of a proposal must outweigh any harm also following discussions with Development Management.

Alternative option(s):

Omit the policy and rely on the NPPF.

Need/justification:

The policy builds on the criteria set down in paragraph 28 of the NPPF to encourage sustainable tourism. It develops this by making use of other elements of the NPPF, in particular minimising traffic impacts and prioritising the conversion or replacement of existing buildings in order to reduce carbon impacts and re-use previously developed land.

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|----|----|-----|-----|-----|-----|-----|----|----|----|-----|----|----|----|----|----|-----|----|----|----|----|----|-----|----|----|----|---------|--|
| DM/25 | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall | |
| | 0 | 0 | 0 | +/- | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | +/- | 0 | 0 | 0 | 0 | - | 0 | +? | 0 | 0 | + | |
| | 0 | + | +/- | 0 | +/- | +/- | +/- | 0 | 0 | 0 | +/- | 0 | + | 0 | 0 | + | + | + | 0 | 0 | 0 | 0 | +/- | + | + | 0 | | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | | |
| Timescale: Short to long term. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Secondary/cumulative/synergistic effects: The policy could work positively with DM/21 (conversion of rural buildings) to convert appropriate buildings in the countryside to tourist uses. These are lower impact in terms of sustainability than residential developments, such as not needing access to the same level of services, and generating lower carbon emissions because they tend to be less frequently used during autumn/winter, when more fuel would be needed to heat them if lived in all year round. Indirect effects could include the boost to rural incomes, particularly in cases where farm owners wish to diversify their activities, and research has often shown that tourism is traditionally an area considered. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Temporary/permanent effects: Permanent, once development has been directed to a location it becomes a fixed feature of the landscape. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

- 5.25.1. This policy sets out the circumstances in which tourist or leisure facility developments are acceptable. Development is permitted inside or adjacent to settlements, and only permitted in the countryside where proposals meet a criterion based approach.
- 5.25.2. This policy scores positively against a number of indicators on the sustainability framework. In terms of employment, it is noted that the policy supports the development of tourist, visitor and leisure facilities, both in/adjacent to settlements, or where justified, within the open countryside, thereby supporting an increase in employment floorspace in rural areas, and overall across the district. This will also result in an increase in the number of tourist bedspaces provided and thereby should positively impact on tourist numbers across the district.
- 5.25.3. Negative impacts are linked to the transportation and carbon emissions associated with locating new development away from existing settlements. The policy applies a stricter control of tourist development away from settlements, only agreeing proposals where there is not an unacceptable impact on the road network. Despite this provision, any development away from settlements will involve a greater level of carbon emissions from the longer journeys required to access the site. This is in addition to the carbon emitted during the manufacture of materials and construction phases.
- 5.25.4. Some indicators note a balanced outcome, with possible positive and negative effects. Developing within the open countryside could impact negatively on the landscape, however to a degree this is mitigated by the policy requirement to respect local character and appearance, whilst any development proposal will also need to adhere to Policy DM/2 High quality design. Access to public transport and local services will depend on the location of the development. If located in or adjacent to a settlement this could have a positive impact on public transport provision, through additional number of tourists/visitors accessing the facility. However, any development in the open countryside is considerably less likely to be close to public transport provision, and unless it is significant in size and attraction, is unlikely to lead to alterations to existing networks. Town centres may also have a mixed outcome from the policy, which, like the above comments, will largely be determined by whether the development is located in such a position as to draw focus towards itself and away from an existing centre, thereby impacting on vitality and viability.

5.26 DM/26 Community facilities

Policy text:

The development of new community facilities providing a local community benefit or environmental enhancement will be permitted where they are easily accessible by the local community and well related to a settlement. Proposals for the redevelopment of existing community facilities that enables them to modernise, remain viable and continue to be retained for the benefit of the community will be supported.

Proposals involving the loss of community facilities such as local shops, public houses, recreational facilities and other important local services will not be permitted where this would damage the settlement's ability to meet its day to day needs or result in the total loss of such services to the community. Only in circumstances where the facility is proven to be no longer economically viable, including for alternative community uses, will applications for alternative use be considered acceptable.

Policy development process:

Broad support expressed from consultees at both the informal scoping consultation and the Issues and Options stages for a policy that protects community facilities, which should include cultural, education, health, social, recreational and welfare facilities. Further request that they should be easily accessible and to meet existing need. Included wording in 2nd paragraph to state 'including for alternative community uses' in describing the circumstances when a facility is proven not to be economically unviable and also included allotments in list of what constitutes community facilities both following discussions with Development Management. Removed the requirement to provide minimum three years trading accounts when assessing viability after PPAG discussions.

Alternative option(s):

A consultee response at Issues and Options stage requested that new facilities should only be provided on brownfield land. This could be included within the policy, but may severely restrict opportunities to deliver new community facilities in rural settlements where brownfield land will be much less available.

Need/justification:

There was broad support from consultees for a policy on community facilities. The policy builds on national guidance in the NPPF, particularly in relation to guarding against their loss, including setting conditions by which the economic viability of a facility can be assessed.

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|-----|----|----|----|---------|--|
| DM/26 | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | |
| | 0 | 0 | 0 | 0 | 0 | + | + | 0 | 0 | 0 | + | + | + | 0 | 0 | + | + | 0 | 0 | 0 | 0 | + | +/- | 0 | 0 | 0 | | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | | |
| Timescale: Short to long term. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Secondary/cumulative/synergistic effects: Retaining community facilities within settlements can increase the vitality and viability of a town/village. Where community facilities do not exist or are lost an indirect effect is likely to take place on the level of local traffic. Where people do not have access to local community facilities they may access others in different settlements; typically they will do this by using a car. The presence of community facilities in a settlement is likely to reduce traffic in that location. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Temporary/permanent effects: Permanent, once facilities are built they are a permanent feature of the landscape. Once community facilities are lost, such changes are unlikely to be reversed. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

- 5.26.1. This policy covers a wide range of community facilities including shops, pubs, post offices, village halls and places of worship. It aims to provide new community facilities where they are accessible and provide a benefit to local residents, whilst only permitting the loss of existing facilities where it can be proven that the facility is not economically viable. The appraisal highlights the positive effects this has in terms of delivering social objectives. In particular the provision of new community facilities in a settlement has positive effects on the viability of settlements. For instance the greater level of services in a settlement, the higher likelihood that it will be served by public transport.
- 5.26.2. There was broad support in the consultation at the Issues and Options stage for local policies that provided new, and protected existing community facilities. Such facilities include schools and colleges, thereby increasing access to education and training. New shops in rural areas will also increase retail and employment opportunities.
- 5.26.3. A potential negative outcome is related to the impact on existing retail facilities in towns and smaller settlements. New development could be harmful to the viability of existing facilities by acting in competition, e.g. a new edge of village retail offer could reduce footfall in the existing centre. However, such proposals will be judged against this policy, and others on employment set out in the Local Plan.

5.27 DM/27 Protection of recreational land and buildings

Policy text:

Open space, sports and recreational buildings and land, including playing fields, will be protected from alternative development unless:

- An assessment has been undertaken which demonstrates that the site is surplus to requirements; or*
- The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location, prior to the commencement of development; or*
- The development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.*

Policy development process:

Consultation responses at the informal scoping stage highlighted the importance of protecting allotments, open space and footpaths. The policy now provides a fuller definition of 'Local Green Space'. Sport England also requested an addition to criterion (b) stating replacement provision should be 'prior to commencement of development'.

Alternative option(s):

At the Issues and Options stage the options included either having a criteria-based policy or relying on national policy to guide the development and protection of community facilities. Cross-referencing with Assets of Community Value legislation was considered, though was not included as full regulations were not available at the time of writing. Including details on community assets may result in duplication of process covered by separate regulations.

Need/justification:

The local priority of protecting recreational land and buildings was highlighted by the informal scoping consultation. The policy builds on the provisions of paragraph 74 of the NPPF, and augments it with guidance from Sport England.

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|---------|--|
| DM/27 | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | | |
| Timescale: Short to long term. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Secondary/cumulative/synergistic effects: Indirectly, retaining open space, sports and recreational land and buildings is likely to have a positive impact on health and wellbeing through providing places for residents to take part in sport or other outdoor activities. When considered alongside policies within the AIDPD that allocate land for new housing, thereby creating additional demand, and putting pressure on existing facilities; their protection is therefore important to meet the needs of future generations. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Temporary/permanent effects: Permanent, once the loss has taken place this is not likely to be reversible. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

- 5.27.1. This policy provides protection for recreational land and buildings against being used for alternative development. It provides a criterion based approach under which open space, sports or recreational buildings and land can only be redeveloped in certain circumstances. Redevelopment is limited to situations where the existing use is surplus, or where there will be replacement provision in a suitable location, or where the new development is for better sports or recreational provision.
- 5.27.2. Against the sustainability framework most indicators register that there will be no change when compared with the 'no plan' baseline should this policy be implemented. There are positive outcomes in terms of the implications for public open space, in that its loss is severely restricted and can only take place where it is surplus or is to be replaced by better provision. However, against the sustainability framework this appears as a neutral impact because the policy does not result in a net increase of public open space. Public consultation responses at the Issues and Options stage also confirmed that there was widespread support for policies that protected existing open space and recreational land and buildings.

5.28 DM/28 Development affecting heritage assets

Policy text:

Development proposals affecting or having the potential to affect heritage assets and their setting, including alterations, extensions, demolitions and change of use, must take account of the significance, character, setting and local distinctiveness of the heritage asset(s).

Proposals which would be likely to directly or indirectly harm any heritage asset or its setting must include sufficient information to assess the significance of the impact, demonstrating that the benefits outweigh the harm.

Proposals which would be likely to directly or indirectly harm designated heritage assets or their settings will be assessed to determine the level of significance of the harm, and approved only where:

- a) The public benefits outweigh the harm; and*
- b) Where a proposed development would lead to substantial harm to or total loss of significance of a designated heritage asset, the proposal meets the requirements of national policy.*

The justification for the development proposal must be proportionate to the importance of the heritage asset. For the most important heritage assets there is a presumption in favour of preservation in situ.

Policy development process:

Broad support was received at the Issues and Options consultation stage for a local policy to cover listed buildings and historic conservation. Suggested criteria for the policy and supporting text that has been included within the final version includes having an encompassing policy for all historic assets entitled 'Heritage assets', which includes archaeological sites; makes reference to 'harm to' and 'loss of significance'; also makes reference to economic, cultural, social and environmental value of heritage assets, and a local register to be published to cover locally important non-designated assets. Split designated from non-designated assets at request of Development Management to ensure consistency with the NPPF. Amended criterion (a) to include 'public benefits' to ensure conformity with NPPF (also following internal discussions). Devon County Council requested the inclusion of 'presumption in favour of preservation in situ' for most important assets, following informal consultation.

Alternative option(s):

Have no policy and rely solely on the NPPF for guidance.

Need/justification:

Consultation has highlighted the significance local residents and groups attach to the historic

environment of the district. Having a local policy that reaffirms the importance of protecting heritage assets is therefore a priority, and it uses the NPPF as the starting point to set out a policy and the circumstances under which development proposals will be assessed.

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|----|----|----|----|----|----|----|----|----|-----|----|----|----|----|----|----|----|----|----|----|----|----|-----|----|----|----|---------|
| DM/28 | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall |
| | 0 | 0 | 0 | + | + | + | + | + | + | +/- | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | + |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | +/- | + | 0 | 0 | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | |
| Timescale: Short to long term. | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Secondary/cumulative/synergistic effects: The policy provides protection from harm to heritage assets, even if that harm is indirect. Providing appropriate protection to heritage assets should result in no incremental or cumulative loss of historic character or gradual fragmentation of conservation areas across the district. | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Temporary/permanent effects: Permanent, provides protection for heritage assets, as once they are lost they are gone forever. | | | | | | | | | | | | | | | | | | | | | | | | | | | |

- 5.28.1. This policy aims to preserve or enhance the heritage of the district, covering all heritage assets including listed buildings, conservation areas, historic parks and gardens, archaeological sites and other locally important features. Heritage assets are a vital element of the district's landscape, contributing towards the character of the area, and once lost are gone forever. This policy therefore aims to preserve these elements, to save them for the benefit of future generations.
- 5.28.2. The policy scores positively against enhancing landscape character, and enhancing or improving the understanding of the district's heritage assets. Local heritage and character is important for tourism, which whilst not playing as large a role as in other parts of the county, is an area that the district wishes to develop. The protection of local heritage ensures this will have a positive effect on efforts to growth the local tourism industry.
- 5.28.3. The policy gives additional support to deliver the objectives of conservation area appraisals and management plans. However, these documents do not exist for all conservation areas, and where they are absent, the full protection provided by the policy will not fully be realised.
- 5.28.4. In addition, the sustainability impacts on town centres also scores a mixed outcome. Many of the town centres of the district have a historic core, and the preservation of their character is therefore a priority. However, for retailers in these areas this places limitations on changes they can make to the appearance of their facility, and can add a cost burden to and development they wish to carry out.

5.29 DM/29 Integrating green infrastructure in major development

Policy text:

Major development proposals must demonstrate that green infrastructure will be incorporated within the site as follows:

- a) Biodiversity mitigation where warranted, resulting in a net gain in biodiversity;
- b) Flood and water resource management;
- c) Green corridors and public rights of way to link the site to the wider GI network, provide walking and cycling opportunities and avoid habitat fragmentation;
- d) New green infrastructure such as the creation of native woodland where possible;
- e) Public open space within housing developments.

Where evidence demonstrates that meeting these criteria would render the development unachievable, the Council will consider offsite provision in lieu of one or more of the policy criteria. The Council will balance the benefits of the development against the objectives of this policy. Housing proposals that do not include public open space within the application site must demonstrate that this will be in the public interest, have no significant adverse impact on the amenity of residents within or adjoining the development, and provide appropriate compensation through design, such as the provision of larger private gardens.

Policy development process:

The 2010 informal scoping consultation highlighted a desire among respondents for protection of green corridors, developments to provide mitigation, larger private gardens and for the inclusion of sustainable drainage systems. There was a mixed response at the Issues and Options stage for a policy on GI, but wide support for a policy on biodiversity. Most responses stated the importance of planning delivering green infrastructure, but were unsure on whether this should best be achieved by having a policy in the LP3, or set out in more detail in an SPD. Suggested criteria that were included from consultation responses included biodiversity mitigation, new or improved habitats, sustainable drainage and water resource management, allotments and consideration of feasibility/viability. Removed criterion (c) 'climate change mitigation and adaption by design' as it is covered elsewhere by Policy DM/3 (sustainable design). Added criterion (d) 'new green infrastructure such as the creation of native woodland', following consultation with the Woodland Trust. The relationship between offsite provision and CIL was an issue in terms of policy clarity and detail. The final wording refers generally to off-site provision and CIL is discussed further in the supporting text. Members requested reference to larger gardens as a potential alternative to public open space within the application site.

Alternative option(s):

There was the option to omit the policy and instead include the details within a supplementary planning document. However, once the draft Green Infrastructure Plan (Strategy to 2026 and Delivery Plan) had been produced in October 2011 it became clear that an SPD would not be appropriate, as much of the document refers to matters outside of planning control. The Green Infrastructure Plan serves as evidence for LP3, which now contains an adapted version of a policy that was consulted on as part of the Green Infrastructure Plan in 2011.

Need/justification:

The NPPF requires LPAs to plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. The Core Strategy only briefly refers to green infrastructure though does set out indicators for monitoring biodiversity, whilst the

AIDPD policy AL/IN/4 states that the Council will prepare a strategy to promote GI. The proposed policy sets in greater detail the GI requirements to be applied to major development, building upon the research and ecological mapping contained in the Green Infrastructure Plan.

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|---------|
| DM/29 | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall |
| | + | + | + | + | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | + | 0 | + | 0 | 0 | + | 0 | + |
| | -? | -? | + | + | 0 | 0 | 0 | -? | 0 | 0 | + | 0 | -? | 0 | -? | -? | 0 | -? | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | |
| Timescale: Short to long term. | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Secondary/cumulative/synergistic effects: Synergistically the policy works alongside a number of other policies within the Local Plan, impacting positively on district wide sustainability issues. In particular it works jointly with Policy DM/2 (high quality design) to provide flood attenuation measures and walking and cycling opportunities. | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Temporary/permanent effects: Permanent, the policy sets the level of GI that is delivered per major development proposal, which will be a permanent feature. | | | | | | | | | | | | | | | | | | | | | | | | | | | |

- 5.29.1. This policy aims to ensure positive gains for biodiversity, public open space and other elements of green infrastructure are delivered as part of major development schemes. Allowances are made within the policy for alternative arrangements when viability or feasibility is a concern.
- 5.29.2. In terms of sustainability impacts, the analysis against the SA framework highlights that there are a large number of positive impacts as a result of implementing the policy. The requirement for a net gain in biodiversity where warranted, means that though biodiversity may be affected by development, overall there will be a positive effect, for example through establishing greater links between wildlife networks or increasing habitat areas. Landscape quality and character should be positively impacted by the requirement to develop green corridors, new woodland and public open space. The policy should also result in an increase in walking and cycling opportunities, through creation and/or improvements to public rights of way. Green infrastructure can also act to mitigate the effects of climate change by acting as a 'carbon sink', thereby helping to reduce the overall CO2 levels in the atmosphere. There could also be an overall reduction in pollution, e.g. through inclusion of sound buffers to reduce noise or by sustainable urban drainage systems bringing about natural improvements to water quality.
- 5.29.3. The outcome of potential negative impacts is not as clear. Integrating green infrastructure within major development does entail an element of additional cost for developers, though this is not a new concept and developers already expect to incorporate green space. It is possible that in some cases this additional requirement may be the element that determines the viability of a particular site. Where viability is cited as a concern, the elements of a scheme that historically have been reduced or omitted have tended to be affordable housing or employment development. However the policy does set out options for providing off-site provision where the criteria would render a development undeliverable. Therefore the negative impacts should be considerably reduced and in many cases off-site provision may mitigate them entirely.

5.30 DM/30 Protected landscapes

Policy text:

Development proposals within or affecting the Blackdown Hills Area of Outstanding Natural Beauty, Dartmoor National Park, Exmoor National Park and the North Devon Biosphere Reserve must demonstrate that:

- a) Cultural heritage and the character, appearance, setting and other special qualities of the landscape will be conserved or, where possible, enhanced; and*
- b) Biodiversity will be conserved and enhanced where possible through improved linking of habitats, appropriate landscaping and habitat creation.*

Major developments within protected landscapes or adjoining Dartmoor or Exmoor National Parks will only be permitted in exceptional cases.

Policy development process:

Wide support was registered at Issues and Options stage for a policy on landscapes that could augment national policy with local knowledge. The policy evolved to accord with the NPPF, such as the presumption against major development other than in 'exceptional circumstances'. Supporting text was amended to provide linkages with Landscape Character Assessment and the Historic Environment Record. Policy wording to take account of 'other special qualities of the landscape' was a result of cooperation with Dartmoor National Park Authority.

Alternative option(s):

Have no policy and rely solely on the provisions of the NPPF, or locate all green infrastructure policies within the Green Infrastructure Plan (Strategy to 2026 and Delivery Plan) rather than LP3.

Need/justification:

Given the proximity of the district to Dartmoor (of which one square mile is within the district) and Exmoor National Parks, the North Devon Biosphere Reserve, and also with the Blackdown Hills AONB partly located within Mid Devon, a high priority has been attached to preserving their special qualities. Wide support was also registered at the Issues and Options stage for a protected landscapes policy. The NPPF provides strong justification for a policy protecting the highest quality landscapes from degradation that is not in the public interest.

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|---------|--|
| DM/30 | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall | |
| | + | + | + | + | + | + | + | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | | |
| Timescale: Short to long term. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Secondary/cumulative/synergistic effects: Indirectly this policy should have a positive impact on tourism, as the character, appearance and setting of these landscapes is directly linked to their appeal as visitor destinations. Synergistically the policy will work alongside a number of others that require consideration of the character and appearance of the landscape, e.g. Policies DM/2 (high quality design), DM/5 (renewable and low carbon energy), DM/12 (conversion of rural buildings), DM/20 (rural shopping), DM/21 (employment development outside settlement limits), DM/23 (agricultural development), DM/24 (equestrian development) and DM/25 (tourism and leisure development). This is likely to reduce opportunities for new housing, employment or renewable/low energy developments within or affecting those landscapes. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Temporary/permanent effects: Permanent; it provides protection for the special qualities of designated landscapes, which could be permanently affected by inappropriate development. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

- 5.30.1. This policy affirms the value of protected landscapes and the need to safeguard them from inappropriate development. Strict controls are in place to ensure that proposals for development within or affecting these areas take account of the character, appearance, setting and special qualities of the landscape. The policy requires, where possible, these features and biodiversity to be enhanced as a result of the development proposal.
- 5.30.2. Against the sustainability framework this policy scores positively for the effect it will have on priority habitats, protected/priority species, wildlife networks and landscape quality and character. Protected landscapes, such as the Blackdown Hills AONB, are a distinctive and highly valued element that contributes to the character of the district. In contributing towards the district's character and appearance, these landscapes also are a primary factor in the area's attraction for tourism. None of the landscapes referenced in the policy text are in locations where strategic policy focuses development, therefore the effects on economic sustainability are not a major issue.
- 5.30.3. There are also positive effects in terms of cultural heritage, which the policy supports. For example the Dartmoor landscape contains many examples of mining heritage that may be visible from long distances, and the implementation of this policy should ensure that the special qualities of these landscapes, in terms of cultural heritage, are conserved or enhanced.

5.31 DM/31 Other protected sites

Policy text:

Where development proposals would lead to an individual or cumulative adverse impact on Special Areas of Conservation, Sites of Special Scientific Interest, ancient woodland, Regionally Important Geological Sites, County Wildlife Sites and Local Nature Reserves, the Council will balance the overall benefits of the proposal against the impact. Sufficient information must be provided for the Council to assess the significance of the impact against the importance of the protected site. Planning permission will be granted only where:

- a) The benefits of and need for the development clearly outweigh the direct and indirect impact to the protected site and the ecosystem services it provides;
- b) The development could not be located in an alternative, less harmful location; and
- c) Appropriate mitigation measures have been put in place.

Policy development process:

As per Policy DM/30, the responses at Issues and Options stage highlighted the demand for policies that protected landscapes and other local sites of wildlife interest. Earlier consultation at the informal scoping stage raised the importance to local residents of protecting Sites of Special Scientific Interest (SSSIs). The policy was amended to include a criteria-based approach, with an additional criterion (c) to give planning permission where appropriate mitigation is in place. Also included Special Areas of Conservation (SACs) within body of policy, given the proximity of certain sites to the boundary of the district following consultation with Natural England. The supporting text outlines the hierarchy of protected sites, pursuant to paragraph 113 of the NPPF.

Alternative option(s):

The Issues and Options report considered relying on national policy and/or the Green Infrastructure Plan, for protection of biodiversity.

Need/justification:

Whilst there are no European protected sites within the Mid Devon district, there is a SAC adjacent to the district's boundary on the A361. The Council accords the highest degree of protection to European designated sites, and others including SSSIs, and given the level of response in favour of their protection from consultation exercises, having a local policy was deemed of the highest importance.

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|---------|
| DM/31 | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall |
| | + | + | + | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | |
| Timescale: Short to long term. | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Secondary/cumulative/synergistic effects: The cumulative effect of the policy is likely to be noted in directing some development to other locations, that are less harmful to protected sites. The scope of the policy covers individual and cumulative adverse impacts on these sites and these are assessed in terms of the significance of the site. The policy provides greater protection for the most significant sites, and cumulative impacts could be felt on those sites of lesser significance. However and development proposals would need to meet the criteria of the policy, which does include demonstrating that other, less harmful locations are not available. | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Temporary/permanent effects: Permanent; the policy provides protection and appropriate mitigation for protected sites, which could be permanently affected by development. | | | | | | | | | | | | | | | | | | | | | | | | | | | |

5.31.1. This policy requires development proposals to balance their benefits against any adverse impacts on protected sites. It aims to provide a degree of protection for important sites that do not have the level of security given to designations such as national parks or AONBs.

- 5.31.2. Analysis against the sustainability framework highlights only positive or neutral impacts. Those impacts on habitats, biodiversity and landscapes are noted as being positive because the criteria are strong enough to afford sufficient protection. In most cases a less harmful location for development could be identified, i.e. where most development is already provided for, such as the towns of the district, or elsewhere in the countryside such as on a farm.

5.32 DM/32 Planning enforcement

Policy text:

The Council will investigate unauthorised development, acting proportionately to the scale of the suspected breach of planning control. Enforcement action will be taken where it is appropriate to do so and in the public interest.

Policy development process:

Inclusion of a policy was deemed of importance following the revocation of all previous enforcement guidelines as set out in Planning Policy Guidance Note 18.

Alternative option(s):

Not to include a policy

Need/justification:

PPG18 set out previous national enforcement policy which was removed with introduction of NPPF. This policy sets out the district's approach, and lays the foundations for a future Local Enforcement Plan, which the NPPF states LPAs should develop in order to take a proactive approach to enforcement.

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|---------|--|
| DM/32 | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall | |
| | + | + | + | + | + | + | + | + | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | + | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | | |
| Timescale: Immediate to long term. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Secondary/cumulative/synergistic effects: Cumulatively the impact of failing to tackle inappropriate development could result in a loss of public confidence in the planning system, and could mean an opportunistic increase in attempts at unauthorised development. The policy has indirect implications for the service provision of planning enforcement, requiring a budget contribution that ensures the local authority adheres to the text of the policy in 'investigating unauthorised developmen't and 'acting proportionately'. A sufficient level of resources will be required to ensure this is undertaken in accordance with the policy. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Temporary/permanent effects: The effects of the policy may have both temporary and permanent effects. Planning enforcement may result in unauthorised development being regularised, either through granting of temporary or permanent planning permission; or may result in inappropriate development being addressed through enforcement action, which could mean developments that are currently part of the landscape or streetscape, being permanently removed. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

- 5.32.1. This policy sets out the district's approach to taking enforcement action. It confirms that investigations will be undertaken and action taken where it is deemed appropriate. The policy and supporting text notes that unauthorised development can have a detrimental impact on the local environment and can be a source of social tension.
- 5.32.2. The NPPF revoked PPG18: Enforcing Planning Control, which was the principal body of guidance that set out the approach taken in relation to planning enforcement. Introduction of this new policy goes some way to setting out the district's approach to enforcement, which will be further developed in a Local Enforcement Plan.
- 5.32.3. Without effective enforcement action adverse impacts will be felt on the local environment. Historic character through listed buildings, conservation areas and historic parks and gardens, as well as landscape character, can suffer from inappropriate development. Such development could affect the setting of a heritage asset, or the character and feel of a landscape, thereby reducing the qualities that make them special. Failure to investigate such developments is likely to encourage further transgressions.

5.33 Retained Policy - BA1 Bampton Stone Crushing Works

Policy text:

A site of 3.4 hectares at the former Stone crushing Works, Bampton is allocated for a mixed use development to include the following elements;

- I) Housing (target 35* dwellings); and*
- II) Employment (B1, B2 and B8) uses (minimum 1.2 hectares); and*
- III) Affordable housing (target 25%); and*
- IV) Provide a pedestrian and cycle link across the disused rail bridge to Station Road; and*
- V) Ensure the dwellings are protected from noise and other nuisance from the employment; and*
- VI) Incorporate extensive strategic landscaping.*

**consistent with good design and other policies of the plan*

Policy development process:

None (original wording retained from Adopted Local Plan 2006).

Alternative option(s):

Not to include this policy.

Need/justification:

This site is almost completely developed and only a small proportion of the employment land is yet to be completed. Other employment development on the site is now operating a full capacity and it is likely that planning applications may come forward for the remaining land shortly.

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|----|----|----|----|----|----|----|----|----|----|----|----|----|-----|----|----|----|----|----|----|----|----|----|----|----|----|---------|
| BA1 | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall |
| | 0 | -? | -? | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | + | +/- | 0 | 0 | + | 0 | 0 | + | 0 | - | 0 | 0 | 0 | 0 | + |
| | 0 | + | -? | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | + | + | + | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | |
| Timescale: Short term. The site is almost entirely built out, and it is anticipated that the final element will come forward within the next five years. | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Secondary/cumulative/synergistic effects: There may be indirect/secondary effects on natural biodiversity networks, e.g. the Habitats Assessment submitted with the planning applications for the site noted the presence of bats, though the site was not used for roosting. Developing the remaining element of the site may impact on these networks, though sufficient mitigation would have to be provided by the applicant. | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Temporary/permanent effects: Permanent. Once the development has taken place it will become a permanent feature of the landscape. Most of the effects will have already taken place given that the development on this site has mostly taken place. | | | | | | | | | | | | | | | | | | | | | | | | | | | |

- 5.33.1. This policy is one of two site allocations that has been retained from the existing Adopted Local Plan (2006). The site provides for a mixture of housing and employment. The site was subject to Sustainability Appraisal at the time of its allocation. Since it was originally allocated the majority of the site has now been developed. Only a small proportion of the employment element remains to come forward. To ensure a comprehensive approach to SA has been undertaken, the site has been reappraised against the current sustainability framework of indicators (see Section 4.2 for a discussion of how the indicators are used to appraise site allocations).
- 5.33.2. There are several positive outcomes as a result of appraisal against the framework. Delivering the remainder of the employment allocation encourages rural sustainability through providing locations for rural employment and business development. The other commercial units on the site that have already been built all have current business tenants. The site is located close to existing housing, and is within walking distance of services within the centre of Bampton. A bus stop is also located in close proximity.
- 5.33.3. New development will create additional carbon emissions, with a potentially negative implication for the environment and climate change. However, any development will need to be in conformity with Policy DM/3 (Sustainable Design), which sets standards for limiting carbon emissions. The site is also over 400m from the nearest public open space. Wildlife impacts are less easy to be absolutely certain about. Ecological surveys submitted with the planning applications for the housing and employment development that has now been built highlighted the presence of dormice, bats and badgers. The habitats survey recommended mitigation measures for dormice which has since been undertaken and the same approach would apply to a proposal to develop the remainder of the site. The new development may have some further impacts, though the majority of the site has now been constructed.
- 5.33.4. A potential planning application for the remainder of the site will specify the amount of employment floorspace to be delivered. It is therefore impossible to say whether this will be above or below the allocated 3500 square metres per hectare. The application will also lead to a reduction in contaminated land through removal of quarry spoil as part of the development.

5.34 Retained Policy - WI1 Willand Industrial Estate

Policy text:

A site of 11.7 hectares is allocated for Business, General Industry and Storage and Distribution uses (classes B1, B2 and B8), subject to the provision of;

- I) Adequate access into the site for existing units immediately adjacent to the proposal; and*
- II) Provision of a cycle link from Muxbeare Lane to the existing Industrial state; and*
- III) Provision of a footbridge along the north side of the South View Road bridge over the former railway line.*

Policy development process:

None (original wording retained from existing Adopted Local Plan 2006).

Alternative option(s):

Not to include this policy.

Need/justification:

This site is an existing allocation from the Adopted Local Plan (2006) and has been partially built out. The Core Strategy highlighted a shortage in the availability of employment land within the district and therefore retaining the allocation at this stage is a priority. Policy DM/22 (protection of employment land) sets a period of five years following which employment land may be considered for alternative uses. The allocation will be reviewed along with all other strategic sites when the Core Strategy is reviewed in the near future.

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|----|----|----|----|----|----|----|----|----|----|----|----|----|-----|----|----|----|----|----|----|----|----|----|----|----|----|---------|--|
| WI1 | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall | |
| | 0 | -? | -? | - | -? | + | 0 | 0 | 0 | 0 | 0 | + | - | +/- | 0 | -? | + | 0 | 0 | + | 0 | - | 0 | 0 | 0 | 0 | +/- | |
| | 0 | + | -? | + | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | + | + | + | 0 | 0 | 0 | 0 | 0 | -? | 0 | 0 | | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | | |
| Timescale: Short term. The site is already partly built out. The development of the remainder of the site for employment use may take place within the next five years; if this has not taken place the site will be reviewed alongside all other strategic allocations at the time of the Core Strategy Review. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Secondary/cumulative/synergistic effects: Indirectly the air quality within Cullompton could be affected by more transportation-intensive uses of the site such as a B2 or B8 use. Synergistically, the effectiveness of the policy will be assessed alongside DM/22 (protection of employment land); if the remainder of the site has not been developed within the five years set down by DM/22, alternative uses may have to be considered, subject to the provisions of the policy, i.e. that there are not strong economic reasons for preventing alternative uses. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Temporary/permanent effects: Permanent. Once the development has taken place it will become a permanent feature of the landscape. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

5.34.1. As per Policy BA1 above, this allocation has been retained from the Adopted Local Plan (2006). It was subject to sustainability appraisal at the time of allocation, and some of the site has since been developed for employment use. This latest SA concludes that there is a mixture of positive and negative sustainability impacts, but overall there is a balance between these.

5.34.2. The original appraisal noted multiple positive impacts against employment, access to jobs, rural prosperity, health, climate change and energy. Negative impacts were flagged against the indicators for landscape and land usage.

- 5.34.3. The new appraisal notes a number of positive outcomes against the sustainability framework. These include the increase in employment floorspace, access to public transport, increase in jobs and improvements to public rights of way and cycle ways. Potential negative impacts include the high visibility of the site from the motorway, having a detrimental effect on the landscape and contributing to a potential decrease in the tourist appeal of the immediate area. The development of the site will also result in the loss of a not insignificant amount of greenfield land. There could also be potential traffic impacts as a result of vehicular trips to and from the site, particularly for B2 and B8 uses, which could impact on the Cullompton Air Quality Management Area.
- 5.34.4. The planning applications for the portion of the site that has already been developed were accompanied by wildlife surveys highlighting the potential for bat roosting and presence of badgers (but no setts). Translocation works have already been undertaken to relocate priority species, though further works may be required when applications for the remainder of the site are received. Archaeologically important remains, and the presence of contaminated land are unknown at present, and would need to be determined as part of the application process.

5.35 Changes to proposals map

Policy development process:

The informal scoping stage consultation highlighted a willingness in some areas for extensions to settlement limits, in order to allow for mixed market and affordable housing development. Specific requests to amend settlement limits from private owners were received as part of the Issues and Options Consultation and also separately (i.e. letters received, but were not part of a specific consultation). These requests were gauged against set criteria and approved where they were in accordance. General support for limited changes to settlement limits was also expressed at this stage, particularly where gardens are split from houses providing a balanced and consistent approach was undertaken. Mixed responses were received at the Issues and Options stage regarding defining town centre boundaries. However a significant number did welcome it in order to protect primary shopping areas, to provide a mix of uses, to promote the evening economy and to adapt to the market by permitting shrinkage.

Alternative option(s):

Make no changes to settlement limits and/or town centre boundaries.

Need/justification:

Many settlements have experienced a modest level of growth since last proposals map was produced. Some new areas have been developed, whilst other properties or gardens that were anomalously excluded have been brought within the limit where they follow the established pattern of development.

- 5.35.1. In a number of cases there have been proposed changes to the proposals maps for the four towns and 17 villages of the district. The proposed changes have either taken place because of one or more of the following reasons:

- The settlement limit has been amended
- The town centre boundary has been amended/added
- A primary shopping area has been added
- Other non-settlement specific change, such as the district-wide removal of the designation 'Importance land for sport and recreation' or where new layers have been added incorporating protected sites

5.35.2. Changes to town centre boundaries or additions of primary shopping areas were recommended within the Mid Devon Retail Study 2012. For settlement limit amendments the following criteria was used to determine where changes could take place:

- **Established pattern of development:** *correct anomalies in the settlement line, e.g. where houses are separated from their gardens, or the settlement limit encompasses land that is divorced from the main built-up edge of the village.*
- **Recent pattern of development:** *include within the settlement limit any sites that have been developed since the Local Plan was adopted in 2006, also taking account of any changes to settlement limits resulting from the AIDPD.*
- **Specific boundary requests:** *consider the suitability of any proposed change in the context of the settlement's scale, massing and existing pattern of development. Large-scale expansion of a settlement will not be supported through a non-strategic local plan.*

5.35.3. The majority of the settlement limit changes typically involve the addition of gardens where they were previously separated from the house by the old settlement limit boundary; new housing development that has taken place adjacent to the settlement boundary since the previous proposals map was drawn up; or individual requests to amend the limit taking into account the suitability of the local context.

5.35.4. Results from analysis against the SA framework of indicators are not displayed for a number of settlements (though the analysis of all settlements except Hemyock and Yeoford can be viewed in Annex III). This is because either no change was proposed, or no negative impacts were registered as a result of the changes (including secondary, synergistic or cumulative impacts). No impacts were recorded because the changes were very minor in their scope. The table below details the settlements to which this refers:

| | |
|---|---|
| Settlements where no changes are proposed | Hemyock, Yeoford |
| Settlements where the SA registered the changes as having no negative impact | Bow, Bradninch, Chawleigh, Cheriton Bishop, Cheriton Fitzpaine, Copplestone, Culmstock, Halberton, Lapford, Newton St Cyres, Sandford, Silverton, Willand |

5.35.5. The following matrices examine the impact of the proposed changes to the proposals map of the four towns of the district:

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|----|----|----|----|----|----|----|----|----|----|----|-----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|---------|---|
| Tiverton | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | +/- | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | +/- | 0 | -? | 0 | 0 | -? | 0 | 0 | 0 | 0 | 0 | 0 | +? | 0 | 0 | | 0 |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | | |
| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Crediton | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | +/- | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | +/- | 0 | -? | 0 | 0 | -? | 0 | 0 | 0 | 0 | 0 | 0 | +? | 0 | 0 | | 0 |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | | |
| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Cullompton | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | +/- | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | -? | 0 | 0 | -? | 0 | 0 | 0 | 0 | 0 | 0 | +? | 0 | 0 | | 0 |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | | |
| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Bampton | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | +/- | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -? | 0 | 0 | -? | 0 | 0 | 0 | 0 | 0 | 0 | +? | 0 | 0 | 0 | | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | | |
| Timescale: Immediate. All changes to policies maps will be made upon adoption of this Local Plan. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Secondary/cumulative/synergistic effects: Cumulatively the amendments to town centre boundaries and primary shopping areas is likely to result in a gradual concentration of town centre uses in line with the new boundaries. Indirectly these proposals are likely to result in more conversions to residential accommodation for properties that previously fell within town centre limits, but do so no longer. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Temporary/permanent effects: Permanent, though the boundaries can be amended in future if needs be, when the next element of the Local Plan is reviewed (this is anticipated to be a review of the Core Strategy). | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

5.35.6. The impacts for the towns are registered because of changes or additions to town centre boundaries and the inclusion of primary shopping areas. No impacts were registered as a result of amending the settlement boundaries. Defining or contracting a town centre boundary has the effect of limiting town centre type development to those areas, through a sequential approach set out in Policy DM/18 (Development outside town centres). This means that the types of uses that are most appropriate for town centres, particularly A1-A5 should first consider locating within the town centre boundary. Over time, employment uses that are outside of this boundary may change use to a residential class, and eventually shift the emphasis of those areas to a more residential usage. These changes may overall result in a reduction of total employment floorspace, but may help to concentrate provision within the town centres and primary shopping areas.

5.35.7. Mid Devon's principal towns are all market towns, and are not particularly large. Town centres nationally are following a trend whereby they are contracting, with larger retailers concentrating in larger urban settlements, most likely to be Taunton and Exeter within the sub-region. The changes to the boundaries aim to concentrate uses, thereby reducing the number of vacant facilities. This could then have a positive impact on the vitality and viability of the town centres. It is difficult to be absolutely certain about the scope and scale of these changes.

5.35.8. The following matrices examine those villages where some potential impacts were indicated by appraising the changes to the proposals maps against the sustainability framework:

| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|---------|
| Burlescombe (including Westleigh) | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | +? |
| | + | 0 | + | 0 | 0 | 0 | 0 | 0 | - | 0 | + | 0 | + | 0 | + | + | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | |
| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Kentisbeare | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | +? |
| | + | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | + | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | |
| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Morchard Bishop | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | +? |
| | + | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | |
| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sampford Peverell | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | +? |
| | + | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | |
| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Thorverton | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | +? |
| | + | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | + | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | |
| Appraisal against sustainability framework | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Uffculme | A1 | A2 | A3 | B1 | C1 | C2 | C3 | C4 | C5 | C6 | D1 | E1 | E2 | E3 | E4 | F1 | G1 | G2 | G3 | G4 | H1 | I1 | I2 | I3 | J1 | J2 | Overall |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | +? |
| | + | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | + | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| | J3 | J4 | J5 | J6 | K1 | K2 | K3 | L1 | L2 | L3 | M1 | M2 | M3 | M4 | M5 | N1 | O1 | P1 | P2 | Q1 | Q2 | Q3 | Q4 | R1 | R2 | S1 | |

Timescale: Immediate. All changes to policies maps will be made upon adoption of this Local Plan.

Secondary/cumulative/synergistic effects: Indirectly, adding gardens that have been separated from their houses may make those sites more acceptable in planning terms for development, as they would no longer be classed as 'countryside' where development is strictly controlled by Policy COR18 (countryside), and instead policy COR17 (villages) would apply. However, other policies, such as DM/2 (high quality design) and other material considerations would also apply, restricting the potential scope for developing any of the affected areas.

Temporary/permanent effects: Permanent, though the boundaries can be amended in future if needs be, when the next element of the Local Plan is reviewed (this is anticipated to be a review of the Core Strategy).

5.35.9. In Westleigh the proposal is to contract the settlement limit to cover solely the housing element of the village and not the large employment site (the tile factory), to the east. This effectively brings the employment site within the remit of proposed Policies DM/21 (employment development outside settlements) and DM/22 (protection of employment land). The site would be less likely to be developed for housing under this arrangement, which is more consistent with the approach set out in the Core Strategy under Policy COR17 (villages) which restricts development to minor proposals within settlement limits.

5.35.10. For Burlescombe, Kentisbeare, Sampford Peverell, Uffculme and Westleigh the changes have resulted in adding some large gardens that were separated from their houses by the previous settlement boundary. Whilst in Thorverton the line has been amended to include a larger area on the north side of Silver Street that had been previously been anomalously excluded. The impact of these changes could mean that these areas could in future be subject to applications for housing development. Under the AIDPD Policy AI/DE/3 (affordable housing site target) housing development of two dwellings or more in villages would need to provide a proportion of affordable housing to meet local need where identified. Developing large gardens is still subject to other planning requirements set out in Policy DM/2 (High quality design) and other material considerations such as safety of vehicular access, and is therefore far from being certain on the sites in question. Therefore these changes have been noted as having an indeterminate positive impact on delivery of affordable homes.

5.35.11. For Morchard Bishop and Sampford Peverell the settlement boundary has been contracted in one location per map to wrap tightly to the existing housing and exclude unallocated greenfield land that had previously been within the limit. The impact of these changes is marginal but could positively impact on the level of affordable housing that could be developed in each settlement. Such housing could still come forward on those sites, but would now be considered an exception site in line with Policy AL/DE/6 (Exceptions Policy) within the AIDPD. Under national policy guidance on the cross-subsidy of affordable housing states that some market housing could be delivered on exception sites in order to bring forward 'significant additional affordable housing to meet local needs'. Allowing some market housing could make a site viable and still deliver needed affordable housing that may not have come forward previously. The proposed Policy DM/9 (cross subsidy of affordable housing) would apply in these cases.

5.36 Policies omitted from the final plan

5.36.1. To ensure a comprehensive approach is taken in relation to the choosing of options, the table below sets out policy topics that were not included in the final version of the plan. It sets out the process by which the policy was developed and the rationale why it was not included in the final version.

| | |
|-------------------------------------|---|
| Policy DM/?: Telecommunications | <p>Policy development process: Inclusion of a policy on this topic was suggested by consultation responses at the Issues and Options stage and a draft version was written. This was subsequently removed following consultation with Development Management staff who considered the policy added nothing that was not already stated at national level.</p> <p>Rationale for omission: A policy on this subject is not required as the provisions of the NPPF are sufficient.</p> |
| Policy DM/?: Town centre housing | <p>Policy development process: Support expressed at Issues and Options stage for a policy on this topic based upon a refined version of that set out in the existing Adopted Local Plan 2006. Now included within Policy DM/17 (town centre development).</p> |

| | |
|--|--|
| | <p>Rationale for omission: A separate policy is not required as it is covered by DM/17 and DM/2 (high quality design) and DM/15 (design of housing).</p> |
| Policy DM/?: Farm diversification | <p>Policy development process: A policy was developed, based on the previous policy from the existing Adopted Local Plan (2006).</p> <p>Rationale for omission: The policy applied a more prohibitive approach than Policy DM/21 and would not have been in conformity with the NPPF. The policy was removed and instead the issues are covered by Policy DM/21 (employment development outside settlement limits).</p> |
| Policy DM/?: Travelling showpeople | <p>Policy development process: The Issues and Options report discussed having a travelling showpeople policy, as they were not previously covered by national guidance on gypsies and travellers. This also meant that they were not within the remit of AIDPD Policy AL/DE/7 (gypsy and traveller pitches).</p> <p>Rationale for omission: No policy has been included in the LP3, as the government has issued 'Planning Policy for Traveller Sites' which includes travelling showpeople within the remit of policies affecting gypsies and travellers. A separate policy will not be required.</p> |
| Policy DM/?: Advertisements | <p>Policy development process: The Issues and Options report discussed having an advertisement policy, but there was mixed feedback from the consultation on whether one was necessary.</p> <p>Rationale for omission: Advertisements are not considered as development, and only such issues should be included within a Local Plan. This should not have been included within the Issues and Options report and as such no policy is included within the LP3.</p> |
| Policy DM/?: Employment development within settlement limits | <p>Policy development process: Broad support at the informal scoping and Issues and Options stages for a policy covering employment development.</p> <p>Rationale for omission: No policy eventually included as the principle of employment development within settlements is already established by the Core Strategy, and any proposals will be assessed in accordance with other policies of the LP3.</p> |

6 Conclusion

6.1.1. This Sustainability Appraisal documents the process by which the LP3 has been developed. It began by setting the rationale for undertaking a sustainability appraisal, then described the sustainability context for the whole of the district. The main body of the document then undertook an analysis of the sustainability implications of the proposed policies, describing how those policies had been developed, the alternative options considered and the potential effects of implementing them.

6.1.2. The appraisal was undertaken for 32 proposed policies, for 2 policies to be retained from the existing Adopted Local Plan (2006) and also for proposed changes to the Adopted Policies Maps. Each policy/proposed change was awarded an overall sustainability score. The following table summarises the findings.

| | Positive impact (+) | Probability of a positive impact (+?) | Neutral impact (0) | Some positive, some negative impacts (+/-) | Probability of a negative impact (-?) | Negative impact (-) |
|-----------------------------|---------------------|---------------------------------------|--------------------|--|---------------------------------------|---------------------|
| Policies DM/1 – DM/32 | 21 | 0 | 0 | 9 | 0 | 2 |
| Retained policies BA1 & WI1 | 1 | 0 | 0 | 1 | 0 | 0 |
| Policies Map Changes | 0 | 6 | 13 | 4 | 0 | 0 |

6.1.3. Only two policies were noted as having an outright negative sustainability impact when scored against the framework of indicators. Another 14 policies/changes were noted as having some positive and negative impacts, but all things considered these were felt to balance each other out. The two policies that were noted as having a negative impact are:

- DM/16 (dwelling sizes)
- DM/21 (employment development outside settlement limits)

6.1.4. Policy DM/16 scored an overall negative result because of the implications the policy has on the number of dwellings to be built per hectare, and for potential increases in carbon emissions. Setting a minimum dwelling size for all housing, which is larger than the average market dwelling size currently being built may result in a reduction the number of dwellings that can be accommodated on a site and could lead to more land being allocated to deliver the required number of dwellings. Larger houses also require more materials during the construction period, and require more energy to heat them. This has long term implications for bringing down carbon emissions.

6.1.5. However negative implications have been considered in light of the positive impacts such a policy would have. Affordable houses are already built to the size proposed by the policy,

which would therefore ensure market dwellings were constructed to the same size. It is not equitable that market houses should be built to a smaller standard than affordable homes. Furthermore national research by CABE has highlighted that new dwelling sizes are often too small for modern living, and increasing the size of homes would have overall benefits for society which outweigh any potential negative sustainability issues. Further positive impacts in terms of increasing solar gain could be realised through the consideration of orientation and the opportunity to use larger windows than is possible in a smaller dwelling.

- 6.1.6. Policy DM/21 (employment development outside settlement limits) scored negatively against the framework of indicators. In particular the analysis highlighted that the policy was likely to result in a reduction in the number of people walking or cycling to work; that new development would not necessarily be in close proximity to housing; that it may result in a reduction in retail floorspace in villages; and that it may result in developing greenfield sites, over existing brownfield.
- 6.1.7. However despite these findings, the precedent for this policy is already established by the NPPF. National policy takes a permissive approach to economic growth within the countryside. To mitigate any potential negative sustainability impacts, the policy wording seeks to augment national policy by ensuring development does not have an unacceptable impact on the local road network or the character and appearance of the countryside. Furthermore, the policy stipulates that other sites within the immediate area must be given consideration first.
- 6.1.8. On balance the SA notes that the LP3 policies will have a positive effect on development across the district. They will work in tandem with the existing Core Strategy and AIDPD policies, which have already been subject to sustainability appraisal, and will work to support the delivery of the strategic policies and allocations set out in those documents.

7 Monitoring

- 7.1.1. Mid Devon District Council will monitor the effectiveness of the LP3 in delivering its objectives by assessing its performance against a series of indicators. These indicators will be set out in the Annual Monitoring Report (AMR), which is made available on our website every December.
- 7.1.2. The AMR already contains a wide range of indicators to monitor existing policy. These indicators are currently monitoring performance against policy from the existing Adopted Local Plan (2006), the Core Strategy (2007) and the AIDPD. Many of the policies of the LP3 would be monitored by use of those same indicators, particularly given that the LP3 replaces the existing Adopted Local Plan (2006) which also contains development management policies.
- 7.1.3. The table below sets out which indicators will be used to monitor the policies of the LP3. Some new indicators have been added to cover elements of the LP3 not monitored within the existing AMR.

| LP3 Policy | Monitoring indicator | Existing or new indicator |
|--|---|---------------------------|
| DM/2 High quality design | Building for Life Assessments Design | Existing |
| DM/3 Sustainable design | Number of dwellings reaching levels 4 and 5 of the Code for Sustainable Homes Square metres of commercial development achieving BREEAM 'Very Good' or 'Excellent' standard | New |
| DM/4 Waste management in major development | Percentage of household waste recycled | Existing |
| DM/5 Renewable and low carbon energy | Renewable energy capacity installed by type | Existing |
| DM/15 Design of housing | Number of dwellings built to Lifetime homes standard | New |
| DM/17 Town centre development | Amount of completed retail (A1 and A2) development Amount of completed retail (A1 and A2) development in town centres Retail indicators (pedestrian counts) | Existing |
| DM/18 Development outside town centres | Amount of out of centre retail (A1 and A2) development | Existing |

| | | |
|---|--|----------|
| DM/25 Tourism and leisure development | Amount of completed leisure (D2) development Amount of completed leisure (D2) development in town centres | Existing |
| DM/26 Community facilities | Services in rural settlements | Existing |
| DM/28 Development affecting heritage assets | Number of Conservation Area Appraisals and Conservation Management Plans | Existing |
| DM/30 Protected landscapes | Areas of Outstanding Natural Beauty and Historic Parks and Gardens (applies also to DM/28) | Existing |

- 7.1.4. It is proposed to review the arrangements for undertaking the AMR in the near future. National indicators no longer exist, and there is no longer a requirement to monitor regional contextual indicators. However, much of this information is useful to see how Mid Devon compares to the rest of Devon. A review of the monitoring information currently collected will be undertaken as a review of the Core Strategy, whereby there will be further opportunities to refine the indicators used to monitor the LP3.

Annex I - Glossary

Assets of Community Value: A new designation introduced as part of the Localism Act 2010 that allows local communities to nominate local buildings, open spaces or other features as 'assets of community value'. These are added to a register of community assets and subsequently must be made available for purchase by community groups prior to sale on the open market.

Air Quality Management Areas: are set by local authorities where air quality objectives are not likely to be achieved. An Air Quality Action Plan is subsequently put together to improve air quality in that area.

Annual Monitoring Report: a report produced annually by the local planning authority that includes data highlighting the performance of local planning policies.

BREEAM: A national standard to guide industry in the design and construction of sustainable buildings, using an environmental assessment method. It is typically applied to non-housing construction.

Building for Life: A national standard for housing and neighbourhood design. Development projects are scored against Building for Life criteria covering social wellbeing, quality of life through reducing crime, improving public health, easing transport problems and increasing property values.

CABE: A national organisation that works to ensure good design delivers growth, sustainability, innovation and stronger communities. It is now merged with the Design Council.

Code for Sustainable Homes: A national standard to guide industry in the design and construction of sustainable homes. The code includes minimum standards for energy and water efficiency, with increasing efficiency requirements as the code levels rise. The highest standard is Code Level 6.

Core Strategy: A local plan which sets out the vision and strategy for the district, including the amount and distribution of new housing, employment and retail development. The Core Strategy is a Development Plan Document.

Development Plan Document: A local plan which forms part of the Development Plan and is therefore a primary consideration in decisions on a planning application.

Equality Impact Assessment: is a process designed to ensure that a policy, project or plan does not discriminate against any of the protected characteristics set out in the Equality Act 2010. The nine protected characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation.

Habitat Regulations Assessment: is an assessment of the impacts of implementing a plan or policy on protected habitats such as Special Areas of Conservation. The assessment is a requirement under EU legislation.

Lifetime Homes Standard: A national standard for homes whereby design features are incorporated into new buildings that allows for later flexibility and adaptability. Homes are designed so that they can be altered or adapted as people's circumstances changes, for example to help with raising small children, or coping with mobility later in life.

Local Plan: The plan for the future development of the local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004.

National Planning Policy Framework (NPPF): sets out the Government's planning policies for England and how these are expected to be applied. The NPPF must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions.

Planning Policy Advisory Group (PPAG): A panel of Elected Members and planning officers with powers to make recommendations to Cabinet about the content of planning policy.

River Basin Management Plan: A plan produced by the Environment Agency in order to meet the requirements of the EU Water Framework Directive. Each plan sets out the environmental objectives for all water bodies in the region and how they will be achieved.

Rural workers: are people whose place of work is located within the countryside, typically comprising farm workers, forestry workers and others involved in rural-based enterprises.

Strategic Environmental Assessment: is a system of incorporating environmental considerations into policies, plans, programmes and strategies. It is European Union legislation as set out in the Strategic Environmental Assessment Directive.

Sustainability Appraisal: is an appraisal of the economic, environmental, and social effects of a plan. The appraisal begins at the outset of the preparation process to allow decisions to be made that accord with sustainable development. The sustainability appraisal process for development plans incorporates the requirements of the Strategic Environmental Assessment.

Sustainable Development: is development which meets the needs of the present while not preventing future generations meeting their own needs. The sustainability of local plans must be assessed through Sustainability Appraisals and Strategic Environmental Assessment (SA/SEA).

Water Framework Directive: European Union legislation that requires all countries throughout the EU to manage the water environment to consistent standards.

Annex II – Water Framework Directive Preliminary Assessment

What is the Water Framework Directive?

The Water Framework Directive is European legislation that requires all countries throughout the European Union to manage the water environment to consistent standards. Each country has a requirement to:

- Prevent deterioration in the status of aquatic ecosystems, protect them and improve the ecological condition of waters;
- Aim to achieve at least good status for all water bodies by 2015. Where this is not possible and subject to the criteria set out in the Directive, aim to achieve good status by 2021 or 2027;
- Meet the requirements of the Water Framework Directive Protected Areas;
- Promote sustainable use of water as a natural resource;
- Conserve habitats and species that depend directly on water;
- Progressively reduce or phase out the release of individual pollutants or groups of pollutants that present a significant threat to the aquatic environment;
- Progressively reduce the pollution of groundwater and prevent or limit the entry of pollutants;
- Contribute to mitigating the effects of floods and droughts.

In order to meet the requirements of the Water Framework Directive, the Environment Agency has developed a River Basin Management Plan (RBMP) for the South West. The plan describes the river basin district, and the pressures that the water environment faces. It shows what this means for the current state of the water environment, and what actions will be taken to address the pressures.

In the context of the Water Framework Directive, the water environment includes rivers, lakes, estuaries, groundwater and coastal waters out to one nautical mile. For the purposes of river basin management, these waters are divided into units called water bodies.

How are WFD considerations assessed in this plan?

Regulation 17 of the Water Environment (WFD) Regulations 2003 places a duty on public bodies, including local planning authorities, to 'have regard to' RBMPs when carrying out their duties. As such the LP3 and this Sustainability Appraisal (SA) have to take account of the WFD and the South West RBMP, which identifies measures that will achieve WFD requirements in water bodies.

The RBMP contains a list of actions for local and regional government that can assist with the implementation of the WFD. Where these actions can be incorporated into policy planning they should result in a positive impact in regards to delivering the objectives of the WFD. The following table sets out a selection of these relevant to local authorities:

| Actions | Challenges addressed | Lead organisation(s) |
|---|---|----------------------|
| Include Sustainable Drainage systems in new development, and retrofit where possible. | Physical modification; priority hazardous substances, priority substances, and specific | Local authorities |

| | | |
|--|--|---|
| | pollutants | |
| Development planning – influence location of development to protect groundwater | Hazardous substances and non-hazardous pollutants; nitrate; priority substances and specific pollutants | Local authorities; water companies; Environment Agency |
| Recommend that all new homes are built to level three of the Code for Sustainable Homes, which includes challenging targets for water efficiency | Abstraction and other artificial flow pressures | Environment Agency |
| Contribute to achievement of Favourable Conservation Status on Natura 2000 Protected Areas through Flood Management Programme | Physical modification | Local authorities; Environment Agency |
| Contribute to achievement of Favourable Conservation Status on Natura 2000 Protected Areas through Implementation of Appropriate Coastal Management | Physical modification | Local authorities |
| Contribute to achievement of Favourable Conservation Status on Natural 2000 Protected areas through planning permission enforcement | Direct biological pressures; physical modification | Local authorities |
| Contribute to achievement of Favourable Conservation Status on Natura 2000 Protected Areas through Specific Management Works to address water quality, invasive species, hydrology and morphology pressure | Sediments (as a direct pollutant); abstraction and other artificial flow pressures; nutrients; physical modification | Local authorities; Natural England; land managers and owners; environmental NGOs; water companies |

Consultation advice from the Environment Agency recommended that the plan should consider whether:

- It will have adverse impacts on water quality elements (e.g. ecological or chemical);
- It will have adverse impacts on water dependent habitats;
- It will result in physical modification of a water body;
- It might, together with existing modifications, lead to deterioration in WFD status;
- It would prevent the implementation of any measures in the RBMP;
- It will provide opportunities to improve a water body.

This requirement has been undertaken in the form of a 'preliminary screening'. To highlight the impacts of the LP3 on the objectives of the RBMP, a matrix has been developed, similar to that used for the sustainability appraisal framework of indicators. Each policy of the LP3 is scored against the

objectives above to indicate whether there are positive, neutral or negative impacts. A commentary is provided after the analysis to highlight where and why potential impacts may arise.

Conclusions from the screening can be found below.

Analysis

| Policy | Could the policy have an adverse impact on water quality, water dependent habitats, result in a physical modification of a water body, lead to a deterioration in WFD status or prevent implementation of any measures in the RBMP? | |
|---|---|---|
| | Type of impact (i.e. positive, neutral, negative) | Commentary |
| Policy DM/1: Presumption in favour of sustainable development | Positive | The policy sets out the Council's positive approach to sustainable development but does not in itself lead to development and is not a land-use policy. However, it does recognise that development affecting protected habitats and species and flood risk areas should be restricted. It also states that mitigation measures will be sought where appropriate, in order to achieve neutral or positive impacts on the environment, which could include ecological measures that may have a positive impact on local water bodies and the Water Framework Directive. Advice from the Environment Agency states that mitigation measures delivered by the planning system can assist Highly Modified Water Bodies to reach their ecological potential. |
| Policy DM/2: High quality design | Positive | The policy relates to design and other qualitative criteria which will be used to conserve or enhance the built and historic environment. The policy requires development to put in place appropriate drainage, including sustainable drainage systems (SUDS) – an objective of the South West RBMP |
| Policy DM/3: Sustainable design | Positive | The policy raises the minimum level of environmental sustainability of new homes and major commercial development. This is intended to better conserve the natural environment through measures contained in the Code for Sustainable Homes and BREEAM, in particular many of the aims are related to water efficiency. The policy requires development to meet level 4 of the code from 2013, and level 5 from 2016. This target meets and exceeds the South West RBMP objective for all new homes to be built to level 3. |
| Policy DM/4: Waste management in major development | Positive | The policy sets qualitative criteria consistent with the Devon county waste hierarchy. The overall target of reducing the amount of waste that goes into landfill supports the RBMP of reducing pollutants that can leach into groundwater sources. |
| Policy DM/5: Renewable energy | Neutral | The policy sets the requirements that new renewable and low carbon energy developments would be assessed by. Development would not occur through the policy itself. |
| Policy DM/6: | Neutral | The policy does not lead to development but introduces qualitative criteria to ensure impacts to air quality and |

| Policy | Could the policy have an adverse impact on water quality, water dependent habitats, result in a physical modification of a water body, lead to a deterioration in WFD status or prevent implementation of any measures in the RBMP? | |
|--|---|--|
| | Type of impact (i.e. positive, neutral, negative) | Commentary |
| Transport and air quality | | the environment are properly assessed. |
| Policy DM/7: Pollution | Positive | The policy requires development that risks negatively impacting on the environment to provide an impact assessment and mitigation scheme. The policy confirms that the Council will have regard to the RBMP and will seek to achieve WFD objectives to ensure there is no deterioration in the status of a water body. |
| Policy DM/8: Parking | Neutral | The policy will not lead to development, but contains criteria to guide the appropriate provision of parking and electric vehicle infrastructure within development. |
| Policy DM/9: Cross subsidy of affordable housing | Neutral | The policy sets the basis on which exception sites will be assessed. It does not allocate land and does not in itself lead to development. Where relevant development proposals come forward, Policies DM1, DM/2 and DM/3 will apply. |
| Policy DM/10: Rural workers dwellings | Neutral | Development would not occur through the policy itself, though it does set the criteria through which proposals will be permitted. Where relevant development proposals come forward, Policies DM1, DM/2 and DM/3 will apply. |
| Policy DM/11: Occupancy conditions | Neutral | The policy will not lead to development and is not a land-use policy. Where relevant development proposals come forward, Policies DM1, DM/2 and DM/3 will apply. |
| Policy DM/12: Conversion of rural buildings | Neutral | The policy does not lead to development. It sets qualitative criteria relating to design, character, access and nature conservation. Where relevant development proposals come forward, Policies DM1, DM/2 and DM/3 will apply. |
| Policy DM/13: Replacement rural dwellings | Neutral | The policy is intended to conserve or enhance the built environment, and does not lead to a net increase in housing. Where relevant development proposals come forward, Policies DM1, DM/2 and DM/3 will apply. |
| Policy DM/14: Extensions and ancillary | Neutral | The policy includes qualitative criteria under which proposals will be assessed. It does not in itself cause development to occur. Where relevant development proposals come forward, Policies DM1, DM/2 and DM/3 will apply. |

| Policy | Could the policy have an adverse impact on water quality, water dependent habitats, result in a physical modification of a water body, lead to a deterioration in WFD status or prevent implementation of any measures in the RBMP? | |
|---|---|--|
| | Type of impact (i.e. positive, neutral, negative) | Commentary |
| development | | |
| Policy DM/15: Design of housing | Neutral | The policy does not lead to development. It sets qualitative design criteria for new housing. Where relevant development proposals come forward, Policies DM1, DM/2 and DM/3 will apply. |
| Policy DM/16: Dwelling sizes | Neutral | The policy does not lead to development. It sets size criteria for new dwellings. Where relevant development proposals come forward, Policies DM1, DM/2 and DM/3 will apply. |
| Policy DM/17: Town centre development | Neutral | The policy is intended to the types of development appropriate for town centres. Where relevant development proposals come forward, Policies DM1, DM/2 and DM/3 will apply. |
| Policy DM/18: Development outside town centres | Neutral | The policy is intended to direct commercial development towards town centre and edge of centre locations, conserving and enhancing the built environment without detriment to European sites. Where relevant development proposals come forward, Policies DM1, DM/2 and DM/3 will apply. |
| Policy DM/19: Fronts of shops and business premises | Neutral | This policy sets the criteria by which shop and business fronts can be developed. |
| Policy DM/20: Rural shopping | Neutral | The policy allows rural retail development subject to controls which are intended to conserve the natural, built and historic environment. In relevant cases, policies DM1, DM/2 and DM/3 will apply. |
| Policy DM/21: Employment development outside settlement limits | Neutral | The policy allows rural employment development subject to controls which are intended to conserve the natural, built and historic environment. In relevant cases, policies DM1, DM/2 and DM/3 will apply. |
| Policy DM/22: Protection of employment land | Neutral | The policy does not lead to development. It puts criteria in place to protect employment land from alternative uses, setting out a qualitative basis for assessment. |
| Policy DM/23: | Positive | The policy sets the criteria by which agricultural development will be permitted. The policy requires |

| Policy | Could the policy have an adverse impact on water quality, water dependent habitats, result in a physical modification of a water body, lead to a deterioration in WFD status or prevent implementation of any measures in the RBMP? | |
|---|---|---|
| | Type of impact (i.e. positive, neutral, negative) | Commentary |
| Agricultural development | | development to not have an unacceptable adverse impact on the environment, and requires hydrological or drainage reports and mitigation where the site threatens the ecological integrity of a water body. Proposals will also be assessed against policies DM/1 and DM/2. |
| Policy DM/24: Equestrian development | Neutral | The policy is intended to conserve the natural, built and historic environment, reducing the impacts from equestrian development. Proposals would also be assessed against policies DM/1 and DM/2. |
| Policy DM/25: Tourism development | Neutral | The policy is intended to conserve the natural, built and historic environment, reducing the impacts from tourism development. Proposals would also be assessed against policies DM/1 and DM/2. |
| Policy DM/26: Community facilities | Neutral | The policy is intended to conserve or enhance the natural, built and historic environment, achieving maximum community benefits and preventing the loss of valuable community services. In relevant cases, policies DM/1 and DM/2 would apply. |
| Policy DM/27: Protection of recreational land and buildings | Neutral | The policy protects recreational land and buildings from alternative development, setting qualitative criteria for the assessment of development proposals. |
| Policy DM/28: Heritage assets | Neutral | The policy is intended to conserve and enhance the historic environment and will not have a negative impact on the objectives of the WFD. |
| Policy DM/29: Green infrastructure in development | Positive | The policy is intended to conserve and enhance the natural environment, setting qualitative criteria for the green infrastructure to be provided within major development sites. The policy highlights the benefits and functions of green infrastructure, such as flood attenuation and provision of natural habitats. The policy also describes green infrastructure to be inclusive of 'blue infrastructure' such as watercourses or other water bodies which are important for linking habitats and enhancing ecosystem services. |
| Policy DM/30: Protected | Neutral | The policy has a positive effect on the natural and historic environment by requiring relevant development proposals to demonstrate how the important qualities of landscape will be conserved or enhanced. |

| Policy | Could the policy have an adverse impact on water quality, water dependent habitats, result in a physical modification of a water body, lead to a deterioration in WFD status or prevent implementation of any measures in the RBMP? | |
|--|---|---|
| | Type of impact (i.e. positive, neutral, negative) | Commentary |
| landscapes | | |
| Policy DM/31: Other protected sites | Positive | The policy protects European sites and other sites of environmental importance by setting criteria for the assessment of development proposals. The policy includes protection for Special Areas of Conservation – a European designation as part of the Natura 2000 sites – and their conservation is an objective of the South West RBMP. The policy notes the important role these sites place by attenuating flood risk and ensuring good water quality in a catchment. |
| Policy DM/32: Enforcing planning decisions | Neutral | The policy does not lead to development, as it is not a land-use policy. |
| BA1 Bampton Stone Crushing Works | Neutral | The site is an existing adopted allocation which has been almost entirely built out. The new plan retains this allocation to enable the completion of the final phase, which relates to a small land area in one remaining corner of the site. The effects are considered minimal. |
| WI1 Willand Industrial Estate | Neutral | The site is an existing adopted allocation which has been partially built out. The new plan retains this allocation to enable the full development of the site. The site is not in Flood Zones 2 or 3, and there are no water bodies within the perimeter. Any development proposals received will need to be delivered in accordance with policies DM/1, DM/2 and DM/3, which includes the provision of SUDs. |
| Changes to Policies Map | Neutral | Small-scale amendments to settlement limits are designed to reflect the current built-up pattern of development and will lead to no or minimal development. Other changes include mapping of protected sites and deletion of a public open space designation. There will be no negative impact to water bodies or the objectives of the WFD as a result of these changes. |

Conclusion

The analysis above notes that eight of the policies will have a positive impact on the objectives of the Water Framework Directive. 25 policies were noted as having a neutral impact on the objectives. No policies were highlighted as having a negative impact, e.g. either by resulting in a deterioration of the status of a water body, or by resulting in the physical modification of a water body. Many of the policies within the LP3 do not in themselves lead to development, but help to manage the development proposals that come forward by ensuring impacts are identified and mitigated where necessary.

Whilst this is a notably unrefined means of assessment, it has not highlighted any areas of significant concern and therefore, a further, more detailed assessment of the impacts on the WFD objectives is not required.

Annex III – Sustainability appraisal with indicator descriptions

| | | | | | Policies | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---------------------------|--|---|--------------------------|--|----------|------|------|------|------|------|------|------|------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|---|---|
| Objective | Impact indicator | Positive impact | Neutral impact | Negative impact | DM 1 | DM 2 | DM 3 | DM 4 | DM 5 | DM 6 | DM 7 | DM 8 | DM 9 | DM 10 | DM 11 | DM 12 | DM 13 | DM 14 | DM 15 | DM 16 | DM 17 | DM 18 | DM 19 | DM 20 | DM 21 | DM 22 | DM 23 | DM 24 | DM 25 | DM 26 | DM 27 | DM 28 | DM 29 | DM 30 | DM 31 | DM 32 | | |
| (A) Wildlife | (A1) Priority habitat area, CWS or SSSI | Increase quality or area | No change | Reduce quality or area | + | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | + | + | + | |
| | (A2) Protected or priority species | Increase numbers or range | No change | Reduce numbers or range | + | 0 | + | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | + | - | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | + | + | + | |
| | (A3) Wildlife networks | Improve network connections | No change | Fragment network | + | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | - | 0 | 0 | 0 | -? | 0 | 0 | 0 | -? | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | + | + | | |
| (B) Landscape | (B1) Landscape quality and character | Enhance | No change | Harm | + | 0 | + | - | 0 | + | - | 0 | 0 | 0 | 0 | -? | 0 | + | 0 | 0 | + | -? | 0 | 0 | 0 | -? | 0 | 0 | + | + | + | 0 | 0 | + | + | + | + | |
| (C) Cultural heritage | (C1) Archaeological sites | Enhance setting of a site | No change | Damage to or loss of site or harm to setting of site | + | + | + | - | 0 | + | - | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | + | 0 | + | |
| | (C2) Archaeological understanding | Improve understanding or interpretation | No change | Not applicable | + | + | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | + | 0 | + | |
| | (C3) Listed buildings | Improve repair or enhances setting | No change | Damage to character or setting | + | + | + | - | 0 | + | - | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | + | 0 | + | |
| | (C4) Historic parks and gardens | Enhance character or setting | No change | Harm character or setting | + | + | + | - | 0 | + | - | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | + | 0 | + | |
| | (C5) Character of conservation areas | Enhance | Preserve | Damage | + | + | + | - | 0 | + | - | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | + | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | + | |
| | (C6) Conservation area appraisals and management plans | Help to implement | No change | Hinder implementation | + | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | - | 0 | 0 | 0 | 0 |
| (D) Water | (D1) River quality | Reduce pollution of rivers | No change | Increase pollution of rivers | + | 0 | + | 0 | 0 | 0 | + | - | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | |
| (E) Land and soils | (E1) Area of contaminated land | Reduce | Maintain | Prevent implementation | + | 0 | + | 0 | 0 | 0 | + | - | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| | (E2) Proportion of site which is previously developed | Increase | No change | Decrease | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | + | 0 | 0 | + | - | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| | (E3) Square metres floorspace per hectare | Increase | No change | Decrease | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| | (E4) Dwellings per hectare | Increase | No change | Decrease | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | - | 0 | 0 | 0 | 0 | 0 | - | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| (F) Air quality | (F1) Air quality | Improve within AQMA | No change | Worsen within AQMA or where it could lead to an AQMA being | + | 0 | + | 0 | 0 | + | + | - | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -? | 0 | 0 | 0 | -? | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| (G) Traffic and transport | (G1) Access to public transport, including any improvements proposed | Increase access | No change | Decrease access | + | + | 0 | 0 | 0 | + | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | + | 0 | + | - | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | (G2) Proportion of people that are forecast to use public transport, walk or cycle to work | Increase | No change | Decrease | + | 0 | 0 | 0 | 0 | + | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | + | + | 0 | + | - | + | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | |
| | (G3) Road vehicle access | Improve road safety | No change to road safety | Harm road safety | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -? | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| | (G4) Impact on public rights of way | Create additional, improve ease of use or improve setting | No change | Loss, reduce ease of use or harm setting | + | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 |
| (H) Waste | (H1) Reduces waste <i>Originally left blank</i> | Reduces overall | No change | Increases overall | + | 0 | + | + | 0 | 0 | 0 | 0 | 0 | 0 | - | 0 | - | 0 | - | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| (I) Climatic factors | (I1) Reduce carbon dioxide emission | Reduces overall | No change overall | Increases overall | + | + | + | + | + | + | + | - | 0 | 0 | + | - | + | - | 0 | - | + | + | 0 | + | - | + | + | - | - | - | 0 | 0 | + | + | 0 | 0 | 0 | |
| | (I2) Land on floodplain | Decrease flood risk | No change | Increase flood risk | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| | (I3) Renewable energy capacity | Increase | No change | Reduce | + | + | + | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | |

| Objective | Impact indicator | Positive impact | Neutral impact | Negative impact | DM 1 | DM 2 | DM 3 | DM 4 | DM 5 | DM 6 | DM 7 | DM 8 | DM 9 | DM 10 | DM 11 | DM 12 | DM 13 | DM 14 | DM 15 | DM 16 | DM 17 | DM 18 | DM 19 | DM 20 | DM 21 | DM 22 | DM 23 | DM 24 | DM 25 | DM 26 | DM 27 | DM 28 | DM 29 | DM 30 | DM 31 | DM 32 | | |
|--|---|--|---|---|------|------|------|------|------|------|------|------|------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|---|---|
| (J) Healthy and safe living environments | (J1) Public open space | Increase provision | No change | Decrease provision | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | +/- | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | |
| | (J2) Road vehicle access | Improve road safety | No change to road safety | Harm road safety | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -? | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | |
| | (J3) Number of affordable houses lost and proposed | Increase provision | No change | Decrease provision | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | +/- | 0 | 0 | 0 | 0 | 0 | 0 | 0 | +? | 0 | 0 | 0 | 0 | +/- | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -? | 0 | 0 | 0 | |
| | (J4) Number of jobs lost and created | Net increase in employment | No change | Net reduction in employment | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | + | 0 | 0 | + | ? | 0 | 0 | +? | 0 | +/- | +? | + | +/- | +? | 0 | + | 0 | 0 | -? | 0 | 0 | 0 | | |
| | (J5) Avoidance of noise and pollution | Improve air quality or noise levels for susceptible uses | No change | Worsen air quality or noise levels for susceptible uses | + | 0 | +/- | 0 | +/- | + | + | + | ? | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -? | +/- | 0 | -? | 0 | -? | +/- | +/- | +/- | 0 | 0 | 0 | + | ? | 0 | 0 | 0 |
| | (J6) Walking and cycling provision | Increase | No change | Decrease | + | +? | 0 | 0 | 0 | + | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | +? | +? | 0 | +/- | - | +? | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 |
| (K) Health care, community services and facilities | (K1) Access to public transport including any improvements proposed | Increase access | No change | Decrease access | + | + | 0 | 0 | 0 | + | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | + | 0 | +/- | 0 | 0 | 0 | 0 | +/- | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | (K2) Access to health and other services | Increase access | No change | Decrease access | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -? | 0 | -? | 0 | 0 | 0 | 0 | 0 | + | + | 0 | +/- | 0 | 0 | 0 | +/- | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | (K3) Access to community services and facilities | Increase access | No change | Decrease access | + | +? | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -? | 0 | -? | 0 | 0 | 0 | 0 | 0 | + | + | 0 | +/- | 0 | 0 | 0 | +/- | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| (L) Housing | (L1) Number of affordable houses lost and proposed | Increase provision | No change | Decrease provision | + | 0 | 0 | 0 | 0 | 0 | 0 | -? | +/- | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | ? | 0 | 0 | 0 | 0 | +/- | 0 | 0 | 0 | 0 | 0 | 0 | -? | 0 | 0 | 0 | |
| | (L2) Number of houses lost and proposed | Increase housing provision | No change | Reduce housing provision | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | + | + | + | 0 | 0 | 0 | 0 | + | ? | 0 | 0 | 0 | 0 | +/- | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| | (L3) Timing of housing provision | Housing available immediately | Housing available later than five years | Housing unavailable | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| (M) Consultation and social deprivation | (M1) Community involvement | Support | No clear view | Opposition | + | 0 | + | + | +/- | 0 | 0 | 0 | + | + | + | + | + | + | + | + | 0 | + | +/- | 0 | 0 | + | + | + | +/- | + | + | + | + | + | + | + | + | + |
| | (M2) Access to education and training | Improved facilities | No change | Reduced facilities | + | +? | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | ? | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | (M3) Employment floorspace | Net increase | No net change | Net reduction | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | +/- | +/- | 0 | + | + | +/- | 0 | 0 | + | + | 0 | 0 | -? | 0 | 0 | 0 | | |
| | (M4) Use of local goods or services | Increase | No change | Reduce | + | 0 | 0 | 0 | + | ? | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | + | + | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| | (M5) Number of affordable houses lost and proposed | Increase provision | No change | Decrease provision | + | 0 | 0 | 0 | 0 | 0 | 0 | -? | +/- | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | ? | 0 | 0 | 0 | 0 | +/- | 0 | 0 | 0 | 0 | 0 | 0 | -? | 0 | 0 | 0 | |
| (N) Economic growth | (N1) Employment, retail, and other business floorspace | Increase | No change | Reduce | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | ? | + | + | 0 | 0 | 0 | 0 | + | + | 0 | + | + | +/- | + | + | + | + | 0 | 0 | -? | 0 | 0 | 0 | | |
| (O) Rural diversification | (O1) Employment floorspace in rural areas | Increase | No change | Reduce | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | ? | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | + | +/- | + | + | + | + | 0 | 0 | 0 | 0 | 0 | 0 | |
| (P) Employment | (P1) Number of jobs lost and created | Net | No change | Reduce | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | + | + | ? | 0 | ? | 0 | 0 | + | +/- | +/- | +/- | + | + | +? | + | + | 0 | 0 | 0 | -? | 0 | 0 | 0 | |
| | (P2) Key workers housing | Increase | No change | Reduce | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | ? | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| (Q) Retail | (Q1) Proximity of new housing to retail | Increase | No change | Decrease | + | +? | 0 | 0 | 0 | 0 | 0 | 0 | - | 0 | - | 0 | 0 | 0 | 0 | 0 | + | +/- | 0 | +/- | - | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| | (Q2) Location of new retail floorspace | Increase town centre provision | No change | Decrease town centre provision | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | + | 0 | +/- | - | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| | (Q3) Retail floorspace within villages | Increase | No change | Reduce | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | - | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | | |
| | (Q4) Impact on vitality and viability of town centres | Improve | No change | Harm | + | +? | 0 | 0 | 0 | + | ? | ? | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | + | +/- | +? | +/- | 0 | 0 | 0 | +/- | +/- | 0 | + | 0 | 0 | + | | |
| (R) Tourism | (R1) Number of tourists visiting and spending nights in Mid Devon | Increase | No change | Reduce | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | - | 0 | 0 | 0 | 0 | + | ? | 0 | + | 0 | 0 | 0 | + | ? | + | 0 | 0 | + | + | 0 | 0 | 0 | |
| | (R2) Tourist bedspaces provided | Increase | No change | Reduce | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | - | 0 | 0 | 0 | + | ? | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| (S) Equalities | (S1) Provision of lifetime homes | Increase provision | No change | Decrease provision | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | ? | 0 | 0 | 0 | + | ? | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| Overall sustainability outcome | | | | | + | + | + | + | + | + | +/- | + | + | +/- | + | +/- | +/- | + | + | - | + | + | + | +/- | - | +/- | - | +/- | + | + | + | + | + | + | + | + | | |

| Objective | Impact indicator | Positive impact | Neutral impact | Negative impact | Policies | |
|---------------------------|--|---|--|--|----------|-----|
| | | | | | BA1 | W11 |
| (A) Wildlife | (A1) Priority habitat area, CWS or SSSI | Increase quality or area | No change | Reduce quality or area | 0 | 0 |
| | (A2) Protected or priority species | Increase numbers or range | No change | Reduce numbers or range | -? | -? |
| | (A3) Wildlife networks | Improve network connections | No change | Fragment network | -? | -? |
| (B) Landscape | (B1) Landscape quality and character | Enhance | No change | Harm | 0 | - |
| (C) Cultural heritage | (C1) Archaeological sites | Enhance setting of a site | No change | Damage to or loss of site or harm to setting of site | 0 | -? |
| | (C2) Archaeological understanding | Improve understanding or interpretation | No change | Not applicable | 0 | +? |
| | (C3) Listed buildings | Improve repair or enhances setting | No change | Damage to character or setting | 0 | 0 |
| | (C4) Historic parks and gardens | Enhance character or setting | No change | Harm character or setting | 0 | 0 |
| | (C5) Character of conservation areas | Enhance | Preserve | Damage | 0 | 0 |
| | (C6) Conservation area appraisals and management plans | Help to implement | No change | Hinder implementation | 0 | 0 |
| (D) Water | (D1) River quality | Reduce pollution of rivers | No change | Increase pollution of rivers | 0 | 0 |
| (E) Land and soils | (E1) Area of contaminated land | Reduce | Maintain | Prevent implementation | + | +? |
| | (E2) Proportion of site which is previously developed | Over 30% | 30% | Under 30% | + | - |
| | (E3) Square metres floorspace per hectare | Over 3500 | 3500 | Under 3500 | +/- | +/- |
| | (E4) Dwellings per hectare | Over 50 | 30-50 | Under 50 | 0 | 0 |
| (F) Air quality | (F1) Air quality | Improve within AQMA | No change | Worsen within AQMA or where it could lead to an AQMA being required. | 0 | -? |
| (G) Traffic and transport | (G1) Access to public transport, including any improvements proposed | 7 services each Monday - Saturday within 400m | Daily service within 400m | Less than a daily service within 400m | + | + |
| | (G2) Proportion of people that are forecast to use public transport, walk or cycle to work | Over 20% | 15-20% | Less than 15% | 0 | 0 |
| | (G3) Road vehicle access | Improve road safety | No change to road safety | Harm road safety | 0 | 0 |
| | (G4) Impact on public rights of way | Create additional, improve ease of use or improve setting | No change | Loss, reduce ease of use or harm setting | + | + |
| (H) Waste | (H1) Reduces waste | Reduces overall | No change | Increases overall | 0 | 0 |
| (I) Climatic factors | (I1) Reduce carbon dioxide emission | Reduces overall | No change overall | Increases overall | - | - |
| | (I2) Land on floodplain | Outside flood zone 2 and 3 and reduces flood impact | Outside flood zone 3 and no change to flood impact | Within flood zone 3 or increases flood impact | 0 | 0 |
| | (I3) Renewable energy capacity | Increase | No change | Reduce | 0 | 0 |

| Objective | Impact indicator | Positive impact | Neutral impact | Negative impact | BA1 | WI1 |
|--|---|--|--|---|-----|-----|
| (J) Healthy and safe living environments | (J1) Public open space | Within 400m of public open space and leads to a net increase of public open space over and above current standards (60 sqm per dwelling) | Within 400m of public open space and leads to a net increase of public open space at current standards (60 sqm per dwelling) | More than 400m from public open space or leads to a net reduction in public open space, or a net increase below current standards (60 sqm per dwelling) | 0 | 0 |
| | (J2) Road vehicle access | Improve road safety | No change to road safety | Harm road safety | 0 | 0 |
| | (J3) Number of affordable houses lost and proposed | Affordable housing provision in excess of standard proportion | Affordable housing provision at standard proportion | Affordable housing provision below standard proportion | 0 | 0 |
| | (J4) Number of jobs lost and created | Net increase in employment | No change | Net reduction in employment | + | + |
| | (J5) Avoidance of noise and pollution | Improve air quality or noise levels for susceptible uses | No change | Worsen air quality or noise levels for susceptible uses | -? | -? |
| | (J6) Walking and cycling provision | Over 15% walking and cycling to work forecast | 15% walking and cycling to work forecast | Under 15% walking and cycling to work forecast | 0 | + |
| (K) Health care, community services and facilities | (K1) Access to public transport including any improvements proposed | 7 services each Monday - Saturday within 400m | Daily service within 400m | Less than a daily service within 400m | + | + |
| | (K2) Access to health and other services | Less than 30 minutes public transport or walking time to a hospital, or leads to an improvement in health services | 30 minutes public transport or walking time to a hospital and no improvement to health services | 30 minutes public transport or walking time to a hospital or leads to a reduction in health services | 0 | 0 |
| | (K3) Access to community services and facilities | Within the same settlement as a shop, hall, school and public house, and increases the provision of those services | Within the same settlement as a shop, hall, school and public house, but does not increase provision of those services | Not within the same settlement as a shop, hall, school and public house, or leads to a reduction in the provision of those services | 0 | 0 |
| (L) Housing | (L1) Number of affordable houses lost and proposed | Affordable housing provision in excess of standard proportion | Affordable housing provision at standard proportion | Affordable housing provision below standard proportion | 0 | 0 |
| | (L2) Number of houses lost and proposed | Increase housing provision | No change | Reduce housing provision | 0 | 0 |
| | (L3) Timing of housing provision | Housing available immediately | Housing available later than five years | Housing unavailable | 0 | 0 |
| (M) Consultation and social deprivation | (M1) Community involvement | Support | No clear view | Opposition | 0 | 0 |
| | (M2) Access to education and training | Improved facilities | No change | Reduced facilities | 0 | 0 |
| | (M3) Employment floorspace | Net increase | No net change | Net reduction | + | + |
| | (M4) Use of local goods or services | Increase | No change | Reduce | 0 | 0 |
| | (M5) Number of affordable houses lost and proposed | Affordable housing provision in excess of standard proportion | Affordable housing provision at standard proportion | Affordable housing provision below standard proportion | 0 | 0 |
| (N) Economic growth | (N1) Employment, retail, and other business floorspace | Increase | No change | Reduce | + | + |
| (O) Rural diversification | (O1) Employment floorspace in rural areas | Increase | No change | Reduce | + | + |
| (P) Employment | (P1) Number of jobs lost and created | Net | No change | Reduce | + | + |
| | (P2) Key workers housing | Increase | No change | Reduce | 0 | 0 |
| (Q) Retail | (Q1) Proximity of new housing to retail | Within a market town | Within a settlement containing a shop and within 30 minutes public transport journey of a town centre | Not within a settlement containing a shop, or not within 30 minutes public transport journey of a town centre | 0 | 0 |
| | (Q2) Location of new retail floorspace | Within a defined town centre | No change Originally 'Outside a defined town centre, and accords with the sequential test' | Decrease town centre provision Originally 'Does not accord with the sequential test' | 0 | 0 |
| | (Q3) Retail floorspace within villages | Increase | No change | Reduce | 0 | 0 |
| | (Q4) Impact on vitality and viability of town centres | Improve | No change | Harm | +? | 0 |
| (R) Tourism | (R1) Number of tourists visiting and spending nights in Mid Devon | Increase | No change | Reduce | 0 | -? |
| | (R2) Tourist bedspaces provided | Increase | No change | Reduce | 0 | 0 |
| (S) Equalities | (S1) Provision of lifetime homes | Increase provision Originally 'Over 4% of dwellings meet the lifetime homes standard' | No change Originally '4% of homes meet the lifetime homes standard' | Decrease provision Originally 'Less than 4% of dwellings meet the lifetime homes standard' | 0 | 0 |
| Overall sustainability outcome | | | | | + | +/- |

| | | | | | Maps | | | | | | | | | | | | | | | | | | | | | | | |
|---------------------------|--|---|--------------------------|--|---------|----------|------------|---------|-----|----------|-----------------------------------|-----------|-----------------|--------------------|-------------|-----------|-----------|-------------|---------|-----------------|------------------|-------------------|----------|-----------|------------|----------|---------|--|
| Objective | Impact indicator | Positive impact | Neutral impact | Negative impact | Therton | Crediton | Cullompton | Bampton | Bow | Bradinch | Burlescombe (including Westleigh) | Chawleigh | Cheriton Bishop | Cheriton Fitzpaine | Copplestone | Culmstock | Halberton | Kentisbeare | Lapford | Morchard Bishop | Newton St. Cyres | Sampford Peverell | Sandford | Silverton | Thorverton | Uffculme | Willard | |
| (A) Wildlife | (A1) Priority habitat area, CWS or SSSI | Increase quality or area | No change | Reduce quality or area | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| | (A2) Protected or priority species | Increase numbers or range | No change | Reduce numbers or range | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| | (A3) Wildlife networks | Improve network connections | No change | Fragment network | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| (B) Landscape | (B1) Landscape quality and character | Enhance | No change | Harm | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| (C) Cultural heritage | (C1) Archaeological sites | Enhance setting of a site | No change | Damage to or loss of site or harm to setting of site | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| | (C2) Archaeological understanding | Improve understanding or interpretation | No change | Not applicable | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| | (C3) Listed buildings | Improve repair or enhances setting | No change | Damage to character or setting | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| | (C4) Historic parks and gardens | Enhance character or setting | No change | Harm character or setting | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| | (C5) Character of conservation areas | Enhance | Preserve | Damage | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| | (C6) Conservation area appraisals and management plans | Help to implement | No change | Hinder implementation | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| (D) Water | (D1) River quality | Reduce pollution of rivers | No change | Increase pollution of rivers | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| (E) Land and soils | (E1) Area of contaminated land | Reduce | Maintain | Prevent implementation | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| | (E2) Proportion of site which is previously developed | Increase | No change | Decrease | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| | (E3) Square metres floorspace per hectare | Increase | No change | Decrease | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| | (E4) Dwellings per hectare | Increase | No change | Decrease | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| (F) Air quality | (F1) Air quality | Improve within AQMA | No change | Worsen within AQMA or where it could lead to an AQMA being | 0 | 0 | 0 | 0 | 0 | 0 | + | ? | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| (G) Traffic and transport | (G1) Access to public transport, including any improvements proposed | Increase access | No change | Decrease access | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| | (G2) Proportion of people that are forecast to use public transport, walk or cycle to work | Increase | No change | Decrease | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| | (G3) Road vehicle access | Improve road safety | No change to road safety | Harm road safety | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| | (G4) Impact on public rights of way | Create additional, improve ease of use or improve setting | No change | Loss, reduce ease of use or harm setting | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| (H) Waste | (H1) Reduces waste <i>Originally left blank</i> | Reduces overall | No change | Increases overall | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| (I) Climatic factors | (I1) Reduce carbon dioxide emission | Reduces overall | No change overall | Increases overall | 0 | 0 | 0 | 0 | 0 | 0 | + | ? | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| | (I2) Land on floodplain | Decrease flood risk | No change | Increase flood risk | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| | (I3) Renewable energy capacity | Increase | No change | Reduce | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |

| Objective | Impact indicator | Positive impact | Neutral impact | Negative impact | Thorton | Credton | Cullompton | Bampton | Bow | Bradinch | Burlescombe (including Westleigh) | Chawleigh | Cherton Bishop | Cherton Fitzpaine | Copplestone | Culmstock | Halberton | Kentisbeare | Lapford | Morchard Bishop | Newton St. Cyres | Sampford Peverell | Sandford | Silverton | Thornerton | Uffculme | Willand |
|--|---|--|---|---|---------|---------|------------|---------|-----|----------|--------------------------------------|-----------|----------------|-------------------|-------------|-----------|-----------|-------------|---------|-----------------|------------------|-------------------|----------|-----------|------------|----------|---------|
| (J) Healthy and safe living environments | (J1) Public open space | Increase provision | No change | Decrease provision | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | (J2) Road vehicle access | Improve road safety | No change to road safety | Harm road safety | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | (J3) Number of affordable houses lost and proposed | Increase provision | No change | Decrease provision | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | + | 0 | + | 0 | 0 | + | + | 0 |
| | (J4) Number of jobs lost and created | Net increase in employment | No change | Net reduction in employment | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | (J5) Avoidance of noise and pollution | Improve air quality or noise levels for susceptible uses | No change | Worsen air quality or noise levels for susceptible uses | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | (J6) Walking and cycling provision | Increase | No change | Decrease | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| (K) Health care, community services and facilities | (K1) Access to public transport including any improvements proposed | Increase access | No change | Decrease access | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | (K2) Access to health and other services | Increase access | No change | Decrease access | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | (K3) Access to community services and facilities | Increase access | No change | Decrease access | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| (L) Housing | (L1) Number of affordable houses lost and proposed | Increase provision | No change | Decrease provision | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | + | 0 | + | 0 | 0 | + | + | 0 |
| | (L2) Number of houses lost and proposed | Increase housing provision | No change | Reduce housing provision | 0 | 0 | 0 | 0 | 0 | 0 | - | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | (L3) Timing of housing provision | Housing available immediately | Housing available later than five years | Housing unavailable | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| (M) Consultation and social deprivation | (M1) Community involvement | Support | No clear view | Opposition | +/- | +/- | + | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | + | + | 0 |
| | (M2) Access to education and training | Improved facilities | No change | Reduced facilities | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | (M3) Employment floorspace | Net increase | No net change | Net reduction | -? | -? | -? | -? | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | (M4) Use of local goods or services | Increase | No change | Reduce | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | (M5) Number of affordable houses lost and proposed | Increase provision | No change | Decrease provision | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | + | 0 | + | 0 | 0 | + | + | 0 |
| (N) Economic growth | (N1) Employment, retail, and other business floorspace | Increase | No change | Reduce | -? | -? | -? | -? | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| (O) Rural diversification | (O1) Employment floorspace in rural areas | Increase | No change | Reduce | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| (P) Employment | (P1) Number of jobs lost and created | Net | No change | Reduce | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | (P2) Key workers housing | Increase | No change | Reduce | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| (Q) Retail | (Q1) Proximity of new housing to retail | Increase | No change | Decrease | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | (Q2) Location of new retail floorspace | Increase town centre provision | No change | Decrease town centre provision | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | (Q3) Retail floorspace within villages | Increase | No change | Reduce | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | (Q4) Impact on vitality and viability of town centres | Improve | No change | Harm | + | + | + | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| (R) Tourism | (R1) Number of tourists visiting and spending nights in Mid Devon | Increase | No change | Reduce | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | (R2) Tourist bedspaces provided | Increase | No change | Reduce | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| (S) Equalities | (S1) Provision of lifetime homes | Increase provision | No change | Decrease provision | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Overall sustainability outcome | | | | | +/- | +/- | +/- | +/- | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | + | 0 | + | 0 | 0 | + | + | 0 |